December 2019

BIDWELLS

GREATER CAMBRIDGE
HOUSING TRAJECTORY

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1.0 Introduction

1.1 This document has been prepared by Bidwells LLP to analyse the housing land supply for Cambridge City Council (CCC) and South Cambridgeshire District Council (SCDC). The two councils are in the early stages of preparing a new joint local plan to cover both areas, collectively known as Greater Cambridge. The 'issues and options' consultation for this new joint local plan is expected in January 2020 and this document is prepared in advance of it to help inform Bidwells' clients consultation responses.

1.2 The document is based primarily on evidence set out in the 'Greater Cambridge Housing Trajectory and Five Year Housing Land Supply Main Document', November 2019 ("the Main Document"). This reflects the current land supply with particular reference to strategic sites that were identified in the current adopted plans:

- The South Cambridgeshire Adopted Local Plan (2011-2031), September 2018.
- The Cambridge Adopted Local Plan (2011-2031), October 2018.

1.3 It is expected that the new joint local plan will entirely replace these documents and cover the 23-year period up to 2040, seven years beyond the current adopted local plans. It is therefore important to understand how the strategic allocations that underpin housing delivery in the current local plans will contribute to the supply post 2031.

1.4 In addition, it is expected that the annual housing requirement will substantially increase in the new joint local plan to facilitate the continued economic growth of Cambridge. Analysis of this is beyond the scope of this document but it is relevant when considering the importance of a continued supply of housing from strategic allocations beyond the current local plan period.

1.5 It should be noted that this is not a 5-year housing land supply (5YHLS) assessment, although it does draw upon similar methodologies and evidence.

2.0 Relevant Planning Policy

Sustainable Development

2.1 The National Planning Policy Framework (NPPF)[1] explains that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7). As such, succinct and up-to-date plans should a provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities (paragraph 15).

2.2 To ensure that sustainable development is pursued in a positive way, the NPPF has a presumption in favour of sustainable development at its heart, as set out in paragraph 11, which explains that for plan-making this means that:

"a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Strategic Policies

2.3 The development plan must include strategic policies to address the LPA's priorities for development and use of land in its area (paragraph 17)[2]. Strategic policies, amongst other factors, should make sufficient provision for housing and set out an overall strategy for the pattern, scale and quality of development in line with the presumption in favour of sustainable development (paragraph 20).

2.4 Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities (paragraph 22). Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period; including, planning for and allocation sufficient sites to deliver the strategic priorities of the area (paragraph 23).

1 MHCLG. February 2019. National Planning Policy Framework.
2 Section 19(1E) of the Planning and Compulsory Purchase Act 2004 (as amended).

Boosting the Supply of Homes

2.5 NPPF Paragraph 59 states that:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

2.6 This objective has been central to Government policy since the beginnings of Conservative and Liberal Democrat coalition[3]:

"2. One of the most important things each generation can do for the next is to build high quality homes that will stand the test of time. But for decades in Britain we have under-built. By the time we came to office, house building rates had reached lows not seen in peace-time since the 1920s. The economic and social consequences of this failure have affected millions: costing jobs; forcing growing families to live in cramped conditions; leaving young people without much hope that they will ever own a home of their own."

2.7 Subsequently, various measures were introduced, not least the first version of the NPPF. More recently a white paper explained that[4] *"the consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and start to tackle years of under-supply".* MHCLG is now targeting[5] *"… the delivery of a million homes by the end of 2020 and half a million more by the end of 2022 and put us on track to deliver 300,000 net additional homes a year on average".* This results in the following stepped trajectory:

- Between 2015 and 2020, one million homes, equating to an average of 200,000 net additional new homes per annum.
- Between 2020 and 2022, half a million homes, equating to an average of 250,000 net additional new homes per annum.
- From the mid-2020s, an average of 300,000 net additional new homes per annum.

2.8 The term 'home' is used exclusively throughout MHCLG's policy documents and is often thought to be synonymous with 'dwelling'. This is not however correct; it also includes communal living such as older persons accommodation and student housing, and accommodation for travellers. For ease, where applicable, homes are converted to dwellings using multipliers derived from the 2011 Census.

2.9 The first Housing Delivery Test (HDT) results[6], which meet with the definition of 'homes', provide an insight as to how the MHCLG has fared against these targets (**Table 2.1**). The data clearly shows that with two years remaining, the target of one million homes by 2020 is achievable.

3 HM Government. November 2011. Laying the Foundations: A Housing Strategy for England.
4 DCLG. February 2017. Fixing our Broken Housing Market.
5 MHCLG. May 2018. Single Departmental Plan.
6 MHCLG. February 2019. Housing Delivery Test: 2018 measurement.

Table 2.1: MHCLG Targets to Boost the Supply of Housing compared to the HDT Results

	2015/16	2016/17	2017/18	2018/19	TOTAL	AVERAGE
MHCLG averaged target	200,000	200,000	200,000	200,000	800,000	200,000
HDT results	195,000	222,000	227,000	248,000	892,000	223,000

2.10 NPPF paragraph 60 recognises this:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

2.11 The Local Housing Need (LHN) standard method is intended as the minimum required to achieve MHCLG's targets with the indicative estimates provided with the consultation document[7] summing to 266,000 net additional homes. The intention was to adjust the standard method over time to ensure it maintained a minimum requirement close to the MHCLG's targets as they increased.

2.12 This however failed to take account of changes in the methodology used to calculate the household projections, on which the LHN standard method is based. Amendments were made to the relevant guidance to prevent this taking effect[8]. This is however only a temporary fix[9]:

"Over the next 18 months we will review the formula and the way it is set using National Statistics data with a view to establish a new approach that balances the need for clarity, simplicity and transparency for local communities with the Government's aspirations for the housing market."

2.13 In any event the LHN standard method is only intended as a minimum benchmark to assist progress towards meeting the MHCLG target of 300,000 net additional homes per annum. It does however underline the commitment that MHCLG has to boosting the supply of housing and therefore the weight it should be attributed in plan-making.

Maintaining Supply and Delivery

2.14 Paragraph 67 of the NPPF next explains the process for identifying land for homes:

"Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for years one to five of the plan period; and

b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."

7 DCLG. September 2017. Planning for the right homes in the right places: consultation proposals.
8 MHCLG. October 2018. Technical consultation on updates to national planning policy and guidance.
9 MHCLG. February 2019. Government response to the technical consultation on updates to national planning policy and guidance.

2.15 The term 'deliverable' is specifically defined in Annex 2 of the NPPF:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

2.16 It should be made clear that this definition of deliverable only applies initially to the first five years of an adopted plan. However, it is a 'rolling' requirement in that the status of the five-year housing land supply (5YHLS) needs to be updated annually.

2.17 This is a notable change in emphasis from the previous NPPF that seeks to significantly increase certainty in delivery, presumably in response to the St Modwen judgement[10] by further qualifying what is meant by a 'realistic prospect'. For strategic sites this has two connotations:

- In terms of part (a) of the definition, sites with detailed planning permission should normally be considered deliverable unless there is clear evidence to the contrary, such as long-term phasing plans.
- In terms of part (b) of the definition, all major development with the principal of development established but without detailed planning permission will normally not be considered deliverable unless there is clear evidence to the contrary.

2.18 In that case, for completeness, Lord Justice Lindblom concluded that:

"[There is an] essential distinction between the concept of deliverability, in the sense in which it is used in the policy, and the concept of an "expected rate of delivery". These two concepts are not synonymous, or incompatible. Deliverability is not the same thing as delivery. The fact that a particular site is capable of being delivered within five years does not mean that it necessarily will be. For various financial and commercial reasons, the landowner or housebuilder may choose to hold the site back. Local planning authorities do not control the housing market. NPPF policy recognizes that.

[…]

Sites may be included in the five-year supply if the likelihood of housing being delivered on them within the five-year period is no greater than a "realistic prospect" – the third element of the definition in footnote 11 (my emphasis). This does not mean that for a site properly to be regarded as "deliverable" it must necessarily be certain or probable that housing will in fact be delivered upon it, or delivered to the fullest extent possible, within five years."

[10] St Modwen v SSCLG [2017] EWCA 1643.

2.19 Therefore, the revised definition is seeking to further qualify what is a deliverable site but does not go as far as to make deliverable synonymous with the 'expected rate of delivery' as discussed by Lord Justice Lindblom.

2.20 'Clear evidence' therefore cuts both ways and simply means that the assessment must be sensible, logical and supported by enough information to make it obvious to the reader how the conclusions were met. However, when read in the context of the case law, the assessment is a matter of planning judgement based on the available evidence. It is not intended to be a definitive assessment of probability of what will be delivered but rather what probably could be delivered in the time period.

2.21 It is not clear if the new definition of deliverable is a closed list and sites that do not benefit from an allocation or planning permission should not be included, which is the view of at least one planning inspector[11]. However, if it is not a closed list, it follows that the evidence threshold necessary to demonstrate that such sites are deliverable would be greater than that in part (b) of the definition. Consequently, while it might not be a closed list, the level of evidence necessary to demonstrate deliverability would mean that the inclusion of such sites would be exceptionally rare.

Larger Scale Developments

2.22 Small and medium sized sites can make an important contribution to meeting the housing requirement and are often built-out relatively quickly (paragraph 68). As such, the NPPF includes various tools to promote their identification and inclusion in development plans. Paragraph 72 explains, however, that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. In identifying suitable locations, LPAs should:

"a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;

b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;

c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;

d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)[35]; and

e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size."

[11] PINS. 26 October 2018. APP/C1950/W/17/3190821: Entech House, London Road, Woolmer Green SG3 6JE.

2.23 Fundamentally, Footnote 35 explains that:

"The delivery of large scale developments may need to extend beyond an individual plan period, and the associated infrastructure requirements may not be capable of being identified fully at the outset. Anticipated rates of delivery and infrastructure requirements should, therefore, be kept under review and reflected as policies are updated."

2.24 The Planning Practice Guidance (PPG, Paragraph 61-038-20190315) on plan-making[12] explains that:

"The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively. Strategic policy-making authorities may wish to consider ensuring that their assessment of and strategies for housing, employment and other uses are integrated, and that they take account of relevant market signals.

Wherever possible, assessments can share the same evidence base and be conducted over similar timescales, but strategic policy-making authorities need to take care to ensure that the purposes and statutory requirements of different assessment processes are respected."

2.25 PPG Paragraph 61-059-20190315 further addresses the issues of larger scale development:

"Where plans are looking to plan for longer term growth through new settlements, or significant extensions to existing villages and towns, it is recognised that there may not be certainty and/or the funding secured for necessary strategic infrastructure at the time the plan is produced. In these circumstances strategic policy-making authorities will be expected to demonstrate that there is a reasonable prospect that the proposals can be developed within the timescales envisaged."

2.26 Note the use of the term 'reasonable prospect', which is intentionally different from the 'realistic prospect' described in the definition of deliverable. Practically, both require sites to be suitable; the only real difference being that a site that is a realistic prospect should be achievable and available now whereas a site that is a reasonable prospect just needs to be shown to be achievable and available at the time it is envisaged to be implemented in the housing trajectory. Indeed, in the PPG on housing and economic land availability assessment[13], Paragraph 3-020-20190722 explains that:

"A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period."

2.27 PPG Paragraph 61-060-20190315 also states that:

"In order to demonstrate that there is a reasonable prospect these large scale developments can come forward, strategic policy-making authorities are expected to make a realistic assessment about the prospect of sites being developed (and associated delivery rates)."

2.28 PPG Paragraph 68-020-20190722 then explains how LPAs can demonstrate that a site is a reasonable prospect of being developable:

12 MHCLG. March 2019. PPG: Plan-Making.
13 MHCLG. July 2019. PPG: Housing and Economic Land Availability Assessment.

"Annex 2 of the National Planning Policy Framework defines what constitutes a developable site. In demonstrating that there is a 'reasonable prospect' plan-makers can use evidence such as (but not exclusively):

- *written commitment or agreement that relevant funding is likely to come forward within the timescale indicated, such as an award of grant funding;*
- *written evidence of agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;*
- *likely buildout rates based on sites with similar characteristics; and*
- *current planning status - for example, a larger scale site with only outline permission where there is supporting evidence that the site is suitable and available, may indicate development could be completed within the next 6-10 years.*

A pragmatic approach is appropriate when demonstrating the intended phasing of sites. For example, for sites which are considered developable within 6-10 years, the authority may need to provide a greater degree of certainty than those in years 11-15 or beyond. When producing annual updates of the housing land supply trajectory, authorities can use these to provide greater certainty about the delivery of sites initially considered to be developable, and those identified over a longer time span."

2.29 Timescales for delivery are further discussed in PPG Paragraph 3-022-20190722:

"Information on suitability, availability, achievability and constraints can be used to assess the timescale within which each site is capable of development. This may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance should be made for several developers to be involved. The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year."

Clear Evidence

2.30 While not relevant to the assessment of housing delivery in the latter part of the local plan period, the housing land supply for the first five years needs to be shown to be deliverable and therefore requires clear evidence.

2.31 PPG Paragraph 68-007-20190722 provides further explanation of what constitutes 'clear evidence':

"Such evidence, to demonstrate deliverability, may include:

- *current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- *firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;*
- *firm progress with site assessment work; or*

- *clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.*

Plan-makers can use the Housing and Economic Land Availability Assessment in demonstrating the deliverability of sites."

2.32 To date there have been only a small number of appeal decisions that have considered this new definition of clear evidence in detail. They effectively fall into two categories:

- The first is the strict interpretation – if the LPA has not provided the clear evidence, sites that fall within part (b) of the definition of deliverable cannot form part of the 5YHLS.
- The second is a slightly more relaxed approach, allowing evidence that is provided by third parties to be taken into consideration in the absence of the LPA providing the clear evidence.

2.33 The former appears to be advocated in a recent called-in appeal decision where the SSHCLG undertook his own analysis of the 5YHLS and concluded that ten sites did not meet the definition of 'deliverable' and were entirely removed from the 5YHLS[14]. Unfortunately, the Inspector's report pre-dated the revised NPPF and is therefore not particularly insightful. Furthermore, in a recent recovered appeal, the SSHCLG endorsed the approach of his Inspector who discounted sites with outline planning permission for as little as 10 dwellings from the 5YHLS on the basis that there was no evidence of reserved matters or discharge of conditions[15]. As one Inspector recently explained[16]:

"… it is clear from the NPPF and PPG that, until sites achieve detailed planning permission, they should not be treated as deliverable, unless the evidence clearly demonstrates that this status is justified."

2.34 Another recent appeal considered in detail build rates of sites with planning permission that would start within the 5-year period but dismissed an allocation with an extant, positively determined, outline planning application because of the lack of clear evidence[17].

14 MHCLG. 8 July 2019. APP/Z1510/V/17/3180729: Land East of Gleneagles Way, Hatfield Peverel.
15 MHCLG. 20 December 2018. PCU/APP/G1630/W/3184272: Land South of Oakridge, Highnam, Gloucestershire.
16 PINS. 3 September 2019. APP/J2210/W/18/3216104: Land off Popes Lane, Sturry, Kent CT2 0JZ.
17 PINS. 27 August 2019. APP/U2805/W/18/3218880: Southfield Road, Gretton NN17 3BX.

3.0 The Housing Land Supply Methodology

Introduction

3.1 This chapter looks at the detail of how the policy and guidance set out in Chapter 2 is applied. Specifically, it considers lead-in times to commence development, lapse and non-implementation rates, and build-out rates.

Lead-In Times

3.2 There has been considerable analysis of lead-in times in recent years. Hourigan Connolly[18] found that on average, sites for more than 500 dwellings could expect an 8-year period from preparation of the outline planning application to the first housing completions. However, this included sites across the UK and as such needs to be used with care. An earlier report by Colin Buchanan[19] found that in the East of England:

- Sites for 1,000 – 1,999 dwellings have a lead-in time on average of 4.7 years.
- Sites for 2,000 – 2,999 dwellings have a lead-in time on average of 5.0 years.
- Sites site 3,000 or more dwellings have a lead-in time on average of 5.5 years.

3.3 Because of the age of this report however, which included sites built in the 1980s and 90s when the evidence required to justify development were less, it should be given less weight than more recent research. It and an earlier Hourigan Connolly report were considered and updated by Savills in 2014 who found that there was evidence that lead-in times were declining, although the relationship between this and the recession is not analysed[20].

3.4 The most recent analysis by NLP[21] suggests lead-in times vary from 3.8 years to 6.9 years, depending on the size of the site:

- Sites for 1 – 99 dwellings spend one year to achieve planning permission and a further 2.8 years before the first completions are achieved.
- Sites for 100 – 499 dwellings spend 2.2 years in planning and a further 1.9 years post-planning before the first completions are achieved.
- Sites for 500 – 999 dwellings spend 4.1 years in planning and a further 1.2 years post-planning before the first completions are achieved.
- Sites for 1,000 – 1,499 dwellings spend 4.8 years in planning and a further 0.9 years post-planning before the first completions are achieved.
- Sites for 1,500 – 1,999 dwellings spend 5.3 years in planning and a further 1.3 years post-planning before the first completions are achieved.

18 Hourigan Connolly. February 2014. Report into the Delivery of Urban Extensions on behalf of Gladman Developments Limited.
19 Colin Buchanan. December 2005. Housing Delivery on Strategic Sites Research Study on behalf of Countryside Properties.
20 Savills. October 2014. Urban Extensions: Assessment of Delivery Rates on behalf of Barratt Homes.
21 Nathaniel Lichfield & Partners. November 2016. Start to Finish: How quickly to large-scale housing sites deliver?

- Sites for 2,000+ dwellings spend 6.1 years in planning and a further 0.8 years post-planning before the first completions are achieved.

3.5 Interestingly, none of the research reviewed found any evidence of local plan allocations significantly speeding-up delivery. This evidenced is summarised in **Table 3.1** and shows that, despite the differences in the periods actually assessed, the conclusions are broadly comparable. However, for those sites of more than 2,000 dwellings, the data is somewhat sparse and therefore subject to greater sample errors. Furthermore, the timing of the analysis is likely to be key with the 2014 Hourigan Connolly report likely to be significantly influenced by the recession.

Table 3.1: Summary of the evidence on lead-in times

	LICHFIELD (2016)			HC (2014)				CB (2005)
DWELLINGS	SUBMISSION TO FULL PERMISSION	FULL PERMISSION TO 1ST COMPLETIONS	TOTAL	SUBMISSION TO OUTLINE PERMISSION	OP TO FULL PERMISSION	FULL PERMISSION TO 1ST COMPLETIONS	TOTAL	OUTLINE PERMISSION TO FULL PERMISSION
1-99	1.1	2.7	3.8	4.25	2.75	1.0	8.0	-
100-499	2.2	1.9	4.1					
500-999	4.1	1.2	5.3					
1,000-1,499	4.8	0.9	5.7					4.7
1,500-1,999	5.3	1.3	6.6					
2,000-2,999	6.1	0.7	6.8					5.0
3,000+								5.5

3.6 **Figure 3.1** provides an illustration of how compatible these different analyses are using greater breakdown of sites by size. From 60-4,200 dwellings, the illustration is comparable with the Lichfield report while the average periods for outline permission to full permission and full permission to 1st completion are also comparable with the Hourigan Connolly report.

Figure 3.1: Illustration of lead-in times based on the size of a site

Dwellings	Years																														Submission to Outline Permission		Outline Permission to Full Permission		Submission to Full Permission		Full Permission to 1st Completion		Total Lead-In Time	
	1				2				3				4				5				6				7				8				9											
	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	Total	Ave	Total	Ave	Total	Ave	Total	Ave	Total	Ave
60																																		0.50		0.50		1.00	1.00	2.75	2.75	3.75	3.75
180																																		1.00		1.00		2.00	2.25	2.00	1.88	4.00	4.13
300																																		1.25		1.25		2.50		1.75		4.25	
600																																		1.75		1.75		3.50	4.00	1.25	1.25	4.75	5.25
900																																		2.25		2.25		4.50		1.25		5.75	
1,200																																		2.25		2.25		4.50	4.50	1.25	1.25	5.75	5.75
1,500																																		2.50		2.50		5.00	5.25	1.25	1.25	6.25	6.50
1,800																																		2.75		2.75		5.50		1.25		6.75	
2,100																																		2.75		2.75		5.50		1.25		6.75	
2,400																																		2.75		3.00		5.75		1.00		6.75	
2,700																																		3.00		3.00		6.00		1.00		7.00	
3,000																																		3.00	2.74	3.00	2.80	6.00	6.66	1.00	0.77	7.00	7.43
3,300																																		3.00		3.25		6.25		0.75		7.00	
3,600																																		3.25		3.25		6.50		0.75		7.25	
3,900																																		3.25		3.25		6.50		0.75		7.25	
4,200																																		3.25		3.50		6.75		0.75		7.50	
4,500																																		3.50		3.50		7.00		0.75		7.75	
4,800																																		3.50		3.50		7.00		0.75		7.75	
5,100																																		3.50		3.75		7.25		0.50		7.75	
5,400																																		3.75		3.75		7.50		0.50		8.00	
5,700																																		3.75		3.75		7.50		0.50		8.00	
6,000																																		3.75		4.00		7.75		0.50		8.25	

3.7 The key difference from the Hourigan Connolly report is the time taken between submission and outline permission, with **Figure 3.1** suggesting an average of 2.74 years compared to Hourigan Connolly's 4.25 years. As discussed above, this is likely due to the influence of the recession, which resulted in many applications being held in abeyance.

3.8 For the purposes of this report, unless there is alternative clear evidence providing lead-in times for a development, the timescales set out in **Figure 3.1** are applied.

Build-Out Rates

3.9 PPG Paragraph 68-007-20190722 states that clear evidence to demonstrate deliverability may include build-out rates. PPG Paragraph 68-020-20190722 further explains that, in the context of plan-making, clear evidence can include *"likely buildout rates based on sites with similar characteristics"*. This section considers the evidence that is generally available and can be used to inform assessments of housing land supply. As the Inspector in the Bures Hamlet appeal put it:

"The Framework definition of deliverable sites provides that in some cases (including outline permissions for major sites and also for development plan allocations where there is as yet no planning permission) there should be clear evidence that housing completions will begin on site within five years. To establish the site's contribution to the housing supply there would also logically need to be an assessment of the amount of housing expected to be delivered within that five-year period." [emphasis is the Inspector's]

3.10 Build-out rates are affected by several factors:

3.11 **The vagaries of the housing market.** Housebuilders need to make a profit and therefore need to consider how the supply and demand for housing will affect prices. In its simplest terms, this calls for the restriction of supply to increase prices. However, this needs to be balanced against the benefits of building quicker for less profit to enable the next site to be started.

3.12 Furthermore, there is the matter of competition between sites. Previous research on behalf of the DCLG found that perceived competition limits for individual developments varied depending on the development type[22]. For apartments, it varied between an average of 2.73 miles and 3.37 miles, depending on the location relative to the settlement centre. For houses on greenfield sites, it varied between 5.62 miles and 7.97 miles depending on whether it was an urban extension or located in a mainly rural area (such as a new settlement). This was thoroughly reviewed in a very detailed analysis by PBA in 2014 and found to be consistent post-recession[23].

3.13 **The vagaries of the supply market, including materials and labour.** The Housing White Paper, for example, highlighted the issues of training:

"The construction sector relies heavily on subcontracted and self-employed labour, and has low levels of investment in skills and new technologies. This has contributed to skills shortages now facing the industry in some key trades and in some regions. This situation is likely to worsen if left unchecked, with many workers due to retire over the next 10 years. The 2016 Farmer Review of the UK Construction Model, Modernise or Die, sets out several challenges for industry, which we have considered."

[22] DCLG. February 2008. Factors Affecting Housing Build-Out Rates.

[23] PBA and HDH. June 2014. Sutton Coldfield Green Belt Sites, Phase 2: Report of Study on behalf of Birmingham City Council.

3.14 This was echoed in Bellway PLC's last annual report[24]:

"Labour and material availability remain the greatest constraint to growth in the sector, with pressures tending to be specific to certain trades, locations and supplies of items such as structural timber, plastics, bricks and blocks. These pressures are a result of the growth in housebuilding over the last five years, an industry-wide lack of investment in training over the long-term and the cyclical nature of the industry."

3.15 It was also foreseen by the OFT[25]:

"The recent downturn in the housing market coupled with the impact of the 'credit crunch' is likely to result in a significant reduction in the number of homes built in the short term and a reduction in capacity of the homebuilding industry. The likelihood is that once the market begins to improve there will be a substantial time lag before there is sufficient capacity in the industry to once again build homes at 2007 rates."

3.16 **Site specific infrastructure.** For many large-scale developments, there are key triggers that limit the amount of housing that can be built before certain infrastructure is in place. Whilst this is perfectly reasonable, often the delivery of this infrastructure is not entirely within the control of the housebuilders, which can then lead to delays.

3.17 **Affordable housing.** The proportion of affordable housing that is delivered is a matter of policy and viability. Areas with good viability can require a higher proportion of affordable housing. During construction, this is not as affected by the vagaries of the housing market and can sometimes be built out at a different rate to the market housing.

3.18 **The type of housing.** While apartment schemes generally have longer lead-in times to the first completions, their build out rate is generally quicker from then on. The sales rate (which is used interchangeably with the build rate below because of their close relationship) is also affected by the type of housing with apartments more likely to be purchased off-plan before they are complete.

3.19 To understand the likely rates of housebuilding on individual sites the following have been considered:

3.20 Where a housebuilder is known for a site, their average market housing sales rate per outlet is initially applied, which can often be sourced from their annual financial reports (**Table 3.2**). Where the housebuilder is not known, an average sales rate is applied. These average-sales rates however hide significant fluctuations dependent on the size of the local housing market and the types of housing it comprises. For example, several of Crest Nicholson's fastest delivering sites at present are apartment schemes in high demand areas (e.g. Western Riverside in Bath and Centenary Quay in Southampton). This has led to their sales rate being one of the highest.

3.21 This is also consistent with analysis previously undertaken by DCLG that suggested that between one sale per outlet every week to 10 days is optimal for both Green and Brownfield sites[26].

3.22 This average sales rate will not include affordable housing. Accordingly, the relevant affordable housing requirement is added to the sales rates for each site to derive a build rate; indicative build rates are set out in **Table 3.2**.

[24] Bellway PLC. November 2018. Annual Report.
[25] OFT. September 2008. Homebuilding in the UK A Market Study.
[26] DCLG. February 2008. Factors Affecting Housing Build-Out Rates.

3.23 Site-specific infrastructure requirements are then considered and whether these might affect the rate of building during the five-year period.

3.24 The number of market housing sales outlets on a site is largely dependent on the size of the site, the site ownership, and the phase of development. For example, a relatively small site in the ownership of a housebuilder will likely only have a single sales outlet. Conversely, a larger site might be divided into plots that are then sold to individual housebuilders, each with their own sales outlet. Generally, however, on large sites there is a lead housebuilder that will be in place for the first year or two. It is only once the site is established that more housebuilders might be introduced. The total number of outlets is dependent on the overall size of the development and the saturation of the local housing market. Overall, it is a matter of judgement.

Table 3.2: Market housing sales rates by PLC housebuilder

HOUSE-BUILDER	AVERAGE UNIT SALES PER OUTLET		INDICATIVE BUILD RATE INCLUDING AFFORDABLE HOUSING		SOURCE
	PER WEEK	PER YEAR	30%	40%	
Barratt	0.72	37.4	53.4	62.3	Annual Report 2018
Bellway	N/A				
Berkeley	N/A				
Bovis	0.58	30.2	43.1	50.3	Annual Report 2018
Countryside	0.80	41.6	59.4	69.3	Annual Report 2018
Crest Nicholson	0.77	40.0	57.1	66.7	Trading Update May 2018
Galliford Try	0.59	30.7	43.8	51.2	Annual Report 2018
Kier	0.70	36.4	52.0	60.7	Annual Report 2017
Legal & General	N/A				
Miller	0.67	34.8	49.7	58.0	Annual Report 2018
Persimmon	0.75	39.0	55.7	65.0	Annual Report 2018
Redrow	0.70	36.4	52.0	60.7	Annual Report 2018
Taylor Wimpey	0.80	41.6	59.4	69.3	Annual Report 2018
AVERAGE	**0.71**	**36.8**	**52.3**	**61.3**	

3.25 In addition, Lichfield's 2016 analysis concluded that Greenfield sites on average build out faster than Brownfield sites. It set out the Greenfield rates by site size:

- 500-999 dwellings: 86dpa
- 1,000-1,499 dwellings: 122dpa
- 1,500-1,999 dwellings: 142dpa
- 2,000+ dwellings: 171dpa

3.26 Colin Buchanan's analysis found that:

- 1,000 to 1,999 dwellings: 101dpa
- 2,000 to 2,999 dwellings: 189dpa
- 3,000+ dwellings: 330dpa

3.27 Lichfield also undertook analysis of smaller sites but did not provide a breakdown by Greenfield/Brownfield:

- 1-99 dwellings: 27dpa
- 100-499 dwellings: 60dpa

3.28 It should be noted however that these are averages across the entire build period, which is likely to see fluctuations with lower rates at the start and end. This is important where large sites have yet to start onsite and are therefore unlikely to reach these averaged delivery rates for several years.

3.29 In addition, it should be recognised that these averages cover significant range of site sizes, particularly the 100-499 dwellings range. While it is accepted that the average of 60dpa for this range is entirely reasonable, this will hide an equally wide range of delivery rates. Sites of 100 dwellings would be expected to be in the region of 30-50dpa while sites of 499 dwellings to be in the region of 70-90dpa, depending on local circumstances.

3.30 When the build rate per outlet data in **Table 3.2** is compared with the above site-wide build rates, it is found that on average a site needs a capacity of at least 600 dwellings before a second outlet can be supported. A third outlet would need approximately 1,200 dwellings and a fourth approximately 1,800 dwellings. However, this is subject to the disposal strategy, particularly whether the intention is to sell individual serviced plots (which can allow a diverse range of builders onsite at the same time) or sell an entire phase to a single housebuilder. Note that the provision of serviced plots, and therefore a greater range of outlets, does not necessarily mean increased build rates due to market absorption, see below.

3.31 **Figure 3.2** illustrates how sites of a size might be built-out, based on the collective evidence set out above. It is however only theoretical and local circumstances must be taken into consideration. Furthermore, for the larger sites, it is probable that the effect of macro-economic cycles will be greater with peaks and troughs influencing the trajectory significantly. It is however a useful indicator of how average build-out rates should be taken into consideration in a 5YHLS assessment.

Figure 3.2: Illustration of build-out rates over time based on the size of a site

Dwellings	Years																									Average	Bidwells	NLP	CB
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26				
60	30	30																									30	30	27	
180	60	60	60																								60	60	60	-
300	60	60	60	60	60																						60			
600	60	60	90	120	90	60	60	60																			75	88	86	
900	60	90	120	120	120	120	120	90	60																		100			
1,200	60	90	120	150	180	180	150	120	90	60																	120	120	122	
1,500	60	120	180	180	180	180	180	150	120	90	60																136	143	142	101
1,800	60	120	150	180	240	240	210	180	150	120	90	60															150			
2,100	60	120	180	210	240	240	240	210	180	150	120	90	60														162			
2,400	60	120	180	240	240	240	240	240	240	180	150	120	90	60													171	171		189
2,700	60	120	180	240	300	270	240	240	240	210	180	150	120	90	60												180			
3,000	60	120	180	240	300	300	270	240	240	240	210	180	150	120	90	60											188			
3,300	60	120	180	240	300	300	300	270	240	240	240	210	180	150	120	90	60										194			
3,600	60	120	180	240	300	300	300	300	270	240	240	240	210	180	150	120	90	60									200			
3,900	60	120	180	240	300	300	300	300	300	270	240	240	240	210	180	150	120	90	60								205			
4,200	60	120	180	240	300	300	300	300	300	300	270	240	240	240	210	180	150	120	90	60							210			
4,500	60	120	180	240	300	300	300	300	300	300	300	270	240	240	240	210	180	150	120	90	60						214	212	161	330
4,800	60	120	180	240	300	300	300	300	300	300	300	300	270	240	240	240	210	180	150	120	90	60					218			
5,100	60	120	180	240	300	300	300	300	300	300	300	300	300	270	240	240	240	210	180	150	120	90	60				222			
5,400	60	120	180	240	300	300	300	300	300	300	300	300	300	300	270	240	240	240	210	180	150	120	90	60			225			
5,700	60	120	180	240	300	300	300	300	300	300	300	300	300	300	300	270	240	240	240	210	180	150	120	90	60		228			
6,000	60	120	180	240	300	300	300	300	300	300	300	300	300	300	300	300	270	240	240	240	210	180	150	120	90	60	231			

30-60	1 Sales outlet + 40% affordable housing
90-120	2 Sales outlet + 40% affordable housing
150-180	3 Sales outlet + 40% affordable housing
210-240	4 Sales outlet + 40% affordable housing
270-300	5 Sales outlet + 40% affordable housing

3.32 The recent Letwin review[27] considered why large sites cannot seem to increase their delivery beyond a certain point – most commonly known as the market absorption rate. To build at a higher rate results in a depreciation in house prices and therefore housebuilder profits. It is therefore in the interests of housebuilders to carefully balance output against local demand.

3.33 This is best characterised by Professor Whitehead[28]:

"Perhaps the most fundamental question is whether any of these changes will actually increase output. One core issue here is the levels of actual demand backed by the ability to pay, as opposed to requirements without financial underpinning.

There are reasons to think demand may be running at lower levels than projected requirements:

- *potential new entrants to owner-occupation have less secure incomes than in the past and find it harder to meet credit conditions;*
- *established households face higher transactions costs when moving so activity levels are low and the overall market is unhealthy;*
- *the Buy to Let market, which is currently providing for those excluded from owner-occupation and for younger households in particular, is being hit with additional tax burdens and institutional investors are still only dipping their feet into the market;*
- *significant proportions of current output would not have occurred without government support (Help to Buy Equity loans; shared ownership etc) or, especially in central London, pre-sales to international buyers; and*
- *government support is based more on financial instruments than traditional subsidy so prices and rents even of government supported housing are higher.*

It is not surprising therefore that risk-averse developers, who suffered very considerably from the financial crisis and are only just rebuilding their capital base are not prepared to expand rapidly. Indeed, if for Brexit or other reasons, prices and confidence were to fall the industry would look very fragile. The fundamental volatility of the UK housing market thus has an inherent dampening effect on supply which in turn means prices rise more rapidly than necessary during economic upturns. Improved macro-stabilisation policies which took account of these costs could probably add more to supply than any changes in planning mechanisms."

3.34 The Letwin Review found that the median build rate of the sites reviewed, all of which were more than 1,500 dwellings, was 6.5% of the total site size. That is, if a site comprises 3,000 dwellings, it could be expected to deliver 195dpa and take more than 15 years to complete, which is consistent with **Figure 3.2**. The Review concluded that it was largely an issue of market differentiation, no matter how many builders were on a site, they are all generally producing the same product and are therefore in competition with one another. This is nothing new and was highlighted in the DCLG (February 2008) research.

3.35 The Review suggests various measures to improve market differentiation and consequently improve site delivery rates. These however will take time to implement and are unlikely to affect the sites currently in consideration.

[27] Rt Hon Sir Oliver Letwin. October 2018. Independent Review of Build Out Final Report.
[28] Whitehead, C. 2017. Breaking Down the Barriers to Housing Delivery. JPL Occasional Paper.

3.36 Overall therefore, the build rates are applied as appropriate to each site but with a recognition that these should not exceed the market absorption rate in that sub-market area.

Risks to Delivery

3.37 PPG Paragraph 3-024-20190722 states that:

"Once the sites and broad locations have been assessed, the development potential of all sites can be collected to produce an indicative trajectory. This should set out how much housing and the amount of economic development that can be provided, and at what point in the future (i.e. within years 1 to 5, 6 to 10, and 11 and beyond). An overall risk assessment should be made as to whether sites will come forward as anticipated."

3.38 These risks are generally broken down into two categories:

- The lapse and non-implementation rate: the average number of housing planning permissions that have lapsed over a given period against the total number of housing planning applications permitted. These are often broken down into minor (less than 10 dwellings) and major development permissions as minor development permissions are generally treated differently in housing land supply analysis as windfall.
- Optimism bias: this is a more qualitative assessment considering whether the LPA has regularly underestimated lead-in times or overestimated build out rates either for the entire housing land supply or for specific sites.

3.39 In relation to lapse and non-implementation rates, the Planning Advisory Service (PAS) has previously advised that for 5YHLS:

"There are examples of cases and Inspectors supporting the need for an allowance but also recognising that one is not necessary. The contradictory appeals are due to different circumstances. The issue of an appropriate discount on the delivery of sites has been discussed at length in the Bloor Homes East Midlands Ltd v SoS and Hinckley and Bosworth BC 2014] EWHC 754 (Admin) 19 March 2014 High Court decision where it was found that the Inspector failed to deal with the need to make a 10% discount from the notional delivery on larger sites and which might have led the supply to be less than five years' worth. More recently in November 2014 an appeal in Stratford on Avon (APP/J3720/A/14/2215757) considered the issue of lapse rates and the 5% versus 10% rate. The need for this type of allowance will depend on the robustness of your evidence about the sites relied upon to deliver housing.

The decision about whether to include an allowance for non-implementation depends on how robust the delivery information is considered to be and is only necessary where there is uncertainty about whether some of the sites are going to come forward. If you have a good evidence base including from developers that confirm sites will come forward there may not be a need for a lapse rate. However, if you have significant number of small sites which you don't have reliable information about then a non-implementation rate based on past data might be useful. It is suggested that as part of the risk review advocated by the Practice Guidance an assessment of the evidence and need for any allowance is considered. If a rate is going to be applied, it is suggested that this is based not on a standard approach but on historic data which sets out the number of permissions compared with completions on similar sized sites."

3.40 Ultimately it is concluded that the applicability of a lapse and non-implementation rate comes down to the robustness of the evidence supporting the housing trajectory. This was echoed in another judgement, which confirmed that a lapse rate should not be applied indiscriminately but rather only on those parts of the supply where there is a concern over their robustness[29].

3.41 The reasons why a planning permission may be allowed to lapse are considerable, as set out in research by both the DCLG[30] and Lichfields[31]:

- An existing occupier of the land or building sought planning permission for reasons other than to build out the site
- The landowner cannot get the price for the site that will justify the disposal of the asset
- A developer cannot secure finance or meet the terms of an option
- The development is not considered to be financially worthwhile
- Market downturns that render the development unviable or less attractive
- The priorities of the landowner/developer may change
- The site is sold to a new developer who wants to re-plan the proposed development in a way that requires a new planning permission
- Pre-commencement conditions take longer than anticipated to discharge.

3.42 DCLG's research found that in 2015 the number of permissions 'on hold' was just 10% nationally, down from the 23% noted in October 2013. This could be indicative of the market strengthening following the recession. However, some 10-20% of permissions lapse, although 15-20% are not actually abandoned but instead a new permission is sought. This would suggest that around 5% of permissions can be reasonably deducted from the housing land supply, based on local evidence. In addition, consideration needs to be given to potential delays to developments due to the need to reapply for planning permission, effectively restarting the clock. This could affect 5-15% of planning permissions.

3.43 Analysis by Turley[32] suggests that smaller sites are far more likely to lapse than larger sites, which need considerably more investment to achieve planning permission. This is also not surprising fore procedural reasons as smaller sites are more likely to seek full rather than outline planning permission, which allows far greater flexibility. If someone wishes to materially change the detailed design of a scheme, perhaps to reflect changing market conditions, the only option is to seek a new planning permission.

3.44 In terms of optimism bias, this is particularly a problem where the local housing market has stalled and average lead-in times or build out rates become unrealistic, where the amount of land available is considerably more than what might be reasonably absorbed by the local market due to competition, or where a number of sites are controlled by the same housebuilder who will want to protect their investment by coordinating sale volumes.

29 Wokingham BC v SSCLG & Cooper Estates [2017] EWHC 1863 Admin.
30 DCLG. September 2015. Planning Update to the HBF Planning Conference 2015.
31 NLP. January 2017. Stock and Flow: Planning Permissions and Housing Output.
32 Turley. March 2019. West Suffolk Housing Delivery Study on behalf of Forest Heath District Council and St Edmundsbury Borough Council.

3.45 The most recent case of this was in Milton Keynes where the Inspector stated that[33]:

"Turning to the optimism bias, the appellants' figures are based on past performance by the Council and in their view results in the annualised supply needing to increase by some 25%. I realise the Council has not achieved the delivery rates expected and has it has not persuaded me that it has in place mechanisms, processes or similar to support the dramatic up-turn in delivery of the magnitude now anticipated. However, on the other hand the emphasis of Central Government, for this Council and for others, is for delivery to increase, and so I therefore consider that the appellants' reliance on the continuation of past rates to be inappropriate. Indeed, delivery has improved recently. The figure for over-optimism should therefore, in my opinion, lie somewhere between that given by the Council and the figure stated by the appellants. I have no particular guidance as to where that would be, but balancing the 2, a point midway seems reasonable."

3.46 While this not in the context of plan-making, it is clearly equally relevant, and LPAs should be cognisant of the accuracy of their previous assessments when considering future housing land supply.

[33] PINS. 26 September. Appeal A: APP/Y0435/W/18/3214365: Land off Castlethorpe Road, Hanslope MK19 7HQ; Appeal B: APP/Y0435/W/18/3214564: Malt Mill Farm, Castlethorpe Road, Hanslope MK19 7HQ.

4.0 Components of the Housing Land Supply

Introduction

4.1 For the purposes of this assessment, only sites allocated for 500 or more dwellings are considered. This is because sites for less than this will almost certainly come forward at some point in the 15+ year local plan period, even if it is substantially delayed. For ease, sites are broken down into the following areas:

- North West Cambridge
- East Cambridge
- Northstowe
- Waterbeach
- Cambourne and Bourn

4.2 The sites are covered by some 13 outline planning permissions, which took an average of 2.8 years from submission to achieve (**Table 4.1**). This has resulted in 62 determined reserved matters applications, on average 1.1 years after the outline permission, which then averaged approximately five months to achieve. It has then taken between six months and three years for the first completions to be achieved, with the average being just under a year. Therefore, the overall period taken between submission of the outline planning application and the first completions is, on average, approximately 5.2 years. This is broadly consistent with the analysis set out in **Chapter 3**, but only comprises a small dataset resulting in significant fluctuations. Consequently, this assessment largely relies on the analysis in **Chapter 3**.

Table 4.1: Time taken to achieve outline planning permission

APPLICATION	SIZE	LPA	SUBMISSION	PERMISSION	TIME TAKEN
Darwin Green Frontage	187	Cambridge	18/03/2003	01/11/2004	1.6
Cambourne Additional	950	South Cambridgeshire	16/08/2007	03/10/2011	4.1
Trumpington Meadows	1,300	Cambridge & South Cambridgeshire	21/12/2007	09/10/2009	1.8
North of Newmarket Road	1,300	South Cambridgeshire	18/12/2013	30/11/2016	3.0
Northstowe Phase 1	1,500	South Cambridgeshire	27/02/2012	22/04/2014	2.2
Darwin Green 1	1,593	Cambridge	19/12/2006	20/02/2015	8.2
Clay Farm	2,300	Cambridge	06/06/2007	11/08/2010	3.2
Cambourne West	2,350	South Cambridgeshire	22/12/2014	29/12/2017	3.0
University Site	3,000	Cambridge & South Cambridgeshire	20/09/2011	22/02/2013	1.4
Northstowe Phase 2	3,500	South Cambridgeshire	29/04/2014	09/01/2017	2.7
Waterbeach	6,500	South Cambridgeshire	17/02/2017	27/09/2019	2.6
AVERAGE	**2,225**	**-**	**-**	**-**	**2.8**

4.3 The Councils' analysis of build rates on all strategic sites is set out in paragraphs C.34 onwards of the Main Document. In essence this comprises the following:

- Between 1999 and 2014, Cambourne delivered at an average rate of 235dpa, totalling 3,525 dwellings
- The Councils' evidence during the examination of the local plans rounded this up to 250dpa as a reasonable average rate of delivery for the new settlements (Northstowe (5,000 dwellings) and Waterbeach (9,000 dwellings)), which was agreed by Bidwells at the time.
- The Councils' then assumed that Cambourne West (2,350 dwellings) and Bourn (3,500 dwellings) should be treated as a single 'new settlement' with an average delivery of 300dpa because they are separated by the existing settlement of Cambourne.
- The Councils' have then assumed that all strategic sites on the periphery of Cambridge can be treated the same as the new settlements with an average rate of 250dpa, comprising:
  - North West Cambridge (5,593 dwellings)
  - North of Newmarket Road (1,300 dwellings)
  - North of Cherry Hinton (1,200 dwellings)
- Finally, the Councils' compare the build rates to the NLP research concluding that:

  "For these larger sites, the Councils' typical assumptions of build out rates of 250 dwellings per year are higher than those recorded in the national evidence; however they are based on actual average completions recorded at Cambourne over time, which has seen peaks and troughs in annual completions, and were generally agreed by developers through the recent Local Plan examinations."

4.4 This is fundamentally flawed in several areas:

- The entire analysis relies on the first element only of Cambourne new settlement. However, a subsequent 950 dwellings were added to the new settlement, overlapping with the first element. Only 38 dwellings are yet to be completed of this extension and therefore it would be reasonable to consider the build rate for the entire new settlement assuming that these are completed in 2019/20. The overall build period would increase to 21 years over which 4,475 dwellings were completed at an average rate of 213dpa. This is entirely consistent with **Figure 3.2**.
- There is no justification to round up delivery from 235dpa to 250dpa, a 6% increase per annum. Indeed, when the Cambourne example is adjusted to reflect the total amount of development seen there, it constitutes a 17% increase per annum.
- An average rate of development of 213dpa, based on Cambourne, is a reasonable comparison for similar sized developments or clusters of development. Both Northstowe and Waterbeach are considerably larger than Cambourne and therefore it was entirely reasonable to assume a higher build rate of 250dpa at the examination. The more recent analysis set out in **Figure 3.2** suggests however that a 5,000-dwellings development would only achieve 220dpa.
- Combined, Cambourne West and Bourn total 5,850 dwellings and based on **Figure 3.2** would deliver at a rate of approximately 230dpa, not 300dpa as suggested by the Councils' based on unsubstantiated assumptions. In fact, these two developments should be considered as two separate extensions to Cambourne with separate build rates. It is probable that the two will compete with one another such that the build rates will be suppressed from those in **Figure 3.2**, which is discussed further below.

- The Councils', using their benchmark of 250dpa for all strategic sites then apply unsubstantiated assumptions to each of the following:
  - At North West Cambridge:
    - 173dpa at Darwin Green, assuming a sustained rate of 200dpa for most of the build period.
    - 185dpa at the University site, assuming a sustained rate of 250dpa for most of the build period.
    - A combined average of 326dpa, contrary to paragraph C.36 of the Main Document which suggests that 250dpa would be applied to the entirety.
  - At North of Newmarket Road, an average build rate of 163dpa.
  - At North of Cherry Hinton, an average build rate of 171dpa.
- Finally, the Councils' fail to recognise that the national research is based on a range of sites, which allows for a reasonable sample on which analysis of future trends can be made. Instead, while acknowledging that their assumptions are higher than the national research, the Councils' continue to benchmark build rates across all strategic sites against part of one new settlement.

4.5 Clearly this approach cannot be considered appropriate to demonstrate that development is either a realistic prospect for the next five years or a reasonable prospect for Year 6 onwards.

4.6 The sections below consider the strategic sites individually to determine the actual realistic and reasonable delivery of housing.

North West Cambridge

4.7 North West Cambridge effectively comprises two sites that straddle the local authority boundary:

- Darwin Green, which is entirely within the control of Barratt Developments; and
- The University Site, which is being brought forward by the University of Cambridge and Hill Residential.

Darwin Green

4.8 Darwin Green comprises three elements, all under the control of Barratt:

- Darwin Green Frontage (187 dwellings), which achieved full planning permission in 2008 and was built out between 2010/11 and 2013/14 at an average rate of 38dpa.
- Darwin Green 1 (1,593 dwellings), which achieved part-full planning permission in 2016 and achieved its first completions in 2018/19.
- Darwin Green 2/3 (1,000 dwellings), which is allocated in the South Cambridgeshire Local Plan with the outline planning application in preparation.

4.9 Excluding the Frontage which has been completed for over five years, the development in total comprises 2,593 dwellings. For the purposes of understanding its trajectory it is reasonable to

consider it to be a single development, particularly given that it is under the control of a single housebuilder.

4.10 The Councils consider there to be a realistic prospect that the development will achieve 154 completions in 2019/20 and 180 dwellings in 2020/21, followed by 200dpa between 2021/22 and 2023/24. The Councils then consider that there is a reasonable prospect that the development will continue at a rate of 200dpa until 2031/32 with the remaining 44 dwellings being completed in 2032/33. This would mean that the development would be completed in 15 years at an average rate of 173dpa.

4.11 Based on the lead-in times set out in **Figure 3.1**, an outline planning application for Darwin Green 2/3 (1,000 dwellings) would need to be submitted 5.75 years before completions could be achieved. To achieve the Councils' trajectory for this development therefore the application would need to be submitted in 2020/21 at the latest. This is a reasonable assumption.

4.12 In terms of build rates, by comparison, the illustrative trajectory set out in **Figure 3.2** suggests that sites for 2,400-2,700 dwellings would take between 14-15 years to complete and would achieve an average rate of between 171dpa and 180dpa. To achieve this there would need to be at least three sales outlets operating for most of the construction period, possibly increasing to five at the peak.

4.13 This development however is under the control of a single housebuilder, which includes two brands (Barratt and David Wilson). Combined, these have an average build rate of 62dpa nationally, slightly above the average for all PLC housebuilders (**Table 3.2**). While there will certainly be fluctuations in delivery depending on the types of units under construction at any one time, it is likely that the average across the entire build period will not notably surpass 124dpa. This would mean that the development would likely take between 20-21 years to complete.

4.14 While 200dpa might be possible at certain points in the construction programme, particularly with the apartment elements, it is ambitious to assume that this maximum rate could be sustained across the entire build.

4.15 There are two local comparables that can be used to understand if a higher build rate is realistic:

- The 'frontage' element of Darwin Green was completed between 2010/11 and 2013/14 by Barratt, which totalled 153 dwellings (Main Document page 65). This had a single sales outlet and achieved an average build rate of 34dpa over four years, with the maximum in one year being 54 dwellings.

- Trumpington Meadows has outline planning permission for 1,200 dwellings and has been under construction, by Barratt, since 2011/12 (Main Document page 70). This has two sales outlets and has achieved an average of 102dpa over eight years, with the maximum of 148 dwellings in one year. At paragraph B.139 of the Main Document it states:

  "Completion of the development is anticipated to be four years later than anticipated in the previously published housing trajectory. The housebuilder has advised that delivery is being delayed as a result of market conditions – sales have slowed down due to Brexit and the uncertain political climate."

  If Trumpington Meadows is completed as Barratt anticipate, the build period would be 14 years and average 85dpa.

4.16 It would seem, if anything, that these comparables, by the same housebuilder and for a similar product in the same housing market, suggest a lower than average built rate. There is certainly

no clear evidence that a significantly higher build rate, the equivalent of at least one additional sales outlet, would be realistic or reasonable.

4.17 In their rebuttal of Bidwells' Statement of Case for the appeal in relation to Land West of Cambridge Road, Melbourn (Reference APP/W0530/W/18/3209856), SCDC suggested that the build rate at Trumpington Meadows was subdued as a result of competition from other large sites that were under construction at the same time. This is a reasonable assumption, although the presence of the Biomedical Campus within walking distance and the thousands of new jobs being created there would mitigate this to some degree. However, the Clay Farm development, the main competitor, is expected to be complete by 2021/22 with only one sales outlet (Countryside Properties) now active on the site. Despite this, Barratt are not anticipating any increase in build rates to compensate for the lack of competition, because of wider market issues cited that will equally affect Darwin Green.

4.18 Darwin Green 2/3 is likely to be able to start delivering housing in 2027/28. It is highly unlikely that across a site of just 2,593 dwellings Barratt could sustain four sales outlets, but the two sales outlets serving the first phase are unlikely to be best placed to serve the new access off Histon Road. It would therefore seem reasonable to assume the equivalent of three sales outlets operating across the entire site from 2027/28 to 2030/31, equating to 186dpa. Phase 1 would then be completed in 2031/32 and the focus would be entirely on Darwin Green 2/3, which would continue at a rate of 124dpa.

4.19 In summary therefore:

- 2018/19: delivery starts on Phase 1 = 15 dwellings.
- 2019/20 – 2026/27: Phase 1 continues to deliver at an average of 124dpa = 992 dwellings.
- 2027/28 – 2030/31: delivery starts on Phase 2/3 at an average rate of 62dpa while Phase 1 continues at 124dpa = 744 dwellings.
- 2031/32: The final 90 dwellings on Phase 1 are completed while Phase 2/3 continues at an average rate of 62dpa = 152 dwellings.
- 2032/33 – 2036/37: Phase 2/3 delivers at an average of 124dpa = 620 dwellings.
- 2037/38: The final 70 dwellings on Phase 2/3 are completed.
- Total of 20 years, averaging 130dpa.

The University Site

4.20 The University Site has outline planning permission for 3,000 dwellings straddling the City/District boundary. It is being brought forward through a partnership between Cambridge University and Hill Residential. The University is constructing most of the housing as keyworker/affordable housing to address its own needs. The remainder is being constructed by Hill Residential with a standard mix of market and affordable housing.

4.21 Because the of unique objectives of the development, between 2016/17 and 2018/19 some 836 dwellings (averaging 279dpa) were completed. This was largely to resolve the backlog in demand for keyworker housing with very little being available as either market or affordable housing. Over the next five years, the Councils' anticipate that construction will only deliver 382 dwellings (76dpa). In total therefore, the period between 2016/17 and 2023/24 would see an average rate of delivery of 152dpa.

4.22 It is reasonable to assume that this average rate of delivery would continue across the entire build period. Effectively it assumes that Hill Residential would seek to build out at an average rate of 61dpa (**Table 3.2**) and that the University would build out at an average rate of 91dpa – the equivalent of 1.5 sales outlets.

4.23 This would mean that from 2024/25 to 2034/35, the development would continue at a rate of 152dpa with the remaining 110 dwellings completed in 2035/36. The development overall would therefore take twenty years to complete and at an average rate of 148dpa.

North West Cambridge Conclusions

4.24 In total, these developments comprise 5,593 dwellings (excluding the Darwin Green frontage site) that are in control of two housebuilders (albeit three brands) and the University. Over the last three years, 851 dwellings have been completed at an average rate of 284dpa. The Councils' consider there to be a realistic prospect that 1,316 dwellings would be completed over the next five years, at an average rate of 263dpa. Bidwells however consider that this is unrealistic and conclude that 1,002 dwellings at an average rate of 200dpa is more realistic.

4.25 Overall, the Councils' conclude that these developments would take 17 years to complete at an average rate of 326dpa. Bidwells however consider that this is unreasonable and conclude that 21 years is more reasonable, at an average rate of 263dpa.

4.26 When compared to the analysis of build out rates in **Figure 3.2**, on average a development of this scale would likely take 24-25 years to complete at an average rate of 225-228dpa. This would require five active sales outlets for 12-13 years of the build period.

4.27 It is accepted that the University is likely to build out at a greater rate than a standard housebuilder, but this is mitigated to some degree by the control only two housebuilders have over the rest of the trajectory. It is highly unlikely that additional housebuilders would be involved with these developments. Despite this, Bidwells conclude that it is still a reasonable prospect that the build rate would be 15% higher than the **Figure 3.2** suggests. By contrast, the Councils' analysis suggests the build would be 43% higher. This is not a reasonable prospect and no evidence is provided to support it.

East Cambridge

4.28 East Cambridge comprises two sites that straddle the local authority boundary:

- Land North of Cherry Hinton, which is controlled by Marshall Group Properties and Endurance Estates.
- Land North of Newmarket Road, which is controlled by Hill Marshall LLP.

Land North of Cherry Hinton

4.29 This site straddles the City and District boundary and is allocated in both local plans, and the Cambridge East Area Action Plan (February 2008). An outline planning application for 1,200 dwellings was submitted in March 2018 and has yet to be determined (18/0481/OUT). Indeed, even as recently as May 2019 considerable further information on land contamination was being submitted by the applicants, Marshall Group Properties and Endurance Estates. This relates to an outstanding objection by the Environment Agency.

4.30 As part of the Councils' rebuttal of Bidwells' Statement of Case for the Melbourn appeal discussed above, a note from the applicants confirmed that the timescales had slipped by

approximately 12 months from those set out in the Councils' housing trajectory. Despite this, the Councils' maintain that the trajectory is still realistic with the site with delivery of completions starting in 2022/23 with 95 dwellings and completed by 2028/29 (seven years) at an average rate of 171dpa.

4.31 **Figure 3.1** suggests that a development for 1,200 dwellings would realistically have a lead-in time of 5.75 years. On this timescale, completions are unlikely to be seen until 2024/25, two years beyond the Councils' estimate, which assumes that only four years is realistic. Given that there has already been a 12 month delay largely due to determination of the outline application, it is not at all unreasonable to expect further delays given the need to agree the s106, sell the site to housebuilder(s), submit reserved matters and discharge pre-commencement conditions, and mobilise the construction workforce. Furthermore, the Councils' own evidence at Figure A1-2 suggests that it would take 5.9 years from the submission of an outline planning application to the first completions, albeit based on a sample of only two sites.

4.32 Based on the above therefore, it is a realistic and reasonable prospect for delivery to start in 2024/25.

4.33 **Figure 3.2** suggests that a development for 1,200 dwellings would realistically take 10 years to complete at an average rate of 120dpa. This assumes that at its peak there would be three sales outlets onsite delivering approximately 180dpa. As discussed in the introduction to this chapter, the Councils' starting point was that strategic sites could deliver 250dpa on average and therefore a reduction to 200dpa is a conservative figure. This firstly ignores the flaws set out above in this approach, and the national evidence that shows this to be unreasonable.

4.34 Consequently, it is concluded that this scheme is likely to start delivery in 2024/25 and follow the generic trajectory set out in **Figure 3.2** for a development of 1,200 dwellings, given the absence of any reasonable evidence to the contrary. This would mean that the development would be completed in 2033/34.

Land North of Newmarket Road

4.35 This site also straddles the City and District boundary and is allocated in both local plans, and the Cambridge East Area Action Plan (February 2008). The site has outline planning permission for 1,300 dwellings (S/2682/13/OL) and reserved matters for 239 dwellings (S/1096/19/RM). The original outline application was submitted by Marshall Group Properties who have since entered into an agreement to deliver the site with Hill Residential. The resulting Hill Marshall LLP was the applicant for the reserved matters.

4.36 The Councils assume that the development will begin delivery in 2020/21, seven years after the outline planning permission was submitted. This is reasonable.

4.37 The Councils then assume that the entire development could be completed in eight years, averaging 163dpa. Again, the Councils' starting point is the typical assumption that strategic sites could yield on average 250dpa and on that basis 163dpa would seem conservative. However, for all the reasons set out in the introduction to this chapter, this approach is fundamentally flawed.

4.38 Based on **Figure 3.2**, it is assumed that this development would average 130dpa and would be completed in 2029/30.

East Cambridge Conclusions

4.39 In total, these developments comprise 2,500 dwellings, none of which are currently in the control of housebuilders. The Councils consider there to be a realistic prospect that 1,000 dwellings

would be completed over the next five years, starting delivery in 2020/21, at an average rate of 250dpa. Bidwells however consider that this is unrealistic and conclude that 420 dwellings at an average rate of 105dpa is more realistic.

4.40 Overall, the Councils conclude that these developments would take 9 years to complete at an average rate of 278dpa. Bidwells however consider that this is unreasonable and conclude that 13 years is more reasonable, at an average rate of 188dpa.

4.41 When compared to the analysis of build out rates in **Figure 3.2**, on average a development of this scale would likely take 14 years to complete at an average rate of approximately 179dpa. This would require four active sales outlets for 6-7 years of the build period.

4.42 Bidwells conclude that it is reasonable prospect that the build rate would be 5% higher than the **Figure 3.2** suggests. By contrast, the Councils' analysis suggests the build would be 55% higher. This is not a reasonable prospect and no evidence is provided to support it.

Northstowe

4.43 Northstowe comprises three phases:

- Phase 1 (1,500 dwellings) commenced delivery in 2016/17 and currently has five sales outlets on site (Barratt, Bloor, Bovis, Linden and Taylor Wimpey). The Councils assume that the development will only yield 1,495 dwellings and will take 10 years to complete at an average rate of 150dpa. This is slightly faster than the 11 years and 136dpa shown in **Figure 3.2** but is close enough to be considered reasonable.
- Phase 2 (3,500 dwellings) currently has outline planning permission. The Councils assume that delivery will commence in 2022/23, eight years after submission of the planning application. Based on **Figure 3.1**, this is entirely reasonable. The Councils then assume an average rate of 206dpa, with four years delivering concurrently with Phase 1, resulting in an average over this period of 247dpa. Extrapolating the remainder of the development beyond the Councils' trajectory end of 2032/33 would suggest it would be completed in 2037/38 at a rate of 219dpa across the entire period.
- Phase 3 (5,000 dwellings) currently has an allocation only and is not included in the Councils' trajectory.

4.44 In total the completed Northstowe is expected to deliver 10,000 dwellings and therefore the Councils' typical assumption of 250dpa is not unreasonable. In fact, Bidwells believe that an average of 300dpa is reasonable between 2023/24 and 20245/46. This however requires Phase 3 to commence delivery in 2033/34, which would suggest an outline planning application would need to be submitted in 2025/26.

4.45 Overall, Bidwells conclude that it is a reasonable prospect for the entire of Northstowe to be completed by 2055/56 with an average build rate of 250dpa over the 40-year period. Extrapolating the Councils' trajectory beyond 2032/33 suggests a 42-year period with an average build rate of 238dpa.

Waterbeach

4.46 Waterbeach new settlement allocation proposes some 9,000 dwellings. However, the recently achieved outlined permission by Urban & Civic (6,500 dwellings) and the undetermined outline planning application by RLW Estates (4,500 dwellings) suggest the site may have capacity for

11,000 dwellings. Since the latter is yet to be determined, this analysis assumes a ceiling of 9,000 dwellings.

4.47 Urban & Civic submitted their outline planning application in February 2017 for which planning permission was achieved in September 2019. It is understood that a reserved matters application for the first phase is likely to be submitted imminently, which could reasonably be approved by the end of the 2019/20 financial year. As an airfield, the site will already have reasonably good access and utilities. It will also be relatively flat so the need for ground works is likely to be limited. Therefore, it is realistic to assume that there will be some completions in 2021/22 despite this being considerably faster than the eight years suggested in **Figure 3.1** for a development of this scale.

4.48 The Councils anticipate that the development would deliver 25 dwellings in 2021/22, 125 dwellings in 2022/23 and 250 dwellings for all subsequent years. In their rebuttal to Bidwells' Statement of Case for the Melbourn appeal, this trajectory was amended to start delivery a year later with 150 dwellings completed in 2021/22 and 250 dwellings thereafter. This would mean that in the first two years of the development it would be expected to deliver 400 dwellings. Extrapolating the Councils' analysis beyond 2032/33 would suggest that the development would be completed in 2057/58 at an average build rate of 243dpa.

4.49 There is merit in comparing the start of Waterbeach to that at Northstowe where 153 dwellings were completed in the first two years with one sales outlet opened in the first year and five in the second.

4.50 Agents for Urban & Civic state that:

"The first parcels enabled by early infrastructure will allow for at least three different house builders to deliver approximately 50 dwellings each over 2021-2022 (150 dwellings in total). Additional parcels can be made available for at least two more housebuilders to deliver dwellings from 2022-2023 (250 dwellings in total per annum)."

4.51 While this might be correct in terms of infrastructure, it fails to recognise that not all housebuilders will mobilise at exactly the point that the infrastructure is in place. Furthermore, delivery will likely be tentative at first due to the intense competition created by so many housebuilders being onsite at once. It is instinctively over optimistic when compared to both Northstowe and the trajectories suggested in **Figure 3.2**.

4.52 Instead Bidwells have applied the trajectory set out in Figure 3.2 from 2021/22 onwards. This suggests 60 dwellings in the first year and 120 dwellings in the second; totalling 180 dwellings which is higher than seen at Northstowe but still half the rate suggested by the Councils. Bidwells then anticipate that by 2026/27, the development is likely to deliver 300dpa, which equates to five sales outlets operating at full capacity. This would continue until 2049/50 when delivery would start to decline with the entire 9,000 dwellings completed in 2056/57 at an average build rate of 250dpa; a year earlier than the Councils' extrapolated trajectory.

Cambourne and Bourn

4.53 Cambourne West is a development of 2,350 dwellings that has outline planning permission, which was achieved in December 2012 for Taylor Wimpey and Bovis. The Councils assume delivery will start in 2021/22 with 25 dwellings, followed by 130 dwellings in 2022/23. The development would then continue at a rate of 150dpa thereon. If the Councils' trajectory is extrapolated beyond 2032/33, it is anticipated that the development would be completed in 2037/38 at an average rate of 138dpa.

4.54 The Bourn development is located on the eastern side of Cambourn. An outline planning application by Countryside Properties for 3,500 dwellings is awaiting completion of the s106. The Councils assume that delivery will commence in 2021/22 with 25 dwellings. This would rise to 100 dwellings in 2022/23 and 150 dwellings from 2023/24 onwards.

4.55 Combined, the two sites have a build rate of 234dpa but average 300dpa between 2023/24 and 2036/37.

4.56 Both lead-in times are considered reasonable. Cambourne West is consistent with **Figure 3.2** while Bourn, similar to Waterbeach, has much of the necessary infrastructure already in place.

4.57 The issue of competition between these sites can be seen by comparing the build rates of a 2,350-dwelling development and a 3,500-dwelling development, with that of a 5,850-dwelling development, using the data in **Figure 3.2**. This shows that combined the two developments would suggest an average rate of 371dpa, but a single development of the same size would only achieve an average rate of 231dpa. Depending on the distance between the sites, and therefore the degree of competition, the actual rate of delivery could be anywhere within this scale.

4.58 For Cambourne West, Bovis and Taylor Wimpey have average build rates of 53dpa and 69dpa respectively (**Table 3.2**), totalling 122dpa. This is likely to be the average across the build period as it is unlikely any housebuilders will be involved. Assuming a tentative start in 2021/22 of 61 dwellings, it is assumed that this will increase to 122 dwellings in 2022/23 and then 130dpa from 2023/24 to 2038/39 before completing in 2039/40 with the final 87 dwellings. This would achieve an average build rate of 124dpa. By contrast, **Figure 3.2** would suggest a development of this scale would achieve an average rate of 171dpa, which would require up to four sales outlets.

4.59 At Bourn, the picture is likely to be more complex. Countryside Properties have an average build rate of 69dpa and are likely to be the only housebuilder onsite initially. Given that the lead-in time is particularly short, it is reasonable to assume that only half this rate would be achieved in 2021/22 before increasing to 69dpa in 2022/23.

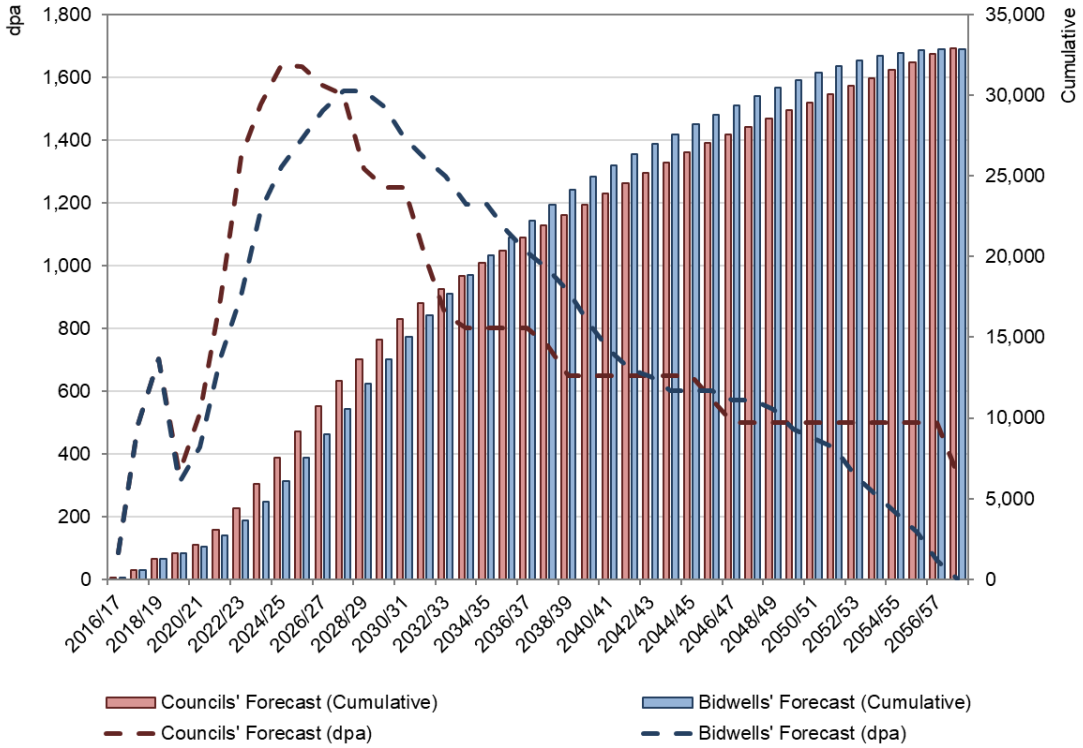
4.60 This site is particularly big for a single housebuilder and Countryside Properties has a history of selling serviced plots to other housebuilders to achieve an earlier return on their investment. Therefore, it is reasonable that by 2023/24 two additional housebuilders will be onsite, which would be broadly consistent with **Figure 3.2**. However, it is unlikely that a further housebuilder would be involved given the competition from nearby Cambourne West. Consequently, the rate of 189dpa is likely to continue until 2038/39 before the number of sales outlets declines to two and then one in 2041/42 (one always being Countryside Properties). This would suggest an average build rate of 159dpa compared to 200dpa shown in **Figure 3.2**.

4.61 Combined therefore the average build rate is 266dpa, notably higher than the Councils' analysis. However, given that three housebuilders are already identified and that the two sites are separated by Cambourne such that they are likely to be considered quite distinct, this seems entirely reasonable.

Summary

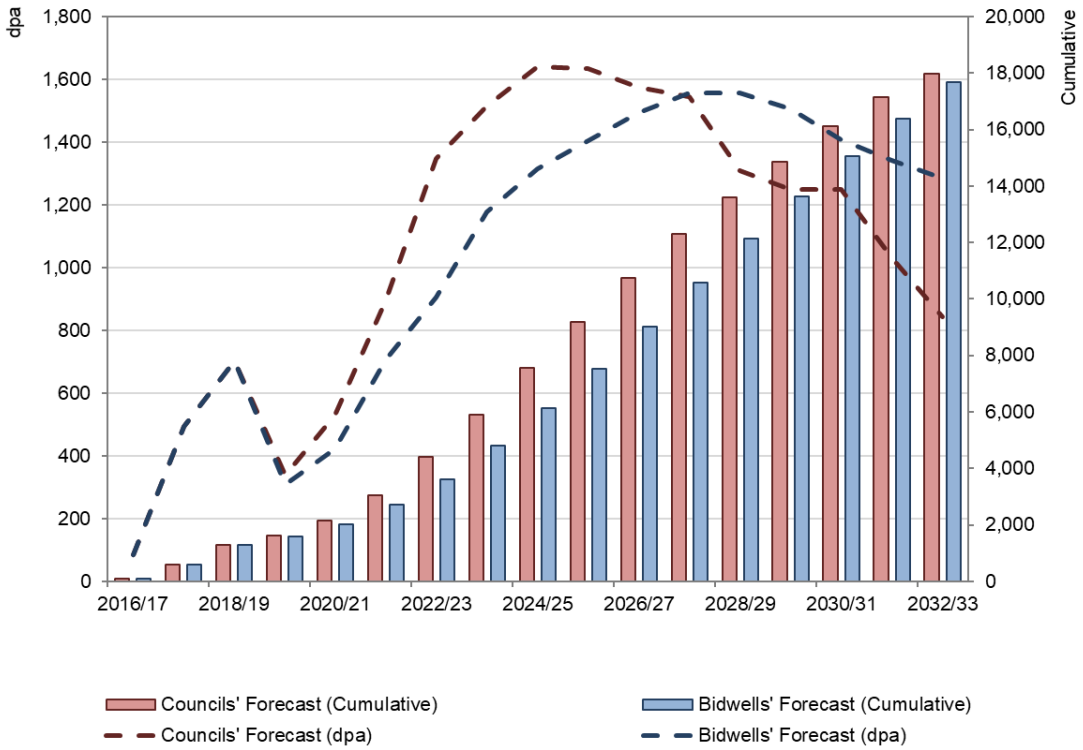
4.62 **Appendix 1** provides a table of the analysis set out above. **Figure 4.1** provides an analysis of the total rate of delivery per annum and the cumulative land supply from these sites, comparing the Councils' and Bidwells' analysis. It shows that Bidwells' analysis results in a slightly lower peak in delivery compared to the Councils' and delayed by four years. Notwithstanding this, the increase in the trajectory from 2019/20 is still significant. Over the longer term, Bidwells' analysis suggests a slower rate of decline in delivery, while the Councils' analysis is more stepped, which is symptomatic of the very broad-brush approach taken.

Figure 4.1: Comparison of Councils' and Bidwells' Analysis (2016/17 – 2057/58)



4.63 **Figure 4.2** presents the same data but focuses on the period up to 2032/33 in line with the Councils' analysis. This shows that by this date, the difference between the analyses is just 315 dwellings (1.8%). The greatest difference is in 2024/25 when the difference is 1,450 dwellings (23.4%). This is due to the Councils being overly optimistic about how quickly developments are likely to increase their build rates, most likely in an effort to demonstrate a 5YHLS.

Figure 4.2: Comparison of Councils' and Bidwells' Analysis (2016/17 – 2032/33)



5.0 Conclusions and Recommendations

5.1 This analysis of housing land supply in Greater Cambridge considers eight strategic sites totalling 32,893 dwellings. The following can be concluded:

5.2 Lead-in times seen and anticipated largely reflect those seen nationally for comparable developments with the exception of Bourn and Waterbeach, both of which are former airfields with considerable infrastructure already serving the sites.

5.3 These strategic sites have all been in the pipeline for some time now and it is reasonable to expect them to start delivery in the next few years. Only the lead-in time for the Land North of Cherry Hinton is questioned by Bidwells.

5.4 The Councils expect delivery from these sites to increase from 703 dwellings in 2018/19 to peak at 1,640 dwellings in 2024/25, an increase of 133% in six years, despite delivery expected to fall to 339 dwellings in 2019/20. By contrast, Bidwells expect the peak to be 1,557 dwellings in 2027/28, an increase of 121% but over nine years. This is considered far more achievable and in line with published literature on build rates.

5.5 Overall, between 2016/17-2032/33, the Councils assume a rate of 1,058dpa while Bidwells assume a rate of 1,040dpa. By 2032/33, this results in a difference of 315 dwellings.

5.6 Post 2032/33, the Councils build rates when extrapolated would suggest that all the sites would be completed in 2057/58 at an average rate of 783dpa. By contrast Bidwells conclude that all sites would be completed in 2056/57 at an average rate of 801dpa.

5.7 The Councils' trajectory is particularly stepped post the peak in 2024/25 as an indicative average delivery rate is applied to each site. This is unrealistic and will cause problems in forecasting future 5YHLS.

5.8 In order to maintain a continued regular delivery of housing into the 2030s to meet the current annual housing requirements, there will be a need to identify additional strategic development sites that will be able to start delivering around 2037/2038 when the average delivery from these current strategic sites starts to fall below 1,000dpa. Given the lead-in times described here, this means that outline planning applications would need to be submitted at least six years prior, in 2031/32 at the latest, and probably identified by the local authority in the local plan process in the decade before.

5.9 Furthermore, with the expected substantial increase in the annual housing requirement through the emerging joint local plan, it is likely that additional strategic sites will need to be identified to start delivery in the late 2020s, concurrently with the sites discussed in this document, which will need planning applications to be submitted in the next few years. Failure to do this will result in a stalling of housing delivery relative to the housing requirement, with the risk that this leads to the Councils not being able to demonstrate a 5YHLS, which may undermine the spatial strategy laid out in the joint local plan soon after its adoption.

APPENDIX 1
HOUSING TRAJECTORY

LP18 Ref	Name	Capacity	Application Reference	Applicant	Dates			1st April - 31st March																																																	Years Taken	Mean dpa	Total	5YHLS Total
					Validation	Decision	Time Taken (years)	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46	2046/47	2047/48	2048/49	2049/50	2050/51	2051/52	2052/53	2053/54	2054/55	2055/56	2056/57	2057/58				
North West Cambridge																																																										
R43	Darwin Green Frontage	187	03/0282/OP	NIAB	18/03/2003	01/11/2004	1.6																																																	-	-	-	-
		187	07/1124/REM	Barratt	12/10/2007	06/11/2008	1.1	54	49	39	11																																													4	38	153	0
R43	Land between Huntingdon Road & Histon Road (Darwin Green 1)	1,593	Councils' Forecast													15	154	180	200	200	200	200	200	199	45																															10	159	1,593	934
		1,593	07/0003/OUT	Barratt	19/12/2006	20/02/2015	8.2																																																	-	-	-	-
		114	15/1670/REM	Barratt	09/09/2015	23/05/2016	0.7									15																																								1	15	15	0
		173	16/0208/REM	Barratt	26/02/2016	27/05/2016	0.3																																																	0			
		330	19/1056/REM	Barratt	07/08/2019	-	-																																																	-	-	-	-
		1,593	Bidwells Forecast													15	124	124	124	124	124	124	124	124	124	124	124	124	90																											14	114	1,593	620
SS/2	Land between Huntingdon Road & Histon Road & the A14 (Darwin Green 2&3)	1,000	Councils' Forecast																					1	155	200	200	200	200	44																										7	143	1,000	0
		1,000	Bidwells Forecast																						62	62	62	62	62	124	124	124	124	124	70																					11	91	1,000	0
SS/2 & R43	North West Cambridge (University Site)	3,000	Councils' Forecast											73	353	410	25	25	117	111	104	250	250	250	250	205	250	250	32																											16	185	2,955	382
		3,000	11/1114/OUT	University of Cambridge	20/09/2011	22/02/2013	1.4																																																	-	-	-	-
			S/1886/11/O	University of Cambridge	22/09/2011	22/02/2013	1.4																																																	-	-	-	-
	M1 & M2	240	15/1663/REM	University of Cambridge & Hill Residential	01/09/2015	18/11/2015	0.2								4	146	25	25	25	15																																					6	40	240	90
			S/2219/15/RM	University of Cambridge & Hill Residential	01/09/2015	18/11/2015	0.2																																																	0			
	M3	106	17/0285/REM	Hill Residential	22/02/2017	21/06/2017	0.3												32	36	38																																				3	35	106	106
	S3	186	18/1195/REM	University of Cambridge	09/08/2018	05/04/2019	0.7												60	60	66																																				3	62	186	186
	Lot 1	117	13/1748/REM	University of Cambridge	02/12/2013	26/02/2013	0.8								117																																									1	117	117	0
	Lot 2	264	14/1722/REM	University of Cambridge	31/10/2014	21/01/2015	0.2									264																																								1	264	264	0
	Lot 3	232	13/1827/REM	University of Cambridge	20/12/2013	19/03/2014	0.2								232																																									1	232	232	0
	Lot 8	73	14/0109/REM	University of Cambridge	21/01/2014	30/07/2014	0.5							73																																										1	73	73	0
		3,000	Bidwells Forecast											73	353	410	25	25	117	111	104	152	152	152	152	152	152	152	152	152	152	152	65																							20	148	2,955	382
Totals		5,593	Councils' Forecast					54	49	39	11			73	353	425	179	205	317	311	304	450	450	450	450	405	450	450	232	44																										21	271	5,701	1,316
		5,593	Bidwells Forecast					54	49	39	11			73	353	425	149	149	241	235	228	276	276	276	338	338	338	338	304	276	276	276	189	124	70																					26	219	5,701	1,002
South Cambridge																																																										
GB1	Land North of Worts' Causeway	200	Councils' Forecast																	60	80	60																																		3	67	200	140
		200	19/0770/SCRE	CEG	04/06/2019	02/07/2019	EIA required																																																	-	-	-	0
		200	Bidwells Forecast																			61	61	61	17																															4	50	200	0
R42a	Clay Farm, South of Long Road	2,250	Councils' Forecast							16	271	393	149	467	539	109	118	94	30																																					10	219	2,186	242
		2,300	07/0620/OUT	Countryside Properties	06/06/2007	11/08/2010	3.2																																																	0	-	-	-
	Parcels 10, 11, 12b & 12c	306	10/1296/REM	Countryside Properties	03/02/2011	18/07/2011	0.5																																																				
	Parcels 1B, 2 & 5	229	12/0794/REM	Countryside Properties	21/06/2012	20/02/2013	0.7																																																				
	Parcels 12A, 13 & 14	136	14/0520/REM	Countryside Properties	28/04/2014	20/08/2014	0.3																																																				
	Parcels 6 & 7	165	14/1736/REM	Countryside Properties	31/10/2014	20/02/2015	0.3			16	134	246	45	219	174	39	113	94	30																																					10	111	1,110	237
	Parcel 8A	251	15/0844/REM	Countryside Properties	05/05/2015	21/08/2015	0.3																																																				
	Parcel 14B	11	15/2397/REM	Countryside Properties	24/12/2015	02/06/2016	0.4																																																				
	Parcel 8A	67	16/2208/REM	Countryside Properties	12/01/2017	17/07/2017	0.5																																																				
	Parcels 1A, 3 & 4	274	12/0867/REM	Crest Nicholson	06/07/2012	23/01/2013	0.5						16	157	69	32																																								4	69	274	0
	Parcels 16 & 17 (part)	102	12/0754/REM	Bovis Homes	08/06/2012	07/12/2012	0.5				52	104	88	75	35	38	5																																							7	57	397	5
	Parcels 15, 17 (part) & 18	295	13/0751/REM	Bovis Homes	24/06/2013	22/08/2013	0.2																																																				
	Parcels 9A & 9B	49	15/1002/REM	CALA Homes	02/06/2015	01/09/2015	0.2							16	33																																									2	25	49	0
	Parcel 21	208	14/1201/REM	Hill Residential	22/07/2014	26/11/2014	0.3								228																																									1	228	228	0
	-	20	14/0093/FUL	Cambridge City Council	23/01/2014	22/08/2014	0.6																																																				
	Parcels 19 & 20	128	11/0698/REM	Skanska	13/06/2011	20/12/2011	0.5				85	43																																													2	64	128	0
		2,250	Bidwells Forecast							16	271	393	149	467	539	109	118	94	30																																					10	219	2,186	242
R42b	Trumpington Meadows	1,300	Councils' Forecast						2	141	141	67	105	89	123	148	85	93	70	61	52	13																																		14	85	1,190	361
		1,300	S/0054/08/O	Barratt	18/01/2008	09/10/2009	1.7																																																	-	-	-	-
			08/0048/OUT		21/12/2007	09/10/2009	1.8																																																	-	-	-	-
	Lots 1-5	29	S/0160/11/RM	Barratt	31/01/2011	13/07/2011	0.5																																																				
		163	11/0073/REM	Barratt	31/01/2011	13/07/2011	0.5		2	141	141	61								8																																				5	71	353	8
		161	11/0075/REM	Barratt	31/01/2011	13/07/2011	0.5																																																				
	Lot 6	39	14/0348/REM	Barratt	19/03/2014	16/07/2014	0.3					6	33																																											2	20	39	0
	Lot 7	86	14/0624/REM	Barratt	06/05/2014	21/10/2014	0.5						65	21																																										2	43	86	0
	Lot 8	36	S/2998/14/RM	Barratt	24/12/2014	17/04/2015	0.3						7	29																																										2	18	36	0
			14/2109/REM	Barratt	23/12/2014	17/04/2015	0.3																																																				
	Lot 9	122	S/0107/16/RM	Barratt	18/01/2016	26/04/2016	0.3							39	83																																									2	61	122	0
	Local Centre	40	S/2647/16/RM	Barratt	06/10/2016	19/01/2017	0.3								40																																									1	40	40	0
	Riverside	122	S/2176/16/RM		11/08/2016	21/12/2016	0.4									84	15	23																																						3	41	122	38
			16/1488/REM	Barratt	11/08/2016	21/12/2016	0.4																																																				
	Lots 10 & 11	392	S/2646/16/RM	Barratt	06/10/2016	22/03/2017	0.5									64	70	70	70	53	52	13																																		7	56	392	315
			16/1769/REM	Barratt	06/10/2016	22/03/2017	0.5																																																				
		1,300	Bidwells Forecast						2	141	141	67	105	89	123	148	85	93	70	61	52	13																																		14	85	1,190	361
Totals		3,750	Councils' Forecast						2	157	412	460	254	556	662	257	203	187	100	121	132	73																																		14	255	3,576	743
		3,750	Bidwells Forecast						2	157	412	460	254	556	662	257	203	187	100	61	52	74	61	61	17																															17	210	3,576	603
East Cambridge																																																										
R47 & SS/3	Land North of Cherry Hinton	1,200	Councils' Forecast																	95	200	200	200	200	200	105																														7	171	1,200	295
		1,200	18/0481/OUT	Marshall Group Properties & Endurance Estates	29/03/2018	-	-																																																	-	-	-	-
			S/1231/18/OL		29/03/2018	-	-																																																	-	-	-	-
		1,200	Bidwells Forecast																			60	90	120	150	180	180	150	120	90	60																									10	120	1,200	0
SS/3	Land North of Newmarket Road, Cambridge	1,300	Councils' Forecast															110	160	225	210	190	185	125	95																															8	163	1,300	705
		1,300	S/2682/13/OL	Marshall Group Properties	18/12/2013	30/11/2016	3.0																																																	-	-	-	-
		239	S/1096/19/RM	Hill Marshall LLP	21/03/2019	12/09/2019	0.5																																																	-	-	-	-
		1,300	Bidwells Forecast															60	90	120	150	180	180	180	150	120	70																													10	130	1,300	420
Totals		2,500	Councils' Forecast															110	160	320	410	390	385	325	295	105																														9	278	2,500	1,000
		2,500	Bidwells Forecast															60	90	120	150	240	270	300	300	300	250	150	120	90	60																									14	179	2,500	420
Waterbeach																																																										
SS/6	Waterbeach New Town	9,000	Councils' Forecast																150	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	100	37	243	9,000	650
		6,500	S/0559/17/OL	Secretary of State for Defence & Urban&Civ	17/02/2017	27/09/2019	2.6																																																	-	-	-	-
		4,500	S/2075/18/OL	RLW Estates	30/05/2018	-	-																																																	-	-	-	-
		9,000	Bidwells Forecast																60	120	180	180	240	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	240	240	240	180	150	120	90	60		36	250	9,000	360
Northstowe																																																										
SS/5	Northstowe Phase 1	1,500	Councils' Forecast											13	140	278	160	214	218	215	147	90	20																																	10	150	1,495	954
		1,500	S/0388/12/OL	Gallagher	27/02/2012	22/04/2014	2.2																																																	-	-	-	-
	Parcel H1	92	S/1416/16/RM	Bloor Homes	02/06/2016	01/09/2016	0.2							13	44	35																																								3	31	92	0
	Parcel H2	135	S/3477/16/RM	Barratt	19/12/2016	31/01/2017	0.1										43	22																																						4	35	140	65
	Parcel H7	115	S/1475/18/RM	Barratt	18/04/2018	18/06/2018	0.2								11	64	20	35	35	20																																				4	28	110	110
	Parcel H8	73	S/1355/19/RM	Barratt	15/04/2019	24/09/2019	0.4											10	30	30	3																																			4	18	73	73
	Parcel H9	130	-	Barratt	-	-	-												5	15	60	50																																		4	33	130	80
	Parcel H3	40	S/2776/16/RM	Taylor Wimpey	18/10/2016	25/11/2016	0.1														7																																			3	35	106	7
	Parcel H10	76	S/0045/19/RM	Taylor Wimpey	02/01/2019	08/03/2019	0.2								28	71		27	49																																					2	38	76	76
	Parcel H11	152	S/1620/17/RM	Taylor Wimpey	08/05/2017	30/06/2017	0.1										36	45																																						2	41	81	81
	Parcel H13	92	-	Taylor Wimpey	-	-	-												19	70	3																																			3	31	92	92
	Parcel H4	84	S/3174/16/RM	Bovis Homes	22/11/2016	21/12/2016	0.1								29	49	6																																							3	28	84	6
	Parcel H5 & H6	240	S/3405/18/RM	Bovis Homes	07/09/2016	13/11/2018	2.2										20	40	40	40	40	40	20																																	7	34	240	180
	Parcel H12	271	S/3016/16/RM	Linden Homes	08/11/2017	19/01/2017	0.8								28	59	35	35	40	40	34																																			7	39	271	184
		1,500	Bidwells Forecast											13	140	278	160	214	218	215	147	90	20																																	10	150	1,495	954
SS/5	Northstowe Phase 2	3,500	Councils' Forecast																	22	103	160	230	250	250	250	250	250	250	250	250	250	250	250	235																					16	219	3,500	125
		3,500	S/2011/14/OL	HCA	29/04/2014	09/01/2017	2.7																																																	-	-	-	-
		3,500	Bidwells Forecast																	25	153	210	280	300	300	300	300	300	300	300	240	180	132	120	60																					16	219	3,500	178
SS/5	Northstowe Phase 3	3,500	Councils' Forecast																																15	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	235	21	238	5,000	0
		3,500	Bidwells Forecast																												60	120	168	180	240	300	300	300	300	300	300	300	300	272	270	240	240	210	180	150	120	90	60			23	217	5,000	0
Totals		8,500	Councils' Forecast											13	140	278	160	214	218	237	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	235	42	238	9,995	1,079
		8,500	Bidwells Forecast											13	140	278	160	214	218	240	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	272	270	240	240	210	180	150	120	90	60			40	250	9,995	1,132
Cambourne & Bourn																																																										
SS/8	Additional 950 dwellings	950	SCDC Forecast							88	123	239	201	96	81	84	39																																							8	119	951	39
		950	S/6438/07/O	MCA Developments	16/08/2007	03/10/2011	4.1																																																	0	-	-	-
	Parcel 1A	5	S/1504/11	Taylor Wimpey	26/07/2011	03/10/2011	0.2																																																				
	Parcel 1A	82	S/2111/11	Taylor Wimpey	20/10/2011	05/02/2012	0.3																																																				
	Parcel 1C	16	S/2398/11	Bovis Homes	06/12/2011	09/03/2012	0.3																																																				
	Parcel 1B	5	S/0350/12/RM	Taylor Wimpey	16/02/2012	31/05/2012	0.3																																																				
	Parcel 1B	98	S/1610/12/RM	Taylor Wimpey	20/08/2012	19/11/2012	0.2																																																				
	Parcel 1C & 2A	114	S/2596/11	Bovis Homes	04/01/2012	26/06/2012	0.5																																																				
	Parcel 3B	56	S/0396/13/RM	Bovis Homes	14/05/2013	13/08/2013	0.2			88	123	239	201	96	81	84	39																																							8	119	951	39
	Parcel 3C & 4C	131	S/0496/14/RM	Bovis Homes	24/02/2014	23/05/2014	0.2																																																				
	Parcel 2B & 2C	120	S/0806/13/RM	Taylor Wimpey	16/04/2013	16/07/2013	0.3																																																				
	Parcel 3A	74	S/1472/14/RM	Taylor Wimpey	03/07/2014	01/10/2014	0.2																																																				
	Parcel 3A	40	S/0114/15/RM	Taylor Wimpey	19/01/2015	14/04/2015	0.2																																																				
	Parcel 4B, 5An & 5Bn	110	S/2352/15/RM	Taylor Wimpey	15/09/2015	15/12/2015	0.3																																																				
	Parcel 5As, 5Bs & 5C	99	S/2292/16/RM	Taylor Wimpey	17/08/2016	20/11/2016	0.3																																																				
		950	Bidwells Forecast							88	123	239	201	96	81	84	38																																							8	119	950	38
Cambourne delivered an average of 235dpa 1999 -2014. Therefore, delivered 3,525 dwellings in 15 years: - If this included the additional 950 dwellings completed 2012/13 -2013/14, then total build is 4,265 dwellings in 21 years, equating to 203dpa. - If this did not include the additional 950 dwellings, then the total build is 4,475 dwellings in 21 years, equating to 213dp a.																																																										
SS/8	Cambourne West	2,350	SCDC Forecast																25	130	150	150	150	150	150	150	150	150	150	150	150	150	150	150	95																					17	138	2,350	305
		2,350	S/2903/14/OL	Taylor Wimpey & Bovis Homes	22/12/2014	29/12/2017	3.0																																																	0	-	-	-
		2,350	Bidwells Forecast																61	122	130	130	130	130	130	130	130	130	130	130	130	130	130	130	130	130	87																			19	124	2,350	313
SS/7	Bourn Airfield	3,500	SCDC Forecast																25	100	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	75													25	140	3,500	275
		3,500	S/3440/18/OL	Countryside Properties	10/09/2018	-	-																																																	0	-	-	-
		3,500	Bidwells Forecast																35	69	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	129	129	69	45																22	159	3,500	293
Grand Totals		6,262	Councils' Forecast							88	123	239	201	96	81	84	39		50	230	300	300	300	300	300	300	300	300	300	300	300	300	300	300	245	150	150	150	150	150	150	150	75													33	206	6,801	619
		3,618	Bidwells Forecast							88	123	239	201	96	81	84	38		96	191	319	319	319	319	319	319	319	319	319	319	319	319	319	319	319	319	216	129	69	45																30	227	6,800	644
Grand Totals (Cumulative)			Councils' Forecast (graded fill)					54	51	284	546	699	455	738	1,236	1,044	581	716	995	1,469	1,646	1,713	1,635	1,575	1,545	1,310	1,250	1,250	1,032	844	800	800	800	800	745	650	650	650	650	650	650	650	575	500	500	500	500	500	500	500	500	500	500	500	335	48	783	37,573	5,407
			Bidwells Forecast (graded fill)					54	51	284	546	699	455	738	1,236	1,044	550	610	805	967	1,229	1,389	1,466	1,556	1,574	1,557	1,507	1,407	1,343	1,285	1,255	1,195	1,108	1,043	989	919	816	729	669	645	600	600	600	572	570	540	480	450	420	330	270	210	150	60		47	799	37,572	4,161
Analysis			Difference (No.)					0	0	0	0	0	0	0	0	0	-31	-106	-190	-502	-417	-324	-169	-19	29	247	257	157	311	441	455	395	308	243	244	269	166	79	19	-5	-50	-50	25	72	70	40	-20	-50	-80	-170	-230	-290	-350	-440	-335	-	-	-	-
			Difference (%)					0	0	0	0	0	0	0	0	0	6	17	24	52	34	23	12	1	-2	-16	-17	-11	-23	-34	-36	-33	-28	-23	-25	-29	-20	-11	-3	1	8	8	-4	-13	-12	-7	4	11	19	52	85	138	233	733	-	-	-	-	-