East Cambridgeshire Five Year Land Supply Report

1 April 2017 to 31 March 2022

Published 9 October 2017
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1. **Introduction**

1.1. The National Planning Policy Framework (NPPF)\(^1\) requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements.

1.2. This report sets out the five year land supply for East Cambridgeshire for the period 01 April 2017 to 31 March 2022. It has been prepared following the resolution of the Council (5 October 2017) to proceed to publication of the Proposed Submission (‘Publication Draft’) Local Plan (scheduled for publication and subsequent consultation in early November 2017).

**Document Structure**

1.3. Section 2 of the report sets out basic assumptions and the preferred methodological approach used to calculate the Five Year Requirement.

1.4. Section 3 estimates the supply of dwellings over the next five years.

1.5. Section 4 calculates the five year supply using the Council’s preferred methodological approach.

1.6. Section 5 provides an alternative land supply calculation using a different approach (the Sedgefield Method),

1.7. Section 6 provides conclusions, summarising the reports main findings.

1.8. Appendix 1 provides a trajectory of sites and their predicted delivery rates to 2036.

1.9. Appendix 2 includes an assessment of historic windfall delivery rates and projected community-led development.

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\(^1\) NPPF Paragraph 47

2. **Assumptions and Methodological Approach**

**Five Year Period**

2.1. The sites’ information presented in this report is predominantly based on monitoring data as at 31 March 2017, provided by Cambridgeshire County Council. The County Council’s reporting year runs from 01 April to 31 March. Data in this report is therefore considered accurate at 01 April 2017.

2.2. In addition, the report includes sites proposed for allocation in the emerging Local Plan. The Proposed Submission Local Plan was approved for publication, consultation and subsequent submission to the Secretary of State by East Cambridgeshire District Council on 05 October 2017.

2.3. Previous versions of the Council’s Five Year Land Supply Report did not include the current reporting year within the five year calculation. This approach sought to ensure that each report projected a full five year period (i.e. five years from the commencement of the next reporting year). However, recent Inspector decisions nationwide suggest that the current year should be included within the five year calculation.

2.4. Consequently, for this Five Year Land Supply report, the five year period commenced on 01 April 2017 and covers the period to 31 March 2022.

**Status of Current Local Plan**

2.5. The National Planning Practice Guidance (NPPG) advises that housing figures in up-to-date Local Plans should be used as the starting point for identifying the five year requirement. However, for housing supply purposes, the adopted East Cambridgeshire Local Plan (2015) is considered outdated and a revised Local Plan is in the latter stages of preparation (but has not been tested by examination). The NPPG states ‘where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered’.

**Housing Need**

*Objectively Assessed Housing Need*

2.6. East Cambridgeshire is currently preparing a new Local Plan which, once adopted, will replace the Local Plan 2015. To inform the preparation of the new Local Plan, the Council commissioned a review of its ‘objectively assessed housing need’ (OAN). This was initially produced in 2015. However in July 2016, Government issued revised household forecast data, meaning a further local update was required. This additional 2016 local update was prepared and published alongside the Further Draft Local Plan in January 2017.

2.7. The OAN, as set out in the 2016 local update, was 12,900 new homes between 2014 and 2036 (or 586 dwellings per annum).

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Local Housing Need

2.8. In September 2017, Government published a consultation document entitled “Planning for the right homes in the right places”\(^3\), which seeks to shift away from local based methods of calculating housing need and instead apply a national standard method to calculate the 'local housing need'.

2.9. The effect of the new method, assuming it is confirmed by government, is to increase the East Cambridgeshire housing need to 598pa, but also bring forward the start date of the calculation (and, therefore, for housing purposes, the emerging Local Plan) to 2016. The overall effect therefore is a baseline housing target for the 2016 to 2036 period of 11,960.

2.10. To ensure the plan reflects the most up-to-date approach and meets the housing need in full, the Proposed Submission Local Plan has opted to apply the slightly higher Local Housing Need figure, and not the locally calculated OAN figure, albeit the difference between the two is very slight (+12 dwellings pa, or 2% uplift).

Memorandum of Cooperation

2.11. In 2013 the Cambridgeshire authorities, plus Peterborough City Council, signed a Memorandum of Cooperation (MoC) to support a coherent and comprehensive growth strategy across Cambridgeshire and Peterborough between 2011 and 2031. This included the agreement that Peterborough would accommodate 2,500 of the housing need arising in the Cambridgeshire Housing Market Area (which includes areas close to Peterborough, such as Yaxley and Whittlesey).

2.12. As part of that redistribution, East Cambridgeshire (by 1,500) and Fenland (by 1,000) had their housing targets reduced from the originally identified need figure. This collaborative approach was undertaken as part of the requirements of the duty to cooperate as set out in the Localism Act 2011, and was endorsed by a Planning Inspector in April 2014 (for Fenland) and March 2015 (for East Cambridgeshire). For example, the Inspector for the East Cambridgeshire Local Plan stated in his Inspector’s Report (March 2015, para 28) that, following consideration of all the issues, the approach outlined above “does not therefore appear either unreasonable or inconsistent with the overall policy thrust of the [National Planning Policy] Framework”.

2.13. East Cambridgeshire District Council continues to support the MoC and is proposing to maintain this approach for the new Local Plan.

2.14. The MoC has the effect of reducing the overall dwelling requirement for East Cambridgeshire by 1,500 dwellings between 2011 and 2031, or 75 dwellings per annum. However, to reflect the passage of time since the MoC was agreed, it is necessary to revise this redistribution.

2.15. The base date for the LHN calculation is 2016, meaning five years have elapsed since the agreed period of the MoC. Consequently the number of dwellings to be redistributed should be reduced by 375 dwellings (75 dwellings per annum x 5 years) i.e. a 25% reduction. The remaining total to be redistributed is therefore 1,125 dwellings. For the avoidance of doubt, the number of dwellings per annum transferred (75pa) has not been altered.

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**Overall Housing Requirement**

2.16. As the LHN calculation forms the basis of the Proposed Submission Local Plan’s dwelling requirement, it is considered that the LHN provides the most appropriate basis for the Five Year Land Supply calculations. The fact that it is almost identical to the local based calculation of OAN gives considerable confidence that the number being used (the LHN) is suitable. The total housing requirement is calculated as follows:

**Scenario 1 (The Council’s Position): Dwelling requirement calculation**

*Local Housing Need 2016-36: 11,960 dwellings*

*Minus (-)*

*Redistribution (75pa) within Cambridgeshire Housing Market Area 2016-31: 1,125 dwellings*

*Equals (=)*

*Dwelling requirement 2016-36: 10,835 dwellings*

2.17. Based on the LHN, adjusted to reflect the MoC, the total housing requirement between 2016 and 2036 is 10,835 dwellings. The Council believes this to be the most appropriate figure and has included it in its Local Plan, and will robustly defend it at examination.

2.18. However, to assist any future decision maker, this report includes separate Five Year Land Supply calculations using both the Local Housing Need (LHN) and Objectively Assessed Need (OAN) figures. Similarly, the OAN figure is adjusted to reflect the MoC.

**Scenario 2 (Alternative Calculation): Dwelling requirement calculation**

*Objectively Assessed Housing Need 2014-36: 12,900 dwellings*

*Minus (-)*

*Redistribution (75pa) within Cambridgeshire Housing Market Area 2014-31: 1,275 dwellings*

*Equals (=)*

*Dwelling requirement 2014-36: 11,625 dwellings*

2.19. Based on the OAN scenario, adjusted to reflect the MoC, the total housing requirement for the period 2014 to 2036 would be 11,625 dwellings.

2.20. Table 1 illustrates the effects of the different approaches to 2036. It should be noted that the end date of the MoC is 2031, whereas the proposed plan period for the emerging Local Plan ceases in 2036. As such, no redistribution is included for the period 2031 to 2036, meaning the annual dwelling requirement rises in the latter part of the plan period.
<table>
<thead>
<tr>
<th>Year</th>
<th>Scenario 1</th>
<th>Scenario 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>MoC</td>
<td>LHN dpa</td>
</tr>
<tr>
<td>2011/12</td>
<td>-75</td>
<td></td>
</tr>
<tr>
<td>2012/13</td>
<td>-75</td>
<td></td>
</tr>
<tr>
<td>2013/14</td>
<td>-75</td>
<td></td>
</tr>
<tr>
<td>2014/15</td>
<td>-75</td>
<td>598</td>
</tr>
<tr>
<td>2015/16</td>
<td>-75</td>
<td></td>
</tr>
<tr>
<td>2016/17</td>
<td>-75</td>
<td>598</td>
</tr>
<tr>
<td>2017/18</td>
<td>-75</td>
<td>598</td>
</tr>
<tr>
<td>2018/19</td>
<td>-75</td>
<td>598</td>
</tr>
<tr>
<td>2019/20</td>
<td>-75</td>
<td>598</td>
</tr>
<tr>
<td>2020/21</td>
<td>-75</td>
<td>598</td>
</tr>
<tr>
<td>2021/22</td>
<td>-75</td>
<td>598</td>
</tr>
<tr>
<td>2022/23</td>
<td>-75</td>
<td>598</td>
</tr>
<tr>
<td>2023/24</td>
<td>-75</td>
<td>598</td>
</tr>
<tr>
<td>2024/25</td>
<td>-75</td>
<td>598</td>
</tr>
<tr>
<td>2025/26</td>
<td>-75</td>
<td>598</td>
</tr>
<tr>
<td>2026/27</td>
<td>-75</td>
<td>598</td>
</tr>
<tr>
<td>2027/28</td>
<td>-75</td>
<td>598</td>
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<tr>
<td>2029/30</td>
<td>-75</td>
<td>598</td>
</tr>
<tr>
<td>2030/31</td>
<td>-75</td>
<td>598</td>
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<tr>
<td>2031/32</td>
<td>0</td>
<td>598</td>
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<td>598</td>
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<tr>
<td>2033/34</td>
<td>0</td>
<td>598</td>
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<tr>
<td>2034/35</td>
<td>0</td>
<td>598</td>
</tr>
<tr>
<td>2035/36</td>
<td>0</td>
<td>598</td>
</tr>
<tr>
<td>Totals</td>
<td>1,500</td>
<td>11,960</td>
</tr>
</tbody>
</table>
Basic Five Year Requirement

2.21. The ‘basic’ five year requirement is the number of dwellings required over the five year period before buffer, shortfall or other factors are added.

2.22. Table 2 calculates the basic five year requirement for the period 2017 to 2022, using the annual housing requirement data set out in Table 1.

Table 2: Basic Five Year Requirement

<table>
<thead>
<tr>
<th>Dwellings requirement (source)</th>
<th>Year 1 2017/18</th>
<th>Year 2 2018/19</th>
<th>Year 3 2019/20</th>
<th>Year 4 2020/21</th>
<th>Year 5 2021/22</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scenario 1: LHN adj. MoC</td>
<td>523</td>
<td>523</td>
<td>523</td>
<td>523</td>
<td>523</td>
<td>2,615</td>
</tr>
<tr>
<td>Scenario 2: OAN adj. MoC</td>
<td>511</td>
<td>511</td>
<td>511</td>
<td>511</td>
<td>511</td>
<td>2,557</td>
</tr>
</tbody>
</table>

2.23. In scenario 1 (LHN adjusted in accordance with the MoC), the basic five year requirement is 2,615 dwellings. In scenario 2 (OAN adjusted in accordance with the MoC) the basic five year requirement would be slightly less, at, 2,557 dwellings.

Buffer

2.24. Once the five year requirement has been calculated, the NPPF requires local authorities to identify a 5% buffer to ensure choice and competition in the market. Where there has been a record of persistent under-delivery of housing, this buffer should be increased to 20%. It is made clear in the NPPF that this additional requirement is moved from further in the plan period and is not an increase in the overall requirement for housing.

2.25. To identify whether persistent under-delivery has occurred, it is necessary to review annual housing completions against the relevant housing requirement for each year.

2.26. Over recent history, there has been a number of strategic development plans each setting out the housing requirement for the district:

- The East Cambridgeshire Local Plan, adopted 2015, included an annual housing requirement of 575 units per annum. It is the current adopted plan for the district and, on adoption, replaced the Core Strategy.
- The Core Strategy Development Plan Document (CS) was adopted in October 2009. It required 5,688 units between 2009 and 2025 (or 355.5 units per annum)
- The East of England Regional Spatial Strategy (RSS) was adopted in May 2008. It required that 5,360 units be built between 2006 and 2021 (or 357.3 units per annum).

2.27. Table 3 sets out housing completions over the 10 year period from 2007 to 2017. This is believed to be an appropriate and reasonable time period for assessing housing delivery, and whether or
not ‘persistent under-delivery’ has occurred. The table also provides the relevant annual housing requirement and calculates surplus / deficit in housing delivery.

### Table 3: Annual delivery and housing requirement

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Year</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total housing completions</td>
<td>755</td>
<td>467</td>
<td>204</td>
<td>368</td>
<td>369</td>
<td>287</td>
<td>191</td>
<td>162</td>
<td>181</td>
<td>232</td>
<td>3,216</td>
</tr>
<tr>
<td>Annual housing requirement</td>
<td>357.3</td>
<td>357.3</td>
<td>355.5</td>
<td>355.5</td>
<td>355.5</td>
<td>355.5</td>
<td>355.5</td>
<td>575</td>
<td>575</td>
<td>575</td>
<td>3,998</td>
</tr>
<tr>
<td>Annual surplus / deficit against annual target</td>
<td>398</td>
<td>110</td>
<td>-152</td>
<td>13</td>
<td>14</td>
<td>-69</td>
<td>-165</td>
<td>-194</td>
<td>-394</td>
<td>-343</td>
<td>-782</td>
</tr>
</tbody>
</table>

Historic completions data provided by Cambs County Council (Sept 2017)

East of England Regional Spatial Strategy (RSS) adopted in May 2008. Requires 5,360 units be built between 2006 and 2021 (or 357.3 units per annum)

Core Strategy Development Plan Document (CS) adopted in October 2009. Requires 5,688 units between 2009 and 2025 (or 355.5 units per annum)

Local Plan (LP15) adopted in May 2015. Requires 11,500 units between 2011 and 2031 (or 575 units per annum)

2.28. Over the 10 year period there was a shortfall of 782 units against the housing requirement (equivalent to 24.32% of the housing requirement over the ten year period). In four of the ten years, the annual housing requirement was exceeded. However, the annual housing requirement was not achieved in six of ten years - five of which were the five most recent years (2012 – 2017).

2.29. Whilst national guidance is unclear on the matter, and on a precautionary basis, the Council is assuming that a decision maker would deem the district to be “persistently under-delivered” and therefore a 20% buffer has been applied.

2.30. Guidance from the Planning Advisory Service (PAS) suggests that where persistent under-delivery has occurred, the 20% buffer should be applied to both the housing requirement and dwelling shortfall. Whilst there appears no logical reasoning to take such a position, the Council again, on a precautionary basis, has applied the 20% buffer to the backlog.
Dwelling shortfall

2.31. In calculating the five year requirement, completions since the housing requirement ‘base date’, along with any under or over-supply during that period, must also be taken into account. Table 4 calculates dwelling shortfall in the context of both LHN and OAN. It should be noted that in Scenario 1 the base date is 2016 and therefore 1 year has elapsed; the base date of Scenario 2 is 2014, therefore 3 years have elapsed.

Table 4: Dwelling Shortfall by Housing Requirement Scenario

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Target delivery rate</td>
<td>523</td>
<td>1,534</td>
<td>Annual dwelling requirement x No. of years since base date</td>
</tr>
<tr>
<td>from base date to 31</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>March 2017</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Completions since base</td>
<td>232</td>
<td>575</td>
<td>See Table 3</td>
</tr>
<tr>
<td>date</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Difference (Shortfall)</td>
<td>-291</td>
<td>-959</td>
<td>Completions - Target delivery</td>
</tr>
</tbody>
</table>

2.32. In recent years housing delivery rates have been relatively low and below target, resulting in a dwelling shortfall for both scenarios (LHN and OAN). The greater length of time that has elapsed since the OAN base date results in a comparatively high shortfall.

2.33. The NPPG states that ‘Local planning authorities should aim to deal with any undersupply within the first five years of the plan period where possible’. This means that if possible the shortfall of 291 or 959 dwellings should be added to the basic five year requirement, rather than distributing the undersupply over the remaining plan period.

2.34. However, as stated in the proposed Submission Local Plan, the Council’s preferred approach in dealing with dwelling shortfall over the plan period is the ‘Liverpool method’. This is principally due to recent poor housing completion rates, and the plan’s reliance on strategic scale sites which typically take longer to come on stream. The Liverpool method addresses dwelling shortfall over the full extent of the plan period, rather than in the Five Year period (the ‘Sedgefield method’), and is considered the most realistic option for East Cambridgeshire.

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4 Paragraph: 035 Reference ID: 3-035-20140306
Summary of assumptions and approach

2.35. In summary, the following assumptions will be applied in calculating the Five Year Land Supply Requirement:

- The housing requirement is determined by DCLG’s Local Housing Need calculation (Scenario 1);
- An alternative OAN scenario (Scenario 2) is also presented, for information and to assist any future decision maker;
- The MoC to redistribute a portion of the dwelling requirement within the Cambridgeshire Housing Market Area is maintained at 75 dpa;
- A 20% buffer will be applied to the housing requirement and dwelling shortfall (‘buffer to backlog’) due to persistent under-delivery in recent years; and
- Dwelling shortfall will be addressed using the Liverpool method, due to poor delivery rates and reliance on strategic sites.
3. **Dwelling Supply**

3.1. For a site to be considered deliverable the NPPF requires that the site ‘should be available now, with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable’. 5

3.2. Deliverable sites can include:

- Sites under construction;
- Sites with full planning permission, but development has not started;
- Sites where there is a resolution to grant planning permission;
- Sites with outline planning permission;
- Sites allocated in an adopted Local Plan; and
- Sites in an emerging Local Plan.

3.3. The emerging East Cambridgeshire Local Plan includes proposed residential site allocations. The NPPG states that ‘If there are no significant constraints to overcome, such as infrastructure, sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe’.

3.4. Appendix 1 provides a trajectory setting out all deliverable sites and their expected delivery rates. Where a site has extant planning permission, the dwelling figure is that for which permission was granted. Where a site is under construction, the outstanding dwelling figure shown is the remaining number still to be completed (at 1 April 2017) in accordance with the permission.

3.5. For existing allocations without planning permission the figure represents ‘indicative dwelling capacity’. Each Local Plan 2015 site allocation has been re-assessed to inform the emerging Local Plan. Where such sites are carried forward into the Proposed Submission Local Plan, indicative dwelling capacity reflects current estimates for the site. Similarly, capacity of new site allocations (as set out in the Proposed Submission Local Plan) uses indicative figures informed by site assessment, unless otherwise stated. Where the Proposed Submission Local Plan indicates a range of values for a site, the minimum value has been applied. This is a very conservative approach, and such sites will likely deliver more homes than the ‘minimum’ value in the range. If anyone attempts to challenge the indicative values used for any site as being too optimistic (too high) for any particular site, then the Council will not only defend such indicative figures but will seek at the same time to reconsider the sites where a ‘minimum’ figure has been applied, and seek instead a mid-point in the range to be applied. The Council will not allow ad hoc indicative figures to be challenged unless all figures (including sites using minimum figures) are similarly challenged.

3.6. The Council’s previous Five Year Land Supply Report (January 17) assumed that all dwellings which were under construction at the base date would be completed within one year. Sites which were not started at the base date were estimated to deliver completions within two years (but not within one year). This approach resulted in a significant under-estimate of the total completions in

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5 Footnote 11 of the NPPF page 12
the current reporting year. To improve accuracy, the Council has reviewed commencement of sites from 01 April to 31 August 2017. It is assumed that sites which commenced development by summer 2017, as indicated by evidence of CIL demand notices issued, will also deliver completions before the end of the current reporting year (i.e. by 31 March 2018).

3.7. In Spring 2016, the Council held a Call for Sites exercise to inform the preparation of the emerging Local Plan. This exercise provided a ‘pool’ of available sites from which the Council eventually selected its preferred site allocations, as set out in the Proposed Submission Local Plan. As part of the Call for Sites exercise, respondents (typically developers, landowners and agents) were requested to provide information on the timescale and rate at which their site would likely deliver new dwellings. This information has informed delivery rates set out in the housing trajectory.

Windfall & Community Land Trust Development

3.8. The NPPF states that ‘local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that sites have consistently become available’.\(^6\) This evidence is explained in Appendix 2, which demonstrates that small windfall sites of fewer than 10 dwellings can reasonably be included in the calculation of the five year supply. By their nature, the precise location of these sites is not known, and the additional windfall allowance figure (850 units, or 50 units per annum) will be included in calculating the Five Year Land Supply (see section 4).

3.9. The Council and Local Plan are particularly encouraging of ‘Community Land Trust’ (CLT) development and expects such developments to play an important contribution to delivering dwellings over the plan period. The Proposed Submission Local Plan allocates a number of sites to specifically enable CLT developments to take place.

3.10. Appendix 2 discusses the role of CLT development on unallocated sites, as an additional form of windfall. The CLT pipeline in Appendix 2 indicates such CLT ‘windfall’ to be delivered in the five year period. However in calculating five year land supply, a particularly conservative approach has been taken, and no allowance for CLT development has been made within the five year period. In all likelihood, CLT development on unallocated sites will take place in the five year period, and is expected to deliver at least 210 dwellings over the remaining plan period.

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\(^6\) NPPF Paragraph 48
Summary of Deliverable and Available Sites

3.11. Table 5 provides a trajectory of deliverable housing sites available over the five year period. The information presented about sites with planning permission is correct at 01 April 2017. In addition, the trajectory includes sites identified for allocation in the Proposed Submission Local Plan. Full details of available and deliverable sites are set out in Appendix 1. Assumptions about future windfall and CLT development is discussed in Appendix 2.

Table 5: Five year trajectory of deliverable and available sites

<table>
<thead>
<tr>
<th>Site type</th>
<th>2017/18</th>
<th>2018/19</th>
<th>2019/20</th>
<th>2020/21</th>
<th>2021/22</th>
<th>Total</th>
<th>Percent of 5Yr Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>i.) Small sites with planning permission (&lt;10 dwellings)</td>
<td>173</td>
<td>277</td>
<td>160</td>
<td>0</td>
<td>0</td>
<td>610</td>
<td>13.4%</td>
</tr>
<tr>
<td>ii.) Large sites with planning permission (10+ dwellings)</td>
<td>251</td>
<td>282</td>
<td>325</td>
<td>294</td>
<td>222</td>
<td>1,374</td>
<td>30.2%</td>
</tr>
<tr>
<td>iii.) Site with planning permission granted after April 17; or has resolution to grant planning permission</td>
<td>0</td>
<td>86</td>
<td>136</td>
<td>127</td>
<td>89</td>
<td>438</td>
<td>9.6%</td>
</tr>
<tr>
<td>iv.) Existing Local Plan 2015 allocations carried forward to PSLP</td>
<td>0</td>
<td>0</td>
<td>84</td>
<td>285</td>
<td>400</td>
<td>769</td>
<td>16.9%</td>
</tr>
<tr>
<td>v.) New sites identified by PSLP (without planning permission)</td>
<td>0</td>
<td>0</td>
<td>230</td>
<td>497</td>
<td>476</td>
<td>1,203</td>
<td>26.5%</td>
</tr>
<tr>
<td>vi.) Windfall</td>
<td>0</td>
<td>0</td>
<td>50</td>
<td>50</td>
<td>50</td>
<td>150</td>
<td>3.3%</td>
</tr>
<tr>
<td>vii.) Future CLT development</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Total</td>
<td>424</td>
<td>645</td>
<td>985</td>
<td>1,253</td>
<td>1,237</td>
<td>4,544</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

3.12. As calculated in Table 5, East Cambridgeshire has a supply of sites which are available now, with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable to deliver 4,544 dwellings in total over the five year period from a combination of: sites with extant planning permission, sites identified by the Proposed Submission Local Plan (see Appendix 1), and windfall development (see Appendix 2).

3.13. A number of sites identified by the Proposed Submission Local Plan have been granted planning permission since 01 April 2017 or have a resolution to grant planning permission (for example, subject to signing a s106 agreement) (row iii.), and as such can realistically be expected to deliver new dwellings within the five year period.

3.14. Existing Local Plan 2015 allocations have been reassessed though the Proposed Submission Local Plan process and those which remain suitable and deliverable will be retained by the new Local Plan (row iv.). In addition, the PSLP identifies a number of new site allocations (row v.)
3.15. Many of those sites which do not have planning permission (i.e. existing Local Plan 2015 allocations and new PSLP sites – see rows iii. & iv.) currently have a valid planning application pending determination. Whilst this report does not attempt to pre-empt the outcome of the decision-making process, it is reasonable to assume that a valid application suggests the landowner’s intent to develop the site in the near future. Sites without extant permission, but with an application pending determination, account (at the time of writing) for 50.1% of the projected delivery from sites without permission in the five year period.
4. **Five Year Land Supply Calculation**

4.1. This section sets out the Five Year Housing Land Supply calculation for East Cambridgeshire. Table 6 calculates the five year requirement using the assumptions and methodological approach set out in section 2. The supply of dwellings is compared with the dwelling supply identified in Section 3 to calculate the district’s land supply, in years. All figures in Table 6 represent total dwellings (rounded to the nearest whole number), except row ‘o’, where the unit is ‘number of years’.

4.2. Table 6 shows that East Cambridgeshire has an estimated supply of deliverable and available sites, of 4,544 dwellings over the five year period which exceeds the five year requirement in both housing need scenarios.

4.3. Scenario 1 represents what the Council believes to be the most appropriate method, based on the government’s proposed standard approach for calculating Local Housing Need and is aligned with the Proposed Submission Local Plan. In Scenario 1, dwelling supply in the five year period exceeds the requirement, providing a dwelling surplus of 1,271 dwellings. This is equivalent to 6.94 years supply of housing land.

4.4. The alternative Scenario 2 is also presented for information (based on the now outdated OAN method), and in this scenario the dwelling supply exceeds the requirement and provides a surplus of 1,032 dwellings. This is equivalent to 6.47 years supply of housing land.
Table 6: Five Year Land Supply Calculation

<table>
<thead>
<tr>
<th>Basic requirement Five Year Requirement 2017 - 2022</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Scenario 1:</strong> LHN adj. for MoC 2016 - 36</td>
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<p>| | | |</p>
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<tr>
<th></th>
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<tbody>
<tr>
<td><strong>a</strong></td>
<td>Total housing requirement</td>
<td>10,835</td>
</tr>
<tr>
<td><strong>b</strong></td>
<td>Five year requirement</td>
<td>2,615</td>
</tr>
<tr>
<td><strong>c</strong></td>
<td>Annual requirement</td>
<td>523</td>
</tr>
</tbody>
</table>

**Dwelling supply since base date**

<p>| | | |</p>
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<thead>
<tr>
<th></th>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td><strong>d</strong></td>
<td>Net completions since base date</td>
<td>232</td>
</tr>
<tr>
<td><strong>e</strong></td>
<td>Target delivery rate since base date</td>
<td>523</td>
</tr>
<tr>
<td><strong>f</strong></td>
<td>Shortfall</td>
<td>291</td>
</tr>
<tr>
<td><strong>g</strong></td>
<td>Additional annual requirement to meet shortfall (<em>Liverpool method</em>)</td>
<td>15</td>
</tr>
<tr>
<td><strong>h</strong></td>
<td>Additional requirement to meet annualised shortfall in five year period</td>
<td>77</td>
</tr>
<tr>
<td><strong>i</strong></td>
<td>Updated basic five year requirement to include annualised shortfall (dwellings)</td>
<td>2,692</td>
</tr>
</tbody>
</table>

**20% buffer**

<p>| | | |</p>
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</thead>
<tbody>
<tr>
<td><strong>j</strong></td>
<td>Twenty percent buffer</td>
<td>523</td>
</tr>
<tr>
<td><strong>k</strong></td>
<td>Twenty percent buffer to shortfall</td>
<td>58</td>
</tr>
<tr>
<td><strong>l</strong></td>
<td>Total five year requirement inc. shortfall and buffer to requirement &amp; shortfall</td>
<td>3,273</td>
</tr>
<tr>
<td><strong>m</strong></td>
<td>Average per year</td>
<td>655</td>
</tr>
</tbody>
</table>

**Estimated five year supply 2017 to 2022**

<p>| | | |</p>
<table>
<thead>
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<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>n</strong></td>
<td>Estimate of five year land supply</td>
<td>4,544</td>
</tr>
<tr>
<td><strong>o</strong></td>
<td>Total supply in five year period (no. of years)</td>
<td>6.94</td>
</tr>
<tr>
<td><strong>p</strong></td>
<td>Dwelling surplus</td>
<td>1,271</td>
</tr>
</tbody>
</table>
5. Further Alternative Calculations

5.1. Section 2 discusses the reasons why the Council’s believes the Liverpool method for dealing with dwelling shortfall is justified and appropriate in the context of East Cambridgeshire.

5.2. However as discussed in section 2, national policy suggests that shortfall should be addressed in the first five years where possible. This approach, often referred to as the Sedgefield Method, is set out in Table 7 as an alternative Five Year Supply calculation.

5.3. Based on the Sedgefield approach, dwelling supply exceeds the five year requirement in both Scenarios 1 and 2. Scenario 1 provides 6.52 years of housing land supply, which offers dwelling surplus of 1,057 dwellings. Scenario 2 offers 5.39 years of housing land supply, which offers a dwelling surplus of 325 dwellings.

5.4. Table 7 therefore demonstrates that the supply of housing land is maintained when shortfall is addressed in the first five years. However, as can be seen, whilst the Council is able to demonstrate deliverable sites to meet even the scenario 2 + Sedgefield method, such a method requires the market to deliver 844 homes per annum, each year, for the next five years. This would require a 440% increase in delivery, for each of the next five years, compared with the average of the past three years, which is a completely unrealistic prospect. Hence further reinforcing why the Liverpool method can be the only sensible and realistic method to apply.
Table 7: Alternative Five Year Supply Calculation

<table>
<thead>
<tr>
<th>Basic requirement Five Year Requirement 2017 – 2022</th>
<th>Scenario 1: LHN adj. for MoC 2016 - 36</th>
<th>Scenario 2: OAN adj. for MoC 2014 - 36</th>
<th>LHN and OAN adjusted to reflect redistribution to Cambs Housing Market Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>a Total housing requirement</td>
<td>10,835</td>
<td>11,625</td>
<td>See Table 1</td>
</tr>
<tr>
<td>b Five year requirement</td>
<td>2,615</td>
<td>2,557</td>
<td>See Table 2</td>
</tr>
<tr>
<td>c Annual requirement</td>
<td>523</td>
<td>511</td>
<td>b / 5</td>
</tr>
</tbody>
</table>

Dwelling supply since base date

| d Net completions since base date                  | 232                                    | 575                                    | See Table 3                                                          |
| e Target delivery rate since base date             | 523                                    | 1,534                                  | b x no. of years elapsed since base date (see Table 4)               |
| f Shortfall                                        | 291                                    | 959                                    | e - d                                                                |
| g Updated five year requirement to include shortfall| 2,906                                  | 3,516                                  | b + f                                                                |

20% buffer

| h Twenty percent buffer                            | 523                                    | 511                                    | b x 20%                                                              |
| i Twenty percent buffer to shortfall               | 58                                     | 192                                    | f x 20%                                                              |
| j Total five year requirement inc. shortfall and buffer to requirement & shortfall | 3,487                                  | 4,219                                  | g + h + i                                                            |
| k Average per year                                 | 697                                    | 844                                    | j / 5                                                               |

Estimated five year supply 2017 to 2022

| l Estimate of five year land supply                | 4,544                                  | see Table 5                            |
| m Total supply in five year period (no. of years)  | 6.52                                   | 5.39                                   | I / k                                                               |
| n Dwelling surplus                                 | 1,057                                  | 325                                    | I - j                                                               |
6. Conclusions

6.1. Overall the Council believes the following methodological principles apply in East Cambridgeshire:

- Local Housing Need providing source of dwelling requirement;
- Liverpool Method of dealing with shortfall;
- Twenty percent buffer to housing requirement and shortfall;
- Prudent but conservative windfall development allowance;
- A cautious, if perhaps unrealistic assumption, of no allowance for windfall CLT development coming forward;
- Realistic and cautious approach to delivery rates;
- Conservative approach to dwellings delivered on sites where a ‘range’ applies.

6.2. This report, and the data used, has, overall, taken a precautionary approach to calculating the five year land supply. It has applied the higher LHN method for calculating base housing requirement; allowed a 20% buffer to housing requirement and dwelling shortfall; used a conservative windfall allowance; and has been conservative in start dates for completions (most often delayed start dates compared with what even the landowner/agent themselves have suggested for their site), as well as taking a modest view as to the trajectory of delivery. Despite this conservative approach, it is demonstrated that a five year land supply exists.

6.3. In addressing dwelling shortfall, the report has applied the ‘Liverpool’ method, which spreads the dwelling shortfall over the remainder of the plan period. Some recent Inspector decisions consider the ‘Liverpool’ method to be a more appropriate method in terms of dealing with dwelling shortfall, especially in scenarios where a significant amount of the overall plan supply relies (to a reasonable degree) on large site delivery, and where the Sedgefield method would result in an unrealistic rate of delivery to be expected (which in East Cambridgeshire case, would be a 440% increase in delivery, a clearly unrealistic scenario, and an annual rate in excess of what has ever been achieved in the district, even for a single year).

6.4. The Proposed Submission Local Plan takes a positive approach to meeting the housing requirement. The plan enables housing development at proposed allocation sites and within Development Envelopes (and certain forms of housing development, including Community Land Trust development, outside Development Envelopes). The plan has sought to provide a wide range of sites, in a wide range of locations, with capacity ranging from 10 houses to 3,000 houses, thereby providing choice and competition for small, medium, large and major/strategic sites.

6.5. Strategic development sites of 500 or more dwellings will provide a major contribution to meeting the district’s housing requirement. Strategic sites, namely located at Ely, Kennett, Littleport and Soham are expected to deliver approximately 5,250 dwellings over the plan period. This is equivalent to 48.5% of the housing requirement - or in other words, nearly half of all new homes will be delivered on strategic sites.

6.6. Typically, strategic sites must address a range of complex issues and as such generally take longer to implement than smaller sites. For example, sites of such a scale will require provision of substantial infrastructure, such as improvements to highways and public transport, early years and
primary education facilities, community facilities, and sports and recreation provision. In addition, they may be affected by a range of external factors such as access to finance and availability of materials and labour, etc.

6.7. Reflecting this longer lead-in time, the housing trajectory generally expects completions from strategic sites to be delivered in the medium and long term. As such, whilst strategic sites play a critically important role in meeting the overall housing requirement, they have limited effect on the five year housing requirement.

6.8. The Council therefore believes there is sufficient justification to apply a method which enables the shortfall to be met later in the plan period when strategic sites have come on stream, and when the market has had opportunity to substantially increase its housing delivery rates.

6.9. Dwelling supply over the five year period includes new allocations identified in the emerging Local Plan. These sites have been subject to public consultation and a robust process of site assessment, and are therefore considered to be suitable and deliverable. As such, it is appropriate to include such sites, as justified by national planning practice guidance.

6.10. In conclusion, as demonstrated by Table 6, East Cambridgeshire currently offers 6.94 years supply of available housing land.

**Future Reports and Comments on this Report**

6.11. The Council will, from time to time, update this Report. As such, we welcome any comments on it which will be considered for the next iteration of this report.
Appendix 1: Table 8 - Development Sites Trajectory

| Planning Application Ref | Local Plan Ref | Site Allocation Ref | Parish | Application Type | Target Dwellings (net) | Outline Planning Permission | Not Started Planning Permission | Total Planning Permission | PSLP Prop. Site Ref (w/o PP) | PSLP Prop. Site Ref (w/o PP / LP15 alloc) | Total Outstanding Commitments | Year 2017/18 | Year 2018/19 | Year 2019/20 | Year 2020/21 | Year 2021/22 | Year 2022/23 | Year 2023/24 | Year 2024/25 | Year 2025/26 | Year 2026/27 | Year 2027/28 | Year 2028/29 | Year 2029/30 | Year 2030/31 | Year 2031/32 | Year 2032/33 | Year 2033/34 | Year 2034/35 | Year 2035/36 | Total |
|--------------------------|----------------|---------------------|--------|-----------------|------------------------|-----------------------------|-------------------------------|-------------------------------|-----------------------------|-----------------------------------|---------------------------------|---------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| E0021516                 |                | Ashley              |        | Full Application (Monitoring) | 1                      | 0                            | 0                             | 1                             | 1                           | 0                                 | 1                                | 1       |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |
| E010416                  |                | Ashley              |        | Full Application (Monitoring) | 2                      | 0                            | 0                             | 2                             | 0                           | 2                                 | 0                                | 2       |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |
| E0025415                 |                | Bottisham           |        | Full Application (Monitoring) | 1                      | 0                            | 0                             | 1                             | 1                           | 0                                 | 1                                | 0       |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |
| E0086414                 |                | Bottisham           |        | Full application (DC and Monitoring) | 2                      | 0                            | 2                             | 0                             | 2                           | 0                                 | 2                                | 2       |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |
| E00416                   |                | Bottisham           |        | Full Application (Monitoring) | 1                      | 0                            | 0                             | 1                             | 1                           | 0                                 | 1                                | 0       |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |
| E005416                 |                | Bottisham           |        | Full Application (Monitoring) | 1                      | 0                            | 0                             | 1                             | 1                           | 0                                 | 1                                | 0       |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |
| E01416                  |                | Bottisham           |        | Full Application (Monitoring) | 9                      | 0                            | 9                             | 9                             | 9                           | 9                                 | 9                                | 9       |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |
| BOT11                   |                | Bottisham           |        | Housing Allocation | 50                      | 0                            | 0                             | 0                             | 0                           | 50                                | 50                               | 0       | 0           | 0           | 0           | 0           | 20          | 30          |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |
| E01226                   |                | Brinkley            |        | Prior Notification (Monitoring) | 1                      | 0                            | 0                             | 1                             | 1                           | 0                                 | 1                                | 0       |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |             |

CIL data indicates site commenced in 07.17, assume complete in Yr1
Site with full PP, assume NS units complete in Yr2
Site with full PP, assume NS units complete in Yr2
Site with full PP, assume NS units complete in Yr2
Site U/C, assume complete in Yr1
Site U/C, assume complete in Yr2
Site U/C, assume complete in Yr1
LP15 allocation carried forward to PSLP, with a planning application currently pending consideration (16/01498/OUT). Site promoter submission (Form B) suggested delivery rate, but rolled back 2 years
Site with full PP, assume NS units complete in Yr2
<table>
<thead>
<tr>
<th>Reference</th>
<th>Borough</th>
<th>Site Location</th>
<th>Type of Application</th>
<th>Status</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>E/01489/16</td>
<td>Burwood</td>
<td>Burrow Green</td>
<td>Outline Application (Monitoring)</td>
<td>11</td>
<td>Site partly with Outline PP (16/01498/OUT), assume complete from Yr2+</td>
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<tr>
<td>E/01297/15</td>
<td>Burwell</td>
<td>Burwell</td>
<td>Reserved Matters (Monitoring)</td>
<td>70</td>
<td>Site U/C, assume complete in Yr1</td>
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<tr>
<td>E/00065/15</td>
<td>Burwell</td>
<td>Burwell</td>
<td>Outline Application (Monitoring)</td>
<td>1</td>
<td>Site with outline PP, assume complete in Yr3</td>
</tr>
<tr>
<td>E/00787/15</td>
<td>Burwell</td>
<td>Burwell</td>
<td>Full Application (Monitoring)</td>
<td>1</td>
<td>Site with Full PP, assume complete in Yr2</td>
</tr>
<tr>
<td>E/00094/16</td>
<td>Burwell</td>
<td>Burwell</td>
<td>Full Application (Monitoring)</td>
<td>1</td>
<td>Site U/C, assume complete in Yr1</td>
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<tr>
<td>E/00272/15</td>
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<td>Full Application (Monitoring)</td>
<td>1</td>
<td>Site U/C, assume complete in Yr1</td>
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<tr>
<td>E/00409/16</td>
<td>Burwell</td>
<td>Burwell</td>
<td>Reserved Matters (Monitoring)</td>
<td>1</td>
<td>Site U/C, assume complete in Yr1</td>
</tr>
<tr>
<td>E/00488/14</td>
<td>Burwell</td>
<td>Burwell</td>
<td>Full application (DC and Monitoring)</td>
<td>1</td>
<td>CIL data indicates site commenced in 06.17, assume complete in Yr1</td>
</tr>
<tr>
<td>E/00004/16</td>
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<td>Burwell</td>
<td>Full Application (Monitoring)</td>
<td>3</td>
<td>Site with Full PP, assume complete in Yr2</td>
</tr>
<tr>
<td>E/00005/15</td>
<td>Burwell</td>
<td>Burwell</td>
<td>Full Application (Monitoring)</td>
<td>1</td>
<td>Site with Full PP, assume complete in Yr2</td>
</tr>
<tr>
<td>E/00293/16</td>
<td>Burwell</td>
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<td>Full Application (Monitoring)</td>
<td>1</td>
<td>Site with Full PP, assume complete in Yr2</td>
</tr>
<tr>
<td>Reference</td>
<td>Location</td>
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<td>Year 3</td>
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<td>E/00533/14</td>
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<td>E/00554/16</td>
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<tr>
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<td>Full Application (Monitoring)</td>
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<tr>
<td>E/00675/15</td>
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<tr>
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<td>1</td>
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<tr>
<td>E/00797/16</td>
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<td>E/01064/15</td>
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<td>E/01186/16</td>
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</tr>
<tr>
<td>E/01251/16</td>
<td>Burwell</td>
<td>Outline Application (Monitoring)</td>
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<table>
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<tr>
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<th>Area</th>
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<th>Code</th>
<th>District</th>
<th>Type</th>
<th>Progression</th>
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<tbody>
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<td>E/0202/14</td>
<td>Burwell</td>
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<td>1</td>
<td>0</td>
<td>1</td>
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<td>E/0671/16</td>
<td>Burwell</td>
<td>Full Application (Monitoring)</td>
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<td>1</td>
</tr>
<tr>
<td>E/0700/16</td>
<td>Burwell</td>
<td>Full Application (Monitoring)</td>
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<td>1</td>
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<tr>
<td>E/0736/16</td>
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<td>1</td>
<td>1</td>
</tr>
<tr>
<td>BUR1</td>
<td>Burwell</td>
<td>Housing Allocation</td>
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<td>0</td>
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<tr>
<td>BUH1</td>
<td>Burwell</td>
<td>Housing Allocation</td>
<td>91</td>
<td>0</td>
<td>0</td>
<td>91</td>
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</tbody>
</table>

<table>
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<th>Year</th>
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<th>Progression</th>
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Reserved matters application for 199 dwellings approved 09.17 (16/01794/RMM). Assume first 199 dwellings complete within five year period, with rest delivered from Yr4+. Letter from Church Commissioners confirms development to commence in 2018.
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<th>Year Allocation</th>
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<td>Ely</td>
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<td>Ely</td>
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<td>Full Application (Monitoring)</td>
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<tr>
<td>PRK1</td>
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<td>Housing Allocation</td>
<td>0 0 0 0 0 0 0 0 0</td>
<td>0 LP2015 allocation, little prospect of delivery</td>
</tr>
<tr>
<td>ELY1</td>
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<td>Mixed Use Allocation (Monitoring)</td>
<td>1,000 0 0 0 0 0 1,000 1,000 0 0 0 0 0 0 0 0 0 0 0 0 50 70 70 70 70 70 75 75 75 75 75 75 75 75 75 1,000</td>
<td>Remainder of North Ely LP15 allocation site (carried forward into PSLP), assume complete after five year period as currently no PP for this part of the site.</td>
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<td>ELY1</td>
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<td>10 0 0 0 0 0 10 10 0 0 0 0 0 0 0 0 0 0 0 0 0 0 10</td>
<td>10 LP2015 allocation, likely to be delivered after 5 year period</td>
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</table>

LP2015 allocation, expected dwelling target revised down by PSLP. Assume outside five year period as regeneration scheme.

PSLP proposed site with PP, assume complete in Y13

Complex for elderly people. Site has PP (15/0538/FUM) and UC in Y1, assume completions from Y2

Site promoter has (publicly) indicated development will commence in 2019. Assume completions from Y4

| E/00088/17 | Fordham | Full Application (Monitoring) | 2 | 0 | 0 | 2 | 2 | 0 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 |
|------------|---------|------------------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| E/00216/15 | Fordham | Full Application (Monitoring) | 2 | 0 | 0 | 2 | 2 | 0 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 |
| E/00468/16 | Fordham | Full Application (Monitoring) | 2 | 0 | 0 | 2 | 2 | 0 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 |
| E/00468/16 | Fordham | Outline Application (Monitoring) | 4 | 4 | 0 | 0 | 4 | 0 | 4 | 0 | 4 | 0 | 4 | 0 | 4 | 0 | 4 | 0 | 4 | 0 |
| E/00589/16 | Fordham | Outline Application (Monitoring) | 2 | 2 | 0 | 0 | 2 | 0 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 |
| E/00590/15 | Fordham | Full Application (Monitoring) | 1 | 0 | 1 | 0 | 1 | 0 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| E/00590/15 | Fordham | Outline Application (Monitoring) | 3 | 3 | 0 | 0 | 3 | 0 | 3 | 0 | 3 | 0 | 3 | 0 | 3 | 0 | 3 | 0 | 3 | 0 |
| E/00590/15 | Fordham | Full Application (Monitoring) | 1 | 0 | 1 | 1 | 0 | 1 | 0 | 1 | 0 | 1 | 0 | 1 | 0 | 1 | 0 | 1 | 0 | 1 |

Site with PP, assume complete in Y2

Site with PP, assume complete in Y2

Site with PP, assume complete in Y2

Site with Outline PP, assume complete in Y3

Site with Outline PP, assume complete in Y3

Site with Outline PP, assume complete in Y3

Site U/C, assume complete in Y11

Site with Outline PP, assume complete in Y3

Site with PP, assume complete in Y2

Site with PP, assume complete in Y2
<table>
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<tr>
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<th>Location</th>
<th>Application Type</th>
<th>Decision</th>
<th>Notes</th>
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<tr>
<td>00950/15</td>
<td>Fordham</td>
<td>Full Application</td>
<td>1</td>
<td>Site with PP, assume complete in Yr2</td>
</tr>
<tr>
<td>00968/15</td>
<td>Fordham</td>
<td>Outline Application</td>
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<td>Site with Outline PP, assume complete in Yr3</td>
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<td>Fordham</td>
<td>Outline Application</td>
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<td>01314/16</td>
<td>Fordham</td>
<td>Outline Application</td>
<td>4</td>
<td>Site with Outline PP, assume complete in Yr3</td>
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<td>01321/16</td>
<td>Fordham</td>
<td>Full Application</td>
<td>8</td>
<td>Site with PP, assume complete in Yr2</td>
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<td>01422/15</td>
<td>Fordham</td>
<td>Outline Application</td>
<td>2</td>
<td>Site with Outline PP, assume complete in Yr3</td>
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<tr>
<td>01436/16</td>
<td>Fordham</td>
<td>Full Application</td>
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<td>Site with PP, assume complete in Yr2</td>
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<td>01450/15</td>
<td>Fordham</td>
<td>Full Application</td>
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<td>Site with PP, assume complete in Yr2</td>
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<td>Reserved Matters</td>
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<td>01594/15</td>
<td>Fordham</td>
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<tr>
<td>01697/16</td>
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<td>Outline Application</td>
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<td>Site with Outline PP, assume complete in Yr3</td>
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<tr>
<td>01697/16</td>
<td>Fordham</td>
<td>Housing Allocation</td>
<td>20</td>
<td>Part of site allocated by LP2015. Based on Form B submission but rolled back 2 year as no current PP</td>
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*Note: The table represents the status of applications for various locations, with decisions ranging from full applications to reserved matters.*
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<th>0</th>
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<td>27</td>
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<td>69</td>
<td>79</td>
<td>0</td>
<td>0</td>
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</table>

Based on Form B submission but rolled back 2 years. Planning App currently pending consideration (17/00221/FUM).

Site granted outline PP in 07.17 (16/01551/FUM). Assume completions from Yr2+.

Based on Form B submission but revised dwelling target down and adjusted delivery rate. Assume Yr 3, as resolution to grant PP subject to signing s106 (16/01662/OUM).

Based on Form B submission but rolled back 2 years and revised dwelling target down. Planning App currently pending consideration (17/00880/OUM).

Site with PP, assume complete in Yr2.

Site U/C, assume complete in Yr1.

Site U/C, assume complete in Yr1.

Site with PP, assume complete in Yr2.

Site with PP, assume complete in Yr2.

Site with PP, assume complete in Yr2.

Site with PP, assume complete in Yr2.
<table>
<thead>
<tr>
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<th>Type</th>
<th>Original Date</th>
<th>Status</th>
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<tbody>
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<td>Haddenham</td>
<td>Outline Application (Monitoring)</td>
<td>4 4 0 0 4 0 4 0</td>
<td>4 Site with Outline PP, assume complete in Yr3</td>
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<tr>
<td>E/00863/16</td>
<td>Haddenham</td>
<td>Full Application (Monitoring)</td>
<td>1 0 0 1 1 0 1 0 1</td>
<td>1 Site with PP, assume complete in Yr2</td>
</tr>
<tr>
<td>E/00864/16</td>
<td>Haddenham</td>
<td>Full Application (Monitoring)</td>
<td>2 0 0 2 2 0 2 0 2</td>
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<tr>
<td>E/00865/16</td>
<td>Haddenham</td>
<td>Full Application (Monitoring)</td>
<td>7 0 0 7 7 0 7 0 7</td>
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</tr>
<tr>
<td>E/00866/16</td>
<td>Haddenham</td>
<td>Full Application (Monitoring)</td>
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<td>1 Site U/C, assume complete in Yr1</td>
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<td>Haddenham</td>
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<td>1 CIL data indicates site commenced in 04.17, assume complete in Yr1</td>
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<tr>
<td>E/00868/16</td>
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<td>E/00872/16</td>
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<td>9 Site with PP, assume complete in Yr2</td>
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<td>Haddenham</td>
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<td>54 0 0 0 0 0 54 54 0 0 10 25 19</td>
<td>54 Based on site promoter's trajectory</td>
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<td>Kirtling &amp; Upend</td>
<td>Full Application (Monitoring)</td>
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</tbody>
</table>

- Site with PP, assume complete in Yr2
- Site with PP, assume complete in Yr2
- PSIP Proposed site, partly allocated by LP2015, assume completions from Yr4+
- LP2015 allocation with little prospect of delivery
- Based on Form B Submission, with dwelling figure revised down and rolled back 2 yrs. Screening opinion application currently pending consideration (17/00738/SCREEN)
- Delivery rate based on info supplied by site promoter, suggested could deliver within 5yr period, but assume after yr5 as strategic site.
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<thead>
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4 Site with PP, assume complete in Yr2
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Based on Form B site submission, adjusted and rolled back 2 yrs.
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Notes:
- PSLP proposed site, assume complete Yr4+
- Site with Outline PP, assume complete in Yr3
- CIL data indicates site has commenced, however replacement dwelling so no net gain
- Site with PP, assume complete Yr2
- Large site with outline PP, assume complete from Yr3+
- Site with PP, assume complete Yr2
- Site U/C, assume complete in Yr1
- Site with Outline PP, assume complete in Yr3
- Site U/C, assume complete in Yr1
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CIL data indicates site commenced in 06.17, assume complete from current year.
Appendix 2: Windfall Allowance & CLT development

7. Windfall developments

7.1. The NPPF\(^7\) states that ‘local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that sites have consistently become available’. The emerging Local Plan typically seeks to allocate sites of 10 dwellings or more only. However, the emerging Local Plan proposes a number of policies which will enable small scale residential developments to take place over the plan period. Therefore there is justification for including a windfall allowance for small sites of fewer than 10 dwellings.

Emerging policies

7.2. The Further Draft Local Plan sets out a number of draft policies which seek to enable windfall development over the plan period.

7.3. Through policy LP3: The Settlement Hierarchy and the Countryside, the Proposed Submission Local Plan applies ‘Development Envelopes’ around the built areas of existing settlements. In principle, development is generally acceptable within the Development Envelope. Over the plan period there are likely to be numerous opportunities for windfall development within Development Envelopes.

7.4. Draft policy LP31: Development in the countryside enables certain forms of development to take place in the countryside (outside of Development Envelopes) and includes Affordable Housing exception sites; dwellings for rural workers; the replacement of existing dwellings in the countryside; and, the re-use and conversion of non-residential buildings for residential use.

7.5. In addition, draft policy LP32: Infill development in locations outside of Development Envelopes, will enable the infilling of plots between small groups of dwellings in the countryside (subject to meeting certain criteria).

Historic windfall delivery

7.6. The emerging Local Plan seeks to identify housing development sites of 10 or more units. Small sites of fewer than 10 units will therefore be considered “windfall development”. To provide an estimate of the level of windfall development which might reasonably be expected to be delivered in the future, this section analyses historic housing completions by size of site.

7.7. Cambridgeshire County Council’s housing completions data for East Cambridgeshire district over the period 01 April 2002 to 31 March 2017 has been analysed to calculate annual historic windfall delivery. This sample therefore provides data spanning 15

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\(^7\) NPPF Paragraph 48
reporting years, and includes 6,297 net housing completions in total. In monitoring housing development sites, the County Council assigns each site to a ‘Development Class’. This field includes the following Development Classes:

- **Estate 9+ Dwellings** – Any development site providing 9 or more residential units.
- **Group 3-8 Dwellings** – Small-scale residential development providing 3 to 8 residential units;
- **Infill 1-2 Dwellings** - Scale residential development providing 1 to 2 residential units;
- **Residential Change of Use** – Change of use of a non-residential building to one or more dwellings. Generally small-scale, however one site providing 16 dwellings (and therefore large scale) was completed in the 2014/15 reporting year and for the purposes of this note has been reassigned to the Estate 9+ Dwellings class.
- **Replacement Building** – Replacement of existing dwelling(s) or ancillary building with one or more dwellings. All records in sample are small-scale.
- **Residential Conversion** – Conversion of dwelling(s) (and in some instances non-residential buildings) to create one or more new dwellings. All records in the sample are small scale.
- **Demolition of Dwelling** – Developments involving the demolition of one or more dwellings, such as to provide an alternative land use. The development is not residential in nature. However losses through demolition are included to enable the reporting of net housing completions.

7.8. Table 9 indicates the total number of dwellings completed in each reporting year by Development Class.

**Table 9: Total housing completions by Development Class and Reporting Year**

<table>
<thead>
<tr>
<th>Reporting Year</th>
<th>Estate 9+ Dwellings</th>
<th>Group 3-8 Dwellings</th>
<th>Infill 1-2 Dwellings</th>
<th>Residential Change of Use</th>
<th>Replacement Building</th>
<th>Residential Conversion</th>
<th>Demolition of Dwelling</th>
<th>Total Completions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016/17</td>
<td>99</td>
<td>35</td>
<td>77</td>
<td>8</td>
<td>8</td>
<td>5</td>
<td>0</td>
<td>232</td>
</tr>
<tr>
<td>2015/16</td>
<td>73</td>
<td>15</td>
<td>60</td>
<td>37</td>
<td>-3</td>
<td>1</td>
<td>-2</td>
<td>181</td>
</tr>
<tr>
<td>2014/15</td>
<td>101</td>
<td>16</td>
<td>18</td>
<td>26</td>
<td>-2</td>
<td>3</td>
<td>0</td>
<td>162</td>
</tr>
<tr>
<td>2013/14</td>
<td>112</td>
<td>17</td>
<td>44</td>
<td>9</td>
<td>8</td>
<td>1</td>
<td>0</td>
<td>191</td>
</tr>
<tr>
<td>2012/13</td>
<td>195</td>
<td>33</td>
<td>47</td>
<td>10</td>
<td>-3</td>
<td>5</td>
<td>0</td>
<td>287</td>
</tr>
<tr>
<td>2011/12</td>
<td>299</td>
<td>29</td>
<td>29</td>
<td>7</td>
<td>-1</td>
<td>6</td>
<td>0</td>
<td>369</td>
</tr>
<tr>
<td>2010/11</td>
<td>259</td>
<td>69</td>
<td>29</td>
<td>8</td>
<td>-3</td>
<td>6</td>
<td>0</td>
<td>368</td>
</tr>
<tr>
<td>2009/10</td>
<td>117</td>
<td>25</td>
<td>32</td>
<td>24</td>
<td>5</td>
<td>2</td>
<td>-1</td>
<td>204</td>
</tr>
<tr>
<td>2008/09</td>
<td>356</td>
<td>49</td>
<td>53</td>
<td>9</td>
<td>2</td>
<td>-1</td>
<td>-1</td>
<td>467</td>
</tr>
<tr>
<td>2007/08</td>
<td>618</td>
<td>78</td>
<td>71</td>
<td>7</td>
<td>-5</td>
<td>7</td>
<td>-21</td>
<td>755</td>
</tr>
<tr>
<td>2006/07</td>
<td>534</td>
<td>75</td>
<td>45</td>
<td>34</td>
<td>-2</td>
<td>3</td>
<td>-2</td>
<td>687</td>
</tr>
<tr>
<td>2005/06</td>
<td>639</td>
<td>68</td>
<td>82</td>
<td>9</td>
<td>-4</td>
<td>4</td>
<td>-2</td>
<td>796</td>
</tr>
<tr>
<td>2004/05</td>
<td>240</td>
<td>99</td>
<td>58</td>
<td>15</td>
<td>-4</td>
<td>-4</td>
<td>-3</td>
<td>401</td>
</tr>
<tr>
<td>2003/04</td>
<td>445</td>
<td>95</td>
<td>47</td>
<td>17</td>
<td>0</td>
<td>5</td>
<td>-2</td>
<td>607</td>
</tr>
<tr>
<td>2002/03</td>
<td>405</td>
<td>77</td>
<td>75</td>
<td>18</td>
<td>3</td>
<td>12</td>
<td>0</td>
<td>590</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>4,492</strong></td>
<td><strong>780</strong></td>
<td><strong>767</strong></td>
<td><strong>238</strong></td>
<td><strong>-1</strong></td>
<td><strong>55</strong></td>
<td><strong>-34</strong></td>
<td><strong>6,297</strong></td>
</tr>
</tbody>
</table>
7.9. Using the Development Class field, it is possible to estimate total housing completions for ‘large-scale’ and ‘small-scale’ development sites.

7.10. The “Estate 9+ dwellings” Development Class can generally be considered a proxy for ‘large-scale development’. Therefore all housing completions on such sites are considered as large scale development and are not considered “windfall development”. It should be noted that the emerging Local Plan considers sites of 10 or more units to be large-scale development, however data is not available at that threshold.

7.11. All other records within the development classes: “Group 3-8 Dwellings”; “Infill 1-2 Dwellings”; “Residential Change of Use”; “Replacement Building”; and, “Residential Conversion”; are considered to be small-scale and therefore windfall development.

7.12. Table 10 calculates the number of housing completions by reporting year and by site capacity - either large scale or small scale. Losses through demolition are included for the purposes of calculating net total housing completions.

### Table 10: Annual housing completions by site capacity

<table>
<thead>
<tr>
<th>Reporting Year</th>
<th>Large scale development (9+ units)</th>
<th>Small scale development i.e. &quot;windfall&quot; (fewer than 9 units)</th>
<th>Demolition of Dwelling</th>
<th>Total Completions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016/17</td>
<td>99</td>
<td>133</td>
<td>0</td>
<td>232</td>
</tr>
<tr>
<td>2015/16</td>
<td>73</td>
<td>110</td>
<td>-2</td>
<td>181</td>
</tr>
<tr>
<td>2014/15</td>
<td>101</td>
<td>61</td>
<td>0</td>
<td>162</td>
</tr>
<tr>
<td>2013/14</td>
<td>112</td>
<td>79</td>
<td>0</td>
<td>191</td>
</tr>
<tr>
<td>2012/13</td>
<td>195</td>
<td>92</td>
<td>0</td>
<td>287</td>
</tr>
<tr>
<td>2011/12</td>
<td>299</td>
<td>70</td>
<td>0</td>
<td>369</td>
</tr>
<tr>
<td>2010/11</td>
<td>259</td>
<td>109</td>
<td>0</td>
<td>368</td>
</tr>
<tr>
<td>2009/10</td>
<td>117</td>
<td>88</td>
<td>-1</td>
<td>204</td>
</tr>
<tr>
<td>2008/09</td>
<td>356</td>
<td>112</td>
<td>-1</td>
<td>467</td>
</tr>
<tr>
<td>2007/08</td>
<td>618</td>
<td>158</td>
<td>-21</td>
<td>755</td>
</tr>
<tr>
<td>2006/07</td>
<td>534</td>
<td>155</td>
<td>-2</td>
<td>687</td>
</tr>
<tr>
<td>2005/06</td>
<td>639</td>
<td>159</td>
<td>-2</td>
<td>796</td>
</tr>
<tr>
<td>2004/05</td>
<td>240</td>
<td>164</td>
<td>-3</td>
<td>401</td>
</tr>
<tr>
<td>2003/04</td>
<td>445</td>
<td>164</td>
<td>-2</td>
<td>607</td>
</tr>
<tr>
<td>2002/03</td>
<td>405</td>
<td>185</td>
<td>0</td>
<td>590</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>4,492</strong></td>
<td><strong>1,839</strong></td>
<td><strong>-34</strong></td>
<td><strong>6,297</strong></td>
</tr>
</tbody>
</table>

7.13. Over the period, there were 4,492 completions on large sites and 1,839 completions on small sites. Expressed as an average, this equates to 299 completions per year on large sites and 123 residential completions on small sites.

7.14. Table 11 expresses housing completions by reporting year and site size, and as a percentage of total completions.
Table 11: Percentage of annual housing completions by site capacity

<table>
<thead>
<tr>
<th>Reporting Year</th>
<th>Large scale development (9+ units) %</th>
<th>Small scale development i.e. &quot;windfall&quot; (fewer than 9 units) %</th>
<th>Demolition of Dwelling %</th>
<th>Total Completions %</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016/17</td>
<td>43</td>
<td>57</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>2015/16</td>
<td>40</td>
<td>61</td>
<td>-1</td>
<td>100</td>
</tr>
<tr>
<td>2014/15</td>
<td>62</td>
<td>38</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>2013/14</td>
<td>59</td>
<td>41</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>2012/13</td>
<td>68</td>
<td>32</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>2011/12</td>
<td>81</td>
<td>19</td>
<td>0</td>
<td>100</td>
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<tr>
<td>2010/11</td>
<td>70</td>
<td>30</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>2009/10</td>
<td>57</td>
<td>43</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>2008/09</td>
<td>76</td>
<td>24</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>2007/08</td>
<td>82</td>
<td>21</td>
<td>-3</td>
<td>100</td>
</tr>
<tr>
<td>2006/07</td>
<td>78</td>
<td>23</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>2005/06</td>
<td>80</td>
<td>20</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>2004/05</td>
<td>60</td>
<td>41</td>
<td>-1</td>
<td>100</td>
</tr>
<tr>
<td>2003/04</td>
<td>73</td>
<td>27</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>2002/03</td>
<td>69</td>
<td>31</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>Total</td>
<td>67</td>
<td>34</td>
<td>0</td>
<td>100</td>
</tr>
</tbody>
</table>

7.15. On average, 67% of total housing completions were on large sites. Small sites provided on average 34% of total dwelling completions.

**Analysis and conclusions – Windfall allowance**

7.16. Table 11 demonstrates that on average, almost exactly one third (34%) of all new homes in East Cambridgeshire are constructed on small-scale development sites each year. Table 10 indicates that over the past 15 years, on average 123 units per year were completed on small-scale development sites. Were this trend to continue, it would deliver a total of 2,337 dwellings on small windfall sites over the remainder of the plan period (123 avg. dwellings x 19 yrs).

7.17. The emerging Local Plan includes a number of policies which enable small-scale windfall developments to take place over the plan period, both within development envelopes and in certain circumstances, in the countryside. It is therefore highly likely that small-scale windfall development will continue to generate a substantial number of new dwellings over the plan period.

7.18. Due to the flexibility offered by such policies, it is possible that the number of small-scale windfall developments could increase. However, land is inevitably finite – as more sites are developed, fewer remain available for development. In addition, once the Local Plan is adopted, the supply of large sites will increase, which could potentially affect the market for smaller development sites.
7.19. For the purposes of the Five Year Housing Land Supply (and Local Plan housing trajectory), it is assumed that 850 units of windfall development will be completed over the remainder of the plan period. In practice, this is highly likely to be exceeded and is therefore considered a conservative estimate. Indeed, it would mean windfall dropping by 64% compared with a long term 15 year trend. It is therefore justified to allow for this amount in the plan period and for feeding into calculations of the five year land supply.

7.20. It is assumed that most windfall sites to be delivered in years 2017/18, and to some extent 2018/19, would currently have planning permission and would likely be broadly accounted for in the commitment data. Therefore, for the purposes of the housing trajectory and five year land supply calculation, it is assumed that ‘new’ windfall development will occur from 2019/20 at a rate of 50 units per annum. Years 1 and 2 of the five year land supply period is set at 0 units per annum.

7.21. If anyone challenges other assumptions in the five year land supply report as a whole (eg the trajectory of a particular site as being too optimistic), then the Council will not only defend this report as a whole, but will seek to reopen the calculations for windfall assumptions. The Council would have been in its right to use a windfall allowance of 123 units per year, which is what the long term trend is identifying, and will seek to use that figure should other parts of the assumptions be challenged.

8. Community Land Trust developments

8.1. In addition to windfall development, it is considered justifiable to include an allowance for community-led development, which in East Cambridgeshire will typically be delivered by Community Land Trusts (CLTs).

8.2. East Cambridgeshire District Council is highly supportive of community-led development, delivered primarily through a Community Land Trust (CLT) model. The Council takes a proactive role, offering a programme of support to CLTs, and as such expects a substantial proportion of new development to be delivered via CLTs. Reflecting this important local priority, through policy LP5: Community-led development, the emerging Local Plan offers general support for community-led development including on land outside of development envelopes. Due to this level of support, it is believed that CLT development will gain impetus over the plan period.

8.3. Table 12 provides a summary of new housing development which is projected to be delivered by Community Land Trust development to 2025 on sites which have no formal planning status i.e. do not have planning permission nor allocated in Local Plan 2015, and not identified by the Proposed Submission Local Plan. The names of specific sites have not been included to protect commercial interests. The source of the data is from colleagues within the Council which work closely with communities either with a CLT in place or showing an interest in CLTs. The figures below are a revised down set,
compared with what such colleagues are actually anticipating (hence, a more conservative figure than could have been applied).

Table 12: ‘Windfall’ CLT development pipeline

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
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</thead>
<tbody>
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<td></td>
<td>0</td>
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<td>10</td>
<td>40</td>
<td>40</td>
<td>45</td>
<td>35</td>
<td>10</td>
<td>10</td>
<td>190</td>
</tr>
</tbody>
</table>

8.4. Table 12 indicates that over the plan period 190 units will be delivered by CLTs on ‘windfall’ sites, of which, 135 additional new dwellings are expected to be delivered in the five year period.

8.5. It is likely that in practice the total CLT development over the plan period would be exceeded as additional sites come forward over time (Table 12 does not look beyond 2025). It is therefore anticipated that CLTs will deliver at least 210 dwellings from unallocated sites over the course of the plan period.

8.6. Whilst table 12 suggests CLTs will deliver a significant amount of development, including within the first five year period, at this stage those sites have no formal status. For the purposes of calculating Five Year Land Supply, no units are included within the five year calculation, but in all likelihood will be delivered. Once again, this demonstrates a very cautious approach to calculating the five year land supply, and again will be a matter reopened should anyone challenge other aspects of this report, its methods and assumptions.