

East Cambridgeshire District Council

Five Year Land Supply

1 April 2018 to 31 March 2023

Published November 2018

This report forms part of the Council's on-going obligations to publish the 'authority's monitoring report'

Please Note:

This is the current version of the five year land supply report, based on data as at 01 April 2018. This report is be used in decision making purposes from the point of publication, and likely will remain the most up to date version until shortly after the emerging Local Plan is adopted by the Council (which is likely to happen at some point in early 2019). Separate supply evidence has been published to support the emerging Local Plan which uses predominantly the same data as used in this report, but may make slightly different assumptions on trajectory for certain sites, especially sites which do not have consent but are allocated in the emerging Local Plan.

Five Year Land Supply

1. Introduction

This Five Year Land Supply report is to be used for the purposes of decision taking from the day of publication until it is superseded. A further update will be issued, when necessary, depending on for example the adoption of a new Local Plan and/or new and significant data becoming available.

This report sets out the process for calculating the five year land supply based on the requirements of the revised National Planning Policy Framework (NPPF) published in July 2018, and associated NPPG as updated in September 2018.

National Policy states that:

'Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old'¹.

The current strategic plan for East Cambridgeshire is the Local Plan (adopted 21 April 2015). Therefore the Council's plan is less than five years old and the housing requirement set out in it must be used to calculate the five year land supply.

2. Housing Requirement

The 2015 Local Plan sets the following housing requirement in Policy GROWTH 1:

- 11,500 dwellings, between 2011-2031

There is no 'stepped trajectory' or other similar mechanism set out in the Local Plan. As such, the annual requirement is **575 dwellings per annum**.

3. Five Year Basic Requirement

The NPPG - [Housing and economic land availability assessment](https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment)² sets out the method for calculating five year land supply.

The annual requirement figure of 575 is used as the basic starting point for this five year land supply report. The basic five year requirement equals 2,875 (575 × 5).

¹ NPPF (July 2018) paragraph 73

² <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

4. Additional 'Buffer'

Paragraph 73 of the NPPF states:

'The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or*
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or*
- (c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply*

Footnote 39 of the NPPF is linked to (c) above and states that:

'From November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement'.

Prior to the Housing Delivery Test (HDT) results being published (which at the time of this report it has not), the NPPF is not clear how (c) should be established.

The NPPG - Housing and economic land availability assessment paragraph 037³ states that 20% buffer must be applied if the delivery of housing over the previous three years, has fallen below 85% of the requirement. This is consistent with the NPPF, albeit the November 2018 date is not referred to in the NPPG.

For this Report, therefore, which is published slightly before the HDT implementation date, the Council has decided to apply the 85% 'rule' as set out in [Housing Delivery Test measurement rule book](#)⁴ (July 2018), to establish if a 5% or a 20% buffer should be applied.

That 'rule book' is somewhat complex to work out what the 'housing requirement' is, for the purpose of the HDT.

Para 12 states that the housing requirement figure is the lower of:

- the latest adopted housing requirement; or
- the *minimum annual local housing need figure*

Paragraphs 21 and 22 of the Housing Delivery Test Rule Book then sets out the transitional arrangements for calculating the housing need figure for the previous three years (2015/16 to 2017/18). It states that the *minimum annual local housing need figure* is replaced by the household projections. Table 1 of the Housing Delivery Rule Book shows what version of the household projections should be used.

For East Cambridgeshire, to determine whether the 85% threshold has been met or not, housing delivery needs to be assessed against the lower of:

³ Reference ID 03-037-20180913

⁴ <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

- 1,725 (which is the latest adopted housing requirement, less than five years old, of 575, multiplied by 3 years); or
- 1,606 (see below)

The figure of 1,606 has been calculated, in accordance with the 'rule book' paras 21-22, as follows:

Table 1: Housing requirement for Housing Delivery Test

Financial year of three year rolling Household Delivery Test Period	Version of household projections	Annual average taken over years	10 year average for East Cambridgeshire
2015/16	2012 based household projections ⁵	2015 to 2025	42,721 - 36,864 = 5,857 Avg = 586
2016/17	2012 based household projections ⁶	2016 to 2036	43,253 - 37,476 = 5,777 Avg = 578
2017/18	2014 based household projections	2017 to 2037	41,651 - 37,230 = 4,421 Avg = 442
Total			1,606

Because 1,606 is the lower of the two figures, it is this figure which is used as the benchmark to see if the '85%' delivery threshold has been met.

Table 2 sets out the actual net completions between 2015 and 2018.

Table 2: HDT Delivery Rate

Year	The minimum requirement	Actual Net Completions	Difference
2015/16	1,606	181	
2016/17		234	
2017/18		289	
Total 2015 to 2018	1,606	704	868

The average delivery rate of the three year period = **44%** ((704 / 1606) x 100). This is clearly well below the 85% requirement and demonstrates that **a 20% buffer should be applied to the five year land supply figure.**

⁵ <http://webarchive.nationalarchives.gov.uk/20151203162720/https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections>

IMPORTANT NOTE: It is the responsibility of government to issue the precise % which applies to each district for formal HDT purposes, and the subsequent importance of that % in terms of Para 215 of the NPPF 2018. The figure of 44% above, therefore, should only be considered an indicative one of what the actual HDT figure may be, once published by government (due each November, from November 2018). However, for the purpose of this five year land supply report, the % figure is clearly well below the 85% threshold.

5. Backlog

On the basis that the housing requirement in the Local Plan 2015 is less than five years old, the NPPG advises as follows:

“The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgfield approach).”⁶

In East Cambridgeshire’s case, the backlog is calculated from April 2011.

Between 2011 and 2018, delivery against the 575 annual requirement has been as follows:

Table 3: Past delivery

Year	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	Total
Total net housing completions	369	287	191	162	181	234	289	1,713
Annual housing requirement	575	575	575	575	575	575	575	4,025
Surplus / deficit against target								- 2,312

The full 2,312 deficit therefore needs to be added to the five year supply requirement.

⁶ See NPPG Paragraph: 044 Reference ID: 3-044-20180913

6. Calculating the updated five year requirement

This Five Year Land Supply Report covers the period 1 April 2018 to 31 March 2023. The following table sets out the total requirement including the required buffer and backlog.

Table 4: Five year requirement including twenty percent buffer

		Dwellings (units)	Calculation / Source
a	Basic Five Year Requirement	2,875	575 x5
b	Backlog	2,312	Table 3
c	Sub-total	5,187	a + b
d	20% buffer	1,037	c x 20%
e	Five Year requirement	6,224	c + d
f	Average annual requirement 2018 to 2023	1,245	e ÷ 5

To meet the requirement to demonstrate a five year supply of deliverable housing land, **the requirement between 2018 and 2023 is a total of 6,224 dwellings.**

7. Five Year Supply

This section sets out how the supply of sites to meet the five year requirement has been identified. For a site to be considered deliverable Annex 2 of the NPPF defines deliverable as:

‘Deliverable: *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. Sites that are not major development, and 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 (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years’.*

The Council is also mindful that the above definition, despite only recently published, is now under review by government, in the form of a consultation - *Technical consultation on updates to national planning policy and guidance* (October 2018)⁷ - to ‘clarify’ the above definition. That consultation proposes “minor clarifications to national planning policy on housing land supply [and] the definition of deliverable sites” (para 6).

In more detail, and of relevance to this report, that consultation documents states (para 36-38):

“36. The new Framework published in July this year set out a revised definition of ‘deliverable’ (contained in the glossary at Annex 2 of the Framework). Early experience of applying this definition has suggested that it would benefit from some clarification of the wording. In particular, the existing text could be clearer that sites that are not major development, and which have only an outline planning consent, are in principle considered to be deliverable. The relationship between the first sentence of the definition (which sets out general considerations in terms of deliverability), and the remainder that explains how particular circumstances should be approached, also needs to be clear. The specific circumstances cited in the definition are intended to indicate how the general considerations in the first sentence apply to the types of development referred to in the text that follows.

37. Consequently, we propose to amend the definition of deliverable to clarify its intended application. The revised definition would be:

Deliverable: *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*

⁷ See -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/751810/LHN_Consultation.pdf

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.*

38. To further support the application of this policy, and subject to the outcome of the present consultation, we will produce additional national planning guidance to provide further information on the way that sites with different degrees of planning certainty may be counted when calculating housing land availability.

The definition of deliverable in both the current NPPF (2018) and the consultation document described above does not expressly refer to other sites which do not fall into any category. However, para 36 of the consultation document helpfully explains that *“The relationship between the first sentence of the definition (which sets out general considerations in terms of deliverability), and the remainder that explains how particular circumstances should be approached, also needs to be clear. The specific circumstances cited in the definition are intended to indicate how the general considerations in the first sentence apply to the types of development referred to in the text that follows.”* Thus, government is making it clear that the first sentence of the definition is the primary definition, and what follows are clarification of what should be done with the examples as listed. For other examples, not listed after the first sentence, then the first sentence alone applies. This was also confirmed by MHCLG in an email exchange of October 2018:

From: Stephen Borrows
Sent: 15 October 2018 16:59
To: Philip Hylton < >
Cc: Nicola Laszlo < >
Subject: RE: PPG Query

Good Afternoon Philip,

What I would say is that if the site is major development (defined in Annex 2), and is not permissioned it is for the LPA to demonstrate that the site is deliverable (it can not be assumed it is). It is for LPAs to use their evidence, such as the HELAA/SHLAA or AMR (or other evidence such as Housing Land Supply Trajectory) to demonstrate whether a site contributes towards their five year supply.

Stage 2 of the HELAA guidance (in the NPPG) remains valid and sets out what should be considered when determining availability.

<https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

Paragraph 036 should be of some assistance.

Kind regards

Stephen Borrows MRTPI

Team Leader – Planning for Housing Delivery and Supply

Planning – Policy Reform

Planning Directorate| Ministry of Housing, Communities and Local Government

Third Floor | Fry Building | 2 Marsham Street | SW1P 4DF

From: Philip Hylton [mailto:]

Sent: 10 October 2018 11:05

To: Stephen Borrows

Subject: RE: PPG Query

Hi Stephen

I wonder if I might pick your brain once again to assist with the ongoing work on five year land supply. We are reacting to the publication of the PPG to help ensure our report is consistent with the guidance, but we have had a debate in the team regarding sites we can or cannot include.

Are we able to include sites which are yet to receive permission or that are not allocated in the Local Plan in the five year supply? An example is a site where there is a live application on an unallocated site, with a willing builder on board, and where the site is policy-compliant and has no constraints on it. Provided there is robust evidence that it is deliverable within the five year period, it seems sensible to include it.

The reason for this debate is the wording of the revised definition in the glossary to the NPPF where this type of site is not listed in the final sentence. Are you able to shed any light on what the Ministry intended for this such scenario?

Many thanks

Phil

Phil Hylton

Team Leader

Central Lincolnshire Local Plan Team

Turning to East Cambridgeshire, the Council is preparing a new Local Plan which is currently being examined. As part of the evidence base being examined is a detailed trajectory of all site allocations. Such evidence is predominantly replicated in Appendix A of this report, with only a very small number of sites updated from that published (for example, where a site promoter at an Examination in Public Hearing session explicitly stated that the trajectory should be adjusted, and the Inspector indicated agreement for such an adjustment. In those cases, the adjustment has been made in Appendix A). The 'comments' column of Appendix A has been updated for a number of sites, again following evidence submitted to a Hearing sessions in September 2018, and also to provide further justification that each site is deliverable, as per the new NPPF definition⁸.

⁸ Annex 2: Glossary p66

Deliverable sites

Appendix A provides a list of all available and deliverable sites between 1 April 2018 and 31 March 2034. For clarity, the trajectory is organised by planning status of sites (for example, non-major development, sites with detailed planning permission, sites with outline permission, etc.), reflecting the NPPF definition.

For committed sites, Appendix A identifies the planning application reference and date permission was granted. It identifies the total number of dwellings permitted on site and total dwellings completed on site at 31 March 2018. This leaves the outstanding dwelling figure (i.e. 'net commitment') as at 1 April 2018. For Local Plan allocations, Appendix A identifies the Local Plan allocation reference and the indicative dwelling figure as per the Proposed Submission Local Plan.

The Appendix includes a trajectory showing the estimated delivery rate for all committed housing sites for each year between 2018 and 2034. The five year period is highlighted to show total dwellings estimated to be delivered during the five year period 2018 to 2023.

Windfall allowance

The five year supply calculation includes an allowance for windfall development. Paragraph 70 of the NPPF states that:

'Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends'.

Appendix B provides evidence of historical windfall rates, and demonstrates that a windfall allowance of 50 per year is achievable. No allowance has been made for the first two years as it is expected that any unallocated sites delivered within that time would likely already be under construction or have planning permission.

Older people's accommodation

National planning practice guidance explains the contribution which older peoples' accommodation in use class C2 makes toward the housing requirement:

*'Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published census data.'*⁹

Appendix C sets out how the Council has applied the method for calculating accommodation released by such residential institutions, and details committed sites considered deliverable within the five year period. This projected supply has been included in the five year supply calculation.

Calculating supply

Table 5 provides a summary of the Council's five year land supply of deliverable sites. The Five Year period runs between 1 April 2018 and 31 March 2023. Appendix A provides details of all housing

⁹ Paragraph: 043 Reference ID: 3-043-20180913

sites and potential housing numbers which could be delivered each year. Appendix B explains how supply from windfall has been estimated. Appendix C details projected supply of older people's accommodation in use class C2.

Table 5: Dwelling supply in five year period

Site Category (at 01 April 2018)	Five Year Supply					
	Year 1	Year 2	Year 3	Year 4	Year 5	Total Five Year
	18/19	19/20	20/21	21/22	22/23	
Minor (non-major) development - schemes of less than 10 dwellings	98	467	213	0	0	778
Dwellings with detailed planning permission (e.g. Full, Reserved Matters)	241	333	162	160	184	1,080
Dwellings with outline permission	0	28	238	193	121	580
Dwellings allocated in development plan, without consent at base date	0	0	0	219	465	684
<i>Of which, at base date Council had resolved to grant planning permission</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>55</i>	<i>130</i>	<i>185</i>
Dwellings without consent at base date but expected to be delivered within five year period (e.g. draft site allocations)	0	70	134	658	668	1,530
<i>Of which, at base date Council had resolved to grant planning permission</i>	<i>0</i>	<i>70</i>	<i>99</i>	<i>185</i>	<i>105</i>	<i>459</i>
Windfall allowance	0	0	50	50	50	150
Older people's accommodation (C2)	13	0	44	50	0	107
Total	352	898	841	1,330	1,488	4,909

The Council has identified land that is estimated, based on evidence set out in appendices A-C, to be capable of delivering 4,909 dwellings within the five year period. This supply falls short of the updated five year requirement, which is 6,224 dwellings (see Table 4). This leaves a deficit of 1,315 dwellings.

Dwelling supply (years)

Expressed in years, this dwelling supply is equivalent to 3.94 years supply of housing land, as shown in Table 6.

Table 6: Five Year Supply

g	Estimate of Supply, over the Five Year period 2018 to 2023	4,909	See Table 5
h	Total Five Year Land Supply in years	3.94	$g \div f$

Following a review of deliverable sites, it is concluded that the Council cannot currently (November 2018) demonstrate a five year supply of housing land. Through this Five Year Land Supply Report 2018, the Council demonstrates **3.94 years of supply over the five year period**.

However, at the point of adopting a new Local Plan (scheduled early 2019), the strong expectation is that the Council will at that point, and for the foreseeable future thereafter, be able to demonstrate a greater than five year land supply.

Appendix A – Trajectory of housing sites

The tables in Appendix 1 project development rates for all deliverable housing sites over the period 2018/19 to 2033/34. This data has been used to calculate the district's dwelling supply in the five year period (plus windfall and older people's accommodation).

Sites are arranged by type/status, reflecting the NPPF's definition of 'deliverable'. Sites are assigned to one of the following categories:

- i. Sites with planning permission which are not "major development" i.e. sites with planning permission and a site capacity of less than 10 dwellings.
- ii. Sites with detailed planning permission i.e. 'Full' or 'Reserved Matters' planning permission.
- iii. Sites with outline permission
- iv. Sites identified in a development plan
- v. Sites without consent, expected to be delivered within five years;

And for completeness:

- vi. Sites not deliverable within five year period, but expected to deliver housing completions beyond the five year period.

The tables show each site's 'position' at 01 April 2018, the base date for the purposes of calculating the current five year land supply. In a small number of cases, a site's capacity has been updated based on material evidence issued after the base date, for example following the granting of planning permission.

Commitment from sites is expressed as a net value. A sites 'net' commitment is the site's total dwelling capacity minus the number of dwellings lost on site as a result of the development. For example, unimplemented proposals for a replacement dwelling (where the original dwelling is demolished and a new dwelling is constructed on site), have a net commitment of 0.

Losses on site (e.g. demolitions, conversions, changes of use) are counted in the same year as the first dwelling completion on-site. For example, in the case of a proposal for a replacement dwelling, the Council reports a gross completion of 1, a gross loss of 1, and a net completion of 0. The loss of a dwelling in effect 'cancels out' the gain of a dwelling in that reporting year. This approach ensures monitoring is simple, yet accurate. In practice, the demolition may occur in a different reporting year to the year the dwelling was completed.

In addition, the site trajectory includes the following fields:

- Site Ref: Council's database reference;
- Application Ref: Planning application reference, or where no planning application, draft site allocation policy reference;
- LP15 Ref: Local Plan 2015 site allocation policy reference;
- PSLP Ref: Draft site allocation, as shown in document "Proposed Submission Local Plan", which is currently being examined ;
- Site address: Street address of development site;
- Parish: Civil parish in which site is located;
- Application type: Type of planning application (e.g. outline, full, reserved matters, etc.). Where no planning application, site allocation or draft site allocation;
- Decision date: Date planning permission issued by East Cambridgeshire District Council. If blank, no decision issued;

- Appeal Decision Date: Date planning permission issued by appeal. Where blank, no decision issued;
- Proposal: Summary of development proposal;
- Site capacity: Total number of dwellings permitted/allocated;
- Past losses: Dwellings lost/demolished prior to 01/04/18;
- Projected losses: losses of dwellings which have not yet occurred/counted, but will be counted in same year as first dwelling completion;
- No. superseded: Where site is partly superseded by another recorded, and those plots are counted on the alternative record. For example, the first phase of a larger scheme;
- Complete: Number of dwellings completed on site prior to 01/04/18;
- Under construction: No of plots under construction at 01/04/2018;
- Not started: Number of plots where development had not commenced at 01/04/2018;
- Net commitment: Number of dwellings on site not completed at base date (either not started or under construction), minus any projected losses on site;
- Years 2018/19 – 2033/34: Projected rate of dwelling completions.

The final column, “Trajectory comments”, provides further explanation, where necessary, to demonstrate each site is deliverable.

Appendix B – Windfall Justification

The housing supply can also include an assumption for future windfall development. Paragraph 70 of the NPPF states that:

‘Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends’

The definition of windfalls in the Glossary to the NPPF states they are sites which have not been specifically identified in the Local Plan process. Therefore a windfall is any site that produces dwellings, but has not been identified in the Local Plan process.

Both the adopted Local Plan 2015 and the emerging Local Plan typically allocate / propose allocation of sites with capacity for 10 dwellings or more¹⁰. The adopted Local Plan 2015 and the emerging Local Plan contain 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.

Local Plan policies for small-scale development

The Local Plan 2015 applies ‘Development Envelopes’ around the built areas of existing settlements. The emerging Local Plan seeks to retain Development Envelopes. In principle, development is generally acceptable within the Development Envelope (see policy *Growth 2: Locational Strategy* and draft policy *LP3: The Settlement Hierarchy and the Countryside*). Over the plan period there are likely to be numerous opportunities for windfall development within Development Envelopes.

In addition, the adopted Local Plan 2015 and emerging Local Plan enable certain forms of development to take place in the countryside (i.e. outside of Development Envelopes), for example 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 (see policies *HOU4*, *HOU5* and draft policy *LP31*).

Through draft policy *LP32: Infill development in locations outside of Development Envelopes*, the emerging Local Plan purposefully seeks to enable the infilling of plots between small groups of dwellings in the countryside (subject to meeting certain criteria). This is a marked change from the Local Plan 2015’s strategy, and could increase the opportunities for small-scale windfall development.

Historic windfall delivery

Developments of fewer than 10 units almost without exception occur on sites not allocated in the adopted or emerging Local Plan. As such small sites can generally be considered to be “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.

¹⁰ The Local Plan 2015 includes a small number of site allocations with a capacity of less than 10 dwellings, but the total capacity of such sites is negligible relative to the overall dwelling supply.

Cambridgeshire County Council supplied housing completions data for East Cambridgeshire district prior to 31 March 2017, with housing completions data for 01 April 2017 to 31 March 2018 provided by East Cambridgeshire District Council.

This data has been analysed to calculate annual historic windfall delivery spanning 16 reporting years, and includes 6,588 net housing completions in total. Each site is assigned to one of 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.

Table B.1 shows the total number of dwellings completed in each reporting year by Development Class.

Table B.1: Total housing completions by Development Class and Reporting Year

Reporting Year	Estate 9+ units	Group 3-8 units	Infill 1-2 units	Residential Change of Use	Replacement Building	Residential Conversion	Loss of dwelling (e.g. demolition)	Total Net Completions
2017/18	223	19	36	2	10	10	-11	289
2016/17	99	35	79	8	8	5	0	234
2015/16	73	15	60	37	-3	1	-2	181
2014/15	101	16	18	26	-2	3	0	162
2013/14	112	17	44	9	8	1	0	191
2012/13	195	33	47	10	-3	5	0	287
2011/12	299	29	29	7	-1	6	0	369
2010/11	259	69	29	8	-3	6	0	368
2009/10	117	25	32	24	5	2	-1	204
2008/09	356	49	53	9	2	-1	-1	467
2007/08	618	78	71	7	-5	7	-21	755
2006/07	534	75	45	34	-2	3	-2	687
2005/06	639	68	82	9	-4	4	-2	796
2004/05	240	99	58	15	-4	-4	-3	401
2003/04	445	95	47	17	0	5	-2	607
2002/03	405	77	75	18	3	12	0	590
Total	4,715	799	805	240	9	65	-45	6,588

Using the Development Class categories, it is possible to estimate total housing completions for ‘large-scale’ and ‘small-scale’ development sites.

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.

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*.

Table B.2 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 B.2: Annual housing completions by site capacity

Reporting Year	Large scale development (9+ units)	Small scale development i.e. "windfall" (fewer than 9 units)	Demolition of Dwelling	Total Net Completions
2017/18	223	77	-11	289
2016/17	99	135	0	234
2015/16	73	110	-2	181
2014/15	101	61	0	162
2013/14	112	79	0	191
2012/13	195	92	0	287
2011/12	299	70	0	369
2010/11	259	109	0	368
2009/10	117	88	-1	204
2008/09	356	112	-1	467
2007/08	618	158	-21	755
2006/07	534	155	-2	687
2005/06	639	159	-2	796
2004/05	240	164	-3	401
2003/04	445	164	-2	607
2002/03	405	185	0	590
Total	4,715	1,918	-45	6,588
Average (rounded)	295	120	-3	412

Since 2002, there were 4,715 completions on large sites and 1,918 completions on small sites. Expressed as an average, this equates to 295 completions per year on large sites and 120 residential completions on small sites.

Table B.3 expresses housing completions by reporting year and site size, as a percentage of gross completions.

Table B.3: Percentage of annual housing completions by site capacity

Reporting Year	Large scale development (9+ units)	Small scale development i.e. "windfall" (fewer than 9 units)	Total
	%	%	%
2017/18	74	26	100
2016/17	42	58	100
2015/16	40	60	100
2014/15	62	38	100
2013/14	59	41	100
2012/13	68	32	100
2011/12	81	19	100
2010/11	70	30	100
2009/10	57	43	100
2008/09	76	24	100
2007/08	80	20	100
2006/07	78	22	100
2005/06	80	20	100
2004/05	59	41	100
2003/04	73	27	100
2002/03	69	31	100
Average (%) (rounded)	67	33	100

On average, 67% of total housing completions were on large sites. Small sites provided 33% of total dwelling completions, on average.

Analysis and conclusions – Windfall allowance

Table B.3 demonstrates that, on average, approximately one third (33%) of all new homes in East Cambridgeshire are constructed on small-scale development sites each year. Table B.2 indicates that over the past 16 years, on average 120 dwellings per year were completed on small-scale development sites.

The current and emerging Local Plans include 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.

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.

It is assumed that most windfall development which will be completed in the next two years would already have planning permission and would likely be broadly accounted for in the commitment data

shown elsewhere in this Five Year Land Supply report. Therefore, for the purposes of the housing trajectory and five year land supply calculation, it is assumed that 'new' windfall development will occur from 2020/21 at a rate of 50 units per annum.

For the purposes of the Five Year Housing Land Supply (and Local Plan housing trajectory), it is therefore assumed that 700 units of windfall development will be completed by 2034. In practice, this is highly likely to be exceeded and is therefore considered a conservative estimate. **Indeed, it would mean windfall dropping by 58% each year, compared to the 15-year average.** It is therefore justified to allow for this amount in the plan period and for feeding into calculations of the five year land supply.

The Council could have used a windfall allowance of 120 units per year, which is what the long term trend is identifying. If other elements of the trajectory for permitted sites are questioned, then the council reserves the right to reconsider the windfall trajectory.

Community Land Trust developments

In addition to windfall development, the Council could reasonably include an allowance for community-led development, which in East Cambridgeshire will typically be delivered by Community Land Trusts (CLTs).

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, the adopted Local Plan 2015 supports community-led development through policy *Growth 6*. The emerging Local Plan continues this support, through policy *LP5*. Due to this level of support, it is believed that CLT development will gain impetus over the plan period.

Table B.4 provides a summary of new housing development which is projected to be delivered by Community Land Trust development to 2030 on sites which have no formal planning status i.e. do not have planning permission nor allocated in Local Plan 2015, and are not proposed for allocation in the emerging 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 who work closely with communities either with a CLT in place or showing an interest in CLTs.

Table B.4: 'Windfall' CLT development pipeline

Year	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	TOTAL
CLT development non-allocated sites	0	35	90	85	105	75	10	0	0	0	0	0	400

The table shows that over the plan period 400 units will be delivered by CLTs on 'windfall' sites, of which, 315 additional new dwellings are expected to be delivered in the five year period.

It is likely that in practice the total CLT development over the plan period would be exceeded as additional sites come forward over time (the Table does not look beyond 2030).

Whilst the table 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 delivered¹¹. Once again, this demonstrates a very cautious approach to calculating the five year land supply.

¹¹ The draft Local Plan's housing trajectory makes some allowance for CLT development after the five year period.

Appendix C – Dwelling Supply Older People's Accommodation

National Planning Practice Guidance sets out the method for counting residential institutions which provide accommodation for older people, against the housing requirement¹².

To establish the amount of accommodation released in the housing market, the NPPG states that calculations should be based on the average number of adults living in households, using the published census data.

At the time of the census 2011, there were 7,256 adults aged 75 or over in 4,874 households within East Cambridgeshire. This provides a ratio of 1.5 (rounded to 1dp).

Using the published census data for older people in East Cambridgeshire, the following table provides a worked example to show the amount of accommodation released, expressed as number of dwellings, by a 50-bed care home.

Example: 50-bed care home scenario

No. of beds / ratio = accommodation released (dwellings)

Beds	50
Ratio	1.5
Accommodation released (dwellings)	33

Table C.1 provides details of sites which the Council expects to deliver older people's accommodation in use class C2 (e.g. care home, nursing home, etc.), within the five year period. Applying the ratio, these developments provide accommodation equivalent to 107 dwellings.

In conclusion, the supply from dwellings within the five year period should be increased by 107 dwellings, to reflect projected delivery of older people's accommodation (in C2 use class).

¹² Paragraph: 043 Reference ID: 3-043-20180913

Table C.1: Projected C2 Dwelling supply in Five Year Period

Planning application ref	Date PP granted	Site address	Proposal	Application type	Supply beds	Supply as dwell-ings	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Justification
							2018/19	2019/20	2020/21	2021/22	2022/23	
17/00880/OUM	08/08/2018	Scotsdales Garden Centre 41 Market Street Fordham Ely Cambridgeshire CB7 5LH	Outline planning application for 150 residential dwellings (Use Class C3), a 75-bed care home (Use Class C2), a local shop (Use Class A1) and an ancillary medical consultation facility (Use Class D1) along with public open space and associated infrastructure with all matters reserved other than the means of access into the site from Market Street / Soham Road and Station Road.	Outline application	75	50				50		At the base date, site did not have planning consent. However, Planning Committee had resolved to grant outline permission in Feb 18 and the site is proposed for allocation in emerging Local Plan. In August 2018, the outline consent was issued. During the Local Plan EiP (Sept 18), the site promoter set out their business plan for developing the site, which demonstrated that most of the housing development will take place within the five year period. It is therefore assumed that the 75-bed care home will be completed within the five year period.
17/02002/FUM	06/04/2018	Land North Of Cam Drive Ely CB6 2WR	Erection of a three storey sixty six bed care home for older people with associated car park, access and landscaping.	Full application	66	44			44			The proposal is located on the North Ely development, which is allocated in the Local Plan 2015 and has a number of existing consents for the development of housing and infrastructure. The first phases of housing development have recently commenced. This proposal was granted full planning permission in April 2018, shortly after the base date. It is reasonable to assume this care home can be delivered within the five year period, alongside housing development on the wider development site.
15/01403/FUM	17/03/2016	Littleport Grange Nursing Home The Grange 1 Grange Lane Littleport Ely Cambridgeshire CB6 1HW	Proposed 20 bed care unit to rear of Littleport Grange Care Home	Full application	20	13	13					At the base date, this site had full planning permission and was under construction. Construction of the 20 bed care unit was completed in July 2018 (i.e. in Year 1).
Total supply					161	107	13	0	44	50	0	NB. Values round to 1d.p