

# **Proposed Submission Local Plan Examination Hearing Statement – Matter 3**

Huntingdonshire District  
Council Proposed  
Submission Local Plan  
Examination

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- 1) We are instructed by various clients (RRS 479, 561, 569, 575, 507, 499 and 489) to submit Hearing Statements and appear at the Huntingdonshire Local Plan Examination on their behalf in relation to the Huntingdonshire Proposed Submission Local Plan and associated evidence base.
- 2) This Statement details our clients' responses to Matter 3 of the Matters and Issues identified by the Inspector.

### 3) **Matter 3 – Development Strategy**

*Whether the Development Strategy is justified, effective and consistent with national policy*

#### Question 1

**What is the basis for the overall strategy for development and the broad distribution of growth set out in Policy LP2? What options were considered and why was this chosen? Is it justified?**

- 4) Our clients consider that this strategy for development is not justified, effective, positively prepared or consistent with national policy.
- 5) Huntingdonshire District Council's (HDC) strategy proposes to deliver a large proportion of the anticipated housing numbers at two strategic allocations of Alconbury Weald (5,000 units) and St Neots East (3,820 units). HDC is therefore relying on these sites to provide the majority (44%) of the total housing provision targeted within the Plan. This strategy fails to plan positively for growth across the District and focuses growth too heavily upon these two strategic locations both of which involve the same property development company.
- 6) In fact the four largest sites are responsible for delivering 59% of the housing of the authority. There are real concerns with placing such great responsibility for housing delivery on so few developers, where failure to deliver either the housing number or delivering the allocated housing out with the specified timeframe can have a disproportionate effect district housing delivery. The Council has not sought to justify sufficiently its delivery assumptions for these sites nor outlines fallback position should these strategic sites fail to deliver as predicted. In the absence of clear justification to support what are extraordinarily high delivery assumptions, the Council's evidence base is not considered to be credible.
- 7) The Council has not sought to justify sufficiently its delivery assumptions for these sites nor outlines fallback position should these strategic sites fail to deliver as predicted. In the absence of clear justification to support what are extraordinarily high delivery assumptions, the Council's evidence base is not considered to be credible.
- 8) Partners in Planning and Architecture believe the authority have not provide sufficiently robust evidence to justify the delivery schedule of the large strategic site identified above. In this absence of such evidence, the housing delivery as predicted cannot be considered to be robust and housing land supply required may be found wanting.

- 9) We consider that too much emphasis on large strategic sites is not planning effectively to ensure that dwellings are delivered throughout the plan period. Strategic sites require the completion of significant new infrastructure before units can be built/occupied. For example, in relation to both the Loves Farm East and Wintringham Park (St Neots East), Highways England have requested that both applications be subject to conditions/S106 obligations which limit the delivery of dwellings until improvements to the A428 have been completed. We understand these have yet to be discharged. The reliance on the delivery of significant infrastructure for large strategic sites effectively delays the commencement of development on these sites and the number of units capable of coming forward year on year until towards the end of the plan period. This is not effective planning for Huntingdonshire and does not comply with the NPPF requirement to maintain a five-year supply of housing land to meet the housing target.
- 10) Additionally, large sites historically take longer for dwellings to be completed than smaller sites. HDC has historically overestimated the number of dwellings which can be completed each year from Alconbury Weald. The 2016 AMR forecast that 200 dwellings would be completed in 2017/18. However, according to the 2017 AMR (published in December) only 48 units had been delivered on site. This demonstrates that HDC has historically overestimated delivery, particularly on the large strategic sites.
- 11) HDC's focus on these large strategic sites is contrary to national guidance with the Housing White Paper and draft NPPF encouraging greater use of small sites to diversify opportunities for builders and increasing the number of schemes which can be built out quickly. We therefore do not consider that the draft Local Plan reflects the direction of travel of emerging national guidance.
- 12) Furthermore, Policy LP2 does not state which services and facilities have been used to categorise the difference between Key Service Centres, Local Service Centres and Small Settlements. For the policy to be considered positively prepared and justified we consider that it is necessary to identify the characteristics which define the different types of centres within the settlement hierarchy.
- 13) We have also been unable to find any evidence that HDC has considered different options for the distribution of growth across the District. The Sustainability Appraisal does not appear to assess different forms of growth options for the District and the benefits this could bring. For example, it does not appear that HDC has assessed the option of delivering the housing provision through the greater use of smaller sites across the district. A more varied approach to growth would help support the rural economy and ensure that both local market and affordable housing needs are met.
- 14) We do not consider that HDCs overall strategy for development and the distribution of growth has been justified.

#### Question 5

**Are the strategic expansion locations at Alconbury Weald and St Neots East justified in principle? What alternative strategies for accommodating development were considered and why was this approach preferred?**

- 15) As set out for Question 1 we object to HDC's concentrated focus on large strategic sites and consider that until the necessary highway improvement work to the A428 has been completed development at the scale proposed for St Neots East has not been justified as a deliverable allocation in the Plan.
- 16) We consider that HDC's reliance on large strategic sites for 44% of the housing target is not adequately explained or justified within the draft Local Plan or the supporting evidence base. Huntingdonshire Housing Strategy 2012-2015 demonstrates some of the issues in relying on large strategic sites and partly attributes the reduction in new affordable dwellings being completed to '*the lack of progress on other large strategic sites*'. This is a clear admission by HDC that large strategic sites are not delivering much needed affordable housing in a timely fashion and are not adequately addressing the obvious shortfall.
- 17) Furthermore, the provision of the majority of dwellings in these two locations will not meet the housing needs of residents across the whole of the district and will fail to boost significantly the delivery of housing land as required by the NPPF. The proposed SELs will focus resources and facilities on two small areas of the District which is an unsustainable approach for Huntingdonshire in order to provide the necessary infrastructure and services for the number of dwellings proposed.
- 18) We have also been unable to find any evidence that alternative strategies were considered for accommodating development within the District and why the development of large strategic sites is advocated. We do not consider that the Housing & Economic Land Availability Assessments provide a clear conclusion as to why certain sites within the 'Broad Locations' are more suitable than others and therefore allocated in the draft Plan.

## **Small Settlements**

### Questions 12 & 13

**Are the Small Settlements appropriately defined, what is the basis for them?**

**Is the approach to the scale and type of development set out in Policies LP2 and LP10 justified?**

- 19) We do not consider that the Small Settlements are appropriately defined within the draft Local Plan. Paragraph 4.105 states that these have very limited or no services or facilities available and are less sustainable than other categories of settlement within the hierarchy. Therefore there are no proposed housing allocations in Small Settlements.
- 20) However, settlements such as Stilton and Needingworth provide a number of services and facilities such as a pre-school, primary school, convenience store and post office, pub and sports club within the settlement boundary. We therefore consider that a blanket embargo on allocations within Small Settlements is not justified and fails to plan positively and sustainably for this tier of settlement within Huntingdonshire. The Local Plan should acknowledge that some Small Settlements can accommodate development.