

HUNTINGDONSHIRE LOCAL PLAN EXAMINATION IN PUBLIC

HEARING STATEMENT

MATTER 6 PROPOSED SITE ALLOCATIONS: HUNTINGDON SPATIAL PLANNING AREA

ON BEHALF OF LINDEN HOMES STRATEGIC LAND

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

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1. Introduction

- 1.1 This Hearing Statement is prepared by Pegasus Group on behalf of Linden Homes Strategic Land, which is promoting land at Lodge Farm, Huntingdon, for development.
- 1.2 Linden Homes Strategic Land has set out its broad concerns in respect of the Local Plan strategy in its Matter 3 Hearing Statement. Linden Homes considers that within the Huntingdon Spatial Planning Area, the development of a single Strategic Expansion Location at Alconbury, somewhat distant from the existing urban area of Huntingdon, does not fully realise the potential of Huntingdon to support sustainable development and to see the benefits that can arise from new development. **The comments in these hearing statements therefore relate to allocations SEL1.1 and SEL1.2 at Alconbury.**

2. Q1: What is the background to the site allocation? How was it identified and which options were considered?

- 2.1 The background to the SEL lies in the site's identification as a potential growth location in the now-revoked Regional Spatial Strategy. As set out in our Matter 3 statement, this is the only significant growth location in the Huntingdon SPA. Linden Homes Strategic Land considers that there is potential to develop sites closer to Huntingdon. This will maximise the town's opportunities to deliver sustainable development and will reinforce its role as the primary settlement in the SPA, consistent with policy LP2 which seeks to "*Concentrate development in locations which provide, or have the potential to provide, the most comprehensive range of services and facilities*".
- 2.2 The Council has considered alternative development options around the Huntingdon SPA in the Housing and Economic Land Availability Assessment (HELAA) (**HOUS02**), last updated in late 2017.
- 2.3 The HELAA includes an assessment of twelve alternative development locations around Huntingdon (p49-57). In summary, this assessment concludes that parcels A (Alconbury), B (north of the A141 including Lodge Farm), E and F (Godmanchester) and L (Ermine Street) are potentially suitable for development, with the other sites discounted either for reason of flood risk, minerals planning, or distance from services. Of these, parcels A, E and F are to be allocated through

the Local Plan and parcel L is an extant allocation from the 2002 Local Plan. This assessment clearly indicates that the only suitable direction for any further growth in Huntingdon is north of the A141.

- 2.4 The HELAA also presents a site-by-site assessment of individual development options. For Lodge Farm (p141-147), the HELAA concludes that the only reason for discounting the site for development is on highways grounds and otherwise reaches broadly favourable conclusions for the site. As set out in our Matter 3 statement, the Council's position on the topic of highways is considered inadequately evidenced. Subject to a proper assessment of highways impact, capacity and necessary mitigation, it may well be the case that development can come forward around Huntingdon during the current Plan period without requiring the costly package of mitigation which the Council's assessment seems to suggest.
- 2.5 Drawing the above together, the Council's evidence base (subject to highways matters being fully resolved) shows that there is a broad location for growth at Huntingdon – Lodge Farm - which offers the opportunity to deliver a significant amount of additional housing in a way which meets the objectives of the Spatial Strategy. This will provide extra flexibility within the Plan and help to resolve the soundness concerns relating to the Plan.

3. Q5: What are the benefits that the proposed development would bring?

- 3.1 The Alconbury Weald SEL will, over time, create a masterplanned, self-contained community with its own employment, services, social and community infrastructure. Alconbury Weald has strong prospects to be a successful and sustainable new settlement, capable of 'standing on its own two feet'. However, we question how much of the benefit will flow to Huntingdon itself, as the primary settlement in the Spatial Planning Area.
- 3.2 The approved scheme at Alconbury provides for a wide range of local services and community infrastructure. However, the scale of these indicates that these will only realistically serve residents of Alconbury and will not provide any new services or facilities that are already available elsewhere, such as in Huntingdon itself.

- 3.3 By contrast, development closer to Huntingdon could achieve tangible benefits for the town and support its role as the primary settlement in the defined Spatial Planning Area and moreover as the second largest settlement in Huntingdonshire. Linden Homes Strategic Land has undertaken a masterplanning exercise for its site at land at Lodge Farm and there are opportunities to deliver:
- Significant amounts of public open space and green infrastructure, including a countryside park accessible to all;
 - Delivery of new sporting facilities capable of serving Huntingdon's wide range of established sports clubs as well as the general public;
 - Realignment of the A141 to the north of the town, helping to separate out longer distance traffic travelling between the north of Huntingdon and towards the A14 interchange; and
 - Delivery of a travel hub as identified in the CCC Long Term Transport Strategy, supporting Huntingdon Town Council's intention to provide a Park and Ride service to ease congestion in the town.
- 3.4 Each of these would be at a site contiguous with the main built up area of Huntingdon, capable of being connected into existing foot and cycle routes as well as existing and proposed bus services.
- 3.5 Furthermore, greater levels of growth closer to Huntingdon will better support the local economy through increased spending and patronage of the town's services and facilities, especially those in the town centre. The regeneration of Huntingdon's town centre has already made good progress, with the redeveloped Chequers Court opening in 2017 and proving a significant uplift in the quantity and quality of comparison goods shopping in the town. Further growth at Huntingdon will support further regeneration and diversification (e.g. through development of more entertainment, leisure, and café/restaurant uses).
- 3.6 The potential of development of land at Lodge Farm to support services, retail and facilities in Huntingdon has been recognised by Huntingdon Town Council. The Council has already indicated that it wishes to see development take place close to Huntingdon north of the A141 and its Leisure and Community Services Committee has previously resolved to include land at Lodge Farm as a location for

future development. It is expected that this will be reflected in the wording of the Draft Neighbourhood Plan which is due to be consulted upon later in 2018.

4. Q6: What are the potential adverse impacts of developing the site? How could they be mitigated?

4.1 From a sustainability perspective, it is considered that Alconbury is somewhat lacking in public transport options which could increase reliance upon the private car – especially during the early days of the development (services currently only run hourly). This could reduce the potential connectivity and interrelationship with Huntingdon and result in the entrenchment of car-borne travel habits. There is a longstanding proposal to deliver a railway station at Alconbury on the East Coast Main Line. However, the proposals did not form part of the original planning application as, at that time, it was not known whether the proposals were feasible or viable (refer to application Transport Assessment, para 8.3.4). It remains the case today that there is no firm proposal for the delivery of the railway station. Network Rail's plans for the four-tracking of the East Coast Main line in this location do not provide for the delivery of this station.

4.2 By contrast, development closer to Huntingdon, such as at Lodge Farm, can be more easily 'plugged in' to existing foot and cycle networks which reach to the current outskirts of the town. There is also the potential to use the existing bus links which already pass near the site (in this case, route B of the Busway passes close to the site en route between Huntingdon and Cambridge with services every fifteen minutes during daytimes) rather than requiring extensions or brand new services. These routes could also form a basis for the Transport Hub which could be delivered through development of land at Lodge Farm, as well as the proposed Park and Ride.

5. Q10: Is the site realistically viable and deliverable?

5.1 Linden Homes Strategic Land is concerned that the RAF Alconbury site (SEL1.2) is at risk of not coming forward at all and therefore being undeliverable. The site is currently used by the United States Air Force to support their ongoing operations and provide accommodation for service personnel. It was originally understood that the site would close in 2023. However the USAF is now reviewing this decision and has already advised it will remain at Alconbury until at least 2024,

leaving open the possibility that the site will remain in use beyond this date. It will therefore be unavailable and undeliverable for new housing for this period. Clearly, in this case, a significant source of additional new housing will be lost or delayed and there will be implications for the rolling housing land supply.

5.2 In light of this risk, the Local Plan is **not considered positively prepared or effective** as it currently provides no ‘back up’ should RAF Alconbury not come forward. More flexibility, in the shape of additional housing allocations, is needed if the Plan is to be found sound.

6. Q11: What is the expected timescale and rate of development and is this realistic?

6.1 The Housing Trajectory (**MON02**) projects completions at the Alconbury SEL throughout the entirety of the Plan period, at both the Alconbury Weald site and RAF Alconbury. Development is already underway with three housebuilders currently active at the site (Redrow, Morris, and Hopkins). As such, the timescales, in and of themselves, are reasonable.

6.2 However, Linden Homes Strategic Land does not consider that the projected rate of development is reliable and as such, the Local Plan is **not effective and not positively prepared**.

6.3 The assumptions set out within the Trajectory are considered highly optimistic. For Alconbury Weald, the Housing Trajectory projects up to 250 completions per annum from 2018/19 onwards, rising to up to 300 completions per annum from 2029/30. For RAF Alconbury the plan projects up to 185 dwellings per annum from 2029/30 (assuming that site comes forward at all). Across both Alconbury sites, the plan projects up to **485 completions per annum**; these delivery rates are sustained right to the end of the Plan period.

6.4 As set out in our Regulation 19 representations, experience shows that large development sites simply do not deliver at this kind of rate over any sustained period. Three local examples include:

- Cambourne in South Cambs will, upon completion in 2019/20, have achieved an average delivery of 206 dwellings per annum over 21 years;

- Hamptons in Peterborough has achieved an average delivery of 228 dwellings per annum over 19 years;
- Loves Farm in St Neots has achieved an average delivery of 143 dwellings per annum over ten years.

6.5 In addition, an extensive study undertaken by Lichfields in November 2016 covering a significant number of sites across the country, has found that average delivery rates on large sites are generally around 170 dwellings per annum.

6.6 It has also become apparent that the Trajectory's assumptions on delivery during the early parts of the Plan period are optimistic. For example, 250 dwellings are forecast at Alconbury Weald during 2018/19 – however reserved matters approval currently only exists on four parcels with four named housebuilders (Urban and Civic¹, Redrow Homes², Morris Homes³ and Hopkins Homes⁴). To achieve 250 dwellings this year, each site would need to contribute 63 dwellings per annum. Normally, one might expect 50 dwellings per outlet per annum as a 'rule of thumb' in good market conditions, so 63 dwellings per site assumes a very strong rate of sales. As a point of comparison, the same approved sites delivered 102 dwellings in monitoring year 2017/18.

6.7 In light of these observed delivery rates, and the approaches taken in other recent Local Plans (such as the South Cambridgeshire Local Plan), it is considered that a maximum of **250 dwellings per annum** should be allowed for at Alconbury SEL within the Housing Trajectory. Even this figure is considered optimistic and further flexibility in the Plan should be provided, in order to minimise the potential impact of any shortfall in delivery. Linden Homes Strategic Land considers that land at Lodge Farm could assist in this, with a first phase capable of coming forward to provide the necessary degree of flexibility.

¹ Application references 17/00079 and 17/00802

² Application reference 16/02013

³ Application reference 16/01329

⁴ Application reference 15/01117