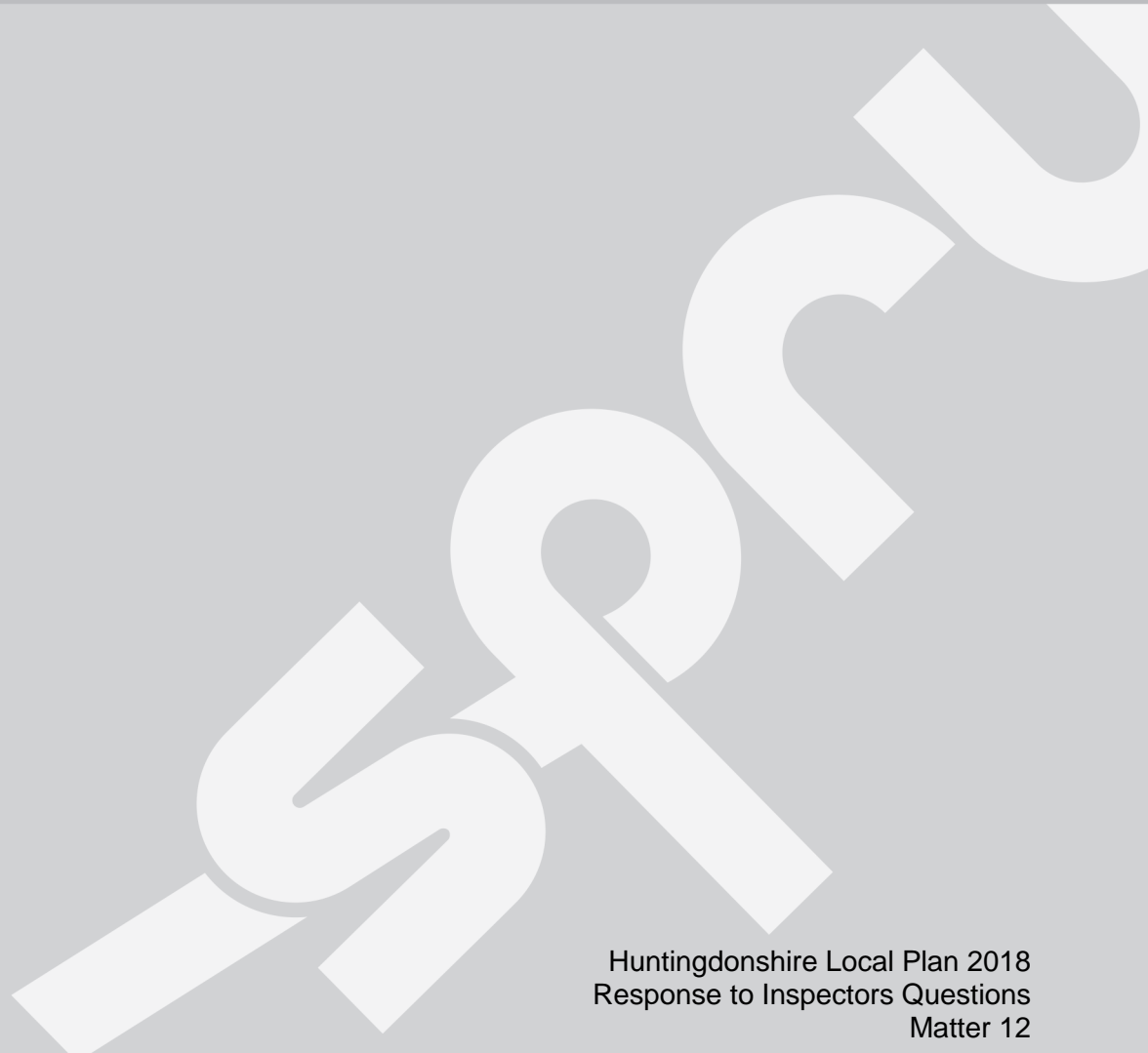




Strategic Planning & Research Unit

For and on behalf of
Bedfordia Developments Ltd



Huntingdonshire Local Plan 2018
Response to Inspectors Questions
Matter 12

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1.0 INTRODUCTION

- 1.1 These responses to the Inspector's matters and questions have been prepared by the Strategic Planning Research Unit of DLP Planning Ltd and are made on behalf of Bedfordia Developments Ltd who have land interests at land east of Eaton Socon.

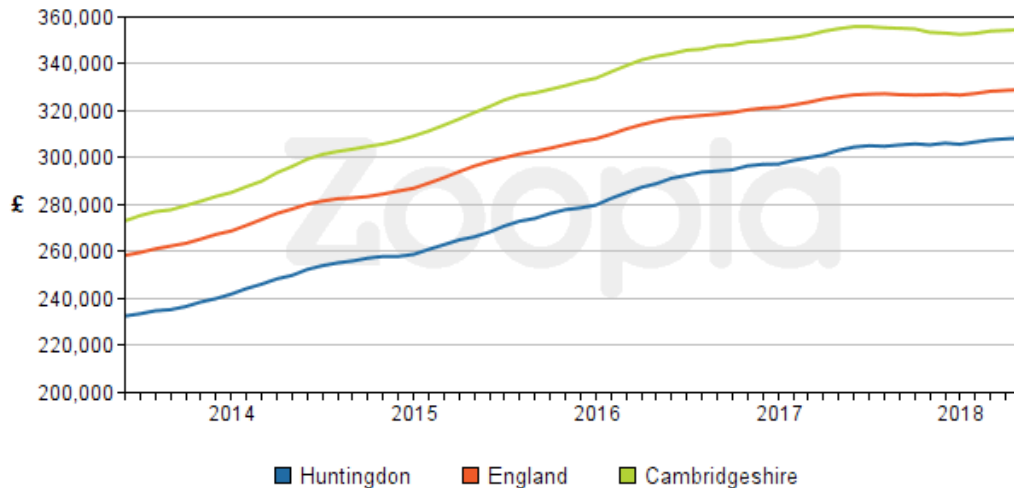
MATTER 12: THE SUPPLY AND DELIVERY OF HOUSING LAND

Issue – Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy.

- i. Q1- What is the estimated total supply of new housing in the plan period 2011-2036 and how does this compare with the planned level of provision of 20,100?*
- ii. Q2- What is the estimated total supply in the plan period from?*
- a) Completions since 2011*
 - b) Existing planning permissions*
 - c) Other commitments e.g. sites subject to S106*
 - d) Proposed site allocations*
- 1.2 As we have set out in our original Regulation 19 representations, we do not consider the Council's assumptions on proposed allocations is soundly based, on some 'smaller sites' and to a greater extent on the larger 'strategic' sites. To overcome this soundness issue, we consider that further sites should be allocated, to provide flexibility to the housing supply and also to ensure that a 5 year housing land supply can be demonstrated upon adoption of the Plan.
- e) Other sources?*
- iii. Q3- What are the assumptions about the scale and timing of supply and annual rates of delivery from these various sources? Are these realistic?*
- iv. Q4- Specifically, are the timescales and rates of delivery on large strategic sites realistic?*
- 1.3 The Council tend to assume rates higher than the national average for Alconbury Weald and St Neots East, Loves Farm and Wintringham Park, RAF Alconbury. SPRU have found no evidence to indicate that sites in Huntingdonshire would deliver housing at rates above those experienced nationally. In fact, some of the local evidence is that lead in times might be longer and build out rates slower.
- 1.4 The level of completions assumed by the Council will require the developers involved to achieve a significantly enhanced performance compared to their typical approach to build out rates. The Council's approach also requires a greater number of housebuilders to be engaged in the delivery of the larger sites than there are at present. There is little to support the contention that the Council's enhanced rates of delivery are realistic.
- 1.5 Since 2012, the house price value trends are shown in the chart below and this indicates that prices in Huntingdonshire District are generally trending at a lower level than Cambridgeshire as a whole and also lower than England. This would suggest that the

market is not as strong as other parts of the country and therefore less likely for build out rates to exceed national averages.

Chart 1: House Value Trends in Huntingdonshire



- 1.6 That said, Loves Farm (Land North of Cambridge Road) is a large site under construction for over 1,000 dwellings. The site has been under construction since 2007 and there have been a total of 8 developers (or 9 if Charles Church is counted independently of Persimmon). The 2017 AMR states that as of March 2017, there have been 1,435 completions with the first completions assumed to have taken place in 2007 (the first building control applications were approved in 2007). This evidence suggests an annual average build rate of 144dpa. This compares with the national average for sites of this size (1,000-1,499 dwellings) which averages 122dpa (NLP).
- 1.7 It is noted that the Council does not have an extensive track record of delivering large sites and one example is not sufficient to justify projected completions which, in the case of Alconbury Weald (at its highest, 300dpa), would be one of the fastest delivering large sites across the whole of England according to the research by NLP. There is insufficient evidence to justify why this site would deliver at such high rates, nor does it have a development model to enable accelerated delivery, for example like that used in Milton Keynes.
- 1.8 Alconbury Weald is a brownfield site with outline permission for up to 5,000 dwellings. The reserved matters consent on this site total some 631 dwellings and confirms there to be three housebuilders on site (Morris Homes, Hopkins Homes and Redrow Homes). Urban and Civic are not a developer, but rather a strategic land promoter. No new developers have come on board since our site visit on 28th March 2017. We do not consider it realistic for the site to deliver above and beyond the national average and the national average according to NLP for a brownfield site of this size is 148dpa. We consider this delivery rate a much more realistic prospect.
- 1.9 Looking at several example sites, compared to national lead in and build out research and the performance of national housebuilders which operate in the area, it suggests that there is no evidence to support higher than national build out rates.

Saxon Gardens, California Road, Huntingdon

- 1.10 This is a green field site of 180 dwellings which was nearing completion in March 2016 (remaining three units completed in 2016/17). The site was developed out by Linden Homes.
- 1.11 A Building control application for 180 new dwellings was accepted in March 2013 and 90 residential plots and 1 non-residential plot was accepted in September 2015.
- 1.12 This evidence would suggest that over a 3 year build the developer has averaged some 60 dpa. This is exactly the same as the national average for sites of this size (100 – 499 see table 2)

Land at Riverside Mill, Little Paxton

- 1.13 This application for 426 mixed residential units, with public house and community hall with ancillary parking on land at Riverside Mill, Mill Lane Little Paxton St Neots Cambridgeshire (0302792FUL) was made in October 2003 and approved in October 2005.
- 1.14 A further application (0901203S73) was made in September 2009 and granted in 2010 for a substitution of house types. This increased the capacity of the site to 442 dwellings.
- 1.15 This site was developed out by 3 developers Taylor Wimpey, Twigden Homes and Kier Homes Ltd.
- 1.16 Building control applications were approved in 2007 and 2013 for 480 and 426 dwellings respectively.
- 1.17 The site was completed in the 2016/17 monitoring year and assuming a full year of completions from March 2011 onwards this represents a build rate of 71 dpa. This is lower than the national average for a site of this size (100 – 499 which is 86 dpa).

Completions per outlet from National House Builders

- 1.18 We have considered predicted levels of completions against the average rate of delivery for the housebuilder concerned as extracted from their own annual accounts. The following is a summary of the relevant national housebuilders:
 - a. Taylor Wimpey: Trading statement 26th April 2018- 0.85 sales per outlet per week (down from 0.93 in 2017). This equates to 44 dwellings a year per outlet.
 - b. Redrow: Annual Report 2017 – 5,416 legal completions on 132 active outlets. This equates to 41 dwellings per year per outlet.
 - c. Crest Nicholson: Trading Update (May 2018)- sales per outlet per week equated to 0.72, this equates to 37 dwellings per year per outlet.
 - d. Bovis: Annual Report (2017) - Ambition to deliver 4,000 units per year which based on the number of active sales outlets in the 2016 Annual Report, would suggest a rate of 41 dwellings per outlet per year.
 - e. Barratt: Trading Update (May 2018): sales rate of 0.80 per active outlet per average week. This equates to 42 dwellings per outlet per year.
- 1.19 These are rates of sales and as such tend to run ahead of actual build rates. Therefore, whilst completion rates will be lower than these sales rates, sales rates can be a reasonable proxy indicator for build out rates.

v. Q5- How has flexibility been provided in terms of the supply of housing? Are there other potential sources of supply not specifically identified? Can this be quantified?

1.20 In its present form, with a heavy reliance on a handful of large strategic sites, the plan provides very little in the way of flexibility of housing supply. We do not consider that identifying ‘other sources’ of housing supply is a sound approach or appropriate. We consider that smaller sites should be brought forward and allocated to ensure the Council can demonstrate and maintain its five year supply upon adoption.

vi. Q6- has there been persistent under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para47 of the NPPF?

1.21 We agree with the Council that a 20% buffer should be applied due to the persistent under delivery in the last five years (since 2011) when judged against the Draft Local Plan requirement of 804dpa.

1.22 The table below compares the policy position with delivery over the period since 2011/12. This suggests that against policy requirements, there has been an undersupply of some 1,149 dwellings since 2011. In the years since 2011, only 76% of the requirement has been delivered and SPRU agree with the Council that a 20% buffer is considered appropriate in accordance with Paragraph 47 of the Framework.

Year	Net Completions	Requirement	Difference	% of Target Delivered
2011/12	847	804	43	105%
2012/13	412	804	-392	51%
2013/14	686	804	-118	85%
2014/15	514	804	-290	64%
2015/16	534	804	-270	66%
2016/17	682	804	-122	85%
Total	3,675	4,824	-1,149	76 %

vii. Q7- How should the shortfall in delivery since 2011 be dealt with?

1.23 In terms of dealing with any undersupply Paragraph: 035 Reference ID: 3-035-20140306 states that local planning authorities should aim to deal with any undersupply within the first five years of the plan period where possible (i.e. the ‘Sedgefield’ approach. Where it is not possible to address the shortfall within the first five years then the guidance requires that the Council approach neighbouring authorities though the Duty to Cooperate to establish if they could assist in meeting this shortfall in the next five years.

1.24 SPRU consider the Sedgefield approach to be most the appropriate method to deal with the shortfall in delivery since 2011. There are no individual circumstances to justify the departure from national planning guidance.

viii. Q8- what would the requirement be for a five year supply including a buffer and accommodating any shortfall since 2011?

1.25 The table below identifies the requirement, based upon the submitted Plan’s housing requirement, as follows:

		No. of Dwellings
A	Requirement for plan period	20,100
B	5 year supply requirement (804dpa x 5)	4,020
C	Shortfall (Since 2011)	1,149
D	5yr Requirement plus Shortfall (B+C)	5,169
E	5yr requirement including 20% buffer (D x1.20)	6,203
f	Annual Supply Required (E / 5)	1,241

ix. Q9- Would the Local Plan realistically provide for a five year supply on adoption? Will a five year supply be maintained?

- 1.26 No, at present the Council can only demonstrate 3.94 years of housing land supply based on SPRU's own assessment. This is unlikely to improve with the adoption of the Local Plan. The shortfall gains greater significance if one considers the general direction of travel of Government policy and guidance which suggests a higher housing requirement and a stricter implementation of what may constitute a deliverable site. The onus will be on the Council to prove there is robust evidence that a site will deliver in the five year period and not inclusion until evidence can demonstrate otherwise as is the process at the current time.
- 1.27 If the Council cannot demonstrate a five-year supply of housing, the Plan's policies relevant to the supply of housing land cannot be considered up-to-date. That in effect triggers, paragraph 14 of the current Framework, as housing proposals should be considered in the context of the presumption in favour of sustainable development (paragraph 49). Therefore, the Council must be confident that the submitted plan, can demonstrate a five-year supply. There are examples in case law where having a land supply, marginally above 5 years, has been deemed 'inadequate' by appeal Inspectors and the presumption has been triggered. Therefore, for it to be sufficiently robust, the 5 year supply should only be considered sound, if the supply is clearly above 5 years.

x. Q10- Is there a case for a staggered or phased requirement with a lower figure in the early years of the plan period to take account of the large strategic allocations? If so, what would be an appropriate phasing?

- 1.28 No, we do not consider there is a case for a lower figure in the early years of the Plan. There are sufficient sites which are available now and suitable for development which the Council could allocate through this Local Plan. This would ensure that the housing need arising now and that which has not been met since 2012 can be delivered at the earliest opportunity. If the Council were to take this approach then the failure to deliver housing need since 2012 will be compounded even further. The Council's strategy should seek to address this problem now, not towards the end of the Plan period.

xi. Q11- In overall terms would the Local Plan realistically deliver the number of houses required over the plan period?

- 1.29 No, SPRU's assessment of delivery rates and lead-in times suggest the Council are only able to demonstrate a plan period supply of 14,604 dwellings to 2036, a shortfall of 5,496 dwellings. Additional sites should be allocated to address this shortfall.
- 1.30 The draft Framework now clearly defines the term "**deliverable**" in Appendix 2 page 24. To be considered deliverable sites need to be **available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on site within five years**. Small sites 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 and sites with outline planning permission, permission in principle, allocations or identified in the brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 1.31 Like the other changes proposed in the draft Framework and Guidance, these indicate the direction of travel in terms of future government policy on these issues. Whilst not national guidance at the time of writing, it is expected that the new Framework will be released on 24th July and thus will be in force by the time of the Matter 12 hearing and therefore, national policy and guidance should be taken into consideration.
- 1.32 If this is the case, we request, through the Inspector, that the Council publishes their most up to date position on land supply, in sufficient time before the Matter 12 hearings, allowing participants to consider any new information and the impact of changes to national policy and guidance.
- 1.33 There are a number of sites, which, based on the Council's own evidence (AMR 2017), do not provide the clear evidence required to support their inclusion in the five year land supply, at the time of our research they did not have the benefit of a full permission. In the event of the Framework's adoption, these sites would not be included in the five year supply. These are:
- a. Main Street, Huntingdon (30 dwellings);
 - b. Cromwell Road North, St Neots (30 dwellings);
 - c. Former Car Showroom, London Road, St Ives (50 dwellings);
 - d. East of Valiant Square, Bury (80 dwellings);
 - e. East of Silver Street and south of A1, Buckden (48 dwellings);
 - f. W of Station Rd, Kimbolton (23 dwellings);
 - g. North of Station Road/ Stow Road, Kimbolton (50 dwellings);
 - h. Land South West of Mill Cottage, Gidding Road, Sawtry (150 dwellings);
 - i. The Pasture, Somersham (15 dwellings);
 - j. Somersham Town Football Club (25 dwellings);
 - k. N of the Bank, Somersham (120 dwellings);
 - l. East of Robert Avenue, Somersham (50 dwellings);
 - m. College Farm, West of Newlands Industrial Estate, Somersham (55 dwellings);
 - n. W of Ramsey Rd, Warboys (45 dwellings);

- o. Manor Farm Buildings, Warboys (10 dwellings);
 - p. South of Stirling Close, Warboys (40 dwellings);
 - q. North of School Lane, Alconbury (55 dwellings);
 - r. North of 10 Station Road, Bluntisham (30 dwellings);
 - s. Land west of Longacres, Bluntisham (135 dwellings);
 - t. Between 20 Cage Lane and Averyhill, Great Staughton (14 dwellings);
 - u. South of 29 The Green, Great Staughton (20 dwellings).
- 1.34 This totals 1,075 dwellings without the sufficient evidence to be included in the 5 Year Land Supply.

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