

**HUNTINGDONSHIRE  
LOCAL PLAN  
EXAMINATION**

**MATTER 12: SUPPLY &  
DELIVERY OF HOUSING**

**REP ID: 1118661**

**HEARING STATEMENT**

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## MATTER 12 – THE SUPPLY AND DELIVERY OF HOUSING LAND

### Introduction

- 1.1 This Matter 12 Statement has been prepared by Carter Jonas LLP on behalf of Hallam Land Management (HLM), who are promoting land at Gifford's Park in St Ives for a residential-led mixed use development. In the HLM representations to the Proposed Submission Huntingdonshire Local Plan 2036 (PS HLP2036) there are comments about the use of unrealistic housing delivery assumptions generally and for specific larger allocations e.g. Policy LP2 (Rep Id. 352), Section D.6 (Rep Id. 363), Policy SEL 1.1 (Rep Id. 365), Policy SEL 1.2 (Rep Id. 368), Policy HU1 (Rep Id. 370), Policy SEL 2 (Rep Id. 371) and Policy RA8 (Rep Id. 378).
- 1.2 In this Statement we focus on housing delivery at the larger sites referred to in our representations, updated to reflect the findings of the Huntingdonshire Housing Monitoring Report 2016/17 (December 2017), as follows:
- Policy SEL1.1 – Former Alconbury Airfield and Grange Farm;
  - Policy SEL1.2 – RAF Alconbury, Huntingdon;
  - Policy HU1 – Ermine Street, Huntingdon;
  - Policy SEL2 – St Neots East (including Loves Farm and Wintringham Park); and,
  - Policy RA8 – Former RAF Upwood, Ramsey

### Issue

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

### Questions

*1) 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?*

- 1.3 We note that Paragraph 4.10 of PS HLP2036 states in part: *"In total housing completions since 2011, commitments as at 1 April 2017 and allocations in this plan account for approximately 22,500 new homes, equivalent to 112% of the objectively assessed need"*. Paragraph 1.8 of the Huntingdonshire AMR 2016/17 (December 2017) states in part: *"Taking into account completions and projected delivery on sites already committed and those sites identified as being capable of contributing to housing delivery, the Local Plan to 2036 housing trajectory indicates that by 2036 22,068 dwellings could be delivered"*. The Council assumes that sufficient land has been identified during the plan period to meet the proposed housing target of 20,100 dwellings. We disagree because the housing delivery assumptions for some of the larger allocations are unrealistic, and as a result the housing land supply would be reduced.

*3) What are the assumptions about the scale and timing of supply and annual rates of delivery from these various sources? Are these realistic?*

- 1.4 In our representations to PS HLP2036 we commented on housing delivery at the larger strategic sites, both commitments and allocations, and focus on these sites in Question 4 below. In those representations we suggested that the housing delivery rates at these larger sites was unrealistic, and requested that more realistic rates should be applied to those sites. We identify below the information which has informed our assessment of the appropriate housing delivery rates that should be applied to the strategic sites.
- 1.5 There is recent national evidence available on housing delivery rates. Nathaniel Lichfield & Partners published a research report 'Start to Finish - How Quickly do Large-Scale Housing Sites Deliver?' (November 2016) which provided evidence on the speed and rate of delivery of large-scale housing developments – see <http://lichfields.uk/content/insights/?article=start-to-finish-how-quickly-do-large-scale-housing-sites-deliver&archive>. The key findings of the research report that we wish to highlight are as follows: the average

annual build rate for a scheme of 2,000+ dwellings is 161 dwellings per year; and, the highest average annual build rate of the schemes assessed is 321 dwellings per year at Cranbrook in East Devon (which received significant amounts of public funding to support delivery including infrastructure).

- 1.6 Cambourne new settlement in South Cambridgeshire provides evidence of housing delivery rates at an established strategic development in the local area over a number of years. The new settlement was started in the late 1990's. It is located within the A428 Corridor between St Neots and Cambridge. It is approximately 11km from St Neots and 10km from Cambridge. The close proximity to Cambridge means that Cambourne is a higher value area than St Neots. The average annual delivery rates at Cambourne is 229 dwellings. It is unrealistic to assume that delivery rates at St Neots East and Alconbury Weald would be higher than those achieved at Cambourne.
- 1.7 There are established strategic scale developments in neighbouring Bedfordshire which provide evidence of housing delivery rates and which have similar characteristics to the proposed development at St Neots East e.g. an urban extension to an existing town located within the A1 and A428 Corridors. It is unrealistic to assume that average housing delivery rates at St Neots East would be significantly different to these developments. The annual average housing delivery rates are as follows:
- Biggleswade East (within Central Bedfordshire) – 202 dwellings per year
  - West of Kempston (within Bedford Borough) – 120 dwellings per year
  - Great Denham (within Bedford Borough) – 123 dwellings per year
- 1.8 Loves Farm in St Neots has historically delivered approximately 100 dwellings per year. The recent housing monitoring data for the five years between 2012/13 and 2016/17 show delivery rates of 60, 106, 59, 85 and 49 dwellings respectively. However, it is predicted in the AMR December 2017 that for some years up to 185 dwellings per year would be delivered from the St Neots East - Loves Farm site. There is no evidence to justify a substantial increase in annual delivery rates above historic levels for St Neots East – Loves Farm and St Neots East – Wintringham Park; as set out below we have estimated a combined housing delivery rate of no more than 200 dwellings per year.
- 1.9 A number of the strategic scale developments in Huntingdon and St Neots are located in close proximity to each another i.e. Alconbury Weald, RAF Alconbury and Ermine Street in Huntingdon, and Loves Farm and Wintringham Park in St Neots East, which will have implications for housing delivery because they will in effect be competing sites and within the same local housing market. It is possible that development could occur at neighbouring sites at the same time, but adjustments to housing delivery rates should be made.
- 1.10 There is uncertainty about the availability of some sites included within the housing trajectory, and we highlight two of those sites at RAF Alconbury and the remainder of the land at RAF Upwood which does not have planning permission. The availability of the RAF Alconbury site for residential development is uncertain because it is currently occupied by the US Air Force, with no confirmation that they intend to move from the site and no indication or agreed timetable for when this might occur. As such, this site cannot be considered 'developable' within the definition of Footnote 12 to Paragraph 47 of the NPPF. Even if the RAF Alconbury site is available during the plan period, then delivery would still be uncertain because of the close proximity of the Alconbury Airfield and Grange Farm site, which will still be delivering when the RAF Alconbury site might become available. The RAF Upwood site is included in the housing trajectory, which assumes that 450 dwellings would be delivered at the site. However, outline planning permission exists for 160 dwellings only on part of the site. There has been concerns raised previously about the suitability of the site in terms of accessibility by sustainable modes of transport, and the likelihood that there would be a high dependence on the private car from the site and the continuation of high levels of out-commuting from Ramsey. It is highly unlikely that the delivery of a limited amount of additional pedestrian and cycle infrastructure with the allocation will be sufficient to address the previous transport-related sustainability concerns which were significant. The suitability of the remainder of the land at RAF Upwood for housing is uncertain because of the ability to improve significantly access by sustainable modes of transport from the site.
- 1.11 In addition, the assumptions about the commencement of development at the larger strategic sites in the housing trajectory will need realistically to reflect actions that need to be completed once a resolution to grant outline planning permission has been made e.g. complete negotiations on the S106 Agreement, discharge relevant conditions, market land parcels to housebuilders, appoint housebuilders, submit reserved matters,

and complete primary infrastructure. These actions do take some time to complete, and need to be fully reflected in the housing trajectory depending on the circumstances at individual sites.

4) *Specifically, are the timescales and rates of delivery on large strategic sites realistic?*

- 1.12 The timescales and rates of delivery at the large strategic sites are not realistic. In our response to Qu.3 we identified the relevant information that we consider should have informed the estimates of housing delivery at the large strategic sites. We set out below our assessment of realistic housing delivery rates, and the appropriate adjustments required to the housing trajectory as a result of our reassessment.
- 1.13 In summary, our comments on the housing trajectory for large strategic sites are as follows:
- It is predicted in the AMR December 2017 that 250 dwellings would be delivered per year at the Alconbury Airfield and Grange Farm site, which increases to 300 dwellings per year once established. It is completely unrealistic to assume annual delivery rates at Alconbury Weald which are just below the highest average recorded levels nationally (at Cranbrook in East Devon) and higher than similar developments in higher value neighbouring authority areas (at Cambourne in South Cambridgeshire). We suggest that it would be appropriate to assume that a maximum of 200 dwellings per year could be delivered from this site. As a consequence we estimate that 1,270 fewer dwellings would be delivered from this site during the plan period.
  - It is predicted that development at RAF Alconbury would start in 2028/29, and would deliver between 180 to 185 dwellings per year once established. However, this site is adjacent to the Alconbury Airfield and Grange Farm site, which is predicted to deliver 300 dwellings per year at the same time that RAF Alconbury is expected to deliver. It is unrealistic to assume that a combined total of 480 dwellings per year would be delivered from these two neighbouring sites. In addition, land at Ermine Street located less than 1.5 miles south of Alconbury Weald is also included within the housing land supply, and is also predicted to deliver at the same time, which must raise further concerns over the ability of each site to meet its housing delivery rates in an overcrowded market. As set out above, the availability of the RAF Alconbury site for residential development is uncertain because it is currently occupied by the US Air Force, and, even if the site is available during the plan period, then delivery must be uncertain because of the close proximity of the Alconbury Airfield and Grange Farm site which will still be delivered when the RAF Alconbury site might become available (if it ever is). We suggest that RAF Alconbury is deleted from the housing supply until evidence is provided that it is available and that delivery will occur during the plan period, and as a consequence 1,320 fewer dwellings would be delivered. In addition, in HLM's Matter 6 Statement, it is also requested that the Ermine Street sites (Policy HU1) are deleted from the housing trajectory unless evidence is provided to demonstrate that the sites are available and as a result 1,440 dwellings would be removed from the housing land supply.
  - Loves Farm in St Neots has historically delivered approximately 100 dwellings per year. However, it is predicted in the AMR December 2017 that up to 185 dwellings per year would be delivered from the St Neots East - Loves Farm site. There is no evidence to justify a substantial increase in annual delivery rates above historic levels. We suggest that the start date for development would be 2020/21 to enable the marketing of parcels of land, purchase by housebuilders, and submission of reserved matters. We also suggest that housing delivery rates at St Neots East – Loves Farm should be reduced to 100 dwellings per year, which still means that all of the proposed 1,020 dwellings at the site would be delivered during the plan period.
  - It is predicted that up to 250 dwellings would be delivered per year from St Neots East - Wintringham Park site after the initial phases of the development, which is unrealistic since this level is higher than the average delivered nationally from strategic developments, it is higher than delivery rates at Cambourne in South Cambridgeshire, and higher than similar types of developments in Bedfordshire (Biggleswade East, West of Kempston and Great Denham). In addition, this site is immediately adjacent to Loves Farm and the housing market area would be the same for both sites. There is no evidence to justify a higher housing delivery rate for St Neots East - Wintringham Park above historic rates for Loves Farm. We suggest that the start date for development would be 2020/21 to enable the marketing of parcels of land, purchase by housebuilders, and submission of reserved matters. We also suggest that housing delivery rates at St Neots East – Wintringham Park should be reduced to 100 dwellings per year while development at St Neots East – Loves Farm is still taking place, and increased to 200 dwellings per year thereafter i.e. from 2029/30. As a consequence we estimate that 600 fewer dwellings would be delivered from the St Neots East – Wintringham Park site during the plan period.

- It is predicted that 450 dwellings would be delivered from the RAF Upwood site during the plan period. Outline planning permission was granted in June 2017 for 160 dwellings on part of the site (Ref. 12/01274/OUT) and are a commitment. However, the remainder of the site has no planning status and the delivery of the remaining 290 dwellings included within the proposed allocation is uncertain. An appeal decision from 2011 for a mixed use development including 650 dwellings on the whole of the RAF Upwood site was dismissed, with transport sustainability being one of the main reasons for that decision (Application Ref. 09/00342/OUT and Appeal Ref. APP/H5020/A/09/2112959). There has been no change in circumstances since the appeal decision in 2011 to indicate that the site is now sustainable in transport terms or can be made sustainable. It is highly unlikely that the delivery of a limited amount of additional pedestrian and cycle infrastructure with the allocation will be sufficient to address the previous transport-related sustainability concerns - which were significant. There is no evidence to demonstrate that the remainder of land at RAF Upwood is available for development during the plan period and that the previous transport-related sustainability concerns about the site can be fully addressed. We request that 290 dwellings are deleted from the supply for land at RAF Upwood.

- 1.14 Therefore, based on the reassessment of delivery assumptions at some of the large strategic sites, we estimate that approximately 3,480 fewer dwellings would be delivered during the plan period. In these circumstances additional strategic allocations will need to be made to meet the proposed housing target. In our representations, we requested that more development should be allocated to St Ives in the development strategy and through allocations, reflecting its identification *by the Council* as a location suitable for accommodating strategic scale development. St Ives is plainly a sustainable location for such development, in that it contains a good range of services and facilities and employment opportunities and it is sustainable in transport terms. St Ives is also physically capable of accommodating strategic scale development. We have requested that land at Gifford's Park is identified as an additional strategic allocation.
- 1.15 It is not unusual for local planning authorities to make overly optimistic assumptions of housing delivery at strategic sites in their housing trajectories, with often dire consequences for the supply of housing when development is delayed. In the future, if monitoring data shows that housing delivery rates are increasing at these strategic sites then a subsequent upward adjustment could be made for future trajectories.

7) *How should the shortfall in delivery since 2011 be dealt with?*

- 1.16 We did not comment on which approach should be used to address the housing land supply shortfall in our representations. We note that the Planning Practice Guidance expresses a clear preference for the 'Sedgefield' approach. In the 'How should local planning authorities deal with past under-supply?' section of the Planning Practice Guidance, at Paragraph 035 (ID: 3), it states in part:

*"Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible....."*

- 1.17 The 'Sedgefield' approach is consistent with national guidance in terms of boosting significantly the supply of housing, and also seeks to address any housing shortfall as quickly as possible. The 'Sedgefield' approach is currently used elsewhere in Cambridgeshire (with the one exception of Fenland).

9) *Would the Local Plan realistically provide for a five year supply on adoption? Will a five year supply be maintained?*

- 1.18 No – see response to Qu.4 above.

10) *Is there a case for a staggered or phased housing 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?*

- 1.19 There is no case for a staggered or phased approach to be included in PS HLP2036. The staggered or phased approach is not proposed, and therefore has not been subject to sustainability appraisal and has not been discussed or agreed with neighbouring authorities. As set out above, the two strategic expansion locations at Alconbury Airfield and St Neots East either have planning permission and are under construction or have a resolution to grant permission. As set out above in our assessment of delivery at the large strategic allocations, the problem mostly relates to unrealistic assumptions about annual housing delivery rates in

general and unrealistic expectations that housing delivery would occur on neighbouring sites without any impact on the rate of delivery. As we understand the position, there are no infrastructure constraints at any of the larger strategic sites which would affect housing delivery and thus potentially justify a staggered or phased approach. As set out above, we consider that the availability of RAF Alconbury and the uncommitted part of land at RAF Upwood for development is uncertain, and that uncertainty would not be addressed by a staggered or phased approach. In any event, a staggered or phased approach would have negative consequences for the supply of housing and affordable housing.

11) *In overall terms would the Local Plan realistically deliver the number of houses required over the plan period?*

1.20 No.

