

Countryside Properties (UK) Ltd and the Huntingdon Freemans Trust

ID: 1151775

Matter 4 Hearing Statement

Huntingdonshire Local Plan Examination

Matter 4: Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the overall provision for housing.

Relevant Policies – LP1.

Question 8

Is the Local plan justified in seeking to make provision to meet this OAN? Is there a case to make provision for a higher or lower number? How does it compare with past rates of delivery?

Our client has previously commented on the need for an increased buffer to be applied to the OAN to boost supply and ensure that the target of 804 units per annum is capable of being delivered over the first 5 years and, subsequently maintained throughout the plan period.

We maintain our position that the plan does not facilitate this and sufficient sites need to be allocated to meet this alternative provision. For example, with a 10% buffer land for an additional 2,010 homes should be identified now.

There is a case to be made for allocating a higher number to facilitate this target and we wish to add to our previous representations to highlight changes that have occurred in the interim period since the Reg 19 consultation stage.

Affordable Housing:

The need for a buffer is justified when the local housing need is considered (i.e. Question 6). The Council has set out its intention to maintain a target for 40% affordable housing provision on qualifying residential sites across the plan period, to continue at the 2009 Core Strategy levels. It is noteworthy that the two Strategic Expansion Locations in the Submission Plan [PREP/01] will provide a substantial proportion of the housing requirements and these either benefit from planning permission (SEL1: Alconbury Weald – 5,000 dwellings) or a resolution to grant planning permission subject to completion of a s106 agreement (SEL:2 St Neots East – Loves Farm Phase 2 and Wintringham Park – 1,020 and 2,800 dwellings

respectively). Both planning applications that combine to deliver SEL2 have now been reported to the Council's Development Management Committee in April 2018 and March 2018 respectively. Neither scheme can stand the 40% target on viability grounds citing 28% and 25% provision in the Officer Reports to committee. The potential 'loss' against the 40% affordable homes policy target is 122 dwellings and 420 dwellings respectively.

The Alconbury Weald s106 dated 30th September 2014 includes 10% affordable housing provision on the first phase of 879 dwellings (i.e. 351 dwellings short of policy target).

An increase in the OAN to deliver more housing generally and specifically through the inclusion of a buffer will help towards the delivery of more affordable housing to offset the known impacts of the two SELs on the ability to achieve the target affordable housing levels for the plan period. At 10% buffer, this would have the potential to secure an additional 804 affordable homes (of 2,010 overall) to 2036.

Supply Shortfall:

If the plan is adopted as currently drafted, we maintain our position that the identified allocations will not supply sufficient specific deliverable sites to provide the next 5 years' worth of housing against the housing requirements of the plan. Whilst this discussion is scheduled for September 2018 under Matter 12, it underpins this issue of whether provision should be made for more than the OAN levels.

This is not an unreasonable given past delivery rates which have failed to maintain the annual 804-unit target in the early 5 years of the plan period (2012/13-2016/17) by at least 15% and in some years, by 34-49% under provision.

In the Reg 19 submissions we highlighted the progress for the first two quarters of the 2017/18 period to Sept 2017 as the completion of 350 dwellings in total with 2017Q2 at 210 and 2017Q3 at 140 dwellings. The Q4,2017 figures from the Office for National Statistics are now available confirming a further 170 dwellings. The 2018Q1 figures will be available during June but based on past rates, this is unlikely to yield the remaining 284 dwellings to meet the annual target but does suggest that the Council's predicted delivery of 689 completions for 1 April 2017 to 31st March 2018 is reliable.

Therefore, another shortfall of approximately 15% against target further justifies the need to include a buffer now. At 10%, this level of buffer is entirely reasonable in the circumstances and would serve two purposes – firstly to capture back the identified shortfall of 1,307 dwellings from the first 7 years of the plan to 31 March 2018; secondly, to continue to provide a buffer for the next few years whilst the two significant Strategic Expansion Locations come on stream and start to make a meaningful impact to the housing trajectory.

In conclusion, there is a case to make provision for a higher number than the OAN. There are omission sites readily available to be considered for additional allocations through modifications to the plan to rectify this, including land south of Stokes Drive and Bluegate, Godmanchester.

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