

RPS

**Proposed Submission
Local Plan Examination
Hearing Statement –
Matter 6**

In respect of

Huntingdonshire District Council
Proposed Submission Local Plan
Examination

On behalf of

Abbey Properties Cambridgeshire
Limited and De Bene Esse Ltd

RPS Ref: JCG19995

6 July 2018

Secure & Stable
ADDING VALUE

QUALITY MANAGEMENT

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1 INTRODUCTION

- 1.1 We are instructed by our clients, Abbey Properties Cambridgeshire Limited and De Bene Esse Ltd to submit Hearing Statements and appear at the Huntingdonshire Local Plan Examination on their behalf in relation the Huntingdonshire Proposed Submission Local Plan and associated evidence base.
- 1.2 RPS previously submitted representations on behalf of our clients to the Huntingdonshire Local Plan to 2036: Proposed Submission (PREP/01), November 2017 Call for Sites, Local Plan to 2036 Consultation Draft 2017 (PREP/02), and the 2016 Housing and Employment Land Availability Assessment: Additional Consultation 2016.
- 1.3 The representations to the Local Plan Consultation Draft 2017 (PREP/02) and to the Proposed Submission Plan (PREP/01) are enclosed (**Appendix A and Appendix B**) with this Statement for ease of reference.
- 1.4 This Statement details our client's responses to Matter 6 of the Matters and Issues identified by the Inspector. Hearing Statements have also been prepared in respect of Matters 8, 9, 11, 12 and 13, as well as Matters 3 and 4 (already submitted)

2 RESPONSE TO THE MATTERS AND ISSUES IDENTIFIED BY THE INSPECTOR

2.1 The Inspector has posed a number of questions in respect of the 15 Examination Matters. This Hearing Statement seeks to respond to questions of relevance to our clients' interest in respect of Matter 6.

Matter 6 – Proposed Site Allocations – Huntingdonshire Spatial Planning Area

Whether the proposed site allocations for the Huntingdon Spatial Planning Area are justified, effective and consistent with national policy

2.2 This Hearing Statement considers all the draft residential allocations within the Huntingdon Spatial Planning Area only. Allocations HU 4 West of Railway; Brampton Road, Huntingdon, HU 5 West of Edison Bell Way Huntingdon; HU 10 Hinchingbrooke Country Park Extension, Huntingdon; HU 11 Huntingdon Racecourse; and HU 15 Park View Garage, Brampton; relate to other types of development and have not be assessed as part of this Hearing Statement.

2.3 HU 14 Brampton Park Golf Club Practice Ground relates to a site previously promoted by our client and has therefore not been assessed within this Hearing Statement.

2.4 **Appendix C** provides our analysis of the draft residential allocations for the Huntingdon Spatial Planning Area. The Appendix sets out the current planning status for each site, the main constraints, suitability of the site for development, deliverability, viability and delivery. These seek to address what we consider to be the key issues for each site and provide responses to the majority of the Inspector's questions.

2.5 Following this review we aver that there are three sites which are not appropriate for residential development and should not be allocated within the Local Plan. These are: HU9 Main Street; HU16 Tyrell's Marina; and HU17 RGE Engineering. All three sites are located within Floods Zones 2 – 3b and we consider these sites do not pass either the Sequential or Exception Tests. These sites combined are proposed to accommodate 136 dwellings.

2.6 Paragraph 101 of the NPPF states:

“The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding....”

2.7 The Council's allocation of these sites essentially means that the Sequential Test does not need to be applied within the district as the Council has already concluded that there is insufficient land within Flood Zone 1 to be developed for housing purposes.

2.8 However we disagree with the Council's assessment. As detailed in our previous representations to the Huntingdonshire Local Plan to 2036: Proposed Submission (**Appendix B**) our client has

submitted a number of sites located within Flood Zone 1 which we consider provide the opportunity for sustainable residential development.

- 2.9 This includes Land off and to the North of 66-100 Thrapston Road, Brampton. Notwithstanding appeal decision APP/H0520/W/17/3172571, we aver that the all or part of site remains suitable for residential development and that this would not have a significant adverse impact upon the local area. Furthermore the Council has recently granted consent for an agricultural dwelling directly to the north of site (17/02000/FUL). This demonstrates that the Council consider that development in this location to the north of Brampton will not cause harm to Hinchbrooke Country Park.
- 2.10 Additionally, we question whether RAF Alconbury (Site SE1.2) will be available and deliverable during the Plan period. The site is currently in active use by the US air force and the timeframe for vacating the airbase has recently been delayed by 2 years. Moreover, as recently as April 2017 the local newspaper (The Hunts Post) reported on the decision by the US Department of Defense to review the closure of a number of bases due to the '*heightened security situation in Europe*'. There is therefore a real possibility that the decision to close and redevelop RAF Alconbury could be delayed further or even reversed.
- 2.11 According to the HDC Housing Trajectory, the site is expected to deliver units by the year 2028/2029. With the level of uncertainty surrounding RAF Alconbury (if and when it will become available in the plan period) HDC should allocate additional sites in order to accommodate at least some of the 1,680 proposed units at RAF Alconbury should the site not become available during the Plan period and to provide choice and competition in the market in accordance with NPPF Paragraph 47.
- 2.12 In respect of the expected timescales and rates of development, the Council have been very optimistic on a number of sites. Sites including SE1.1 Former Alconbury Airfield and Grange Farm, and HU13 Brampton Park, are forecast to deliver more than 200 dwellings per annum during the course of their construction. We consider this rate of delivery is not supported by the Letwin preliminary update letter dated 9th March 2018 nor the NLP 'Start to Finish' research. Further information in relation to this issue is provided within our Hearing Statement for Matter 12. Furthermore allocations HU6 George Street and HU8 California Road all are expected to start delivering sites within the year 2018/19 despite planning permissions and/or pre-commencement conditions still being outstanding.
- 2.13 While the unrealistic forecast timescales and rates of delivery do not mean the sites are necessarily unsuitable to be allocated, a more realistic delivery rate on Alconbury Airfield does impact the long term ability for HDC to meet its OAN and annual housing targets. Therefore, additional housing sites should be allocated to ensure the Council is able to fully meet its objectively assessed housing need for both market and affordable housing.

3 CONCLUSION

- 3.1 On behalf of our clients, we have a number of concerns in relation to the approach taken by the Council towards the Proposed Site Allocations – Huntingdon Spatial Planning Area. This Hearing Statement has been produced in response to these concerns.
- 3.2 We consider that draft Local Plan is not justified, effective or consistent with national policy in respect of a number of the proposed allocations. The draft Local Plan also relies on overly optimistic delivery rates for a number of sites particularly in relation to the forecast number of dwellings to be delivered on site towards later in the plan period where there is less information available regarding the condition of the site; number of house builders involved; market conditions etc. We contend that the following amendments are required in order for the Plan to be considered sound:
- The removal of sites HU9 Main Street, HU16 Tyrell’s Marina and HU17 RGE Engineering as they do not comply with the Sequential Test set out within the NPPF;
 - The allocation of sequentially preferable sites within Flood Zone 1 to replace those allocations which do not comply with the Sequential Test including Land off and to the North of 66-100 Thrapston Road, Brampton;
 - Revisions to the proposed delivery rates and timescales for construction of a number of proposed allocations to provide more realistic delivery rates;
 - The allocation of additional sites to ensure that HDC can meet its housing targets (both affordable and market housing) once more realistic delivery figures have been applied.

**APPENDIX A – REPRESENTATIONS LETTER TO
CONSULTATION DRAFT DATED AUGUST 2017**

Our Ref: 19995/RMG/MB
Your Ref:

E-mail: mark.buxton@cgms.co.uk
Date: August 2017

Local Plans Team
Pathfinder House
St Mary's Street
Huntingdon
PE29 3TN

Dear Sir/Madam,

**REPRESENTATIONS TO THE HUNTINGDONSHIRE LOCAL PLAN TO 2036:
CONSULTATION DRAFT 2017**

RPS CgMs are instructed to submit representations on behalf of our client, Abbey Properties Cambridge Limited ('Abbey Properties'), to the Huntingdonshire Consultation Draft Local Plan.

This letter sets out our objections to, and where relevant, support for, the Consultation Draft Local Plan.

Objectively Assessed Needs (OAN)

Paragraph 4.8 identifies that the emerging Local Plan will support the overall provision of at least 21,000 new homes. Paragraph 4.34 states the emerging draft Local Plan identifies that 20,100 homes are required to meet the forecast population growth between 2011 and 2036 according to the Objectively Assessed Need for Huntingdonshire (2017). This equates to 804 dwellings per annum.

To be positively prepared the Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. While we welcome Huntingdonshire District Council's intention to target an overall provision of new homes above their assessed OAN, the Plan only contains a single sentence (at paragraph 4.1) setting out that the Council has taken this approach. We consider further justification for this approach should be contained within the Plan to accord with the tests of soundness reflected in NPPF paragraph 182.

We also highlight that if the Council seeks to provide at least 21,000 new homes during the plan period they will need to provide in excess of 804 dwellings per annum. We therefore consider that the Council should make it clear how many dwellings are required per annum to achieve the provision of at least 21,000 new homes over the course of the plan period in order for the Plan to be considered sound.

Furthermore, we consider that the Council has underestimated its Objectively Assessed Need for housing in the district. Abbey Properties has commissioned its own assessment of OAN for Huntingdonshire which it considers to be an appropriate Housing Target for the District. This figure has been created using PopGroup Modelling software in order to determine the objective assessed housing need. The software incorporates a wide range of socio-economic data which is sensitive to local circumstances and satisfies the requirements of the NPPF. The

assessment has been submitted to the Council on a number of occasions in support of Outline Planning Applications: 16/01530/OUT, 17/01161/OUT and 17/00931/OUT. A further update has also been commissioned.

This work assessed a variety of different scenarios and concluded that taking account of the Demographic, Economic, Affordability and Market Signals for Huntingdonshire there is clear evidence of a housing need of between 23,809 and 27,068 to be met between 2011 and 2036.

Therefore, we consider that a housing need of 23,809 dwellings is a robust and sound figure based on the sensitivity testing and should be the minimum level of housing need countenanced by Huntingdonshire District Council.

Policy LP 1 - Strategy For Development

The policy concentrates development in locations which provide the greatest access to services and facilities and directs substantial development to two strategic expansion locations: Alconbury Weald and St Neots East. We consider this strategy inhibits growth and does not provide a sufficiently flexible approach to bring further sites forward. The Policy also fails to comply with the NPPF which requires Local Planning Authorities *“to boost significantly the supply of housing”* (Paragraph 47).

The policy does not proactively address the key reasons behind the persistent under delivery of houses within the District during the previous plan period. The Local Plan again places over reliance on the delivery of a small number of large strategic sites which take a long time to bring forward, have substantial infrastructure requirements, and are more likely to be delayed.

We therefore consider that the Distribution of Growth should be planned more positively across the District with greater allowance made for additional small and windfall sites to support the larger strategic sites. The Housing White Paper ‘Fixing our Broken Housing Market’ advocates such an approach.

Policy LP 5 - Spatial Planning Areas

We disagree with the Council’s position on developments on unallocated sites. We consider that this policy is too restrictive and fails to recognise that the built-up areas of identified Spatial Planning Area are unable to accommodate viable and sustainable further growth. We therefore consider this policy is unsound.

The built-up area act as a proxy for the settlement boundaries. These have not been positively planned or adequately reviewed in this Local Plan and therefore do not allow for future growth. This results in limiting and restricting much needed housing growth. Moreover the built-up areas are based on outdated policy, the 2002 Local Plan Alterations, and are no longer relevant nor are they supported by the evidence base.

The supporting text *states “allocations for new development reflect existing known opportunities within each spatial planning area”*. These areas are planned to cater for 70% of future housing growth. However the boundaries reflected in LP5 limit the opportunities to provide the future housing need of Huntingdonshire, as well-located and strategically placed housing settlements are not identified. These settlement boundaries should be reviewed as the areas defined are out of date.

We advise, with consideration to paragraph 151 of the NPPF, that to contribute to sustainable development less constrained boundaries are necessary. We consider there to be further sites suitable for residential development which are appropriately located with excellent access to services and public transport.

Policy LP 6 – Key Service Centres

The Council identifies in its objectives that there should be a good supply of suitable land for growth and the promotion of high quality, well designed and locally distinctive sites. We support this objective but consider that certain policies fail to support this and are therefore unsound.

Policy LP 6 states that a “*proposal for development on a site in addition to those allocated in this plan will be supported where it is located within a built-up area of a Key Service Centre*”. However, we consider the Policy and emerging Plan has failed to support this aim by effectively retaining the existing settlement boundaries originally defined with the 1995 Local Plan and 2002 Local Plan Alterations through the Built-up Areas definition. Any sites suitable and viable for development would have already been identified and developed during the preceding years. We consider evidence of this can be seen through the Council’s failure to meet its annual housing target in 4 of the last 5 years. Therefore, we considered that this policy is unreasonable and fails to plan positively for the District.

As a result the emerging Local Plan relies too heavily upon a small number of large strategic sites which take a long time to bring forward, affecting housing delivery in the district. Notably the Council has failed to meet its identified need over the last 4 years; a position the Inspector at the recent Lucks Lane Inquiry (Appeal Ref: APP/H0520/W/16/3159161) concluded constituted ‘*persistent under delivery*’. Furthermore we disagree with the ‘built up area’ definition. Excluding sites which are not ‘Previously Developed Land’ or ‘relate to surrounding countryside rather than buildings’ limits the number of sustainable sites which could deliver sustainable development.

Paragraph 157 of the NPPF requires Local Plans to plan positively for the development and infrastructure required in the area. This means indicating broad locations for strategic development. We consider there are other suitable sites which can positively meet housing need in the District. Therefore, we submit that the Council should identify further locations where development will be supported when it is well-related to the built-up area. This is over and above the policy support espoused in Community Planning Proposals and Rural Exceptions Housing policies.

Policy LP8 - Countryside

This policy states all development in the countryside must “*avoid the irreversible loss of the best and most versatile agricultural land (grade 1 to 3a) where possible.*”

While we recognise that this policy is supported by the NPPF, we consider this policy fails to recognise that there are suitable sites for development particularly in agricultural grade 3a. Selective planned development of these sites will not harm the countryside nor materially affect the amount of the best and most versatile agricultural land within the District and would furthermore provide opportunities for the Council to meet its housing need. We therefore argue that limiting development in the countryside is too restrictive and does not plan positively.

Moreover, the policy position appears to be a direct contradiction to the majority of the Council's Strategic Allocations and the 2017 HELAA. A number of sites being promoted and allocated by the Council are former agricultural land comprising of either Grade 2 to 3a.

We consider that the policy should be reworded to more accurately reflect the Council's Strategic Allocations and positively plan for the District.

Policy LP9 - Flood risk

This policy determines the locations suitable for development and states proposals will only be supported where the flood risk has been addressed. This requires that *"all reasonable opportunities to reduce overall flood risk have been taken"*.

We support this policy but consider there is an inconsistency with this policy and a number of Strategic Allocations. We consider that the Council needs to address this inconsistency and ensure that it correctly implements the Sequential and Exception Tests as set out in the NPPF.

Policy LP23 – Affordable Housing Provision

The policy sets out the provision of affordable housing to delivered on site. It targets the delivery of 40% affordable housing on sites where 11 homes or 1,001sqm residential floorspace or more is proposed except where it can be demonstrated that the target is not viable.

We support the principle of this policy, however, we consider that the range of affordable housing types, sizes and tenures should be clearly set out within the main policy text rather than a referring back to the Housing Register, the Cambridge sub-region Strategic Housing Market Assessment and other local sources. The Policy currently fails to provide certainty for developers seeking to establish the tenure mix and associated costs. The policy is also likely to create uncertainty during periods when evidence is being updated or in situations when the evidence documents contradict each other. We therefore consider that the Council should state the percentage of affordable housing types, sizes and tenures sought within the Local Plan.

Furthermore we have concerns in relation to bullet point c. This requires affordable housing to be dispersed across the development in *'small clusters of about 15 dwellings'*. This can only reasonably apply to the largest strategic allocations in the District. Furthermore, it exceeds the 11 unit threshold. For example, it would be impossible for a 12 unit scheme to meet this policy requirement.

We consider that 15 dwellings constitutes more than what would typically be considered a *'small cluster'* on the majority of sites. We consider this will result in the majority of the affordable units being located in one area of the site. We are also unaware of any evidence which supports this figure. We therefore consider this element of the policy to be unsound and not supported by evidence. We would wish to see this element of the policy amended with a reduced figure which can be reasonably considered to be a *'small cluster'* in the context of the proposed development. Amending the draft policy to refer to clusters of up to 15 units and removing the reference to a *'small cluster'* maybe an acceptable solution. We consider that this would also provide flexibility for smaller sites where the number of units proposed means a cluster of 15 dwellings is not possible or suitable.

We consider that the policy should also recognise that a site's location within the District and its local housing market characteristics could be a material consideration affecting the percentage

and mix of affordable housing which can be provided on site. The District Council should recognise that the different settlements within the District have different markets for affordable housing with some areas more attractive to affordable housing providers than others. The policy wording or supporting text should reflect that, where it is supported by viability evidence, the location of sites will be a material consideration to justify a reduction in the amount of affordable housing proposed on site.

Policy LP28 - Rural Exceptions Housing

Policy LP28 offers flexibility to proposals outside the built-up area and provides a positive opportunity to meet housing need as a rural exception. The policy requires providing “*affordable housing for people with a local connection*” with the aim of increasing diversity in housing tenures and to meet Huntingdonshire’s housing need.

We support this policy in so far that it recognises that development might be necessary outside of the built-up area. The policy could enable the Council to support sites outside the built-up area of settlement to come forward to help meet the District’s housing need. The policy also recognises the need to provide both affordable and market housing on site to ensure such sites are viable. This could help offset the restrictions of LP1 Strategy for development and LP5 ‘Spatial Planning Areas’.

We are concerned however over the lack of clarity in this policy. The policy states the scale and location of the proposal must demonstrate the availability of services and infrastructure and the effect on the character of the immediate locality. This does not provide sufficient clarity to the development industry over issues such as the location of these exception sites or what scale will be acceptable.

Allocations

We object that a number of sites which we consider to be sustainable and suitable for development have not been included within the emerging plan allocations. We therefore consider the allocations in the Plan to be unsound.

Separate representations on the HELAA and ‘Call for Sites’ forms have been submitted for each of these sites. We consider it is necessary for the HELAA and proposed allocations to be reviewed and additional sites included for the emerging plan to be considered sound.

A brief description and analysis of the additional sites we consider should be allocated is provided below:

Biggin Lane, Ramsey

Biggin Lane is located to the west of Ramsey and we consider could be developed for at least 141 dwellings. The site is assessed within the HELAA and was found to be suitable for only low density development before being considered as ‘not suitable’ within the summary table for Ramsey. We consider this is inconsistent and the HELAA has failed to consider a realistic capacity for the site.

We note that the majority of Biggin Lane comprises grade 3b agricultural land and is exclusively located within Flood Zone 1. We also consider the site has been incorrectly assessed within the Council’s Sustainability Appraisal for the reasons set out in our separate representation letter. *Old Ramsey Road, St Ives*

Old Ramsey Road is located to the north west of St Ives and despite representations being submitted to the 2016 HELAA Additional Sites Consultation, the site has been omitted from the HELAA 2017.

The site is approximately 10.81 hectares and we consider is suitable for 131 dwellings. The site is located entirely with Flood Zone 1 and could provide at least 40% affordable units. The site has been fully assessed through a number of technical reports submitted in support of Outline Planning 17/00931/OUT which demonstrate that the site is sustainable.

Thrapston Road, Brampton

The site is located to the north of Brampton and has in part been included with the HELAA, but limited to the frontage site only and therefore considered to have a capacity of just 8 dwellings. The site was not therefore considered for allocation as it fell below the capacity threshold of 10 dwellings. The full site was not assessed due to concerns relating to flood risk.

However, we consider that the HELAA has failed to reflect the Council's updated Strategic Flood Risk Assessment which identifies the site almost entirely within Flood Zone 1. The site performs well in the Sustainability Appraisal and we consider should only result in 6 negative impacts of the 32 criteria tested.

We therefore consider that the Thrapston Road site should be reassessed within the HELAA and allocated for 63 dwellings.

Conclusion

Overall we disagree with elements of the Council's Draft Local Plan. We believe the Plan to unduly limit potential future development sites. In addition we advise further consideration into its settlement boundaries is needed to deliver sites to meet, and potentially exceed, the OAN for housing and to provide sustainable and inclusive communities for the future.

RPS CgMs reserves the right to appear and speak at the Examination should the emerging Local Plan continue to fail to satisfactorily address our concerns over issues of soundness.

Please do not hesitate to contact either myself or my colleague Robert Mackenzie-Grieve if you require any information on, or wish to further discuss, this representation.

Yours Sincerely



Mark Buxton
Director

**APPENDIX B – REPRESENTATIONS LETTER TO PROPOSED
SUBMISSION PLAN DATED 5/2/18**



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Our Ref: 19995/RMG/MB
Your Ref:

E-mail: mark.buxton@rpsgroup.com
Date: 5th February 2018

Local Plans Team
Pathfinder House
St Mary's Street
Huntingdon
PE29 3TN

By email only

Dear Sir/Madam,

REPRESENTATIONS TO THE HUNTINGDONSHIRE LOCAL PLAN TO 2036: PROPOSED SUBMISSION

RPS are instructed to submit representations on behalf of our client, Abbey Properties Cambridge Limited ('Abbey Properties'), to the Huntingdonshire Local Plan Proposed Submission.

This letter sets out our representations to the Proposed Submission version of the Local Plan and should be read alongside the representations made to the July 2017 Consultation Draft. Previous representations were submitted under the name of RPS CgMs.

We set out at the end of each representation whether we consider the policy/allocation meets the tests of soundness and the reasons why.

LP1 – Amount of Development: OBJECT

Policy LP 1 sets out the amount of development which is required in Huntingdonshire.

According to the Policy at least 20,100 new homes (both market and affordable) are required within the District. We consider that this policy fails to meet the Objectively Assessed Housing Need for the District for the reasons set out in the 'Huntingdonshire Housing Requirement and OAN' report by Regeneris Consulting attached to this letter.

According to the Regeneris Report the Council's OAN evidence contains the following shortcomings:

- A lack of consistency between the figures and aspects of the method in the 2013 SHMA and 2017 CRG study;
- The absence of any substantive consideration of the implications of Huntingdonshire's stand-alone OAN study for housing need figures in the wider Housing Market Area;
- The lack of a thorough assessment of past trends in household formation rates;
- Flaws in the Council's approach to economic growth adjustments in the OAN; and
- An adjustment for market signals which falls far short of an increase in the future housing supply relative to assessed demand which might reasonably be expected to result in an easing of affordability problems.

Regeneris consider that a minimum OAN of 23,750 (950 dpa) should be planned for the district and we support and endorse their conclusions.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	No	No evidence of joint working on strategic priorities
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

LP2 – Strategy for Development: OBJECT

This policy seeks to protect the intrinsic character and beauty of the countryside surrounding settlements and therefore seeks to apply a blanket protection to the whole of the countryside. This is inconsistent with the NPPF which is clear that account should be taken of the different roles and character of different areas. The NPPF only uses the term ‘protect’ in reference to valued landscape and designated areas. We therefore consider that this addition to Policy LP2 from previous draft versions of the Local Plan is inconsistent with National Guidance.

The policy further concentrates development in locations which provide the greatest access to services and facilities and directs substantial development to two strategic expansion locations: Alconbury Weald and St Neots East. This means that approximately 75% of housing growth is proposed to be located within the four spatial planning areas.

We consider this strategy potentially inhibits growth and does not provide a sufficiently flexible approach to encourage other sites to come forward. The Policy therefore arguably fails to comply with the NPPF which requires Local Planning Authorities “to boost significantly the supply of housing” (Paragraph 47).

The policy does not proactively address the key reasons behind the persistent under delivery of houses within the District earlier in the plan period. The Local Plan again places over reliance on the delivery of two large strategic sites which take a long time to bring forward, have substantial infrastructure requirements, and are more likely to be delayed.

We therefore consider that the distribution of growth should be planned more positively across the District with greater allowance made for additional small and windfall sites to support the larger strategic sites. The Housing White Paper ‘Fixing our Broken Housing Market’ advocates such an approach.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	N/A	
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

LP7 – Spatial Planning Areas: OBJECT

We disagree with the Council’s position on developments on unallocated sites. We consider that this policy is still too restrictive and fails to recognise that the built-up areas identified as Spatial Planning Area settlement are unable to accommodate sufficient viable and sustainable further growth to meet the Objectively Assessed Need. We therefore consider this policy is unsound.

The built-up area effectively acts as a proxy for the settlement boundaries. These have not been positively planned or adequately reviewed within the Local Plan and therefore do not allow for future growth. This results in limiting and restricting much needed housing growth. Moreover the built-up areas appear to be based on outdated policy, the 2002 Local Plan Alterations, and are no longer relevant nor are they supported by the evidence base.

The supporting text states *“allocations for new development reflect existing known opportunities within each spatial planning area”*. These areas are proposed to cater for 75% of future housing growth according to Policy LP2. However, supporting paragraph 4.8 states that to allow for the level of growth currently proposed the use of some greenfield land will be required to deliver the necessary scale of development. The policy wording of LP7 does not reflect this need and limits the opportunities to deliver the future housing need of Huntingdonshire, as well-located and strategically placed housing settlements are not identified. These settlement boundaries should be reviewed as the areas defined are out of date.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	No	No evidence of joint working on strategic priorities
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

LP11 – The Countryside: OBJECT

This policy requires that all development in the countryside must *“avoid the irreversible loss of the best and most versatile agricultural land (grade 1 to 3a) where possible.”*

While we recognise that this policy is supported by the NPPF through directing development to poorer quality land, we consider this policy fails to recognise that there are suitable sites for development particularly in agricultural land grade 3a. Selective planned development of these sites will not harm the countryside nor should it materially affect the amount of the best and most versatile agricultural land within the District. It would furthermore provide opportunities for the Council to meet its identified housing need. We therefore contend that the countryside policy is too restrictive and fails to plan positively.

Moreover, the policy position appears to be a direct contradiction to the majority of the Council’s Strategic Allocations and the 2017 HELAA. A number of sites being promoted and allocated by the Council are best and most versatile agricultural land comprising Grade 2 to 3a.

Furthermore we object to the policy seeking to protect the intrinsic character and beauty of the countryside. As stated above this is inconsistent with the NPPF which is clear that account should be taken of the different roles and character of different areas.

We consider that the policy should be reworded to more accurately reflect the Council's Strategic Allocations and positively plan for the District.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	N/A	
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

LP25 – Affordable Housing Provision: OBJECT

This policy sets out the provision of affordable housing to be delivered on site. It targets the delivery of 40% affordable housing on sites where 11 homes or 1,001sqm residential floorspace or more are proposed except where it can be demonstrated that the target is not viable.

We do not support this policy and consider, amongst other things, that the range of affordable housing types, sizes and tenures should be clearly set out within the main policy text rather than referring back to the Housing Register, the Cambridge sub-region Strategic Housing Market Assessment and other local sources. The Policy currently fails to provide certainty for developers seeking to establish the tenure mix and associated costs. The policy is also likely to create uncertainty during periods when evidence is being updated or in situations when the evidence base documents contradict each other. We therefore consider that the Council should state the percentage of affordable housing types, sizes and tenures sought within the Local Plan.

We support the removal of the reference in bullet point c to small clusters referring to ‘about 15 dwellings’. However, we still consider the reference to ‘small clusters of dwellings’ is unclear, inconsistent with the supporting text, and difficult to achieve on smaller sites.

Supporting paragraph 7.10 states that affordable housing should be ‘pepper-potted’ around a development and ‘may be provided in small clusters, proportionate to the scale of development’. However, the proposed wording of Policy LP25 is less clear and does not provide sufficient guidance regarding what is considered to be a ‘small cluster’. Furthermore, supporting paragraph 7.14 still refers to small clusters consisting of about 15 dwellings. While paragraph 7.14 acknowledges that clusters of 15 affordable dwellings could be too large on smaller sites we consider this reference currently provides the only indication of what the Council considers to be a ‘small cluster’.

We wish to see this element of the policy amended to provide further clarity on what is considered to be a ‘small cluster’ in the context of the proposed development or to remove the reference altogether. We consider that this would provide a greater degree of flexibility for smaller sites.

We consider that the policy should also recognise that a site's location within the District and its local housing market characteristics could be a material consideration affecting the percentage and mix of affordable housing which can be provided on site. The District Council should recognise that the different settlements within the District have different markets for affordable housing with some areas more attractive to affordable housing providers than others. The policy wording or supporting text should reflect that, where it is supported by viability evidence, the location of sites will be a material consideration to justify a reduction in the amount of affordable housing proposed on site.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	N/A	
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

LP30 – Rural Exceptions Housing: OBJECT

Policy LP30 offers some flexibility to proposals outside the built-up area and provides a positive opportunity to meet housing need as a rural exception. The policy seeks to provide “*affordable housing for people with a local connection*” with the aim of increasing diversity in housing tenures and to meet Huntingdonshire’s housing need.

We support this policy in so far as it recognises that development might be necessary outside of the built-up area. The policy could enable the Council to support sites outside the built-up area of settlements to come forward to help meet the District’s housing need. The policy also recognises the need to provide both affordable and market housing on site to ensure developments are viable. This provides a counter-balance to the restrictions on development of LP2 ‘Strategy for Development’ and LP7 ‘Spatial Planning Areas’.

We are concerned however over the lack of clarity in this policy. The policy states the scale and location of the proposal must demonstrate the availability of services and infrastructure and the effect on the character of the immediate locality. This does not provide sufficient clarity to the development industry over issues such as the location of these exception sites or what scale will be acceptable.

We are also concerned that the policy may not assist with the need to provide additional affordable housing within the District due to the overly restrictive criteria for eligibility. We consider that the need for affordable houses across the District, as set out in LP25, should result in the Council allocating more new housing developments in order to achieve 40% affordable housing provision from those sites. This would address an urgent need within the District and provide access to affordable dwellings to all.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	N/A	
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

Allocations: OBJECT

We consider that the following allocations should have been included within Huntingdonshire Proposed Submission Local Plan:

Land off and to the North of 66-100 Thrapston Road, Brampton

An application for 63 dwellings was dismissed at Appeal in December 2017 (APP/H0520/W/17/3172571) as the site was considered to have a harmful impact on the local landscape and townscape.

However, we do not agree with the Inspector's findings (and we have lodged a judicial review of the decision) on this point and note the Council did not consider this site to comprise part of a valued landscape in its determination of the original planning application. We therefore consider the site is still suitable for 63 dwellings and lies within a sustainable location which would not harm the landscape or setting of Brampton.

With regard to landscape impact the site is undesignated in landscape terms, contains no features of particular value and is enclosed to the public.

The site is approximately 3.25 hectares and is located to the north of Brampton. It is currently a vacant greenfield site with residential properties to the south. To the north, east and west of the site is open land including Hinchingsbrooke Country Park and Alconbury Brook Pond. Existing agricultural and commercial uses are located to the north and north east of the site including Poplars Farm.

The majority of the site comprises semi-improved grassland, tall ruderals and scrub with the site boundaries comprising individual trees, hedgerows and scrub. Development of the site should not have a negative impact on either Hinchingsbrooke Gravel Pits or Portholme SAC. Great Crested Newts have been identified within the pond on site and appropriate mitigation would therefore be required. No reptiles have been recorded on site.

No Tree Preservation Orders are in place on site and one group of trees would require partial removal to create the vehicle entrance. A number of trees are recommended for removal for reasons of good arboricultural practice.

There are no designated heritage assets within the site and a single listed building is located 100m to the south. The closest Scheduled Monument is located 500m west of the site. Development of the site will not affect the setting of these assets due to their distance from the site and the existing screening. There is no suggestion that the site contains archaeological remains that would prohibit development.

The site lies within the Huntingdon Spatial Planning Area (SPA) and presents a sustainable location for residential development in terms of access to local facilities and amenities as well as a good level of public transport provision. The site is well located to access local schools on foot/cycle as well as local shops and larger superstores. The site is also located in close proximity to the cycling routes. The nearest bus stops are located within 250m of the site's frontage to Thrapston Road. Development of the site would not have a detrimental impact on the local highway or sustainable transport networks.

The site is located within Flood Zone 1 and all built development can be proposed outside of the modelled 1 in 1000 year flood extent. SuDs such as permeable paving and detention basins can be incorporated into any scheme to ensure that runoff rates do not exceed greenfield rates.

According to Natural England Agricultural Land Classification the site comprises Grade 3 Agricultural Land; two grades below the best quality agricultural land. The site is also suitable for affordable housing.

For the reasons above we consider that Land off and to the North of 66-100 Thrapston Road is suitable, available and achievable for the provision of new residential development within the next 5 years. Therefore the site should be included as a residential allocation within the Proposed Submission Local Plan.

Thrapston Road Frontage Site

Additionally, we consider (in the event that the site above is not allocated) that the smaller frontage site, to the east of no.66 Thrapston Road, should be considered for allocation within the Proposed Submission Local Plan.

The site is 0.49ha and capable of accommodating 14 dwellings along the frontage of Thrapston Road.

We consider that this site would address the perceived impact on the valued landscape raised in the Inspector's Appeal Decision referred to above (notwithstanding that a judicial review application has been lodged). A frontage scheme would not extend further north than the existing ribbon development, could not be described as 'in depth' and would not breach the visual boundary of Brampton.

A frontage scheme would continue the established pattern of houses and would complement the village form and settlement pattern. Additionally any impact on the character of the village edge or the landscape would be limited due to the reduced extension of development into the countryside.

The Council assessed the suitability of this site within the May 2013 Environmental Capacity Study. It was concluded at that time that only the eastern part of the site would be suitable for development owing to flood risk issues. As a result the scheme would have been below the 10 dwelling threshold for allocation within the future Local Plan so was not separately identified.

These concerns from May 2013 over flood risk have subsequently been removed owing to the more up-to-date Environment Agency flood risk maps. The Council should therefore look favourably upon new development in this location on the edge of the settlement which relates more to the built-up area than the countryside.

We consider this site should be included within Huntingdonshire Local Plan Proposed Submission.

Old Ramsey Road, St Ives

The site is approximately 10.81 hectares and is located to the north west of St Ives. It is a greenfield site currently in agricultural use with a residential property, caravan storage business

to the east (in part) and allotments to the south. To the north of the site is agricultural land and RAF Wyton a short distance further north. The site would be accessed via Old Ramsey Road.

The site lies within the St Ives SPA and is currently subject to Outline Planning application 17/00931/OUT and we consider the site is suitable for 131 dwellings.

The site mainly comprises arable land with the boundaries consisting of individual trees, scrubs, and tall ruderals. A stream runs along the northern boundary. The arable land is not in itself of ecological significance. No reptiles were found on site however the site margins do have the potential to support invertebrates, amphibians, reptiles, breeding birds, foraging and commuting bats and hedgehogs. The site also has the potential to support Barn Owls as a Barn Owl box is present on the western boundary.

It is not necessary to remove any trees to enable development but a section of hedgerow on the eastern boundary of the site will need to be removed to facilitate vehicle access. The remaining boundary landscaping can be retained and enhanced through sensitive planting.

There are no designated heritage assets within the study site or the surrounding 1km search area. Evidence provided from the Historic Environment Record demonstrates that the site is considered to have low/negligible potential for significant archaeological evidence from all periods.

Vehicular access to the site could be provided from Old Ramsey Road in the form of a priority junction designed in accordance with DMRB standards. A new footway is proposed to be provided along the western side of Old Ramsey Road. The Transport Assessment establishes that the site enjoys a sustainable location in respect of the services and facilities and in respect of available public transport. A proposed development of 131 dwellings would not be anticipated to have a material impact on the operation of the local highway network.

The site is primarily located in Flood Zone 1 and is not considered to be at a significant risk of flooding from any sources assessed. However, parts of the site adjacent to the ordinary watercourse are at 'medium' to 'high' risk of surface water flooding and therefore any proposed development should be located wholly outside of this area. Sustainable Drainage can also be incorporated into the scheme to ensure that runoff rates do not exceed greenfield rates. This can be done through permeable paving and a retention basin on site.

As the site is located within Flood Zone 1 it is sequentially preferable to a number of sites assessed within the 2017 HELAA. We calculate there are 11 sites with flood risk issues assessed within the HELAA. We consider that these sites are sequentially less preferable to Land off Old Ramsey Road and the Council has failed the sequential test set out in the NPPF by not adequately assessing this site within Flood Zone 1 before actively promoting other sites.

The allocation of some sites within Flood Zone 2 may be necessary in order to meet the Council's Objectively Assessed Need but they should be shown to meet the Sequential and Exception Tests set out in the NPPF. We object to these sites being allocated before all possible sites within Flood Zone 1 have been assessed and allocated where they are identified as being sustainable.

The majority of the site comprises Grade 2 agricultural land. Therefore, we consider the development would not involve the loss of the best quality Grade 1 agricultural land. The site is located in very close proximity to the built up area of St Ives with urban uses immediately to the south east of the site.

The site could also provide additional affordable housing. The Proposed Submission Local Plan sets a target of 40% affordable housing on residential sites. We consider that this site could provide 40% affordable housing (equating to 52 units), or potentially more, while remaining viable. This development site could therefore provide a significant number of the affordable dwellings requirement within St Ives.

A Sustainability Matrix based on the Council's HELAA criteria was prepared and submitted with application 17/00931/OUT and the previously withdrawn application 16/01884/OUT. This found that of the 23 criteria tested, there were 12 positive returns, 10 neutral and only 1 negative (relating to the site not being previously developed land). We therefore object to the fact that a number of sites have been allocated as a result of the 2017 HELAA which have a similar or higher number of negative impacts when assessed against the sustainability criteria.

For the reasons above we consider that land off Old Ramsey Road is suitable, available and achievable for the provision of new residential development within the next 5 years. Therefore the site should be included within the Huntingdonshire Local Plan to 2036: Proposed Submission.

Meeting Lane, Needingworth

The site is approximately 4.9 hectares and is located on the north west edge of Needingworth.

Needingworth is identified as a small settlement in the draft Local Plan. Draft Policy LP10 'Small Settlements' states that "*a proposal for development on land well-related to the built-up area may be supported where it accords with the specific opportunities allowed for through other policies of this plan*". We contend that land at Meeting Lane is very well related to the existing built up area.

The site is greenfield and accessible from either Meeting Lane or the High Street. The site lies primarily in Flood Zone 1 although access issues need to be satisfactory resolved. It is located a short distance to the north of two bus stops and Needingworth Post Office. We therefore consider that the site is a sustainable location for development.

The site was assessed within the Housing & Economic Land Availability Assessment December 2017. Overall the appraisal was positive with some of the main positive features including the sites close proximity to Overcote Lane playing fields, Needingworth Village Hall, Post Office and One Stop Shop. The site is also only 700m away from the Holy Church of England Primary School and 1.9km from Needingworth Industrial Estate.

However, the Sustainability Appraisal within the 2017 HELAA concluded that the "*the site is not considered suitable for development as it contributes significantly to the character area of the local area*".

This conclusion seems to run counter to the overall assessment and is seemingly based on the fact the site would be inappropriate for higher density development.

We consider the site to be suitable for up to 50 dwellings and is also capable of providing significant public open space. At 4.9ha such a scale of development would qualify as very low density development, well below the Council's own assessment of 'low density' development of 30 dwellings per ha in the HELAA. We therefore consider this site is suitable for low density residential development.

Furthermore the site is supported locally for additional development in the village with the Parish Council expressing a positive early view of the site’s potential.

Meadow Lane, Ramsey

The site is approximately 2.2 hectares and is located to the east of Bury within the Ramsey Spatial Planning Area. The site is currently greenfield with an electricity sub-station adjacent to the south-eastern corner and was previously used as a practice ground by Ramsey Golf Club. The development would be accessed from Meadow Lane off Warboys Road.

The site is approximately 650m from Bury Stores and 750m away from Bury Church of England Primary School. The site is also within 2km of both the High Lode industrial Estate and the proposed employment site at Upwood Airfield.

We consider the site is suitable for 40 dwellings, open space and additional landscaping. The site is not located in an area of flood risk. It lies on the south-eastern edge of the extensive Ramsey Conservation Area adjacent to other housing which falls outside the Conservation Area.

There is scope to provide a high quality and sensitively designed housing scheme on this site which could enhance this part of the conservation area and provide an improved edge to the settlement boundary in this location. It would also help to secure the long-term future of Ramsey Golf Club.

Accordingly, we consider the site should be allocated for low-medium density residential development in the Proposed Submission Local Plan.

A site location plan for this site is attached to this covering letter (area marked by black hatching).

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	No	Plan will not deliver levels of development needed over its period
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

Proposals Map: NOTE/OBJECT

We consider the key to the Proposals Map is currently misleading. It contains a reference to SPA which is understood in this context to apply to ‘Special Protection Areas’ but could equally apply to ‘Spatial Planning Areas’. We consider this should be clarified and cross reference to relevant Plan policies in the key could assist in this regard.

Conclusion

We object to the Council’s Proposed Submission Local Plan for the reasons outlined above. We consider the Plan unduly limits potential future development sites. Further consideration of the settlement boundaries is required to deliver sites to meet, and potentially exceed, the OAN



for housing and to provide sustainable and inclusive communities for the future. We therefore consider the Local Plan, as drafted, fails the tests of soundness

RPS wish to participate at the oral examination on behalf of Abbey Properties Cambridgeshire Limited to ensure that our clients' interests are adequately addressed.

Please do not hesitate to contact either myself or my colleague Robert Mackenzie-Grieve if you require any information on, or wish to further discuss this representation letter.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Mark Buxton', written in a cursive style.

Mark Buxton
Director

**APPENDIX C – HUNTINGS DON SPATIAL PLANNING AREA
DRAFT ALLOCATIONS SITE APPRAISALS**

Proposed Site Allocations – Huntingdon Spatial Planning Area

Site Allocation	SE1.1 Former Alconbury Airfield and Grange Farm
Unit size	575ha for 5,000 homes
Current planning status	Outline planning permission for 5,000 homes under reference 1201158OUT was granted in October 2014. Reserved matters applications for all parcels in Phase 1 have been approved.
Constraints	<p>This is a large strategic site with four housebuilders currently operating on site including Hopkins Homes, Redrow Homes, Morris Homes and Urban & Civic. It is understood that this is Urban & Civic’s first venture into house building on this scale.</p> <p>There are still a number of pre-commencement conditions that need to be discharged in relation to some of the land parcels before development can commence. A number of parcels of land are yet to be subject of Reserved Matters details submissions.</p> <p>The site is located in Flood Zone 1 and there are no constraints relating to flood risk.</p>
Suitability	<p>This site has the expectation of delivering c.25% of the residential development proposed for the District in the Local Plan period. There would be a significant undersupply in housing for the district if this development experienced further problems and delays.</p> <p>The approach of seeking to provide a quarter of the overall housing requirement for the District on one housing allocation is unsustainable and unsuitable. A much wider range and number of sites should be allocated in order to reduce the reliance on this site.</p>
Viability	We consider the site is viable as work has commenced on some parcels of land. However, as the site is only providing 10% affordable housing in Key Phase 1 (Urban & Civic Tier 2 Key Phase 1 Affordable Housing Delivery Plan July 2017, submitted to discharge S106 Obligation 9 of Planning Permission 1201158OUT). The Council should be allocating additional sites to address this shortfall in affordable housing as recognised with the PPG.
Deliverability	<p>There are a number of outstanding restrictive conditions on the following parcels:</p> <ul style="list-style-type: none"> • 16/01329/REM (Morris Homes) for 165 units; • 17/00079/REM (Urban & Civic) for 101 units; and • 17/00802/REM (Urban & Civic) for 37 units. <p>Planning Applications 15/01117/REM (Hopkins Homes) for 128 units and 16/02013/REM (Morris Homes) for 200 units have no outstanding restrictive conditions.</p> <p>Overall 303 units still have restrictive conditions before work above slab level can commence. Furthermore, we also note that only 631 units currently have Reserved Matters out of the 5,000 homes approved by the Outline Permission. According to the Council’s housing trajectory these units will be completed by the end of 2019/2020. Therefore, we consider that further Reserved Matters details will need to be submitted shortly in order for the number of dwellings forecast within the AMR trajectory to be met.</p>

Delivery	<p>Alconbury Weald is expected to deliver 250 units from 2018/2019 increasing to 300 units by 2028/2029. We question this delivery rate and consider it is overly optimistic. This is supported by both the NLP November 2016 'Start to Finish' research (please see Matter 3 Appendix C) and the Letwin preliminary findings (Annex A) on build out rates.</p> <p>The Council should also take a more cautious approach in considering the long term delivery of units considering the unknown future market conditions and the large number of units which are currently pending Reserved Matters approval.</p>
Conclusion	<p>This development is not progressing as rapidly as expected. The Council have overestimated how many dwellings can be completed each year. We consider 250 dwellings per annum is too ambitious and the site will inevitably experience further delays.</p>

Site allocation	SE1.2 RAF Alconbury
Unit size	84ha for approximately 1,680 homes
Current planning status	<p>The site has still not been released by the Ministry of Defence and the Council do not expect it to be released until the mid-2020s if it is to be released at all.</p> <p>No planning application has been submitted.</p>
Constraints	<p>The site is still an active RAF base with the vacating of the base delayed by further a 2 years from the mid 2020 timeframe according to the 2017 AMR. This demonstrates there is clearly ongoing uncertainty regarding when the site will become available for development. Additionally, according to the local press the US Department of Defense is reviewing the decision to vacate RAF Alconbury.</p> <p>There are a range of heritage assets of significance in the area including the Prestley Wood moated site, a number of listed structures and a scheduled monument. The site is located within the Little Stukeley Conservation Area.</p> <p>The submitted Local Plan requires a public masterplanning exercise to be completed and agreed with the Council, design codes must be established and there must be satisfactory integration with the Former Alconbury Airfield and Grange Farm development. Based on HDC's previous record in negotiating planning permission for large strategic sites we consider agreeing these aspects could be a lengthy process.</p> <p>Additionally the site is highly likely to require decontamination due to its current use.</p> <p>The site is located in Flood Zone 1 and there are no constraints relating to flood risk.</p>
Suitability	<p>This is suitable in the long term if the RAF vacates the site. However there is still uncertainty whether and when this will occur. The site therefore is a long term allocation rather than short term fix to the housing shortage in Huntingdonshire.</p>
Availability	<p>The timeframe for vacating RAF Alconbury has been delayed by 2 years as</p>

	<p>stated in the most recent AMR and this is ultimately going to result in delays in the start of construction.</p> <p>The site is in active use and the timeframe for vacating the site has been recently delayed by 2 years with no guarantee the site will be vacated at that date or an official timeframe for vacating the site given. We therefore consider there is the possibility that the site will not be available until the last few years of the plan period and HDC should allocate additional sites in case units cannot be delivered in the timeframe currently proposed.</p>
Viability	With no planning application submitted, RAF Alconbury still operational, and units not expected to be delivered until 2028/2029, we are unable to comment on viability at this time.
Deliverability	No comments.
Delivery	The site is proposed to deliver around 180 units per annum from 2029/30 according to the 2017 AMR. Again we consider this to be optimistic based on the evidence provided by the NPL 'Start to Finish' research and the uncertainty over market conditions at the time when housing is expected to be delivered.
Conclusion	<p>The most recent AMR expects the first 50 dwellings to be built in 2028/2029. However as the RAF have not vacated the site and there is no application we maintain that there is considerable uncertainty over when the first homes will be delivered as the allocation is very much in the early stages.</p> <p>Additionally, we consider there should be an acceptance by the Council that there is the possibility that the site will not come forward during this plan period and therefore should allocate additional sites accordingly.</p>

Site Allocation	HU1 Ermine Street
Unit size	85ha for approximately 1,440 homes
Current planning status	<p>Planning Application (1001712OUT) for 1,021 dwellings was submitted in October 2010 for the South of the site but no decision has been made.</p> <p>No submission for the North of Ermine Street has been submitted as of yet.</p> <p>Planning application (1300730OUT) for business park approved in November 2015.</p>
Constraints	<p>Residential led development of the southern part of this site was proposed in the 2002 Local Plan Alteration. However the emerging Local Plan does note there are difficulties with its delivery relating to access and integration.</p> <p>Access will need to be considered with other developments and in particular the potential new highways junction for Alconbury Weald.</p> <p>In regards to flood risk the majority of the land is in Flood Zone 1, although a portion on the western edge is in Flood Zones 2 and 3a.</p>
Suitability	The site is separated from the main built up area of Huntingdon by the A141 dual carriageway and is on greenfield land. We consider that due to the site's proximity to Alconbury Weald any transport mitigation strategy/junction improvements should be implemented before the development commences.

	We question the suitability of this site before it can be adequately demonstrated that a suitable mitigation strategy can be implemented.
Availability	In the north parcel 400 units are expected with the first 80 dwellings anticipated to be delivered in 2022/23. Ermine Street South is expected to deliver 1,040 dwellings from 2022/23 (50 units) with Planning Application 1001712OUT still pending some eight years after submission.
Viability	We are unaware of any viability issues relating to the site.
Deliverability	No comments.
Delivery	No comments.
Conclusion	We consider that this site has a number of obstacles to overcome before development can begin. The site is detached from the built up area and there are transport issues associated with the site which need to be resolved prior to development commencing.

Site Allocation	HU2 Former Forensic Science Laboratory
Unit size	2.7ha for approximately 105 homes
Current planning status	Planning application 17/01597/FUL was approved in November 2017 following the refusal of the previous application 16/00304/FUL in February 2017 and subsequent appeal withdrawn.
Constraints	Hinchingbrooke Country Park is 0.21km south of the site. The site is located in Flood Zone 1 and there are no constraints relating to flood risk.
Suitability	Brownfield site with the opportunity to provide a mix of uses.
Availability	A number of discharge of condition applications have been submitted and a number of conditions have now been discharged. Pre-commencement conditions relating to floor levels, highway details and road construction still need to be discharged.
Viability	We are unaware of any viability issues relating to the site.
Deliverability	No comments.
Delivery	No comments.
Conclusion	The site is expected to deliver homes in 2018/19 however we note that a number of pre-commencement conditions still require discharging. However, we consider that it is likely that the site will be developed within the next five years.

Site Allocation	HU3 Former Police HQ site
Unit size	5.8ha for approximately 75 dwellings.
Current planning status	No application submitted.
Constraints	The site is on greenfield land and has constraints arising from heritage assets. In particular the site is located within the historic setting of Hinchingbrooke House. Therefore suitable mitigation will be required to minimise the impact of the proposed development. Access directly into the site will only be available once the proposed access road connecting the realigned A14 to Hinchingbrooke Park Road is completed.

	The site is located in Flood Zone 1 and there are no constraints relating to flood risk.
Suitability	The site is located in Flood Zone 1 and subject to access and heritage issues being resolved could be suitable for development.
Availability	The opportunity to access directly from the proposed access road connecting the realigned A14 to Hinchbrooke Park Road is not expected to be completed until late 2021 and the Council considers this will delay the development.
Viability	We have no evidence of viability issues associated with the site.
Deliverability	We have no evidence to suggest that the site is not deliverable during the Plan Period provided there are no significant delays to the realignment of the access road.
Delivery	We consider that the Council is being overly optimistic that units can be delivered on site by 2023/24. Any delays in delivering the access road would have a knock-on effect on delivery of the site. However, we agree that the site should be deliverable within the plan period.
Conclusion	While there are potential issues associated with the delivery of the site (heritage and transport). Overall we consider that the site can be delivered during the plan period.

Site Allocation	HU6 George Street
Unit size	3.0ha for approximately 300 homes
Current planning status	Planning application 17/00733/FUL for 309 dwellings was approved at Planning Committee in June 2018, subject to a S106 Agreement being signed.
Constraints	<p>The designated Conservation Area surrounds the site and there are a number of listed buildings nearby.</p> <p>In the past the application had issues with providing an acceptable Transport Assessment and mitigating the transport impacts which would result from the development.</p> <p>Once the S106 Agreement is signed and the planning permission 17/00733/FUL is issued a number of conditions will need to be discharged. These include a Contamination Site Investigation and Remediation Strategy, material details, a phasing plan and a number of other details.</p> <p>The site is located in Flood Zone 1 and there are no constraints relating to flood risk.</p>
Suitability	Following the resolution to grant at Planning Committee, HDC considers the site is suitable for development
Availability	Two industrial buildings are in the process of being demolished before development can commence
Viability	<p>The scheme does not provide the 40% affordable housing contribution to be policy compliant. The applicants have produced a Viability Assessment to illustrate that it is not viable to deliver 40% affordable housing.</p> <p>We consider that this adds further pressure for additional sites to make up the shortfall in affordable housing provision.</p>
Deliverability	This is a complex brownfield site and involves a phased mixed-use development. The application was submitted in April 2017 and it has taken

	<p>over a year to secure a resolution to grant consent at the Planning Committee in June 2018.</p> <p>However, despite the fact that planning permission is yet to be approved and there are a number of conditions outstanding the Council considers 50 dwellings will be completed by 2018/2019. We consider this to be unrealistic.</p>
Delivery	<p>We consider that the Council's current trajectory for 50 units to be completed by 2018/19 is extremely optimistic given that the planning permission is still to be issued. We also note that once the planning permission is issued there are still a number of complex pre-commencement conditions to discharge followed by site preparation work. We therefore consider that delivery should be pushed back at least one year.</p>
Conclusion	<p>While we consider that the site will not come forward within the current timeframe proposed by the Council we have no reason to consider that the site will not be developed during the Local Plan period.</p> <p>However we do consider these delays will mean the site cannot deliver the 237 dwellings forecast in the AMR 2017 between 2017/19 and 2021/22.</p>

Site Allocation	HU7 Gas Depot, Mill Common
Unit size	0.6ha for approximately 11 homes
Current planning status	Planning application for 11 dwellings was submitted in October 2016 (16/02093/FUL) and approved in January 2018.
Constraints	<p>A small proportion on the southern edge of the site is in Flood Zone 3b and around half the site is in Flood Zone 2. Flooding is an issue, however with the supporting Flood Risk Assessment the Council consider that neither the Sequential nor Exception tests were required. We consider this conclusion is debatable when consider against the requirement for the NPPF.</p> <p>The site is in close proximity to high value biodiversity assets. It is very sensitively located with regard to nature conservation interests. It lies immediately north of Alconbury Brook and Portholme. Portholme is designated as a SAC and contains an SSSI.</p> <p>Completion of land contamination remediation measures would need to be completed and development must be concentrated on the northern part of the site.</p>
Suitability	Following the granting of Planning Permission in January 2018, HDC consider the site to be suitable development despite being located within Flood Zone 3b and Flood Zone 2.
Availability	All Conditions that need to be discharged were submitted for approval in April 2018 with decision notices expected imminently. We therefore consider that the site is potentially available for development.
Viability	All indicators suggest the site will be developed and therefore the development is viable.
Deliverability	No comments.
Delivery	No comments.
Conclusion	This brownfield site is expected to deliver all 11 units in 2018/19 subject to the remaining conditions being discharged.

Site Allocation	HU8 California Road
Unit size	1.3ha for approximately 55 homes
Current planning status	Application 17/02123/OUT was submitted in October 2017 but no decision has been made yet.
Constraints	<p>The land is predominately greenfield. The June 2017 HELAA concluded that the scale and open nature of the land means that development would have a significant impact on the local townscape.</p> <p>The application was submitted 9 months ago with a decision yet to have been made. According to the documents online there appear to be highways and landscaping issues which require resolution before the application can be determined.</p> <p>The site is located in Flood Zone 1 and there are no constraints relating to flood risk.</p>
Suitability	Generally the site is considered to be suitable for development and is located within Flood Zone 1.
Availability	According to the Council's 2017 AMR the first 18 units are expected to be built in 2018/2019. The site therefore appears to be immediately available.
Viability	We have no information regarding the viability of the site.
Deliverability	No Comments.
Delivery	As stated above the first 18 units are expected to be built in 2018/2019. We consider this is optimistic considering the Outline Planning Application is yet to be approved and Reserved Matters details as well as pre-commencement conditions have not yet been submitted. Given HDC's timeframes for determining such applications we consider it is unlikely that dwellings will commence until 2019/20 at the earliest.
Conclusion	We consider that there will be delays in the delivery of this allocation as outline planning application is yet to be determined and Reserved Matters details will be required. Although we consider that the site can be delivered within the timeframe of the Local Plan we do not consider the site will be delivered in its entirety within the next five years.

Site Allocation	HU9 Main Street
Unit size	1.2ha for approximately 30 homes
Current planning status	A planning application for 2 dwellings on the eastern part of the site was approved in January 2017 (16/00597/FUL). However it appears that this is unlikely to be built out with the landowners preparing to market the site according to the Agents.
Constraints	<p>The site is classified as Grade 2 agricultural land located on the edge of Huntingdon's built up area. It is not connected to a green infrastructure network and is located in Flood Zone 2.</p> <p>The site is adjacent to and partially within Hartford conservation area which means its redevelopment may impact a heritage asset. According to the Agent the site is being marketed prior to a planning application being submitted.</p>
Suitability	The development of the site would involve the loss of Grade 2 Agricultural land which is the second highest grade. The NPPF states that LPAs should seek to use areas of poorer quality land in preference to that of higher

	<p>quality. We do not consider that the Council has demonstrated this has been fully considered and our client has put forward a number of sites on lower grade agricultural land which were not considered appropriate to be allocated by the Council.</p> <p>The site is also located within Flood Zone 2. While the exception test would not be required for residential development we do not consider that this site would be pass the sequential test. Our client has put forward a number of sites within Flood Zone 1 which are therefore sequentially preferable to the proposed allocation.</p>
Availability	We have no information that the site is not available for development.
Viability	We have no information that the site is not viable.
Deliverability	We consider that the site will need to demonstrate that it has passed the sequential test before wider planning permission for up to 30 units can be granted. We do not consider that the site will pass the sequential test as there are a number of alternative sites suitable for residential development within the District.
Delivery	No comments.
Conclusion	We consider this site is unsuitable for development due to the site being located within Flood Zone 2 and there being sequentially preferable available sites.

Site Allocation	HU12 Dorling Way
Unit size	12ha for approximately 150 homes
Current planning status	<p>Outline Planning Permission 16/00194/OUT was issued in September 2016 and Reserved Matters application 17/01879/REM was approved in September 2017.</p> <p>18/80109/COND to discharge a number of conditions was submitted on 26 April 2018 with a decision expected imminently. The latest application 18/80159/COND has a determination deadline of 6 August 2018.</p>
Constraints	<p>Due to the site's location adjacent to the A1 and A14 noise and light pollution are significant constraints. However, as planning permission has been granted we consider these issues must have been resolved to the satisfaction of the Council.</p> <p>Additionally there are no constraints to flood risk as the site is located in Flood Zone 1.</p>
Suitability	Since planning permission has been granted for the site and a number of conditions have been approved we consider that the site is suitable for development.
Availability	Since planning permission has been granted for the site and a number of conditions have been approved we consider that the site is available for development.
Viability	We are aware of no viability issues associated with the development, with the site providing 40% affordable housing.
Deliverability	No comments.
Delivery	No comments.
Conclusion	No major obstacles in delivering development.

Site Allocation	HU13 Brampton Park
Unit size	32ha for approximately 600 homes
Current planning status	Outline planning permission 1301178OUT was withdrawn and 15/00368/OUT was approved as a phased hybrid application for 437 dwellings. The whole site has the benefit of full planning permission under various schemes, totalling 603 dwellings. Residential development has commenced on two parcels of the site.
Constraints	The northern and eastern parts of the site fall within Flood Zones 3a, 3b and 2. It also constrained by protected trees in the northern part of the site. However, we assume these issues have been overcome as a consequence of the approval of the planning applications.
Suitability	As Planning Permission has been granted for the site HDC must consider that the site is suitable for development.
Availability	As Planning Permission has been granted for development and 52 units are proposed to be completed in the last monitoring year we consider that the site is available for development.
Viability	We note that no affordable housing has been provided on the site due to Vacant Building Credit. Therefore, HDC should be seeking to allocate additional sites to address the shortfall in affordable housing resulting from this scheme.
Deliverability	No comments.
Delivery	According to the 2017 AMR, 224 units are proposed to be delivered in 2018/19. We consider this is overly optimistic and is not supported by evidence contained within the Letwin preliminary report or the NLP 'Start to Finish' research. We therefore consider that the delivery on site should be spread across additional years.
Conclusion	We consider the Council are over estimating the number of dwellings this development can bring forward over a 5 year period. The Council sets an ambitious target of 224 unit completions in the year 2018/2019 which is rarely achievable on a site of this size. Although we do consider it is likely that the site will come forward during the Plan Period we consider that the development will not deliver the 573 units the AMR is forecasting in the 5 year period.

Site Allocation	HU16 Tyrell's Marina
Unit size	0.3ha for approximately 16 dwellings
Current planning status	Planning application 16/00906/FUL was submitted in May 2016 for 16 dwellings on the site with the loss of 2 existing flats. The application is still to be determined. Much of the site has been cleared in anticipation of redevelopment.
Constraints	Most of the site is within Flood Zones 3b or 3a with the river frontage regularly being flooded. The HELAA considers that given the significance of flood risk, capacity is limited without suitable mitigation. As such a revised Flood Risk Assessment has been submitted recently in May 2018. The December 2017 HELAA states the site is in close proximity to the A14 Flyover which may have detrimental impacts in terms of noise and air

	pollution.
Suitability	<p>The site is brownfield and its allocation may assist in its regeneration. However the Council's HELAA states an innovative design solution will be required to overcome the significant flooding constraints with a vertical mix of uses being anticipated.</p> <p>The Environment Agency is objecting to the application as it is considered contrary to the NPPF and Policy HU16 of the emerging Local Plan as housing development is not appropriate within Flood Zone 3b.</p> <p>Given the acknowledgement by the Council and objection by the Environment Agency to the development of the site we consider the site must overcome these flood risk constraints.</p>
Availability	Due to the site clearance already being undertaken we consider that the site is available for development.
Viability	Any application will likely require substantial mitigation and flood risk protection for the site to be considered appropriate for development. This could potentially have an impact on the viability of the site and its ability to deliver affordable housing.
Deliverability	No comments.
Delivery	No comments.
Conclusion	We consider that the site needs to pass the Sequential and Exception Tests in order to comply with the NPPF and emerging Local Policies and the outstanding objection from the Environment Agency to be considered suitable for residential development.

Site Allocation	HU17 RGE Engineering
Unit size	2.6ha for approximately 90 homes
Current planning status	No application submitted.
Constraints	<p>Flood risk and the relationship with heritage assets are likely to be significant factors in determining the form and scale of development.</p> <p>Almost a quarter of the site lies in Flood Zone 3b due to the proximity to Cook's Stream.</p> <p>The site is also adjacent to Huntingdon and Godmanchester Conservation Areas and is close to several listed buildings.</p> <p>Existing businesses have to be relocated before development could begin.</p>
Suitability	<p>The site is located within Flood Zone 3b and therefore is required to pass the Sequential and Exception Tests in order to comply with the NPPF and emerging Local Policies.</p> <p>We do not consider that the site would not pass either of these tests and our client has promoted a number of sites which would be sequentially preferable to the proposed allocation.</p>
Availability	The site currently hosts a number of existing businesses which would require relocating before the site can be developed. We therefore consider it is not

	currently available. However, it could become available during the life of the local plan should it become clear that the site is no longer viable for economic development.
Viability	We have no information to suggest the site is not viable.
Deliverability	No comments.
Delivery	No comments.
Conclusion	The loss of existing viable business premises and the site's location within Flood Risk Zone 3b means the site is not appropriate to be allocated for housing development within the Local Plan.

Site Allocation	HU18 Wigmore Farm Buildings
Unit size	0.7ha for approximately 13 homes
Current planning status	A planning application for 13 dwellings (16/01477/FUL) was approved in August 2017. Application 18/80122/COND to discharge Conditions 3, 7, 9, 17 and 19 was submitted in May 2018 and has a determination deadline of 12 July 2018. Conditions 6, 10 and 18 have already been discharged.
Constraints	Flood Risk in the southern part of the site and development would need to take into account the relationship to the adjoining open countryside. The site's location is on the rural fringe of Godmanchester means the landscape impact is a potential development constraint. The site lies within an area of high archaeological potential.
Suitability	As Planning Permission has been granted for the site, HDC must consider it is appropriate for development.
Availability	The developer's website shows homes as 'coming soon'. 2017 AMR suggests units will be delivered in 2019/2020. Development can begin once the final pre development conditions have been discharged.
Viability	We have no information to suggest that the site is not viable.
Deliverability	No comments.
Delivery	No comments.
Conclusion	Development is considered likely to be delivered in the timescale expected by the Council.

Site Allocation	HU19 Bearscroft Farm
Unit size	45.5ha for approximately 750 homes
Current planning status	Planning permission 1200685OUT was granted in July 2013 for a mixed use development of up to 753 dwellings for which design codes were agreed in June 2015. Reserved Matters (15/01158/REM) was approved in December 2015 for the first phase of 223 dwellings and development commenced in April 2016.
Constraints	The majority of the site is classified as agricultural grade 2 land, with the section adjacent to Cardinal Park classified as grade 3. The site is located in Flood Zone 1 and there are no constraints relating to flood risk.

Suitability	As Planning Permission has been granted for the site, HDC must consider it is appropriate for development.
Availability	Development of the site has commenced and is therefore considered as available.
Viability	Viable development – a number of affordable units already been built. The scheme provides 35% affordable homes which is 5% below the policy target. This is understood to be due to an over-provision of land for the primary school by 0.3ha and the developers agreeing a contribution of £250,000 towards community facilities.
Deliverability	No comments.
Delivery	The 2017 AMR considers that 95 dwellings can be delivered each year until 2022/23 with 87 currently delivered on site. At this rate of delivery proposed in 2017 AMR, by 2019 the currently permitted 223 dwellings will have been completed on site. A Reserved Matters submission for the remaining dwellings will therefore be required for the site to deliver the additional units.
Conclusion	Development is likely to be delivered in the timescales forecast by the Council.

ANNEX A – LETWIN PRELIMINARY UPDATE LETTER 9/3/18

The Rt Hon Sir Oliver Letwin MP
The Independent Review of Build Out

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9th March 2018

Dear Philip and Sajid

My terms of reference require me, by the time of the Budget in the Autumn, to “explain the significant gap between housing completions and the amount of land allocated or permitted in areas of high housing demand, and make recommendations for closing it”.

The output of new housing is determined by the number of homes permitted and the rate at which those permissions are built out. Successive governments have done much in recent years to increase the number of permissions granted by reform of the planning system and by introducing other measures to encourage local authorities to grant more planning permissions for new homes. I have decided to focus, in the first stage of my work, exclusively on analysis of the reasons why – against the background of the current planning system – build out rates are as they are, without yet making any recommendations for increasing such build out rates in future.

I have further narrowed my focus by considering exclusively the question why, once major house-builders have obtained outline planning permission to build large numbers of homes on large sites, they take as long as they do to build those homes. The many questions that surround the build out rates achieved by smaller house-builders and on smaller sites may well be worthy of investigation in due course; but the importance of the large sites and large house-builders to the overall house-construction numbers is such as to make it sensible for me to devote all of my attention to them at this stage.

I propose to publish the results of my analytical work by the end of June in the form of a Draft Analysis. This will contain only a description of the problem and of its causes. I will seek comments from interested parties and experts before I finalise this analytical aspect of my work.

On the basis of this careful approach to analysis of the problem, I hope to be able to formulate robust recommendations from the Summer onwards in order to produce a Final Report containing recommendations in time for the Budget.

So far, with my team of officials and with help from my panel, I have:

- visited large housing development sites in ten local authorities, meeting house-builders and planning officials;
- held round table meetings and individual meetings with stakeholders including land agents, house-builders, local authorities and NGOs; and
- reviewed the extensive material that has already been published about this problem.

Work on all of these fronts continues. Over the next twelve weeks, I envisage that we will:

- visit further large sites;
- obtain data showing the pipeline of large sites from application to completion on site;
- visit Germany and the Netherlands to examine ways in which build out rates are affected by the use of public or publicly-led mechanisms for increasing the variety of what is offered on large sites; and
- hold further meetings with stakeholders to test my diagnosis of the issue.

A point which has become abundantly evident from all of our work so far is that there are two distinct stages for building a large number of houses on a large site:

- Stage 1 (the ‘regulatory stage’) consists of securing all the necessary approvals to allow development to commence on at least part of the site.
- Stage 2 (the ‘build out stage’) starts at the moment when the house-builder has an implementable consent and is therefore able to start construction on the site (i.e. has received either the grant of full planning permission or the first final, detailed planning permission under reserved matters, and has satisfied all pre-commencement conditions).

We have heard from many witnesses that the rate of build out of large sites during Stage 2 is typically held back by a web of commercial and industrial constraints including:

- limited availability of skilled labour,
- limited supplies of building materials,
- limited availability of capital,
- constrained logistics on the site,
- the slow speed of installations by utility companies,
- difficulties of land remediation, and
- provision of local transport infrastructure.

Each of these reasons for a slow and gradual build out of large permitted sites deserves further investigation – and I intend, in the Draft Analysis, to provide an assessment of each of them. This will require further discussion with providers of the relevant items (e.g. training, building materials, finance, on-site utility-infrastructure) as well as further examination of the relevant data (e.g. on labour markets and building material markets) by the Treasury micro-economist that has been seconded to my team of officials.

But I am not persuaded that these limitations (which might well become biting constraints in the future) are in fact the primary determinants of the speed of build out on large permitted sites at present. They are components of the velocity of build out; but they are not the fundamental rate-setting feature.

The fundamental driver of build out rates once detailed planning permission is granted for large sites appears to be the ‘absorption rate’ – the rate at which newly constructed homes can be sold into (or are believed by the house-builder to be able to be sold successfully into) the local market without materially disturbing the market price. The absorption rate of homes sold on the site appears, in turn, to be largely determined at present by the type of home being constructed (when ‘type’ includes size, design, context and tenure) and the pricing of the new homes built. The principal reason why house-builders are in a position to exercise control over these key drivers of sales rates appears to be that there are limited opportunities for rivals to enter large sites and compete for customers by offering different types of homes at different price-points and with different tenures.

When a large house-builder occupies the whole (or even a large part) of a large site, the size and style (and physical context) of the homes on offer will typically be fairly homogeneous. We have seen examples of some variation in size, style and context on some large sites; but the variations have not generally been great. It has become apparent to us that, when major house-builders talk about the absorption rates on a large site being affected by “the number of outlets”, they are typically referring not only to the physical location of different points of sale on the site, but also and more importantly to differences in the size and style (and context) of the products being offered for open market sale in different parts of the site. Even these relatively slight variations are clearly sufficient to create additional demand – and hence additional absorption, leading to a higher rate of build out.

It is also clear from our investigation of large sites that differences of tenure are critical. The absorption of the ‘affordable homes’ (including shared ownership homes) and of the ‘social rented housing’ on large sites is regarded universally as additional to the number of homes that can be sold to the open market in a given year on a given large site. We have seen ample evidence from our site visits that the rate of completion of the ‘affordable’ and ‘social rented’ homes is constrained by the requirement for cross-subsidy from the open market housing on the site. Where the rate of sale of open market housing is limited by a given absorption rate for the character and size of home being sold by the house-builder at or near to the price of comparable second-hand homes in the locality, this limits the house-builder receipts available to provide cross-subsidies. This in turn limits the rate at which the house-builder will build out the ‘affordable’ and ‘social rented’ housing required by the Section 106 Agreement – at least in the case of large sites where the non-market housing is either mixed in with the open market housing as an act of conscious policy (as we have frequently found) or where the non-market housing is sold to the Housing Association at a price that reflects only construction cost (as we have also seen occurring). If freed from these supply constraints, the demand for ‘affordable’ homes (including shared ownership) and ‘social rented’ accommodation on large

sites would undoubtedly be consistent with a faster rate of build out. And we have heard, also, that the demand for private rented accommodation at full open market rents (the scale of which is at present uncertain) would be largely additional to, rather than a substitute for, demand for homes purchased outright on the open market.

So further questions arise:

- would the absorption rate, and hence the build out rate be different if large sites were ‘packaged’ in ways that led to the presence on at least part of the site of:
 - other types of house-builder offering different products in terms of size, price-point and tenure? Or
 - the major house builders offering markedly differing types of homes and/or markedly different tenures themselves?
- would the absorption rate be different if the reliance on large sites to deliver local housing were reduced? And
- what are the implications of changing the absorption rate for the current business model of major house-builders if the gross development value of sites starts to deviate from the original assumptions that underpin the land purchase?

As I continue my investigation into these questions over the next few months, I shall also investigate what constraints would be imposed on build out rates by the supply of finance, the supply of skilled labour, the supply of utility-infrastructure, the availability of building materials, and the management of site logistics if the fundamental constraints currently imposed by the absorption rate for the type and price of home currently being offered on large sites were lifted for any of the reasons to which the questions refer. I shall investigate what effect faster build out rates would be likely to have on the 'land banks' held by the major builders. And I shall continue to seek views from industry participants, planners, NGOs and others on the possible answers to the questions in order to deepen the analysis published in June.

Yours ever,

A handwritten signature in black ink, appearing to read 'Oliver Letwin', written in a cursive style.

The Rt Hon Sir Oliver Letwin MP

cc. Dominic Raab MP, Minister of State for Housing

