

**RPS**

**Proposed Submission  
Local Plan Examination  
Hearing Statement –  
Matter 12**

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

13 July 2018

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# QUALITY MANAGEMENT

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Date:	<b>July 2018</b>
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# 1 INTRODUCTION

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- 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 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 12 of the Matters and Issues identified by the Inspector. Hearing Statements have also been submitted in respect of Matters 3, 4, 6, 8, 9, 11 and 13.

## 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 client's interest in respect of Matter 12. These responses are provided below.

### Matter 12 – The supply and delivery of housing land

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

#### Question 1

2.2 Question 1 asks what the estimated total supply of new housing is in the plan period 2011-2036 and how this compares with the planned level of provision. According to Huntingdonshire's Annual Monitoring Report December 2017 (AMR 2017) (MON/01) there have been a total of 3,675 completions between 2011 and 2017 with a further 18,393 completions projected between 2017-2036. Therefore, Huntingdonshire District Council (HDC) considers it will supply a total of 22,068 dwellings during the plan period. Should these all dwellings be provided it would result in a surplus of 1,968 (9%) above the planned provision.

2.3 As an aside, the draft plan refers to the provision of 22,500 dwellings over this period (PREP/01 para 4.10). We question the basis of this figure and the calculation behind it.

2.4 The Council has a record of over estimating when dwellings will be delivered on site and also over estimating the total numbers of dwellings which will be delivered each year which has resulted in shortfall of 1,149 completions between 2011-2017. Table 1 below summarises how the target and forecasts provided in the 2015, 2016 and 2017 AMRs (MON/01) compares to the completions achieved.

**Table 1: HDC Completions Achieved vs Targets and Previous AMR Forecasts**

Monitoring year	Completions achieved	2015 AMR Forecast (2014-15)	Net Performance against Forecast	2016 AMR Forecast (2015-16)	Change from Previous Forecast		2017 AMR Forecast (2016-17)	Change from Previous Forecast	
2011/12	847								
2012/13	412								
2013/14	686								
2014/15	514								
2015/16	534	541	-7						
2016/17	682	940	-258	567	-373	-40%			
2017/18		1,214		1,135	-79	-7%	689	-446	-39%
2018/19		1,557		1,428	-129	-8%	1,256	-172	-12%
2019/20		1,246		1,487	241	19%	1,613	126	8%
2020/21		1,262		1,324	62	5%	1,864	540	41%
2021/22		1,374		1,576	202	15%	1,734	158	10%

2.5 The table clearly demonstrates that the forecasts have historically proved to be overly optimistic. As HDC has been unable to accurately forecast completions 1 year in advance of the AMR, we

have genuine concerns regarding their long term housing trajectory. We therefore question the robustness of the assumptions made in the AMRs and consider the forecasts cannot be relied upon.

- 2.6 Furthermore HDC is being extremely optimistic regarding the amount of units which can be delivered each year on the larger strategic allocations of SEL 1.1, SEL 1.2 and SEL 2. Each of these sites is forecast to deliver over 100 dwellings per annum following the initial years of construction with the Former Alconbury Airfield and Grange Farm (SEL 1.1) set to deliver 300 units per annum between 2028/29 and 2033/34. As set out in our response to Matter 6, this is a very ambitious delivery rate especially when only c.630 of the 5,000 units planned for the site have a detailed planning permission. There is no evidence provided by the Council that these sites will be able to deliver the necessary number of dwellings per annum to meet these forecasts.
- 2.7 These levels of delivery do not reflect the evidence contained within NLP Research Paper 'Start to Finish' November 2016 (**Appendix C**) which notes that on sites of up to 1,499 units completions barely exceed 100 units per annum. Of the 55 case studies reviewed in Figure 6 of the report only 5 sites experienced build rates of over 200 dwellings per annum and only 2 over 250 per annum. Only one of the sites recorded a housing delivery per annum of over 300 units. We therefore consider delivery rates well in excess of 100 dwellings per annum on a single site are not the norm and the Council should provide a fuller justification for the high numbers of dwellings forecast to be delivered. This is especially the case against a backdrop of historic undersupply due to the delays in these strategic sites delivering houses.
- 2.8 We also have notable reservations over a number of the proposed allocations as set out in the Hearing Statements on Matters 6, 8, 9 and 11 and also within **Appendix D**. A number of the proposed allocations have substantial constraints and issues impacting their capacity to deliver houses including being located within Flood Zones 2, 3a or 3b. Should the Inspector agree that these sites are unsuitable for allocation; the total number of dwellings proposed to be delivered across the plan period would be reduced by 373<sup>1</sup> dwellings to 21,695 units. This reduces the housing surplus to 1,595 dwellings before the Council's forecast delivery rates are brought into question.
- 2.9 We therefore have serious concerns as to whether HDC estimated total supply is robust and will meet the level of provision required for the Local Plan to be found sound.

### Question 3

- 2.10 Question 3 seeks confirmation regarding the assumptions behind the scale and timing of supply and annual rates of delivery and whether these are considered to be realistic. We have been unable to find the Council's evidence behind its assumptions online. For a number of sites identified within the AMR 2017 (MON/01) where delivery and scale of development on the site has been estimated there is seemingly no evidence provided to support the Council's conclusions.

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<sup>1</sup> Sites considered unsuitable for allocation: HU9 Main Street (30 dwellings); HU16 Tyrell's Marina (16 dwellings); HU17 RGE Engineering (90 dwellings); SI14 Former Car Showroom (50 dwellings); and Part of SI1 – St Ives West (187 dwellings)

- 2.11 Examples within MON/01 include Field Road, Ramsey and East of Glebe Farm, Sawtry where, according to the 'Notes' provided within the Housing Trajectory, delivery on both sites has been estimated based on the housebuilders website stating homes are 'coming soon'.
- 2.12 Based on the lack of evidence provided within MON/01 and other supporting documents and the historic inaccuracies in relation to forecasting rates of completion, we consider that there is little or no evidence that the Council's assumptions regarding scale, timing of supply and annual rates of delivery are realistic.

#### Question 4

- 2.13 Question 4 relates to whether the timescales and rates of delivery on large strategic sites are realistic. As briefly set out for Question 1, HDC delivery rates for large strategic sites appear very optimistic and are inconsistent with the evidence provided by sources such as the NLP Research Paper 'Start to Finish' November 2016. Furthermore previous AMRs demonstrate that forecasts for sites such as Alconbury Weald have been overestimated for a number of years.
- 2.14 For Alconbury Weald, the 2016 AMR Housing Trajectory (**Appendix E**) forecast that 200 dwellings would be completed in 2017/18. However, the 2017 AMR has almost halved this to only 102 projected completions. When compared to the 2015 AMR Housing Trajectory (**Appendix F**), the overestimation of units is further demonstrated with 125 forecast to be completed in 2016/17. However, according to the 2017 AMR Housing Trajectory only 48 units have been delivered on site in the monitoring year. The 2015 AMR also considered that 200 dwellings would be completed during 2017/18. HDC have therefore continuously overestimated the number of dwellings which can be delivered at Alconbury Weald year on year and these overestimates have been reflected in the future trajectories.
- 2.15 The Letwin preliminary update letter dated 9 March 2018 (**Appendix G**) indicated that the fundamental driver of slow build out rates for large sites appears to be the 'absorption rate'. Large sites create the opportunity for house-builders to control sales rates and limit opportunities for rivals to enter the market and compete for customers. This reduces the absorption rate as the homes on offer will typically be fairly homogeneous and provide limited choice for customers. Therefore, housebuilders operating on large sites are unlikely to deliver the high number of dwellings expected by the Council as these cannot be absorbed by the market or sold by the house builder at a quick enough rate.
- 2.16 Questions over the timescales and delivery rates on large strategic sites is further supported by the findings of the NLP November 2016 'Start to Finish' research as set out in paragraph 2.6 above. HDC currently consider that Alconbury Weald, St Neots East – Wintringham Park will both achieve 250+ dwellings per annum and a further 4 sites will deliver at 150+ dwellings per annum. HDC proposed build out rates are not supported by evidence and therefore are not realistic.

#### Question 6

- 2.17 Question 6 queries whether there has been a persistent under delivery of housing within the District. Following the Lucks Lane appeal decision (Ref: APP/H0520/W/16/3159161) and publication of the August 2017 Housing Land Supply Position Statement (MON/02), HDC has

accepted that a 20% buffer should apply. HDC has failed to deliver sufficient housing to meet its annual average target every year since 2012/13 including 2016/17. There has therefore been 5 consecutive years over which HDC has failed to deliver against its housing target comprising a cumulative shortfall of 1,149 dwellings. This is substantial under-supply.

Question 7

2.18 The NPPG advocates the Sedgefield approach as the most appropriate method to address an accrued housing shortfall (Paragraph 35 ID 3-035-20140306) in order to boost significantly the supply of housing. We consider MON/01 has correctly applied this approach.

Question 8

2.19 Based on Table 3 of MON/01 the requirement for a five year supply including a buffer and shortfall is 6,203 dwellings. We consider this to be an under-estimate for the reasons set out in this Hearing Statement.

Question 9

2.20 Question 9 asks whether the Local Plan realistically provides for a five year supply on adoption and whether this five year supply will be maintained. We contend that the Local Plan has overestimated the delivery of dwellings based on the trajectory set out within MON/01. **Appendix D** provides an in-depth analysis of the draft Local Plan allocations and our critique on whether these will be delivered in the timeframe proposed by the Council.

2.21 Additionally the table below provides a summary of the key sites which the Council considers can be delivered within the next 5 years but which we dispute. The table includes a summary of reasons why sites are considered unlikely to be delivered at the rate assumed by HDC and the impact this would have on the 5 year supply.

**Table 2: Disputed Sites – AMR 2017 vs RPS 5 Year Assumption**

Site	HDC's 2017 AMR	RPS 5 Year Assumption	Summary of Reasons	Impact on supply
Brampton Park	573	552	Ambitious completion rates and only 517 units currently with Permission. (Maximum estimated delivery of 150 DPA in years 2 and 3 reducing to a maximum of 100 DPA in years 4 and 5 as less house builders operate on site. Remaining completions moved to 2022/23.)	-21
Alconbury Weald	1,087	902	Phased development, slower build out rates, ambitious completion rates and not all with Permission. (Maximum estimated delivery 200 DPA. Completions over 200 DPA moved outside of the 5 years.)	-185
George St Huntingdon	237	174	Resolution to grant however Decision Notice yet to be issued as S106 is still to be agreed. A complex brownfield site which	-63



			already has one unimplemented consent. (Delivery pushed back one year to 2019/20. Number of completions per year unchanged)	
RAF Upwood & Upwood Hill House, Ramsey	90	20	Outline permission granted 07/06/17, nearly 5 years after submission. A complex brownfield site with conditions pending and demolitions needed. (Delivery pushed back one year to 2021/22. Number of completions per year unchanged)	<b>-70</b>
Loves Farm East, St Neots	330	145	Outline application still pending approval, no RMs and substantial infrastructure requirements and likely to include a restrictive condition until the highway improvements have been implemented. (Delivery pushed back one year to 2021/22. Number of completions per year unchanged)	<b>-185</b>
Wintringham Park, St Neots	675	425	Application previously refused. New hybrid application resolution to grant subject to agreement from Cambridgeshire County Council to layout and design of the Potton Road Access and S106. Decision Notice still pending. RM applications required should the application be approved. Substantial infrastructure requirements and ambitious delivery. Likely to include a restrictive condition until the highway improvements have been implemented. (Delivery pushed back one year to 2019/20. Maximum estimated delivery of 200 DPA)	<b>-300</b>
Cromwell Rd North, St Neots	30	0	No application submitted and potential conflict with the EA in regard to opening up the existing culvert. Currently being marketed subject to planning. (Delivery pushed back one year to 2022/23)	<b>-30</b>
Former Car Showroom London Rd, St Ives	50	25	No application submitted. Applicants consider the site is suitable for 75 dwellings. Therefore planning submission likely to be submitted for more than the allocated number of dwellings. Site in Flood Zone 3a and we contend does not pass the sequential test. Site been vacant for 8 years. (Site is not suitable for development and therefore removed)	<b>-50</b>
W of Ramsey Rd, Warboys	45	30	No application submitted yet. Site in dual ownership, with one owner seemingly objecting to allocation. (Delivery pushed back one year to 2020/21)	<b>-15</b>

Main Street Huntingdon	30	0	No application submitted. Site in Flood Zone 2 and we contend does not pass the sequential test. (Site is not suitable for development and therefore removed from the 5 year supply	-30
St Ives Football Club	15	0	Site is currently unavailable for development with the relocation of the Football Club required before the site can be developed. To date no planning application has been submitted to relocate the Football Club. (Delivery pushed back until towards the end of the plan period)	-15
<b>Total</b>	<b>3,197</b>	<b>2,208</b>		<b>-989</b>

2.22 The AMR 2017 shows that HDC claims to have a 5 year supply (April 2017 – March 2022) of 7,165 dwellings based on its current trajectory. This equates to a surplus of 962 dwellings compared to the stated housing requirement (including shortfall and 20% buffer). However, Table 2 demonstrates that if the Inspector agrees with our critical review and conclusions over the proposed allocations HDC would have a reduced 5 year supply of 6,176 dwellings and would therefore be unable to demonstrate a 5 year housing land supply. This is a very fragile position We therefore do not consider that the Draft Local Plan contains a robust five year supply of dwellings and contend that more suitable sites, such as those promoted by my clients, should be allocated.

#### Question 10

2.23 Question 10 seeks views on whether there is a case to stagger or phase the housing requirement with a lower figure in the early years of the plan period. A staggered or phased housing requirement would not be suitable for the District as it could effectively result in unrealistic annual requirements later in the plan period should the larger housing sites not be delivered in accordance with the Council's Housing Trajectory.

2.24 As demonstrated above, we consider that the Council has historically failed to accurately forecast the delivery of dwellings more than one year in advance of its AMR period. We therefore question the accuracy of units being forecast to be delivered on a site in 10 years' time. As has been suggested by the preliminary update review by Oliver Letwin MP, the development of large sites does not lead to higher build out rates.

2.25 In addition to this, at this point in time prior to an application being submitted, the Council cannot be aware of all the issues involved in development of the sites such as RAF Alconbury where dwellings are not expected to be completed until 2028/29. The 2017 AMR notes that the timeframe for vacating RAF Alconbury has already been delayed '*by 2 years in recent months*'. There is no guarantee that there will not be further delays. Furthermore, future economic uncertainties could impact the willingness of housebuilders to deliver units thereby impacting future completions. Therefore, there is no guarantee that future sites will come forward as currently forecast within MON/01 and that the Council will be able to meet its phased housing requirement in the future should one be implemented.

2.26 Overall, we consider staggering the HDC housing requirement would have a negative impact on the District, result in a further overreliance on the strategic sites, and potentially result in an unrealistic yearly housing figure.

Question 11

2.27 As set out above, we contend that the Local Plan cannot demonstrate a deliverable 5 year housing land supply over the plan period and that HDC has been overly optimistic in its assumed housing trajectory.

### 3 CONCLUSION

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- 3.1 On behalf of our clients, we have a number of concerns in relation to the approach towards the supply and delivery of housing land. This Hearing Statement has been produced in response to Matter 12: Questions 1, 3, 4, 6, 7, 8, 9, 10 and 11.
- 3.2 We consider that the draft Local Plan will not enable the delivery of the number of houses required over the plan period and therefore is not positively prepared, justified, nor is it and consistent with national policy. We contend that the following amendments are required as a minimum in order for the Plan to be considered sound:
- The supply of new housing and the housing trajectory should be reviewed to ensure that the sites have a reasonable prospect of being delivered within the timeframe proposed;
  - The Council should present all its evidence used in relation to its decisions on the scale and timing of delivery present in the AMR;
  - Additional smaller sites should be allocated (such as those promoted by our client in Matters 6, 8, 9 and 11) to ensure the District has a sufficient range and mix of sites to constitute a robust and reliable supply sufficient to meet in full the 5 year housing land requirement (plus 20% buffer for persistent under-delivery) and the OAN for the plan period. A wider variety and mix of deliverable sites will help to increase absorption rates and ensure that the Local Plan can deliver the number of houses required over the plan period should the delivery of larger strategic sites prove to be slower than the current forecast (as has been the case to date).

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

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**Our Ref: 19995/RMG/MB**  
**Your Ref:**

**E-mail: [mark.buxton@cgms.co.uk](mailto: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**  
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**E-mail: [mark.buxton@rpsgroup.com](mailto:mark.buxton@rpsgroup.com)**  
**Date: 5<sup>th</sup> 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 satisfactorily 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 – NLP RESEARCH PAPER 'START TO FINISH'**  
**NOVEMBER 2016**

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TRIP

Targeted Research  
& Intelligence Programme



Nathaniel Lichfield  
& Partners

Planning. Design. Economics.

# Start to Finish

## How Quickly do Large-Scale Housing Sites Deliver?

November 2016

# Executive Summary

There is a growing recognition that large-scale housing development can and should play a large role in meeting housing need. Garden towns and villages – planned correctly – can deliver sustainable new communities and take development pressure off less sustainable locations or forms of development.

However, what looks good on paper needs to deliver in practice. Plans putting forward large sites to meet need must have a justification for the assumptions they make about how quickly sites can start providing new homes, and be reasonable about the rate of development. That way, a local authority can decide how far it needs to complement its large-scale release with other sites – large or small – elsewhere in its district.

This research looks at the evidence on speed and rate of delivery of large-scale housing based on a large number of sites across England and Wales (outside London). We draw five conclusions:

1. If more homes are to be built, more land needs to be released and more planning permissions granted. There is no evidence to support the notion of systemic 'land banking' outside London: the commercial drivers of both house builders and land promoters incentivises rapid build out of permissions to secure returns on capital.
2. Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period. Because no one site is the same – and with significant variations from the average in terms of lead-in time and build rates – a sensible approach to evidence and justification is required.
3. Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times.
4. Plans should reflect that – where viable – affordable housing supports higher rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand for those products). This might mean some areas will want to consider spatial strategies that favour sites with greater prospects of affordable or other types of housing delivery.
5. For large-scale sites, it matters whether a site is brownfield or greenfield. The latter come forward more quickly.

In our conclusions we identify a check list of questions for consideration in exploring the justification for assumed timing and rates of delivery of large-scale sites.

# The Research in Figures

**70** number of large sites assessed

**3.9** years the average lead in time for large sites prior to the submission of the first planning application

**6.1** years the average planning approval period of schemes of 2,000+ dwellings. The average for all large sites is circa 5 years

**161** the average annual build rate for a scheme of 2,000+ dwellings

**321** the highest average annual build rate of the schemes assessed, but the site has only delivered for three years

**40%** approximate increase in the annual build rate for large sites delivering 30%+ affordable housing compared to those delivering 10%-19%

**50%** more homes per annum are delivered on average on large greenfield sites than large brownfield sites



# Introduction

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When it comes to housing, Government wants planning to think big. With its Garden Towns and Villages agenda and consultation on proposed changes to the National Planning Policy Framework (NPPF) to encourage new settlements, planning authorities and developers are being encouraged to bring forward large-scale housing development projects, many of them freestanding. And there is no doubt that such projects will be necessary if England is to boost supply and then consistently deliver the 300,000 new homes required each year<sup>1</sup>.

Large-scale sites can be an attractive proposition for plan-makers. With just one allocation of several thousand homes, a district can – at least on paper – meet a significant proportion of its housing requirement over a sustained period. Their scale means delivery of the infrastructure and local employment opportunities needed to sustain mixed communities.

But large-scale sites are not a silver bullet. Their scale, complexity and (in some cases) up-front infrastructure costs means they are not always easy to kick start. And once up and running, there is a need to be realistic about how quickly they can deliver new homes. Past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result.

So, if Local Plans and five year land supply assessments are to place greater reliance on large-scale developments – including Garden Towns and Villages – to meet housing needs, the assumptions they use about when and how quickly such sites will deliver new homes will need to be properly justified.

*“Local planning authorities should take a proactive approach to planning for new settlements where they can meet the sustainable development objectives of national policy, including taking account of the need to provide an adequate supply of new homes. In doing so local planning authorities should work proactively with developers coming forward with proposals for new settlements in their area.”*

**DCLG consultation on proposed changes to national planning policy (December 2015)**

The Planning Practice Guidance (PPG) offers little guidance other than identifying that timescales and rates of development in land availability assessments should be based on information that “*may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance should be made for several developers to be involved. The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year*”<sup>2</sup>. It also requires housing land availability assessments to include: “a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome.”<sup>3</sup>

This research provides insights to this topic – which has become a perennial discussion at Local Plan examinations and Section 78 appeals in recent years – by focusing on two key questions:

1. what are realistic lead-in times for large-scale housing developments?; and
2. once the scheme starts delivering, what is a realistic annual build rate?

NLP has carried out a desk-based investigation of the lead-in times and build-out rates on 70 different strategic housing sites (“large sites”) delivering 500 or more homes to understand what factors might influence delivery. For contrast 83 “small sites” delivering between 50 and 499 homes have been researched to provide further analysis of trends in lead in times and build rates at varying scales.

As well as identifying some of the common factors at play during the promotion and delivery of these sites it also highlights that every scheme has its own unique factors influencing its progress: there can be significant variations between otherwise comparable developments, and there is no one ‘typical scheme’. This emphasises the importance of good quality evidence to support the position adopted on individual projects.

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<sup>1</sup> House of Lords Select Committee on Economic Affairs (2016) Building more homes: 1st Report of Session 2016-17 - HL Paper 20

<sup>2</sup> PPG ID: 3-023-20140306

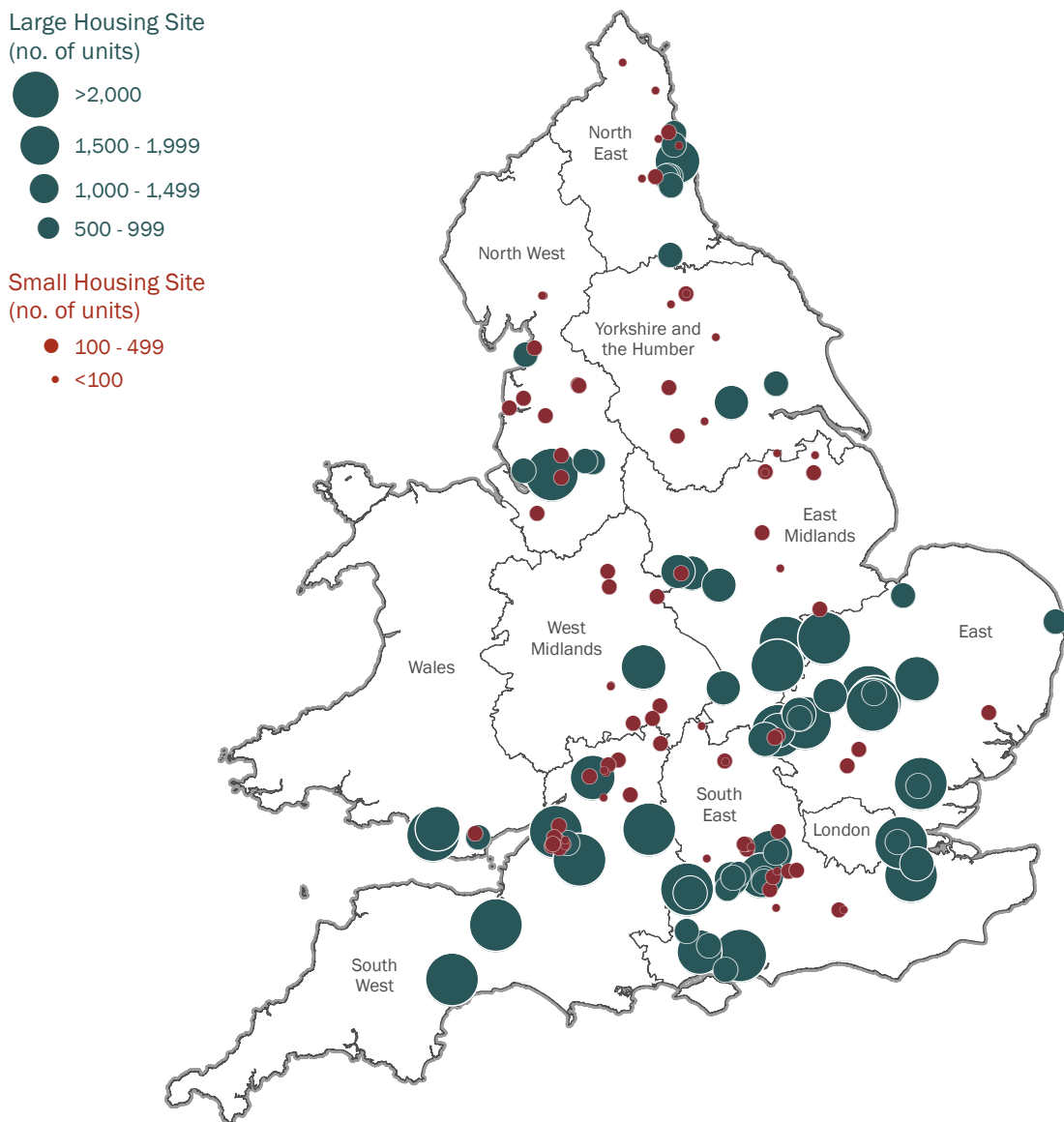
<sup>3</sup> PPG ID: 3-028-20140306

# Data Sources and Methodology

In total NLP reviewed 70 strategic sites (“large sites”) which have delivered, or will deliver, in excess of 500 dwellings. The sites range in size from 504 to 15,000 dwellings. The geographic distribution of the 70 large sites and comparator small sites is set out below in Figure 1. A full list of the large sites can be found in Appendix 1 and the small sites in Appendix 2. NLP focused on sites outside London, due to the distinctive market and delivery factors applicable in the capital.

Efforts were made to secure a range of locations and site sizes in the sample, but it may not be representative of the housing market in England and Wales as a whole and thus conclusions may not be applicable in all areas or on all sites.

Figure 1: Geographic Distribution of the 70 Large Sites and 83 Small Sites Assessed



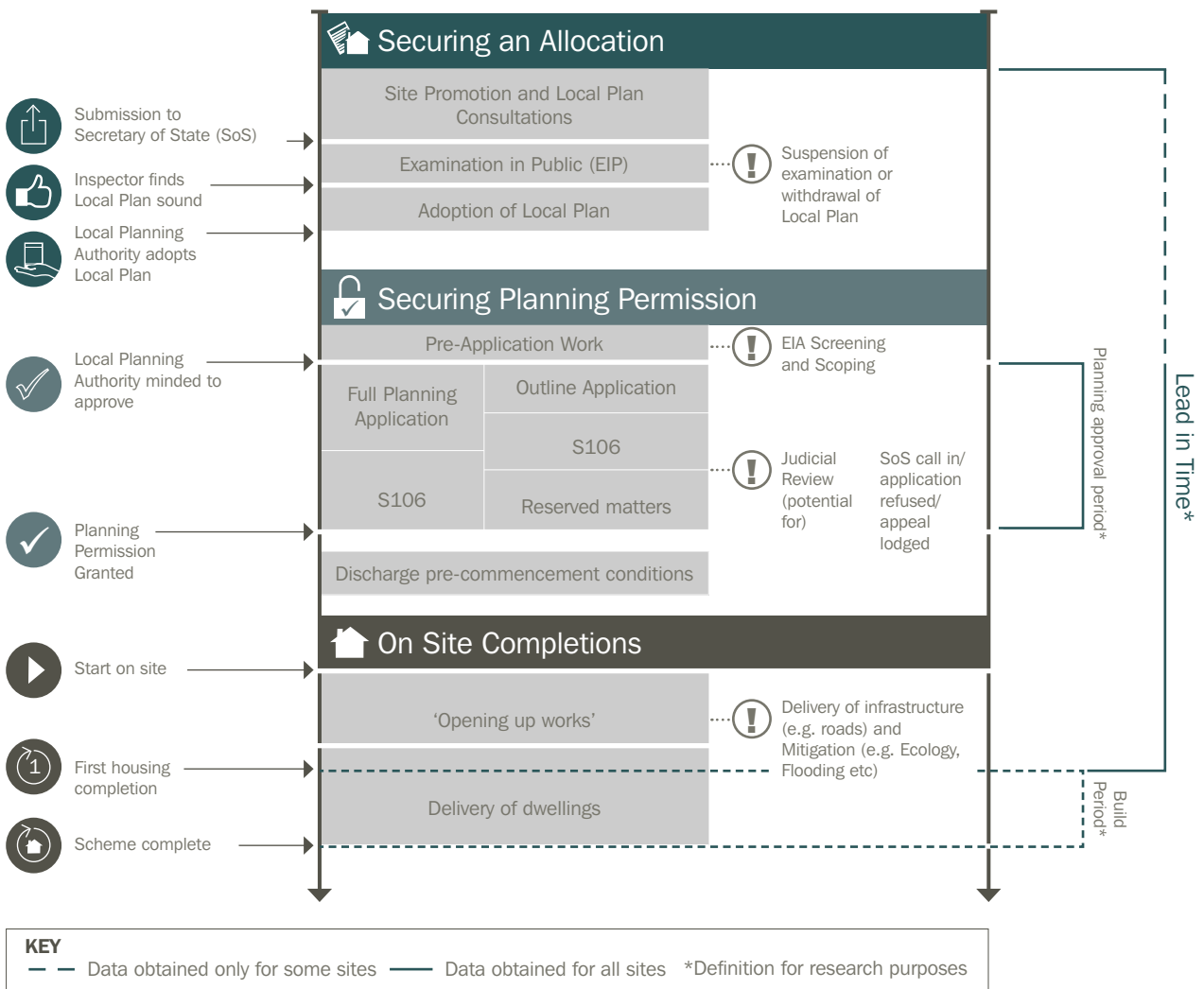
Source: NLP analysis

## Methodology

The research aims to cover the full extent of the planning and delivery period. So, wherever the information was available, the data collected on each of the 70 sites covers the stages associated with the total lead-in time of the development (including the process of securing a development plan allocation), the total planning approval period, starting works on site, delivery of the first dwelling and the annualised build rates recorded for the development up until to the latest year where data is available (2014/15). To structure the research and provide a basis for standardised measurement and comparison, these various stages (some of them overlapping) have been codified.

Figure 2 sets out the stages and the milestones used to measure them. These are assumed to fall under what are defined as 'lead-in times', 'planning approval periods' and 'build periods', with 'first housing completion' denoting the end of the lead-in time and start of the build period. Not every site assessed will necessarily have gone through each component of the identified stages sequentially, or indeed at all (for example, some sites secure planning permission without first being allocated).

Figure 2: Timeline for the Delivery of a Strategic Housing Site



Source: NLP

Start to Finish

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The approach to defining these stages for the purposes of this research is set out below:

- The **'lead-in time'** – this measures the period up to the first housing completion on site from either a) the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document) or where not applicable, available or readily discernible – b) the validation date of the first planning application made for the scheme.
- The **'planning approval period'** is measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwellings on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). The discharge of any pre-commencement and other conditions obviously follows this, but from a research perspective, a measurement based on a detailed 'consent' was considered reasonable and proportionate milestone for 'planning' in the context of this research.
- The date of the **'first housing completion'** on site (the month and year) is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a mid-point of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.
- The **'annual build rate'** falls within the overall 'build period'. The annual build rate of each site is taken or inferred from the relevant Local Planning Authority's Annual Monitoring Reports (AMR) or other evidence based documents where available. In some instances this was confirmed – or additional data provided – by the Local Planning Authority or County Council.

Due to the varying ages of the assessed sites, the implementation of some schemes was more advanced than others and, as a function of the desk-based nature of the research and the vintage of some of the sites assessed, there have been some data limitations, which means there is not a complete data set for every assessed site. For example, lead-in time information prior to submission of planning applications is not available for all sites. And because not all of the sites assessed have commenced housing delivery, annual build rate information is not universal. The results are presented accordingly.





# Getting Started: What are Realistic Lead-in Times?

How long does it take for large-scale sites to get up and running? This can be hard to estimate. Understandably, those promoting sites are positive about how quickly they can deliver, and local authorities choosing to allocate large-scale sites in their plans are similarly keen for these sites to begin making a contribution to housing supply. This leads some local housing trajectories to assume that sites can be allocated in Local Plans and all detailed planning approvals secured in double-quick time. However, the reality can prove different.

Our main focus here is on the average 'planning approval period' and the subsequent period from receiving a detailed planning approval to delivery of the first house on site. However, another important metric is how long it takes from the site being first identified by the local authority for housing delivery to getting started on site. Unfortunately, getting accurate data for this on some of the historic sites is difficult, so this analysis is focused on a just 18 of the sample sites where information was available.

## Lead-in Times

The lead-in time prior to the submission of a planning application is an important factor, because many planning issues are flushed out in advance of planning applications being submitted, not least in terms of local plan allocations establishing the principle of an allocation. In a plan-led system, many large-scale sites will rely on the certainty provided by Local plans, and in this regard, the slow pace of plan-making in the period since the NPPF<sup>4</sup> is a cause for concern.

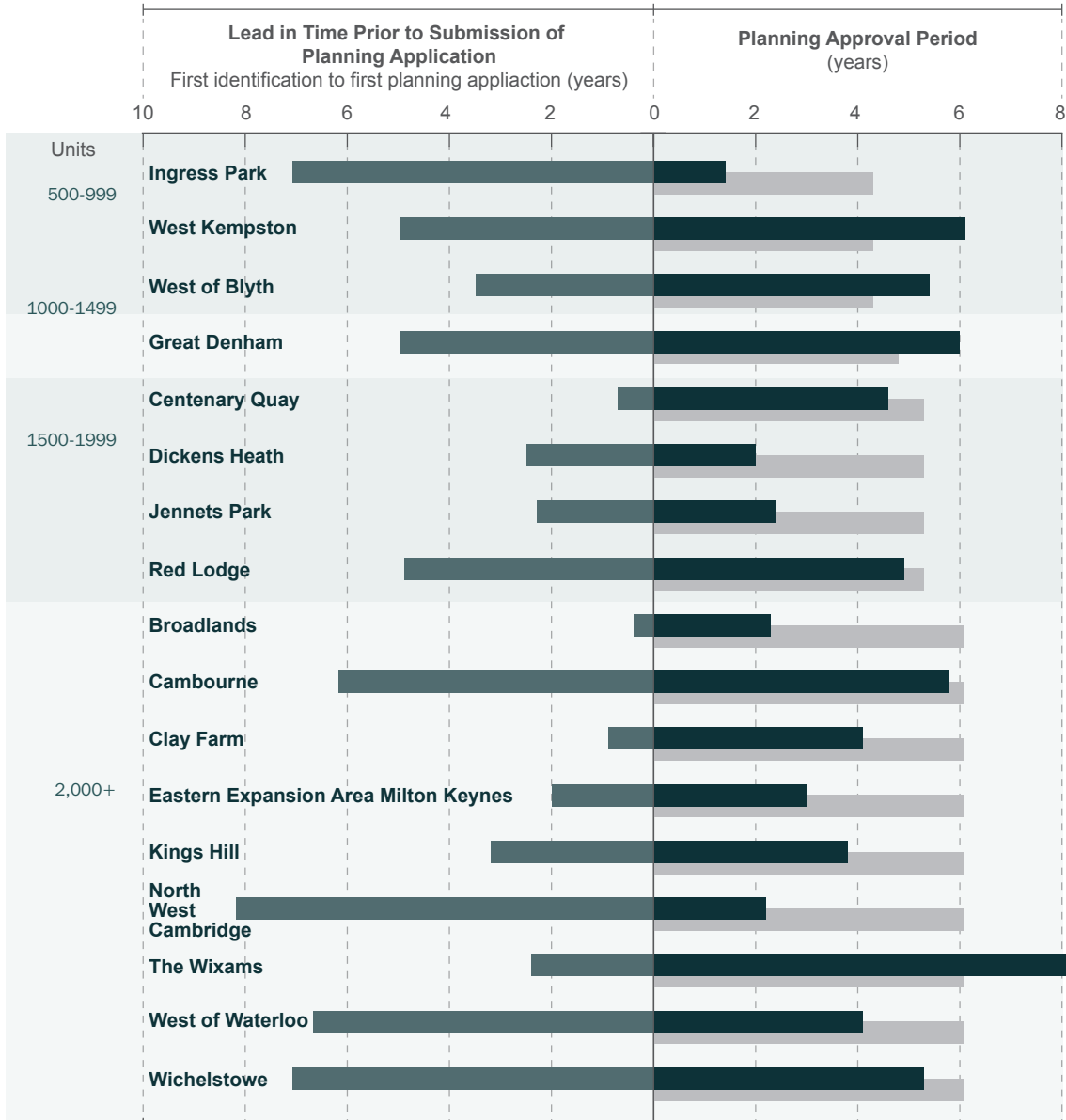
If the lead-in time prior to submission of an application is able to focus on addressing key planning issues, it can theoretically help ensure that an application – once submitted – is determined more quickly. Our sample of sites that has lead-in time information available is too small to make conclusions on this theory. However, there is significant variation within these sites highlighting the complexity of delivering homes on sites of different sizes. Of this sample of sites: on average it was 3.9 years from first identification of the site for housing to the submission of the initial planning application.

Moreover, a substantial lead-in time does not guarantee a prompt permission: 4 of the 18 sites that took longer to gain planning permission than the average for sites of comparable size and also had lead-in times prior to submission of a planning application of several years<sup>5</sup>.

<sup>4</sup> As at September 2016, just 34% of Local Authorities outside London have an up-to-date post-NPPF strategic-level Local Plan. Source: PINS / NLP analysis.

<sup>5</sup> The sites in question were The Wixams, West Kempton, West of Blyth, and Great Denham.

Figure 3: Average lead-in time of sites prior to submission of the first planning application



**KEY**  
 Lead in time prior to submission of planning application  
 Planning approval period  
 Average planning application period for site of that size

Source: NLP analysis

## The Planning Approval Period: Size Matters

The term ‘planning approval period’ in this report measures the period from the validation date of the first planning application for the scheme to the decision date of the first application which permits development of dwellings on site (this could be a full, hybrid or reserved matters application). Clearly, in many cases, this approval will also need to be followed by discharge of pre-commencement conditions (a focus of the Government’s Neighbourhood Planning Bill) but these were not reviewed in this research as a detailed approval was considered an appropriate milestone in this context.

The analysis considers the length of planning approval period for different sizes of site, including comparing large-scale sites with small sites. Figure 4 shows that the greater the number of homes on a site, the longer the planning approval period becomes. There is a big step-up in time for sites of in-excess of 500 units.

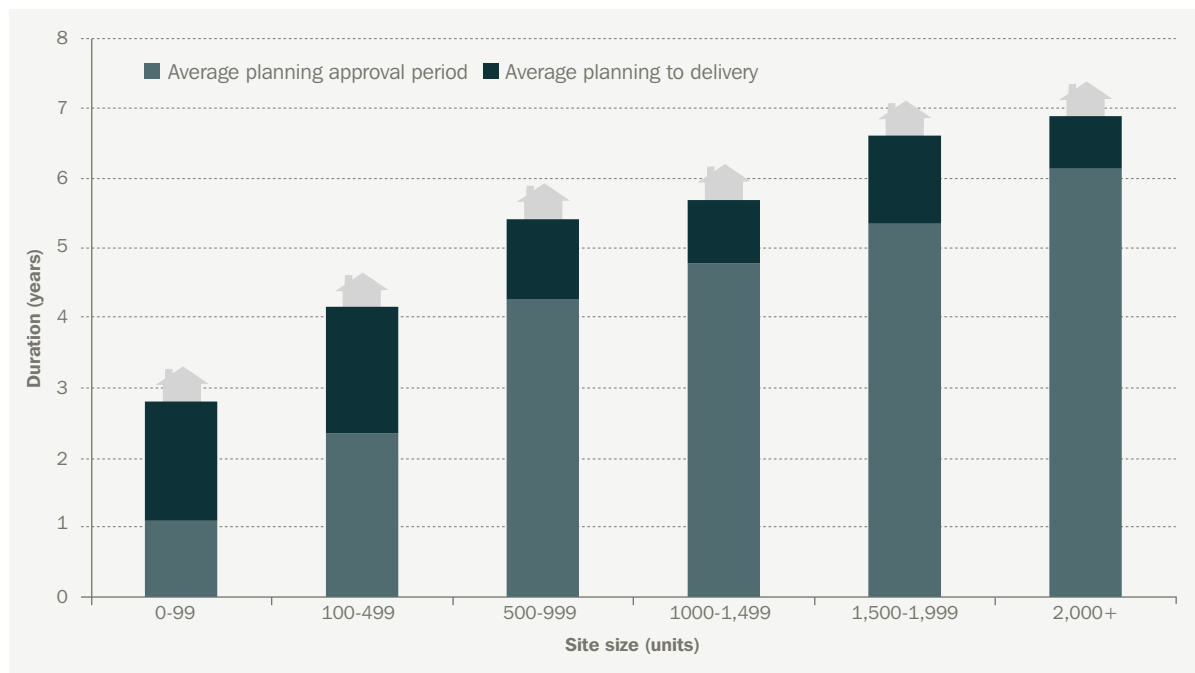
## Time Taken for First Housing Completion after Planning Approval

Figure 4 also shows the time between the approval of the first application to permit development of dwellings on site and the delivery of the first dwelling (during which time any pre-commencement conditions would also be discharged), in this analysis this is the latter part of the lead in time period. This reveals that the timescale to open up a site following the detailed approval is relatively similar for large sites.

Interestingly, our analysis points to smaller sites taking longer to deliver the first home after planning approval. This period of development takes just over 18 months for small sites of under 500 units, but is significantly quicker on the assessed large-scale sites; in particular, on the largest 2,000+ dwelling sites the period from receiving planning approval to first housing completion was 0.8 years.

In combination, the planning approval period and subsequent time to first housing delivery reveals the total period increases with larger sites, with the total period being in the order of 5.3 – 6.9 years. Large sites are typically not quick to deliver; in the absence of a live planning application, they are, on average, unlikely to be contributing to five year housing land supply calculations.

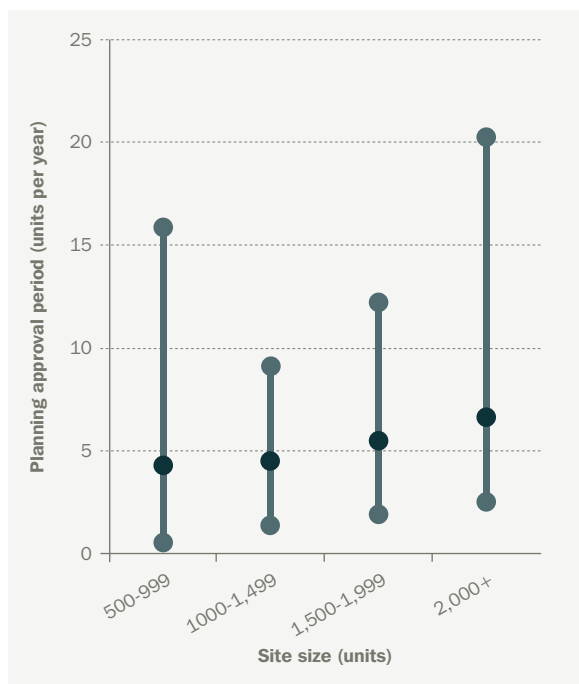
Figure 4: Average planning approval period and delivery of first dwelling analysis by site size



Source: NLP analysis

Of course, these are average figures, and there are significant variations from the mean. Figure 5 below shows the minimum and maximum planning approval periods for sites in each of the large size categories. This shows even some of the largest sites coming forward in under two years, but also some examples taking upwards of 15-20 years. Clearly, circumstances will vary markedly from site to site.

Figure 5: Site size and duration of planning



Source: NLP analysis

## Case Studies

If some sites are coming forward more quickly than the average for sites of that size, what is it that is driving their rapid progress? We explored this with some case studies. These suggest that when schemes are granted planning permission significantly faster than the above averages, it is typically due to specific factors in the lead-in time prior to the submission of a planning application.

### Gateshead – St James Village (518 dwellings): Planning approval period 0.3 years<sup>6</sup>

This site was allocated as a brownfield site in the Gateshead UDP (2000) prior to the submission of a planning application for the regeneration scheme. A Regeneration Strategy for East Gateshead covered this site and as at 1999 had already delivered high profile flagship schemes on the water front. Llewelyn Davis were commissioned by the Council and English Partnerships to prepare a masterplan and implementation strategy for the site which was published in June 1999. Persimmon Homes then acquired the site and it was agreed in autumn 1999 that they should continue the preparation of the masterplan. East Gateshead Partnership considered the masterplan on the 08th March 2000 and recommended approval. Subsequently, the outline application (587/00) with full details for phase 1 was validated on the 6th September 2000 and a decision issued on the 9th January 2001.

It is clear that although it only took 0.3 years for the planning application to be submitted and granted for a scheme of more than 500 units, the lead in time to the submission of the application was significant, including an UDP allocation and a published masterplan 18 months ahead of permission being granted. By the time the planning application was submitted most of the site specific issues had been resolved.

<sup>6</sup> St James Village is excluded from the lead-in time analysis because it is unclear on what date the site was first identified within the regeneration area

### **Dartford – Ingress Park (950 dwellings): Planning approval period 1.4 years**

This site was initially identified in a draft Local Plan in 1991 and finally allocated when this was adopted in April 1995. The Ingress Park and Empire Mill Planning Brief was completed in three years later (November 1998).

The submission of the first planning application for this scheme predated the completion of the Planning Brief by a few months, but the Council had already established that they supported the site. By the time the first application for this scheme was submitted, the site had been identified for development for circa seven years.

The outline application (98/00664/OUT) was validated on the 10th August 1998 and permission granted on the 21st Nov 2000, a determination period of 1 year and 3 months). A full application for the First Phase for 52 dwellings (99/00756/FUL) was validated and approved in just two months, prior to approval of the outline. Clearly, large-scale outline permissions have to wrap up a wide range of other issues, but having first phase full applications running in parallel can enable swifter delivery, in situations where a 'bite sized' first phase can be implemented without triggering complex issues associated with the wider site.

### **Cambridge and South Cambridgeshire – North West Cambridge (3,000 dwellings and 2,000 student bed spaces): Planning approval period 2.2 years**

Cambridge University identified this area as its only option to address its long-term development needs, and the Cambridgeshire and Peterborough Structure Plan 2003 identified the location for release from the Green Belt. The site was allocated in the 2006 Cambridge Local Plan, and the North West Cambridge Area Action Plan was adopted in October 2009. The Area Action Plan established an overall vision and set out policies and proposals to guide the development as a whole.

As such, by the time the first application for this scheme was submitted, there had already been circa eight years of 'pre-application' planning initially concerning the site's release from the Green Belt, but then producing the Area Action Plan which set out very specific requirements.. This 'front-loaded' consideration of issues that might otherwise have been left to a planning application.

The outline application (11/1114/OUT – Cambridge City Council reference) for delivery of up to 3,000 dwellings, up to 2,000 student bed spaces and 100,000 sqm of employment floorspace was validated on the 21st September 2011 and approved on the 22nd of February 2013. The first reserved matters application for housing (13/1400/REM) was validated on the 20th September 2013 and approved on the 19th December 2013. Some ten years from the concept being established in the Structure Plan.

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## Summary on Lead-in Times

1. On average, larger sites take longer to complete the planning application and lead-in processes than do smaller sites. This is because they inevitably give rise to complex planning issues related to both the principle of development and the detail of implementation.
2. Consideration of whether and how to implement development schemes is necessary for any scheme, and the evidence suggests that where planning applications are determined more quickly than average, this is because such matters were substantially addressed prior to the application being submitted, through plan-making, development briefs and/or master planning. There is rarely a way to short-circuit planning.
3. Commencement on large sites can be accelerated if it is possible to 'carve-out' a coherent first phase and fast track its implementation through a focused first phase planning application, in parallel with consideration of the wider scheme through a Local Plan or wider outline application.
4. After receiving permission, on average smaller sites take longer to deliver their first dwelling than do the largest sites (1.7-1.8 years compared to 0.8 years for sites on 2,000+ units).

# Lapse Rates: What Happens to Permissions?

Not every planning permission granted will translate into the development of homes. This could mean an entire site does not come forward, or delivery on a site can be slower than originally envisaged. It is thus not realistic to assume 100% of planning permission granted in any given location will deliver homes. Planning permissions can lapse for a number of reasons:

1. The landowner cannot get the price for the site that they want;
2. A developer cannot secure finance or meet the terms of an option;
3. The development approved is not considered to be financially worthwhile;
4. Pre-commencement conditions take longer than anticipated to discharge;
5. There are supply chain constraints hindering a start; or
6. An alternative permission is sought for the scheme after approval, perhaps when a housebuilder seeks to implement a scheme where the first permission was secured by a land promoter.

These factors reflect that land promotion and housebuilding is not without its risks.

At the national level, the Department for Communities and Local Government has identified a 30-40% gap between planning permissions granted for housing and housing starts on site<sup>7</sup>. DCLG analysis suggested that 10-20% of permissions do not materialise into a start on site at all and in addition, an estimated 15-20% of permissions are re-engineered through a fresh application, which would have the effect of pushing back delivery and/or changing the number of dwellings delivered.

This issue often gives rise to claims of 'land banking' but the evidence for this is circumstantial at best, particularly outside London. The business models of house builders are generally driven by Return on Capital Employed (ROCE) which incentivises a quick return on capital after a site is acquired. This means building and selling homes as quickly as possible, at sales values consistent with the price paid for the land. Land promoters (who often partner with landowners using promotion agreements) are similarly incentivised to dispose of their site to a house builder to unlock their promotion fee. Outside London, the scale of residential land prices has not been showing any significant growth in recent years<sup>8</sup> and indeed for UK greenfield and urban land, is still below levels last seen at least 2003<sup>9</sup>. There is thus little to incentivise hoarding land with permission.

The LGA has identified circa 400-500,000 units of 'unimplemented' permissions<sup>10</sup>, but even if this figure was accurate, this is equivalent to just two years of pipeline supply. More significantly, the data has been interpreted by LGA to significantly overstate the number of unimplemented permissions because 'unimplemented' refers to units on sites where either the entire site has not been fully developed or the planning permission has lapsed<sup>11</sup>. It therefore represents a stock-flow analysis in which the outflow (homes built) has been ignored.

Insofar as 'landbanking' may exist, the issue appears principally to be a London – rather than a national – malaise, perhaps reflecting that land values in the capital – particularly in 'prime' markets – have increased by a third since the previous peak of 2007. The London Mayor's 'Barriers to Housing Delivery – Update' of July 2014 looked at sites of 20 dwellings or more and reported that only about half of the total number of dwellings granted planning permission every year are built (Table 3); a lapse rate of circa 50% across London.

Clearly, the perceived problem of landbanking is seeing policy attention from Government, but caution is needed that any changes do not result in unintended consequences or act as a disincentive to secure planning permissions.

A more practical issue is that Plans and housing land trajectories must adopt sensible assumptions, based on national benchmarks, or – where the data exists – local circumstances, to understand the scale of natural non-implementation.

<sup>7</sup> DCLG Presentations to the HBF Planning Conference (September 2015)

<sup>8</sup> Knight Frank Residential Development Land Index Q1 2016 <http://content.knightfrank.com/research/161/documents/en/q1-2016-3844.pdf>

<sup>9</sup> Savills Development Land Index <http://www.savills.co.uk/research/uk/residential-research/land-indices/development-land-index.aspx>

<sup>10</sup> Glenigan data as referenced by Local Government Association in its January 2016 media release (a full report is not published) [http://www.local.gov.uk/web/guest/media-releases/-/journal\\_content/56/10180/7632945/NEWS](http://www.local.gov.uk/web/guest/media-releases/-/journal_content/56/10180/7632945/NEWS)

<sup>11</sup> This would mean that a site which has built 99% of homes will still show up as 100% of units being 'unimplemented'



# Build Rates: How Fast Can Sites Deliver?

The rate at which sites deliver new homes is a frequently contested matter at Local Plan examinations and during planning inquiries considering five year housing land supply. Assumptions can vary quite markedly and expectations have changed over time: in 2007, Northstowe – the new settlement to the north west of Cambridge – was expected by the Council to deliver 750-850 dwellings per annum<sup>12</sup>; it is now projected to deliver at an annual rate of just 250<sup>13</sup>.

There is a growing recognition that the rate of annual delivery on a site is shaped by ‘absorption rates’: a judgement on how quickly the local market can absorb the new properties. However, there are a number of factors driving this for any given site:

- the strength of the local housing market;
- the number of sales outlets expected to operate on the site (ie the number of different house builders or brands/products being delivered); or
- the tenure of housing being built. Are market homes for sale being supplemented by homes for rent, including affordable housing?

The analysis in this section explores these factors with reference to the surveyed sites.

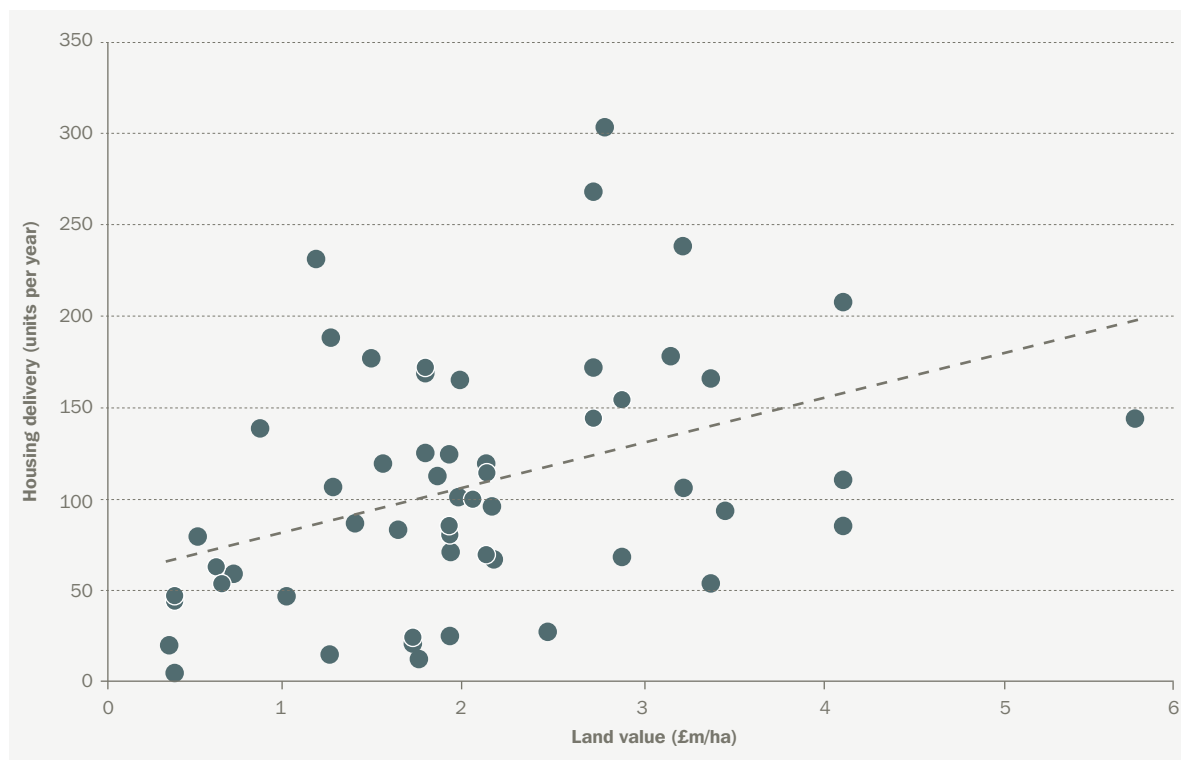
## Market Strength

It might seem a truism that stronger market demand for housing will support higher sales and build rates – but how far is that the case and how to measure it?

Figure 6 below compares CLG data on post-permission residential land value estimates (£/ha) by Local Authorities in 2014<sup>14</sup> to the average build out rate of each of the assessed strategic sites. Unfortunately the residential land value estimates are only available for England and as such the Welsh sites assessed are excluded, leaving 57 sites in total.

The analysis shows that markets matter. Relatively weaker areas may not be able to sustain the high build-out rates that can be delivered in stronger markets with greater demand for housing. There are significant variations, reflecting localised conditions, but the analysis shows a clear relationship between the strength of the market in a Local Authority area and the average annual build rates achieved on those sites. Plan makers should therefore recognise that stronger local markets can influence how quickly sites will deliver.

Figure 6: Average Annual Build-out Rates of sites compared to Land Values as at 2014



Source: NLP analysis and CLG Post-permission residential land value estimates (£/ha) by Local Authorities (February 2015)

<sup>12</sup> South Cambridgeshire Annual Monitoring Report 2006/07

<sup>13</sup> South Cambridgeshire Annual Monitoring Report 2014/15

<sup>14</sup> Post-permission residential land value estimates were released in December 2015, however the end date of the build rate data obtained is 2014/15; as such land value estimates at February 2015 are better aligned to the build periods assessed in this report and have been used for consistency.

## Size Matters

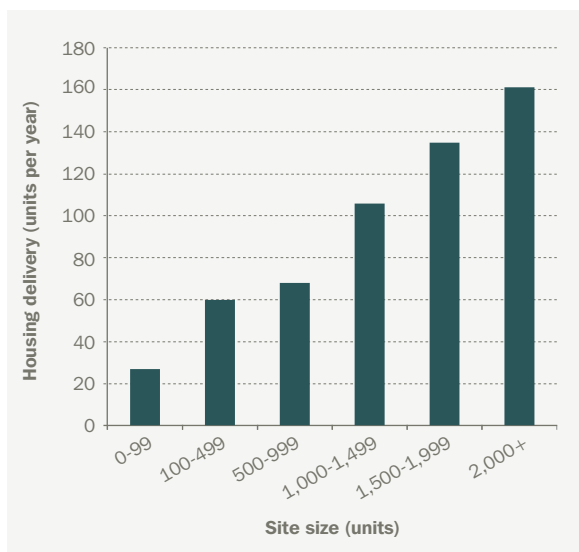
A key metric for build rates on sites is the number of sales outlets. Different housebuilders will differentiate through types or size of accommodation and their brands and pricing, appealing to different customer types. In this regard, it is widely recognised that a site may increase its absorption rate through an increased number of outlets.

Unfortunately, data limitations mean that the number of outlets is not readily available for the large sites surveyed within this research, and certainly not on any longitudinal basis which is relevant because the number of outlets on a site may vary across phases.

However, it is reasonable to assume that larger sites are likely to feature more sales outlets and thus have greater scope to increase build rates. This may relate to the site being more geographically extensive: with more access points or development ‘fronts’ from which sales outlets can be driven. A large urban extension might be designed and phased to extend out from a number of different local neighbourhoods within an existing town or city, with greater diversity and demand from multiple local markets.

Our analysis supports this concept: larger sites deliver more homes each year, but even the biggest schemes (those with capacity for 2,000 units) will, on average, deliver fewer than 200 dwellings per annum, albeit their average rate – 161 units per annum – is six times that of sites of less than 100 units (27 units per annum).

Figure 7: Average annual build rate by site size



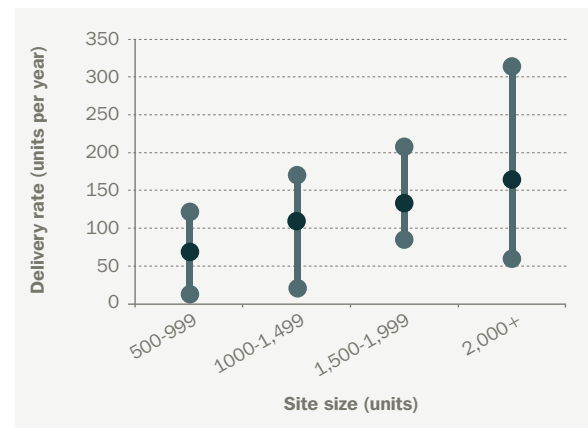
Of course, these are average figures. Some sites will see build rates exceeding this average in particular years, and there were variations from the mean across all categories (see Figure 8), suggesting that higher or lower rates than this average may well be possible, if circumstances support it.

Nevertheless, it is striking that annual average delivery on sites of up to 1,499 units barely exceeds 100 units per annum, and there were no examples in this category that reached a rate of 200 per annum. The highest rate – of 321 units per annum – is for the Cranbrook site, but this is a short term average. A rate of 268 per annum was achieved over a longer period at the Eastern Expansion Area (Broughton Gate & Brooklands) site in Milton Keynes. The specific circumstance surrounding the build rates in both these examples are explored as case studies opposite. It is quite possible that these examples might not represent the highest rate of delivery possible on large-scale sites in future, as other factors on future sites might support even faster rates.

Our analysis also identifies that, on average, a site of 2,000 or more dwellings does not deliver four times more dwellings than a site delivering between 100 and 499 homes, despite being at least four times the size. In fact it only delivers an average of 2.5 times more houses. This is likely to reflect that:

- it will not always be possible to increase the number of outlets in direct proportion to the size of site – for example due to physical obstacles (such as site access arrangements) to doing so; and
- overall market absorption rates means the number of outlets is unlikely to be a fixed multiplier in terms of number of homes delivered.

Figure 8: Average annual build-out rate by site size, including the minimum and maximum averages within each site size



Source: NLP analysis

## Cranbrook: East Devon

The highest average annual build out rates recorded in this analysis comes from the Cranbrook site in East Devon where an average of 321 dwellings per annum were delivered between 2012/13 and 2014/15. Delivery of housing only started on this site in 2012/13, with peak delivery in 2013/14 of 419 dwellings.

Cranbrook is the first new standalone settlement in Devon for centuries and reportedly – according to East Devon Council – the result of over 40 years of planning (this claim has not been substantiated in this research). It is the circumstances surrounding its high annual delivery rate which is of most interest, however.

Phase 1 of the development was supported by a £12 million repayable grant from a revolving infrastructure fund managed by the Homes and Communities Agency. The government also intervened again in the delivery of this site by investing £20 million for schools and infrastructure to ensure continuity of the scheme, securing the delivery of phase 2. The government set out that the investment would give local partners the confidence and resources to drive forward its completion.

The Consortium partnership for Cranbrook (including Hallam Land, Persimmon Homes (and Charles Church) and Taylor Wimpey) stated the following subsequent to the receipt of the government funding<sup>15</sup>.

*“Without this phase 2 Cranbrook would have been delayed at the end of phase 1, instead, we have certainty in the delivery of phase 2, we can move ahead now and commit with confidence to the next key stages of the project and delivering further community infrastructure and bringing forward much needed private and affordable homes”.*

Clearly, the public sector played a significant role in supporting delivery. The precise relationship between this and the build rate is unclear, but funding helped continuity across phases one and two of the scheme. More particularly, the rate of delivery so far achieved relates just to the first three years, and there is no certainty that this high build-out rate will be maintained across the remainder of the scheme.

## Eastern Expansion Area (Broughton Gate & Brooklands): Milton Keynes

The second highest average build out rates recorded in this analysis comes from the Eastern Expansion Area (Broughton Gate & Brooklands) site in Milton Keynes where an average of 268 dwellings per annum were delivered between 2008/09 and 2013/14. As is widely recognised, the planning and delivery of housing in Milton Keynes is distinct from almost all the sites considered in this research.

Serviced parcels with the roads already provided were delivered as part of the Milton Keynes model and house builders are able to proceed straight onto the site and commence delivery. This limited the upfront site works required and boosted annual build rates. Furthermore, there were multiple outlets building-out on different serviced parcels, with monitoring data from Milton Keynes Council suggesting an average of c.12 parcels were active across the build period. This helped to optimise the build rate.

<sup>15</sup> <https://www.gov.uk/government/news/government-funding-to-unlock-delivery-of-12-000-new-homes>

## Peak Years of Housing Delivery

Of course, rates of development on sites will ebb and flow. The top five peak annual build-out rates achieved across every site assessed are set out in Table 1 below. Four of the top five sites with the highest annual peak delivery rates are also the sites with the highest annual average build out rates (with the exception of Broughton & Atterbury). Peak build rates might occur in years when there is an overlap of multiple outlets on phases, or where a particular phase might include a large number of affordable or apartment completions. It is important not to overstress these individual years in gauging build rates over the whole life of a site.

Table 1: Peak annual build-out rates compared against average annual delivery rates on those sites

Scheme	Peak Annual Build-Out Rate	Annual Average Build-Out Rate
Cambourne	620	239
Hamptons	548	224
Eastern Expansion Area	473	268
Cranbrook	419	321
Broughton	409	171

Source: NLP analysis and various AMRs

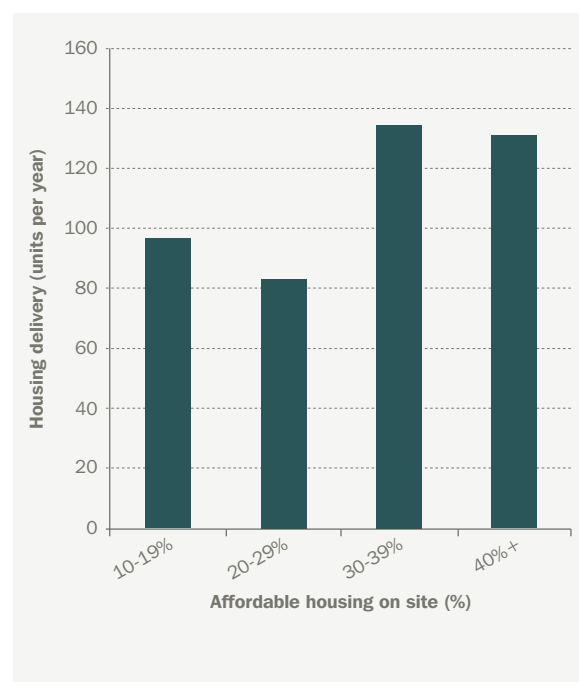
## Affordable Housing Provision

Housing sites with a larger proportion of affordable homes (meeting the definition in the NPPF) deliver more quickly, where viable. The relationship appears to be slightly stronger on large-scale sites (500 units or more) than on smaller sites (less than 500 units), but there is a clear positive correlation (Figure 9). For both large and small-scale sites, developments with 40% or more affordable housing have a build rate that is around 40% higher compared to developments with 10-19% affordable housing obligation.

The relationship between housing delivery and affordable (subsidised) housing is multi-dimensional, resting on the viability, the grant or subsidy available and the confidence of a housing association or registered provider to build or purchase the property for management. While worth less per unit than a full-market property, affordable housing clearly taps into a different segment of demand (not displacing market demand), and having an immediate purchaser of multiple properties can support cash flow and risk sharing in joint ventures. However, there is potential that starter homes provided in lieu of other forms of affordable housing may not deliver the same kind of benefits to speed of delivery, albeit they may support viability overall.

This principle – of a product targeting a different segment of demand helping boost rates of development – may similarly apply to the emergent sectors such as ‘build-to-rent’ or ‘self build’ in locations where there is a clear market for those products. Conversely, the potential for starter homes to be provided in lieu of other forms of affordable housing may overlap with demand for market housing on some sites, and will not deliver the kind of cash flow / risk sharing benefits that comes from disposal of properties to a Registered Provider.

Figure 9: Affordable housing provision and housing output



Source: NLP analysis

## The Timeline of the Build-out Period

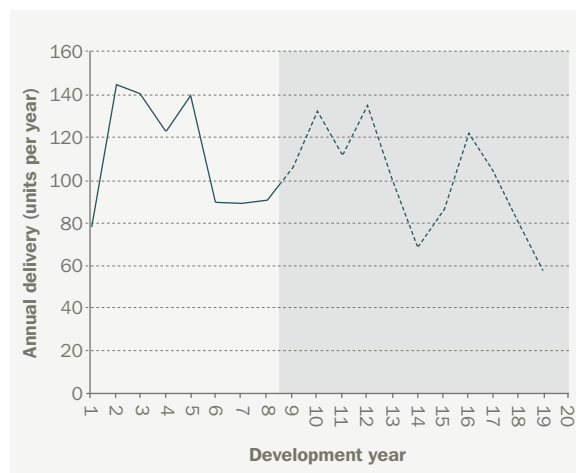
Many planners’ housing trajectories show large sites gradually increasing their output and then remaining steady, before tailing off at the end. In fact, delivery rates are not steady. Looking at the first eight years of development – where the sample size of large sites is sufficiently high – NLP’s research showed that annual completions tended to be higher early in the build-out period before dipping (Figure 10).

For sites with even longer build out periods, this pattern of peaks and troughs is potentially repeated again (subject to data confidence issues set out below). This surge in early completions could reflect the drive for

rapid returns on capital in the initial phase, and/or early delivery of affordable housing, with the average build rate year by year reducing thereafter to reflect the optimum price points for the prevailing market demand. Additionally, the longer the site is being developed, the higher the probability of coinciding with an economic downturn – obviously a key factor for sites coming forward over the past decade – which will lead to a reduction in output for a period.

Our sample of sites where the development lasted for more than eight years is too small to draw concrete findings, but it does flag a few other points. On extremely large sites that need to span more than a decade, the development will most likely happen in phases. The timing and rate of these phases will be determined by a range of factors including: the physical layout of the site, the ability to sell the homes; trigger points for payment for key social and transport infrastructure obligations; the economic cycle; and local market issues. Predicting how these factors combine over a plan period is self-evidently difficult, but plan makers should recognise the uncertainty and build in flexibility to their housing trajectories to ensure they can maintain housing supply wherever possible.

Figure 10: Average annual build-out rate per year of the build period



Source: NLP analysis

## Summary

1. There is a positive correlation between the strength of the market (as measured by residential land values) and the average annual build rates achieved.
2. The annual average build-rate for the largest sites (of 2,000 or more units) is circa 161 dwellings per annum
3. The rate of delivery increases for larger schemes, reflecting the increased number of sales outlets possible on large sites. However, this is not a straight line relationship: on average, a site of 2,000 units will not, deliver four times as fast as a site of 500. This reflects the limits to number of sales outlets possible on a site, and overall market absorption rates.
4. There is significant variation from the average, which means some sites can be expected to deliver more (or less) than this average. However, the highest average build-out rate of all the assessed sites is 321 dwellings per annum in Cranbrook. But this relates to just three years of data, and the scheme benefitted from significant government funding to help secure progress and infrastructure. Such factors are not present in all schemes, and indeed, the data suggests sites tend to build at a higher rate in initial years, before slowing down in later phases.
5. Build rates on sites fluctuate over their life. The highest build rate recorded in a single year is 620 units at Camborne, but for the duration of the development period the average annual build rate is 239 dwellings.
6. There is a positive correlation between the percentage of affordable homes built on site and the average annual delivery of homes with sites delivering 30% or more affordable housing having greater annual average build rates than sites with lower affordable housing provision. The introduction of different tenures taps into different market segments, so a build to rent product may similarly boost rates of delivery – where there is a market for it – but starter homes may have the opposite effect if they are provided in lieu of other forms of affordable homes, and displace demand for cheaper market homes.

# A Brownfield Land Solution?

The NPPF encourages the effective use of previously-developed land, and recent Government announcements suggest increased prioritisation of development for brownfield sites. Efforts to streamline the planning process for brownfield sites may also speed up their delivery. But, is there a difference in how quickly brownfield sites can come forward compared to greenfield sites?

Research produced by CPRE and Glenigan in March 2016<sup>16</sup> suggested that the time between planning permission being granted and construction work starting is generally the same for brownfield and greenfield sites, but suggested that work on brownfield sites is completed more than six months quicker. However, it was not clear if this finding was because the greenfield sites were larger than the equivalent brownfield sites surveyed in that study. We therefore looked at how lead in times and build rates compared for large-scale sites of 500+ dwellings on greenfield and brownfield sites.

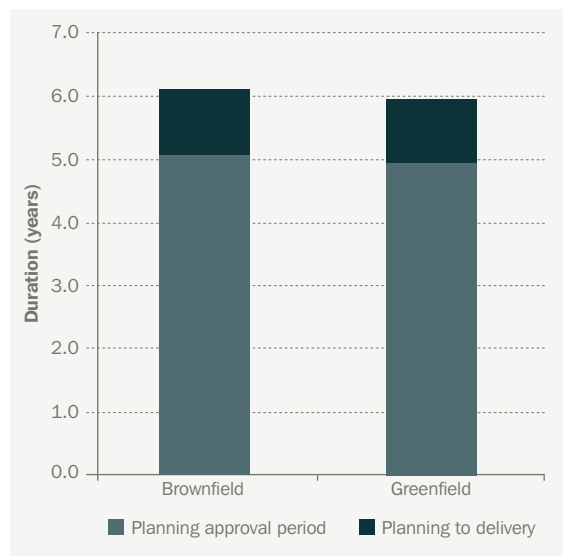
## The Planning Approval Period

Whether land is brownfield or greenfield does not impact on the planning approval period. On average, for all sites, the planning approval period for the sites delivering 500 dwellings or more is almost identical at 5.1 years for brownfield and 5.0 years for greenfield – see Figure 11, although this is skewed by the very largest sites of 2,000+ units (see Table 2), with brownfield sites in the smaller-size bands being on average slightly quicker than their greenfield counterparts (albeit caution is required given the small sample size for some size bandings).

What the analysis tends to show is that it is the scale of development – rather than the type of land – which has the greatest impact on the length of planning process, and that despite government prioritisation on brownfield land in the NPPF, this is unlikely to result in significant further improvements in timescales for delivery.

The time period between gaining a planning approval and the first delivery of a dwelling is also similar overall.

Figure 11: Previous land use and duration of planning



Source: NLP analysis

Table 2: Previous land use and duration of planning approval period

	Site Size (dwellings)	Number of sites in this group	Average Planning Approval Period
Greenfield Sites	500-999	14	4.5
	1,000-1,499	9	5.3
	1,500-1,999	7	5.5
	2,000+	13	5.0
	<b>Total/Average</b>	<b>43</b>	<b>5.0</b>
Brownfield Sites	500-999	16	4.1
	1,000-1,499	3	3.3
	1,500-1,999	1	4.6
	2,000+	7	8.6
	<b>Total/Average</b>	<b>27</b>	<b>5.1</b>

Source: NLP analysis

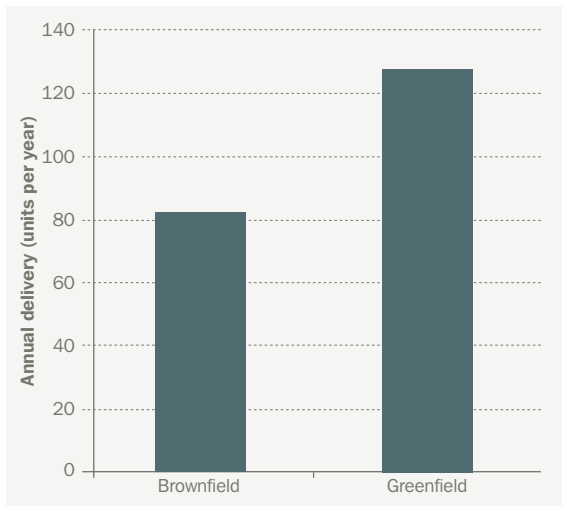
<sup>16</sup> Brownfield comes first: why brownfield development works CPRE, March 2016

## Build-out Rates

There is a more discernible difference between brownfield and greenfield sites when it comes to the annual build out rates they achieve, with the analysis in Figure 12 suggesting that brownfield sites on average deliver at lower rates than their greenfield counterparts, both overall and across the different size bandings (see Table 3) albeit recognising the small sample size for some sizes of site. On average, the annual build-out rate of a greenfield site is 128 dwellings per annum, around 50% higher than the 83 per annum average for brownfield sites.

This may reflect that brownfield sites carry extra costs (e.g. for remediation) which reduces the scale of contribution they make to infrastructure and affordable housing provision (which as shown can boost rates of delivery).

Figure 12: Previous land use and housing delivery



Source: NLP analysis

Table 3: Previous land use by size and average annual build out rate

	Site Size (dwellings)	Number of sites in this group	Average Annual Build-out Rate
Greenfield Sites	500-999	14	86
	1,000-1,499	9	122
	1,500-1,999	7	142
	2,000+	13	171
	<b>Total/Average</b>	<b>43</b>	<b>128</b>
Brownfield Sites	500-999	16	52
	1,000-1,499	3	73
	1,500-1,999	1	84
	2,000+	7	148
	<b>Total/Average</b>	<b>27</b>	<b>83</b>

Source: NLP analysis

## Summary

1. Brownfield and greenfield sites come forward at broadly similar rates, although at the smaller end of the scale, there does appear to be some 'bonus' in speed of decisions for previously-developed land. For the largest sites (of 2,000+ units) the sample of brownfield sites suggests an extended time period (3.6 years longer) compared to their equivalent greenfield sites;
2. Once started, large-scale greenfield sites do deliver homes at a more rapid rate than their brownfield equivalents, on average 50% quicker.

# Conclusion

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There is a growing recognition that large-scale housing development can and should play a large role in meeting housing need. Garden towns and villages – planned correctly – can deliver sustainable new communities and take development pressure off less sustainable locations or forms of development.

However, if planners are serious about wanting to see more homes built each year and achieve the government’s target of one million by 2020 (or indeed, deliver the 300,000 per annum that are needed), simply allocating a site or granting a permission is not enough. The Government recognises this: the Minister for Planning has been quoted as saying that *“you cannot live in a planning permission”*.

Part of the debate has focused on perceptions of ‘land banking’ – the concept that developers are hoarding land or slowing down development. Equally, suggestions have been made that proposals for large-scale development should be ‘protected’ from competition from smaller sites or from challenge under five year land supply grounds. The evidence supporting these propositions appears limited.

In our view the real concern – outside London, at any rate – is ensuring planning decisions (including in plan-making) are driven by realistic and flexible housing trajectories in the first place, based on evidence and the specific characteristics of individual sites and local markets.

Based on the research in this document, we draw five conclusions on what is required:

1. If more homes are to be built, more land needs to be released and more planning permissions granted. Confidence in the planning system relies on this being achieved through local plans that must be sufficiently ambitious and robust to meet housing needs across their housing market areas. But where plans are not coming forward as they should, there needs to be a fall-back mechanism that can release land for development when it is required.
2. Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period. Because no one site is the same – and with significant variations from the average in terms of lead-in time and build rates – a sensible approach to evidence and justification is required.
3. Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times. To secure short-term immediate boosts in supply – as is required in many areas – a good mix of smaller sites will be necessary.
4. Plans should reflect that – where viable – affordable housing supports higher rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand for those products). Trajectories will thus need to differentiate expected rates of delivery to respond to affordable housing levels or inclusion of other market products. This might mean some areas will want to consider spatial strategies that favour sites with greater prospects of affordable or other types of housing delivery. This plays into the wider debate about support for direct housing delivery for rent by local government and housing associations and ensuring a sufficient product mix on sites.
5. Finally, in considering the pace of delivery, large-scale brownfield sites deliver at a slower rate than do equivalent greenfield sites. The very largest brownfield sites have also seen very long planning approval periods. Self-evidently, many brownfield sites also face barriers to implementation that mean they do not get promoted in the first place. In most locations outside our biggest cities, a good mix of types of site will be required.



## A Checklist for Understanding Large-scale Site Delivery

In setting or assessing reasonable housing trajectories for local plans or five year housing land supply, the lead-in times and average rates of housing delivery identified in this research can represent helpful benchmarks or rules of thumb, particularly in situations where there is limited local evidence.

However, these rules of thumb are not definitive. It is clear from our analysis that some sites start and deliver more quickly than this average, whilst others have delivered much more slowly. Every site is different.

In considering the evidence justifying the estimated time and rate of delivery, the questions listed in Table 4 below represent a checklist of questions that are likely to be relevant:

Table 4: Questions to consider on the speed of housing delivery on large-scale sites

Lead-in times to getting started on site	Factors affecting the speed of build out rate
<input checked="" type="checkbox"/> Is the land in existing use?	<input checked="" type="checkbox"/> How large is the site?
<input checked="" type="checkbox"/> Has the land been fully assembled?	<input checked="" type="checkbox"/> Will the scale, configuration and delivery model for the site support more sales outlets?
<input checked="" type="checkbox"/> If in multiple ownership/control, are the interests of all parties aligned?	<input checked="" type="checkbox"/> How strong is the local market?
<input checked="" type="checkbox"/> To what extent is there any challenge to the principle of development?	<input checked="" type="checkbox"/> Does the site tap into local demand from one or more existing neighbourhoods?
<input checked="" type="checkbox"/> Is the site already allocated for development? Does it need to be in order for release?	<input checked="" type="checkbox"/> Is the density and mix of housing to be provided consistent with higher rates of delivery?
<input checked="" type="checkbox"/> Does an SPD, masterplan or development brief help resolve key planning issues?	<input checked="" type="checkbox"/> What proportion of affordable housing is being delivered?
<input checked="" type="checkbox"/> Is the masterplan/development brief consistent with what the developer will deliver?	<input checked="" type="checkbox"/> Are there other forms of housing – such as build to rent – included?
<input checked="" type="checkbox"/> Is there an extant planning application or permission?	<input checked="" type="checkbox"/> When will new infrastructure – such as schools – be provided to support the new community?
<input checked="" type="checkbox"/> Are there significant objections to the proposal from local residents?	<input checked="" type="checkbox"/> Are there trigger points or phasing issues that may affect the build rate achievable in different phases?
<input checked="" type="checkbox"/> Are there material objections to the proposal from statutory bodies?	
<input checked="" type="checkbox"/> Are there infrastructure requirements – such as access – that need to be in place before new homes can be built?	
<input checked="" type="checkbox"/> Are there infrastructure costs or other factors that may make the site unviable?	
<input checked="" type="checkbox"/> Does the proposal rely on access to public resources?	
<input checked="" type="checkbox"/> If planning permission is secured, is reserved matters approval required?	
<input checked="" type="checkbox"/> Does the scheme have pre-commencement conditions?	
<input checked="" type="checkbox"/> Is the scheme being promoted by a developer who will need time to dispose of the site to a house builder?	







# Appendix 2: Small Sites Reviewed

Site Name	Local Planning Authority	Site Size
Holme Farm, Carleton Road, Pontefract	Wakefield	50
Part Sr3 Site, Off Elizabeth Close, Scotter	West Lindsey	50
Former Downend Lower School, North View, Staple Hill	South Gloucestershire	52
Fenton Grange, Wooler	Northumberland	54
Land at the Beacon, Tilford Road, Hindhead	Waverley	59
Land To Rear Of 28 - 34 Bedale Road, Aiskew	Hambleton	59
Hanwell Fields Development, Banbury	Cherwell	59
Land at Prudhoe Hospital, Prudhoe	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Clewborough House School, St Catherines Road	Cherwell	60
Land south of Pinchington Lane	West Berkshire	64
Land Off Cirencester Rd	Stroud	66
Springfield Road Caunt Road	South Kesteven	67
Land off Crown Lane	Wychavon	68
Former Wensleydale School, Dent Street, Blyth	Northumberland	68
Land at Lintham Drive, Kingswood	South Gloucestershire	68
Hawthorn Croft (Off Hawthorn Avenue Old Slaughterhouse Site), Gainsborough	West Lindsey	69
Land to the North of Walk Mill Drive	Wychavon	71
Watermead, Land At Kennel Lane, Brockworth	Tewkesbury	72
North East Area Professional Centre, Furnace Drive, Furnace Green	Crawley	76
Land at Willoughbys Bank, Clayport Bank, Alnwick	Northumberland	76
The Kylins, Loansdean, Morpeth	Northumberland	88
MR10 Site, Caistor Road, Market Rasen	West Lindsey	89
OS Field 9972 York Road Easingwold	Hambleton	93
Land At Green Road - Reading College	Reading	93
North East Sandylands	South Lakeland	94
Auction Mart	South Lakeland	94
Parcel 4, Gloucester Business Park, Brockworth	Tewkesbury	94
Former York Trailers Yafforth Road Northallerton Scheme 1/2	Hambleton	96
Poppy Meadow	Stratford-on-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Land South of Station Road	East Hertfordshire	111
Former Bewbush Leisure Centre Site, Breezehurst Drive, Bewbush	Crawley	112
Land West Of Birchwood Road, Latimer Close	Bristol, City of	119
Land Between Godsey Lane And Towngate East	South Kesteven	120
Bibby Scientific Ltd	Stafford	120
Kennet Island Phase 1B - E, F, O & Q, Manor Farm Road	Reading	125
Primrose Mill Site	Ribble Valley	126
Land Rear Of Mount Pleasant	Cheshire West and Chester	127
Land to the east of Efflinch Lane	East Staffordshire	130
North of Douglas Road, Kingswood	South Gloucestershire	131
Land at Farnham Hospital, Hale Road, Farnham	Waverley	134
Bracken Park, Land At Corringham Road, Gainsborough	West Lindsey	141
Doxey Road	Stafford	145
Former York Trailers Yafforth Road Northallerton Scheme 2/2	Hambleton	145

Site Name	Local Planning Authority	Site Size
London Road/ Adj. St Francis Close	East Hertfordshire	149
MR4 Site, Land off Gallamore Lane, Market Rasen	West Lindsey	149
Queen Mary School	Fylde	169
Sellars Farm, Sellars Road	Stroud	176
Land South of Inervet Campus Off Brickhill Street, Walton	Milton Keynes	176
Notcutts Nursery, 150 - 152 London Road	Cherwell	182
Hoval Ltd North Gate	Newark and Sherwood	196
Hewlett Packard (Land Adjacent To Romney House), Romney Avenue	Bristol, City of	242
128-134 Bridge Road And Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
GCHQ Oakley - Phase 1	Cheltenham	262
Land off Henthorn Road	Ribble Valley	270
Land Between A419 And A417, Kingshill North, Cirencester	Cotswold	270
Hortham Hospital, Hortham Lane, Almondsbury	South Gloucestershire	270
Land At Canons Marsh, Anchor Road	Bristol, City of	272
M & G Sports Ground, Golden York and Middle Farm, Badgeworth	Tewkesbury	273
Long Marston Storage Depot Phase 1	Stratford-on-Avon	284
Land at Brookwood Farm, Bagshot Road	Woking	297
Land at, Badsey Road	Wychavon	298
Land At Fire Service College, London Road, Moreton in Marsh	Cotswold	299
Land At Dorian Road	Bristol, City of	300
Kennet Island Phase 1 - H, M, T, U1, U2 Manor Farm Road	Reading	303
Chatham Street Car Park Complex	Reading	307
Former NCB Workshops, Ellington Rd, Ashington (aka Portland Park)	Northumberland	357
Former Masons Cerement Works and Adjoining Ministry of Defence Land, Gipping Road, Great Blakenham	Mid Suffolk	365
Woolley Edge Park Site	Wakefield	375
Luneside West	Lancaster	403
Radyr Sidings	Cardiff	421
New World House, Thelwall Lane	Warrington	426
Land at former Battle Hospital, 344 Oxford Road	Reading Borough Council	434
New Central (Land at Guildford Road and Bradfield Close including Network House, Merrion House, Bradford House and Coronation House	Woking Borough Council	445
Kingsmead South	Milton Keynes Council	450
Bleach Green, Winlaton	Gateshead	456
Farington Park, East of Wheelton Lane	South Ribble	468
Bickershaw Colliery, Plank Lane, Leigh	Wigan	471
Farnborough Business Park	Rushmoor	476
Horfield Estate, Filton Avenue, Horfield	Bristol City Council	485
Stenson Fields	South Derbyshire	487
Cookridge Hospital	Leeds	495

# About NLP

Nathaniel Lichfield & Partners (NLP) is an independent planning, economics and urban design consultancy, with offices in Bristol, Cardiff, Edinburgh, Leeds, London, Manchester, Newcastle and Thames Valley.

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**APPENDIX D – COMBINED HUNTINGDONSHIRE DRAFT  
ALLOCATIONS SITE APPRISALS**

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## Proposed Site Allocations – Huntingdon Spatial Planning Area

<b>Site Allocation</b>	<b>SE1.1 Former Alconbury Airfield and Grange Farm</b>
<b>Unit size</b>	575ha for 5,000 homes
<b>Current planning status</b>	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.
<b>Constraints</b>	<p>This is a large strategic site with four housebuilders currently operating on site including Hopkins Homes, Redrow Homes, Morris Homes and Urban &amp; Civic. It is understood that this is Urban &amp; 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>
<b>Suitability</b>	<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>
<b>Viability</b>	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.
<b>Deliverability</b>	<p>There are a number of outstanding restrictive conditions on the following parcels:</p> <ul style="list-style-type: none"> <li>• 16/01329/REM (Morris Homes) for 165 units;</li> <li>• 17/00079/REM (Urban &amp; Civic) for 101 units; and</li> <li>• 17/00802/REM (Urban &amp; Civic) for 37 units.</li> </ul> <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>

<b>Delivery</b>	<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 (<b>Annex A</b>) 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>
<b>Conclusion</b>	<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>

<b>Site allocation</b>	<b>SE1.2 RAF Alconbury</b>
<b>Unit size</b>	84ha for approximately 1,680 homes
<b>Current planning status</b>	<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>
<b>Constraints</b>	<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>
<b>Suitability</b>	<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>
<b>Availability</b>	<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>
<b>Viability</b>	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.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	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.
<b>Conclusion</b>	<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>

<b>Site Allocation</b>	<b>HU1 Ermine Street</b>
<b>Unit size</b>	85ha for approximately 1,440 homes
<b>Current planning status</b>	<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>
<b>Constraints</b>	<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>
<b>Suitability</b>	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.
<b>Availability</b>	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.
<b>Viability</b>	We are unaware of any viability issues relating to the site.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	No comments.
<b>Conclusion</b>	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.

<b>Site Allocation</b>	<b>HU2 Former Forensic Science Laboratory</b>
<b>Unit size</b>	2.7ha for approximately 105 homes
<b>Current planning status</b>	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.
<b>Constraints</b>	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.
<b>Suitability</b>	Brownfield site with the opportunity to provide a mix of uses.
<b>Availability</b>	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.
<b>Viability</b>	We are unaware of any viability issues relating to the site.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	No comments.
<b>Conclusion</b>	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.

<b>Site Allocation</b>	<b>HU3 Former Police HQ site</b>
<b>Unit size</b>	5.8ha for approximately 75 dwellings.
<b>Current planning status</b>	No application submitted.
<b>Constraints</b>	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.
<b>Suitability</b>	The site is located in Flood Zone 1 and subject to access and heritage issues being resolved could be suitable for development.
<b>Availability</b>	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.
<b>Viability</b>	We have no evidence of viability issues associated with the site.
<b>Deliverability</b>	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.
<b>Delivery</b>	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.
<b>Conclusion</b>	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.

<b>Site Allocation</b>	<b>HU6 George Street</b>
<b>Unit size</b>	3.0ha for approximately 300 homes
<b>Current planning status</b>	Planning application 17/00733/FUL for 309 dwellings was approved at Planning Committee in June 2018, subject to a S106 Agreement being signed.
<b>Constraints</b>	<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>
<b>Suitability</b>	Following the resolution to grant at Planning Committee, HDC considers the site is suitable for development
<b>Availability</b>	Two industrial buildings are in the process of being demolished before development can commence
<b>Viability</b>	<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>
<b>Deliverability</b>	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>
<b>Delivery</b>	<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>
<b>Conclusion</b>	<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>

<b>Site Allocation</b>	<b>HU7 Gas Depot, Mill Common</b>
<b>Unit size</b>	0.6ha for approximately 11 homes
<b>Current planning status</b>	Planning application for 11 dwellings was submitted in October 2016 (16/02093/FUL) and approved in January 2018.
<b>Constraints</b>	<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>
<b>Suitability</b>	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.
<b>Availability</b>	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.
<b>Viability</b>	All indicators suggest the site will be developed and therefore the development is viable.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	No comments.
<b>Conclusion</b>	This brownfield site is expected to deliver all 11 units in 2018/19 subject to the remaining conditions being discharged.

<b>Site Allocation</b>	<b>HU8 California Road</b>
<b>Unit size</b>	1.3ha for approximately 55 homes
<b>Current planning status</b>	Application 17/02123/OUT was submitted in October 2017 but no decision has been made yet.
<b>Constraints</b>	<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>
<b>Suitability</b>	Generally the site is considered to be suitable for development and is located within Flood Zone 1.
<b>Availability</b>	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.
<b>Viability</b>	We have no information regarding the viability of the site.
<b>Deliverability</b>	No Comments.
<b>Delivery</b>	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.
<b>Conclusion</b>	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.

<b>Site Allocation</b>	<b>HU9 Main Street</b>
<b>Unit size</b>	1.2ha for approximately 30 homes
<b>Current planning status</b>	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.
<b>Constraints</b>	<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>
<b>Suitability</b>	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>
<b>Availability</b>	We have no information that the site is not available for development.
<b>Viability</b>	We have no information that the site is not viable.
<b>Deliverability</b>	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.
<b>Delivery</b>	No comments.
<b>Conclusion</b>	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.

<b>Site Allocation</b>	<b>HU12 Dorling Way</b>
<b>Unit size</b>	12ha for approximately 150 homes
<b>Current planning status</b>	<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>
<b>Constraints</b>	<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>
<b>Suitability</b>	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.
<b>Availability</b>	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.
<b>Viability</b>	We are aware of no viability issues associated with the development, with the site providing 40% affordable housing.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	No comments.
<b>Conclusion</b>	No major obstacles in delivering development.

<b>Site Allocation</b>	<b>HU13 Brampton Park</b>
<b>Unit size</b>	32ha for approximately 600 homes
<b>Current planning status</b>	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.
<b>Constraints</b>	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.
<b>Suitability</b>	As Planning Permission has been granted for the site HDC must consider that the site is suitable for development.
<b>Availability</b>	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.
<b>Viability</b>	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.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	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.
<b>Conclusion</b>	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.

<b>Site Allocation</b>	<b>HU16 Tyrell's Marina</b>
<b>Unit size</b>	0.3ha for approximately 16 dwellings
<b>Current planning status</b>	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.
<b>Constraints</b>	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.
<b>Suitability</b>	<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>
<b>Availability</b>	Due to the site clearance already being undertaken we consider that the site is available for development.
<b>Viability</b>	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.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	No comments.
<b>Conclusion</b>	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.

<b>Site Allocation</b>	<b>HU17 RGE Engineering</b>
<b>Unit size</b>	2.6ha for approximately 90 homes
<b>Current planning status</b>	No application submitted.
<b>Constraints</b>	<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>
<b>Suitability</b>	<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>
<b>Availability</b>	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.
<b>Viability</b>	We have no information to suggest the site is not viable.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	No comments.
<b>Conclusion</b>	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.

<b>Site Allocation</b>	<b>HU18 Wigmore Farm Buildings</b>
<b>Unit size</b>	0.7ha for approximately 13 homes
<b>Current planning status</b>	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.
<b>Constraints</b>	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.
<b>Suitability</b>	As Planning Permission has been granted for the site, HDC must consider it is appropriate for development.
<b>Availability</b>	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.
<b>Viability</b>	We have no information to suggest that the site is not viable.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	No comments.
<b>Conclusion</b>	Development is considered likely to be delivered in the timescale expected by the Council.

<b>Site Allocation</b>	<b>HU19 Bearscroft Farm</b>
<b>Unit size</b>	45.5ha for approximately 750 homes
<b>Current planning status</b>	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.
<b>Constraints</b>	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.

<b>Suitability</b>	As Planning Permission has been granted for the site, HDC must consider it is appropriate for development.
<b>Availability</b>	Development of the site has commenced and is therefore considered as available.
<b>Viability</b>	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.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	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.
<b>Conclusion</b>	Development is likely to be delivered in the timescales forecast by the Council.

## Proposed Site Allocations – St Neots Spatial Planning Area

<b>Site Allocation</b>	<b>SEL.2 St Neots East (Loves Farm East)</b>
<b>Unit size</b>	60ha for 1,020 dwellings
<b>Current planning status</b>	<p>Loves Farm East Phase 2 - Application 1300388OUT for 1,020 dwellings was submitted in March 2013 and was resolved to be approved at the April 2018 Planning Committee. However the S106 is still be completed.</p> <p>Reserved Matters details and pre-commencement conditions required to be determined before work can commence on site.</p>
<b>Constraints</b>	<p>An objection from Sport England as they have concerns with distribution of outdoor sport areas and the absence of indoor sports facilities being provided.</p> <p>Archaeological concerns due to the lack of pre-determination investigation.</p> <p>Parts of the site are at risk from flooding. There is a potential flood risk in the south of the site and areas are within Flood Zones 2, 3a and 3b.</p>
<b>Suitability</b>	<p>Parts of the site are at risk from flooding which may cause issues. Due to the scale of the site the development will have a significant impact on the transport network and there are substantial infrastructure requirements.</p> <p>The application will have an impact on the local highway by itself and cumulatively with Wintringham Park and will be required to provide joint mitigation measures with Wintringham Park with the S106 Agreement needing to incorporate a mechanism to ensure that sufficient mitigation is delivered either for Loves Farm in isolation or cumulatively with Wintringham Park.</p> <p>Additionally Highways England has recommended a condition which allows for a maximum of 250 dwellings to be delivered prior to the A428 improvements being completed.</p> <p>However, as the Council has resolved to approve the application HDC consider the site is suitable for development.</p>
<b>Availability</b>	The site is available.
<b>Viability</b>	<p>Affordable housing will be delivered at a rate of 28% of the total number of homes across the whole site. However the LPA commissioned Deloitte Real Estate (DRE) to undertake a viability appraisal which argues that development could support in excess of 30% affordable housing. We therefore consider that there could be some viability issues in relation to developing the site.</p>
<b>Deliverability</b>	<p>Transport infrastructure - The strategic highway network is essential for the site to be available. Highways England are progressing an improvement scheme and on-site works are anticipated to start around Spring 2020.</p> <p>Should these works be delayed or not come forward as currently planned it will highly likely impact whether the site can be delivered at the scale proposed during the plan period.</p>

<b>Delivery</b>	<p>It is likely that necessary transport mitigation measures will be jointly undertaken with Wintringham Park as these are essentially one site and both applications have resolutions to grant planning permission. We therefore consider that the transport mitigation measures will be more complicated to implement than for the majority of schemes and will delay the delivery of units on site.</p> <p>The applicant is not a housebuilder and the site will need to be sold before units can be delivered.</p> <p>The latest AMR forecasts that 30 units will be delivered in 2019/20 and that 330 units will be completed in the next five years. We consider is optimistic as it exceeds the restrictive Highways England condition and the necessary transport improvements to the A428 are not anticipated to start until Spring 2020.</p>
<b>Conclusion</b>	<p>We consider the housing trajectory is overly optimistic and will ultimately be subject to delays due to the infrastructure improvements required. The outline planning permission has taken over 5 years to secure a resolution to grant and Planning Permission still not issued. Additionally Reserved Matters details and pre-commencement conditions will need to be submitted and discharged before work can be undertaken.</p> <p>There are also a number of concerns regarding the delivery of the transport infrastructure alongside the Wintringham Park application.</p>

<b>Site Allocation</b>	<b>SEL.2 St Neots East (Wintringham Park)</b>
<b>Unit size</b>	50ha for 2,800 dwellings
<b>Current planning status</b>	<p>Planning application 1300178OUT for 2,800 dwellings was refused in April 2016 and an appeal was lodged but withdrawn in April 2017.</p> <p>A new hybrid planning application 17/02308/OUT was submitted in November 2017. This is an outline application for 2,800 dwellings and a full planning application for the construction of new roads. The scheme has a resolution to grant from the Planning Committee held in March 2018 subject to final details for Potton Road being agreed with Cambridgeshire County Council Highways department and the completion of the S106 agreement.</p> <p>A separate application 17/02645/FUL to secure access points off the two existing roundabouts along Cambridge Road was approved in April 2018.</p>
<b>Constraints</b>	<p>The previous application was refused as the applicants failed to justify why they could not provide 40% affordable housing.</p> <p>The most recent application generated an objection from St Neots Town Council as it fails to meet the policy requirements of the St Neots Neighbourhood Plan. Additionally the Town Council have concerns regarding access to the site.</p> <p>Highways England has suggested a number of conditions which restrict the development of the site to 250 dwellings until transport details/junctions details have been agreed and implemented. This includes a condition relating</p>

	<p>to the A428 northern access which limits both Wintringham Park and Loves Farm to cumulatively no more than 500 dwellings until the improved access is completed.</p> <p>An objection was lodged by Sport England due to the lack of indoor sports provision and insufficient outdoor sports area.</p>
<b>Suitability</b>	Despite a number of transport migration measures being required, following HDC resolution to approve the application the Council consider the site is suitable for development.
<b>Availability</b>	The site is available.
<b>Viability</b>	Affordable housing will be delivered at a rate of 25% of the first 500 dwellings with a review mechanism to determine the percentage in subsequent phases. The Council acknowledge the infrastructure costs required in the early phases of development. Therefore it is questionable whether the scheme is viable.
<b>Deliverability</b>	Providing the necessary access details can be agreed with CCC we consider it is likely that the site can be delivered during the plan period but not at the rate assumed by HDC.
<b>Delivery</b>	<p>Full build out of residential units is expected to be completed by 2031 according to the applicant. The latest AMR forecasts that the first 25 units will be delivered in 2018/19 and 675 units delivered in the next 5 years. This appears optimistic considering the applicant is relatively new to delivering units themselves and little information has been provided as to whether other housebuilders will be involved on site.</p> <p>Additionally the 675 units forecast to be delivered in the next 5 years exceeds the triggers set out in Highways England recommended conditions for mitigation work to be agreed and delivered. We contend that it is unlikely that all the necessary junction improvement work required by Highways England can be agreed and implemented within the next 5 years.</p> <p>Furthermore we highlight the accelerated delivery of the site in the 2017 AMR compared to the 2016 AMR which only forecast 25 units to be delivered over the 5 year period. We contend there is no evidence that the site is progressing at such a rate to justify the accelerated delivery rate set out in the 2017 AMR.</p> <p>Additionally the proposed delivery rates are not supported by evidence presented by the Letwin preliminary update letter or NLP 'Start to Finish' research.</p>
<b>Conclusion</b>	<p>We consider the housing trajectory is overly optimistic and is unlikely to provide the number of units forecast to be delivered on site over the next 5 years.</p> <p>The site will also require substantial infrastructure works and Highways England have suggested conditions which would limit the number of dwellings which can be completed until this infrastructure is provided.</p> <p>Furthermore, the scheme could potentially experience viability issues as reflected in the reduced amount of affordable housing being delivered on site.</p>



## Proposed site allocations – St Ives Spatial Planning Area

<b>Site Allocation</b>	<b>SI1 – St Ives West</b>
<b>Unit size</b>	54ha for approximately 400 homes
<b>Current planning status</b>	<p>There are a number of planning applications associated with this allocation.</p> <ul style="list-style-type: none"> <li>• Outline Application 1302210OUT was approved in June 2016 for approximately 90 dwellings.</li> <li>• Outline Application 1301056OUT for 224 dwellings on the land between Houghton Grange and The How is currently pending consideration.</li> <li>• Two smaller applications 1201890FUL and 1201891FUL for 7 dwellings has been approved subject to the completion of the S106 Agreement.</li> <li>• The remainder of the site on the former golf course was granted permission on appeal (hybrid application 1301895OUT) in December 2015 for 166 units.</li> </ul>
<b>Constraints</b>	<p>The site is sensitively located and most of the site comprises greenfield land. The west of the site contains Houghton Grange, a grade II listed building. The central part of the site contains a water tower and two groups of derelict buildings. Additionally the southern boundary and western part of the site are located within Houghton and Wyton Conservation Area.</p> <p>Flood risk is potentially an issue with a small part of the site lying within Flood Zones 2, 3a and 3b. Additionally due to the geology of the site it is unlikely that it would be conducive to the use of soakaways or infiltration devices according to the HELAA December 2017. However, the Sustainability Appraisal within the HELAA considers that the Flood Risk is outside the area proposed for development and therefore is considered appropriate for development. Additionally as a number of applications have already been approved within the allocation we consider that any issues relating to flood risk have been satisfactorily resolved.</p> <p>The site contains a number of trees which are subject to preservation orders.</p> <p>Moreover the larger application 1301056OUT for 224 units is still pending determination. This is largely due to the conflict with development plan policies, such as Policy En15 of the Local Plan Alteration 2002 which states <i>“the maintenance of the green wedge between [the original Golf Course allocation] and Houghton Grange is vital to the separate physical identity of St Ives and Houghton”</i>.</p> <p>This complex site is therefore subject to a number of constraints and will require a sensitive approach to development.</p>
<b>Suitability</b>	<p>Sensitive site location with a number of issues that still need to be resolved including conflict with adopted Local Plan policies, issues in relation to the flood risk and drainage, and potential heritage issues.</p> <p>The length of time taken to determine planning application 1301056OUT (5 years) leads to questions over the suitability of the site to deliver housing on at least part of the allocation.</p>

	Other elements (former golf course) have been granted planning permission and are therefore considered suitable for residential development by HDC.
<b>Availability</b>	We have no reason to consider that the various sites which comprise St Ives West will not be available. Furthermore we note that development has commenced on The Spires (former Golf Course) with 18 units currently completed and a further 166 units expected to be completed within the next 5 years.
<b>Viability</b>	It is noted that the application for The Spires (1301895OUT) only provided 35% affordable housing on site. Therefore, the Council should be seeking to allocate additional housing sites to address the shortfall in the affordable housing provided on this site.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	<p>According to the Council's 2017 AMR, Land between Houghton Grange and The How can deliver 125 units with the first units being delivered in 2022/23. This is approximately 100 units less than that sought by the current application on site. Furthermore this application (1301056OUT) has taken 5 years to determine and is still awaiting a decision.</p> <p>With the considerable difference in the housing numbers proposed by the landowners and Council we consider it is unlikely housing will be delivered on site in the timeframe currently forecast by the Council.</p>
<b>Conclusion</b>	Overall the majority of the proposed allocation can be delivered. However, there are clear issues in relation to the suitability of the land between Houghton Grange and The How and whether 224 units can be provided on this site

<b>Site allocation</b>	<b>SI2 – St Ives Football Club</b>
<b>Unit size</b>	1.4ha for approximately 30 homes.
<b>Current planning status</b>	Outline planning application 16/01485/OUT was submitted in August 2016 and is still pending determination.
<b>Constraints</b>	<p>Replacement facilities for the football club must be available prior to development starting.</p> <p>Access to the site is restricted by a very narrow private road with a sharp bend.</p> <p>Substantial landscaping will be required on the western boundaries to help safeguard against disturbance from the adjoining leisure uses.</p> <p>The site is located within Flood Zone 1.</p> <p>A number of consultees have raised issues with the application. The Urban Design Officer objects to the development failing to understand the site context and constraints and the open spaces are poorly integrated within the development. A significant number of trees are proposed to be removed. Additionally the Parish Council strongly objects to the application.</p>
<b>Suitability</b>	The planning application was submitted nearly 2 years ago and is still pending determination. We therefore consider there are a number of issues which require resolution regarding the suitability of the site for development. However, based on a review of the consultees' responses we consider these

	objections relate to the design of the proposed development rather than the suitability of the site for housing.
<b>Availability</b>	The Agent says the site will become available for development from 2020 when the relocation of the football club can commence. However, we note that the ES Scoping Opinion was submitted in May 2018 for the mixed use scheme including a new sports ground (18/70112/SCOP). We therefore question where the approved relocation of the football club is going ahead in the timeframe currently suggested. Additionally there is no certainty that the football club will relocate to this site as 18/70112/SCOP proposes an urban extension to the town which is not proposed within the draft Local Plan
<b>Viability</b>	The viability appraisal for the development is still ongoing suggesting there may be issues over the viability of the site.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	The site is unable to be delivered prior to the relocation of the football ground. Should the football ground not be relocated until the a decision has been reached on the likely future planning application which will follows the May 2018 Scoping Opinion (18/70112/SCOP) then it is unlikely that units will be completed on site before 2021/22
<b>Conclusion</b>	Overall we consider that the site is currently unavailable for development with the relocation of the Football Club required before the site can be developed. However we consider there is a strong possibility that the site could become available during the life time of the Local Plan.

<b>Site Allocation</b>	<b>SI4 Former Car Showroom, London Road</b>
<b>Unit size</b>	1.4ha for approximately 50 homes
<b>Current planning status</b>	No application submitted but the agent considers the site's capacity could be up to 75 dwellings.  Agent has confirmed that technical reports for flooding and heritage matters are currently underway.
<b>Constraints</b>	The whole site sits within the rapid inundation zone and the majority of the site falls within Flood Zones 2 and 3a.  Given the previous use as a car showroom there is potential for contamination.  The site is located with the St Ives Conservation Area.
<b>Suitability</b>	Brownfield site with potential contamination issues considering its previous use. The site is located within Flood Zones 2 and 3a and will therefore need to pass both the Sequential and Exceptions Tests in order to comply with the NPPF.  Our client has promoted a number of sites located within Flood Zone 1 which are sequentially preferable to the proposed allocation.
<b>Availability</b>	According to the 2017 AMR the Agent considers that the site is available and we have no reason to disagree with this assessment.
<b>Viability</b>	If contamination is found on the site it could increase the costs of bringing the development forward.
<b>Deliverability</b>	Due to the sites location within the Rapid Inundation Zone and with the

## Proposed Site Allocations – Ramsey Spatial Planning Area

<b>Site Allocation</b>	<b>RA2 Ramsey Gateway</b>
<b>Unit size</b>	1.8ha for approximately 50 homes
<b>Current planning status</b>	Planning application 16/00311/FUL was submitted in February 2016 with a number of amended documents submitted in June 2018. The application is still to be determined.
<b>Constraints</b>	<p>Landscape/townscape impact – the site is at a prominent gateway entrance to Ramsey and lies within Ramsey conservation area.</p> <p>A small portion of the site at the north western edge lies within Flood Zones 2 and 3a.</p> <p>There may be protected species existing on the site due to the presence of suitable habitats on and adjacent to the site, including a pond, trees and brambles.</p> <p>High and medium pressure gas pipelines run through the site.</p> <p>There are clearly delays to determination of the planning application as this was submitted over 2 years ago and still no decision has been made. Amendments to site layout, block layout and elevations were submitted in June 2018. The application has previously received objections by various consultees, including the Environment Agency which considered the Drainage Strategy to be unacceptable. There has also been lengthy correspondence with the Highways Authorities.</p>
<b>Suitability</b>	Previously developed land in close proximity to services, employment and public transport.
<b>Availability</b>	The site is available according to the Agents. The site is to be developed simultaneously with 94 Great Whyte (Allocation RA6 in Draft Local Plan) as the AMR 2017 states that the sites have interlinked public open space provision. According to the AMR 2017 the site will be able to deliver units by 2020/21.
<b>Viability</b>	Delays to planning application could result in or result from issues with viability.
<b>Deliverability</b>	The site is dependent on the development of 94 Great Whyte (Allocation RA6) as the sites, whilst not contiguous, have interlinked public open space provision. Therefore should either of these sites not come forward (for whatever reason) then the deliverability of both sites should be brought into question.
<b>Delivery</b>	No comments.
<b>Conclusion</b>	The latest AMR expects the first 20 dwellings to be completed in 2020/2021. We consider this to be optimistic as the planning application is still pending determination even though it was submitted over 2 years ago. Amended documents have only recently been submitted to overcome previous objections to the scheme. Once a decision is made there will still be considerable obstacles to overcome including resolving issues around the existing gas pipelines. The application is also likely to have a number of pre-commencement conditions that will need to be discharged.

<b>Site allocation</b>	<b>RA3 West Station Yard and Northern Mill</b>
<b>Unit size</b>	1.6ha for approximately 30 homes
<b>Current planning status</b>	No planning application submitted.
<b>Constraints</b>	<p>Landscape/townscape impact – the site is at a prominent gateway entrance to Ramsey and there are views in and out of the site. The site is located in Flood Zone 1.</p> <p>The impact on heritage assets is a development constraint. The site lies within Ramsey conservation area and Northern Mill has local historic significance.</p> <p>There may be protected species existing on the site due to the presence of suitable habitats on and adjacent to the site, including a pond, trees and brambles.</p>
<b>Suitability</b>	The site comprises previously developed land in close proximity to services, employment and public transport
<b>Availability</b>	The site is considered to be available.
<b>Viability</b>	We are unaware of any viability issues relating to the site.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	No comments.
<b>Conclusion</b>	The AMR forecasts the site to be delivered in 2031/2032. As this is near the end of the Local Plan period and allows time for issues to be resolved we do not dispute the delivery of this allocation.

<b>Site Allocation</b>	<b>RA4 Field Road, Ramsey</b>
<b>Unit size</b>	5.2ha for approximately 90 homes
<b>Current planning status</b>	A planning application for 90 dwellings (1401852OUT) was approved in October 2016, and a Reserved Matters application was approved in May 2017 (16/02379/REM). All pre development conditions have been discharged.
<b>Constraints</b>	<p>The site is located on Grade 2 agricultural land but is located in close proximity to services, employment, public transport and open space.</p> <p>Landscape constraint – The site lies adjacent to open countryside and residential properties.</p> <p>The site is located within Flood Zone 1.</p> <p>There may be protected species existing on the site due to the presence of suitable habitats on and adjacent to the site, including woodlands, a pond, trees and brambles.</p>
<b>Suitability</b>	The Council consider the site is suitable for the proposed development with planning permission granted and all pre development conditions discharged.
<b>Availability</b>	The site is considered to be available.
<b>Viability</b>	We are unaware of any viability issues with the site providing 40% affordable homes.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	No comments.
<b>Conclusion</b>	The first 45 dwellings are forecast to be delivered in 2019/2020. The

	housebuilder's website states that homes are 'coming soon'. As all pre development conditions have been discharged we do not dispute this trajectory.
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<b>Site Allocation</b>	<b>RA5 Whytefield Road, Ramsey</b>
<b>Unit size</b>	0.9ha for approximately 40 homes
<b>Current planning status</b>	No application to date but agent confirms an application will be submitted in the near future.
<b>Constraints</b>	<p>Due to its relatively small scale and location it is unlikely to provide opportunities to link with the strategic green infrastructure network.</p> <p>The development of the site would result in the loss of employment land given the site's former use as a petrol station. The site is also likely to be contaminated.</p> <p>The site is located within Flood Zone 1.</p> <p>The site's visibility from the wider area and its location within Ramsey conservation area mean that the townscape impact and impact on the conservation area could constrain the development. We also consider the close proximity to Ramsey Community Junior School playground and playing fields could constrain development.</p>
<b>Suitability</b>	The site comprises previously developed land and in close proximity to services and transport facilities. It is suitable for residential development subject there being no contamination
<b>Availability</b>	The site is understood to be available.
<b>Viability</b>	Potential for contamination on the site could cause viability issues.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	No comments.
<b>Conclusion</b>	The latest AMR forecasts that the site is to be delivered in 2021/2022. We consider this to be ambitious as no application has been submitted and there are a number of obstacles residential development would need to overcome. The site is on a former petrol station and there is potential for the site to be contaminated. However, overall the site is appropriate to be allocated and could be delivered during the plan period.

<b>Site Allocation</b>	<b>RA6 94 Great Whyte, Ramsey</b>
<b>Unit size</b>	0.7ha for approximately 35 homes
<b>Current planning status</b>	<p>Planning Application 15/02384/FUL for 32 dwellings was approved on 22 June 2018.</p> <p>A number of pre commencement conditions need to be discharged before development can commence.</p>
<b>Constraints</b>	<p>The site is within Ramsey conservation area, and there is a listed building opposite the site.</p> <p>The site is located within Flood Zone 1.</p> <p>Due to the former uses of the site, a contamination risk assessment is</p>

	required which could raise issues for the expected delivery of the site.
<b>Suitability</b>	The site comprises previously developed land and lies in close proximity to services and transport facilities.
<b>Availability</b>	The site is available subject to site clearance. It is understood the site will be developed simultaneously with RA2 Ramsey Gateway allocation as the sites have interlinked public open space provision.
<b>Viability</b>	Viability could be an issue if the site proves to be heavily contaminated.
<b>Deliverability</b>	The site is dependent on the development of Ramsey Gateway to deliver the interlinked public open space provision. Planning application 16/00311/FUL is yet to be determined with a number of outstanding issues still needing to be resolved. Therefore, for dwellings to be completed in 2019/2020 appears optimistic.
<b>Delivery</b>	No comments.
<b>Conclusion</b>	The latest AMR forecasts the first 16 dwellings will be completed in 2019/2020. We consider this is optimistic and the delivery of the site is questionable until permission has been granted for Ramsey Gateway.

<b>Site Allocation</b>	<b>RA8 Former RAF Upwood and Upwood Hill House, Ramsey</b>
<b>Unit size</b>	25ha for approximately 450 homes
<b>Current planning status</b>	Planning application 1201274OUT was approved with the S106 Agreement completed in June 2017.  No Reserved Matters application submitted.
<b>Constraints</b>	There is currently poor access to services and facilities.  The site is constrained by its former uses with potential for heritage assets and wildlife/ecological interests to be protected.  The site is located within Flood Zone 1.  Substantial demolition would be required - There are a number of buildings on site that need to be removed.  Protected trees will act as a constraint to the siting of development.  Despite these constraints as planning permission has been granted for the site HDC must consider it is suitable for residential development.
<b>Suitability</b>	HDC granted planning permission for redevelopment in June 2017. Before the site is able to deliver units, demolition, clearance, and potentially decontamination is required.
<b>Availability</b>	The site is available but a number of buildings must be demolished before development can commence.
<b>Viability</b>	A viability assessment was submitted with the outline application. It was agreed that the smaller 150 unit scheme would be viable with at least 23% affordable housing (Officers Report April 2015). Therefore, we consider that additional sites should be allocated to address the shortfall in affordable dwellings likely to be delivered on the site.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	No comments.
<b>Conclusion</b>	The latest AMR forecasts the first 10 dwellings will be completed in

	2018/2019. This is very optimistic as no Reserved Matters application has been submitted. There are also a number of pre commencement conditions that need to be discharged as well as a considerable amount of demolition.
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	majority of the site falling within Flood Zones 2 and 3a there are a number of constraints to its deliverability.
<b>Delivery</b>	The Agent contends that the site has capacity to deliver up to 75 dwellings which has been reduced to 50 by the Local Plan allocation with the first units expected to be completed in 2019/20.
<b>Conclusion</b>	We consider that the proposed allocation does not comply with the NPPF Sequential or Exceptions Tests which constrains the deliverability of the site.

# APPENDIX E – 2016 AMR EXTRACTS

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# Annual Monitoring Report

December 2016

Planning Services

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# Housing Trajectory Data: Local Plan to 2036 Appendix 1

Huntingdonshire District Council Local Plan | Annual Monitoring Report 2016

## Appendix 1 Housing Trajectory Data: Local Plan to 2036

Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	16/17 Yr 1	17/18 Yr 2	18/19 Yr 3	19/20 Yr 4	20/21 Yr 5	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 16/36	
<b>Extant Planning Permission on Allocated Sites</b>																													
<b>Full</b> 1001750FUL	George St Huntingdon 523521 271848	0.19	Brownfield. Part of allocation HW4 in HWAAP (200 dwellings in total - for residue see below in residual allocations). 1001750FUL lapsed in May 2016. Agent says the site is currently available for a mixed-use residential/commercial development with George St/Edison Bell Way site.	0	260	260	160	0	0	50	55	55	50	50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	260
<b>Full</b> 1300535REP	Adj 25 St Giles Close Holme 519025 287754	0.2	Part brownfield. Application approved July 16 (15/00079/FUL) for revised scheme. Agents says there are no constraints to delay development.	0	8	8	8	0	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8
<b>Reserved Matters</b> 0101550OUT	E. of the Railway (Loves Farm) St Neots 520045 260690	30.5	Greenfield. Multiple developers. Estimated based on CCC monitoring.	1386	52	1438	52	40	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	52	
<b>Full</b> 0900411FUL	Windmill Row St Neots 518375 260191	0.4	Brownfield. Site in multiple ownership. Allocated in Local Plan Alteration 2002. Included in St Mary's Urban Village Framework & Masterplan 2006. 24 units permitted on part (0900411FUL) Dec 14. 2 dwellings on another part (1201442FUL) permitted Apr 13. See SN6 in Draft Local Plan sites below for draft	0	26	26	26	0	0	2	12	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	26	

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			Local Plan allocation which will be 38 dwellings in total on a larger site than original 2002 allocation. No response from agents so estimated.																																	
<b>Outline</b> 1301836OUT	South of Edison Bell Way Huntingdon 523487 272111	1.0	Brownfield. Part of allocation HW4 in HWAAP (200 dwellings in total - for residue see below in residual allocations). Reserved Matters application submitted Feb 2016 for 74 units. No reply from agent so estimated..	0	74	74	74	0	0	37	37	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	74								
<b>Extant Planning Permission on Unallocated Sites of 10+ dwellings</b>																																				
<b>Full</b> 0302792FUL	Papermill Lock Little Paxton 813391 262036	5.9	Brownfield. Site approaching completion.	352	90	442	90	90	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	90							
<b>Full</b> 1400693FUL	Elm Tree Court, Cromwell Walk, Huntingdon 523643 272123	0.18	Brownfield. 'Retirement Living' apartments. Site completed summer 2016.	0	26	26	26	26	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	26							
<b>Full</b> 1300679FUL	Hill Rise & Hill Close, Brington 508267 276314	4.5	Brownfield. 56 dwellings following demolition of 40 existing former MOD dwellings so 16 net new. 12 affordable. 40 dwellings being demolished and 40 replacements, so no net gain in the residue. The 16 net additional dwellings were built in 2015/16..	16	40	56	0	-40	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
<b>Full</b> 1400102FUL	N. of Pathfinder House, Huntingdon 523976 271566	0.12	Brownfield. Site approaching completion.	0	14	14	14	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14								

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Status/ Site ref	Address eastng/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	16/17 Yr 1	17/18 Yr 2	18/19 Yr 3	19/20 Yr 4	20/21 Yr 5	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 16/36
Full 1301798FUL	3-5 Bridge Place, Godmanchester 524318 271414	0.02	Brownfield. Under construction. Conservation issues have delayed progress somewhat, but the site is anticipated for completion within 2 years.	0	12	12	12	0	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12
Full 1400010FUL	W of 94 Ramsey Rd, Warboys 529949 280641	0.53	Greenfield. Rural Greenfield. Rural exception site, 100% affordable. Site is under construction. Due for completion early 2017.	0	19	19	19	19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	19
Full 1301316FUL	R/o of 64 High St Warboys 530796 280049	0.4	Brownfield. Site completed autumn 2016.	10	3	13	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Full 1301979FUL	Langley Court, St Ives 531263 271827	0.6	Brownfield. Site under construction and anticipated for completion during 2016/17. No net gain as this is a replacement building involving the loss of 55 existing extra care units and gain of 55 in the same monitoring year.	0	55	55	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Full 1401248FUL	Eaton Crescent, Eaton Scon, St Neots 516482 258702	1.0	Brownfield. Developer anticipates the housing will be completed in 2016/17. 20 dwellings deferred by one year as this seems optimistic; however site is progressing well.	5	40	45	40	20	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	40
Full 15/00016FUL	Eaton Gate (Eaton Court) Gt North Rd St Neots 517302 261082	1.2	Brownfield. Site commenced April 2016.	0	29	29	29	16	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	29
Full 15/01015FUL	Hermitage Rd, Eairth 539028 275380	0.2	Greenfield. Rural exceptions site 100% affordable dwellings. Site commenced April	0	11	11	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11

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## Huntingdonshire District Council Local Plan | Annual Monitoring Report 2016

Status/ Site ref	Address easting/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	16/17 Yr 1	17/18 Yr 2	18/19 Yr 3	19/20 Yr 4	20/21 Yr 5	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 16/36
			2016 and developer anticipates completion in spring 2017.																									
<b>Full</b> 15/00029/FUL	Former Clinic RAF Upwood 527744 283587	2.0	Brownfield. Agent says there are no constraints to delivery subject to resolution of current viability discussions.	0	6C	60	60	0	25	35	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	60
<b>Full</b> 15/00659/FUL	Former Ashton House, Yaxley 518743 292745	0.2	Brownfield. Permission granted for 13 affordable dwellings, but an amendment to the scheme for 12 dwellings was approved in Aug 2016 (16/01603/NMA). Agent says site is about to commence.	0	12	12	12	0	6	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12
<b>Full</b> 16/00195/FUL	1 The Meadow, St Ives 531762 271238	0.02	Brownfield. Commenced April 2016.	0	1C	10	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10
<b>Full (part)</b> 1301895OUT	St Ives West - The Spires (former Golf Course) 530307 271995	6	Greenfield. Hybrid application for 125 dwellings in outline and 59 in full. Site commenced Sep 2016. Agent says first completions are anticipated by April 2017. Agent's projections considered somewhat protracted, and the Council considers site could be delivered sooner with higher annual completion rates.	0	184	184	160	0	40	40	40	40	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	184
<b>Reserved Matters</b> 0700364REM	Old Grarary Sawtry 516325 283533	0.6	Brownfield. Rough foundations in place so material start has been implemented. No reply from developer so estimated. In view of lack of recent activity on site, estimated after first 5 years.	0	1C	10	0	0	0	0	0	0	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	10

# Housing Trajectory Data: Local Plan to 2036 Appendix 1

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<b>Reserved Matters</b> 0200293REM	Water's Edge Wansford 507951 298077	2.3	Brownfield. Estimated based on officer knowledge of progress on site.	21	6	27	6	5	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6
<b>Reserved Matters</b> 1201953REM	Saxon Gardens California Rd Huntingdon 524363 272925	3.9	Greenfield. Site approaching completion.	177	3	180	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
<b>Reserved Matters</b> 1101894REM	R. Gateway High Lode Ramsey 528360 285818	2.5	Part brownfield. Application submitted for 55 bed extra care facility on eastern part of site Apr 2015 (15/00687/REM). Agents says site is to be implemented within 5 years. Agent's projections appear somewhat protracted, and the Council considers site could be delivered sooner with higher annual completion rates. .	0	110	110	30	0	5	5	10	10	10	15	15	20	20	0	0	0	0	0	0	0	0	0	0	110
<b>Reserved Matters</b> 1300164OUT	New Horizons (former Snowcap Mushrooms) Mere View Yaxley 519336 293034	1.8	Brownfield. Development commenced June 2016. No reply from developer so estimated based on last year's response and officer knowledge of progress on site.	0	78	78	78	8	35	35	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	78
<b>Reserved Matters</b> 1200590OUT	The Orchard (former Ivy Nursery) Fenstanton 532402 268077	0.8	Mainly greenfield. Site commenced Apr 16. No response from developer so based on last year's response and officer knowledge of progress on site.	0	34	34	34	4	18	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	34
<b>Reserved Matters (part)</b> 1201158OUT	Alconbury Weald 519713 276509	200	Brownfield. Reserved matters application approved Dec 15 for first phase of housing 128 dwellings (15/01117/REM) and site commenced early 2016. Making excellent	0	5000	5000	1000	50	200	250	250	250	250	250	250	250	250	250	250	250	300	300	300	300	300	250	250	5000



# Appendix 1 Housing Trajectory Data: Local Plan to 2036

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			progress. Primary School opened Sep 2016.																									
<b>Reserved Matters (part)</b> 1200685OUT	Bearscroft Farm GMC 525533 269869	25	Greenfield. Reserved matters approved Dec 15 for 1st phase of 223 dwellings (15/01158/REM) and site commenced Apr 16. Developer has provided projections for the first phase of development (1st 3 years), the rest is estimated based on previous year's responses.	0	753	753	450	50	90	90	110	110	110	110	83	0	0	0	0	0	0	0	0	0	0	0	0	753
<b>Outline</b> 1401547OUT	Askew's Lane Yaxley 518349 291991	0.5	Part brownfield. Agent says a Reserved Matters application is in preparation. Advanced discussions taking place with a developer who wishes to commence as soon as possible. Agent's projection deferred by 2 years as appeared optimistic.	0	9	9	9	0	0	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	9
<b>Outline</b> 1301790OUT	Great Pastures, West of Station Rd, Warboys 531051 280593	3.3	Greenfield. Reserved matters application approved June 16 (15/01817/REM). Site commenced Aug 16.	0	120	120	120	7	54	54	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	120
<b>Outline</b> 1301178OUT	Brampton Park (formerly RAF Brampton) 520942 270184	12	Brownfield. Hybrid applications for 437 dwellings (15/00368/OUT) & 78 dwellings + 70 C2 beds (15/00643/OUT). Numerous Reserved Matters/Full applications submitted to bring the anticipated total no. of dwellings to approximately 600. Agent's projections considered somewhat protracted and the Council considers site could be delivered	0	600	600	450	0	50	100	150	150	100	50	0	0	0	0	0	0	0	0	0	0	0	0	0	600

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			sooner with higher annual completion rates.																										
<b>Extant 'Prior Approval' Conversions to C3 residential Use under GPDO</b>																													
<b>Prior Approval</b> 15/00349/P3JPA	Anglian House, Huntingdon 523830 271959	0.3	Brownfield. Completed summer 2016.	0	5E	56	56	56	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>56</b>
<b>Prior Approval</b> 15/02304/P3JPA	2 The Meadow, St lves 531756 271227	0.02	Brownfield. No reply from agent so estimated. Building work commenced summer 2016.	0	1C	10	10	0	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>10</b>
<b>Prior Approval</b> 15/00825/P3JPA	8 The Meadow St lves 531779 271170	0.02	Brownfield. No reply from agent so estimated.	0	1C	10	10	0	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>10</b>
<b>Prior approval</b> 1300950/PACOU	15A Huntingdon St St Neots 518532 260428	0.05	Brownfield. Being advertised for office use. No indication currently this will be converted to residential, so no housing included in supply..	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>0</b>
<b>Prior approval</b> 1300951/PACOU	17A Huntingdon St St Neots 518538 260441	0.05	Brownfield. In office use still and no indication currently this will be converted to residential use, so not included in supply.	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>0</b>
<b>Prior approval</b> 1300952/PACOU	21A Huntingdon St St Neots 518535 260451	0.05	Brownfield. In office use still and no indication currently this will be converted to residential use, so not included in supply.	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>0</b>
<b>Prior approval</b> 1301362/PACOU	Kings Hall Parsons Green St lves 532387 271813	0.4	Brownfield. Understood to be remaining as offices and no housing now expected on this site.	0	22	22	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>0</b>

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Prior approval 1301500PACOU	145 High St Huntingdon 524128 271596	0.02	Brownfield. Site completed autumn 2016.	0	3	3	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Prior approval 1400791PACOU	Storage Building, Fen Rd, Pidley 533078 278238	0.01	Greenfield. Completed summer 2016.	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 1401223PACOU	Two Hoots Farm, Wyton 528834 272897	0.01	Greenfield. Estimated.	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 14/01345PMBPA	Capricorn House, Pidley 533194 278150	0.05	Greenfield. Under construction.	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 1401222PACOU	Adj. Albion Rose, Pidley 532844 278215	0.02	Greenfield. Under construction.	0	2	2	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
Prior Approval 15/00147PMBPA	Avenue Farm, Fenton 531899 279611	0.03	Greenfield. Estimated.	0	3	3	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Prior Approval 1400897PACOU	Unit 5 Fen Rd Industrial Estate, Pidley 533041 278236	0.01	Brownfield. Estimated.	0	3	3	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Prior Approval 14/01702PMBPA	Adj Mancr Farm, Wyton 527275 273129	0.08	Greenfield. Estimated.	0	3	3	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Prior Approval 1401334PACOU	Top Farm, Old Hurst 529889 277045	0.05	Greenfield. Under construction.	0	3	3	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Prior Approval 14/01516/P3JPA	Hill Farm Industrial Est., Wennington 523671 279331	0.07	Brownfield. Application submitted for external alterations in connection with	0	5	5	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5

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			residential scheme Oct 15 (15/01880/FUL). Estimated.																									
<b>Prior Approval</b> 14/02026:PMBPA	Dentons Farm, Ramsey St Marys 525821 269255	0.03	Greenfield. Estimated.	0	2	2	2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
<b>Prior Approval</b> 15/00248:P3JPA	1 The Quay, St Ives 531309 271172	0.01	Brownfield. Estimated.	0	2	2	2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
<b>Prior Approval</b> 15/00459:PMBPA	Lockers Barn, Somersham 535159 277752	0.02	Greenfield. Under construction	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
<b>Prior Approval</b> 15/00342:PMBPA	Wilsons Orchard, Warboys 531560 281733	0.03	Greenfield. Under construction	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
<b>Prior Approval</b> 15/00462:PMBPA	Model Farm, Fenstanton 531727 268007	0.05	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
<b>Prior Approval</b> 15/00727:PMBPA	SW of Cosa Mia, Farcot 523927 293355	0.01	Greenfield. Under construction spring 2016.	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
<b>Prior Approval</b> 15/00531:PMBPA	Hereford Farm, Pidley 532631 278481	0.05	Greenfield. Under construction	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
<b>Prior Approval</b> 15/00649:P3PPA	Shop, 210 Great North Rd, St Neots 517006 259165	0.01	Brownfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
<b>Prior Approval</b> 15/02394:P3JPA	210 Great North Rd, St Neots 517006 259165	0.01	Brownfield. Estimated.	0	2	2	2	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2

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Prior Approval 15/00461:PMBPA	Tick Fen Farm, Warboys 535969 285837	0.02	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/00602:PMBPA	Toons Lodge Farm, Haddon 514370 293128	0.02	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/00729:PMBPA	Sidings Farm, Pidley 533946 279657	0.01	Greenfield. Under construction	0	3	3	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Prior Approval 15/00694:PMBPA	NW of Briar Lodge, Earith 537809 275546	0.01	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/00870:PMBPA	Old Spot Farm, Somersham 536956 280444	0.03	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/00929:P3PPA	Unit 3 Oak Acres Farm, Somersham 536309 279681	0.01	Greenfield. Under construction	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/00913:P3JPA	Red Lodge, Huntingdon 523026 271655	0.02	Brownfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/00892:PMBPA	Heyes Farm, Yaxley 516674 290950	0.07	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/00949:P3JPA	Heap Farm, Ramsey 531063 285545	0.02	Brownfield. Commenced autumn 2016.	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/00939:P3PPA	Unit 2 Manor Farm, Pidley 533436 278371	0.02	Brownfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/01118:P3JPA	11 Bridge St, St Ives 531332 271234	0.01	Brownfield. Estimated.	0	3	3	3	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3

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Prior Approval 15/01119/PMBPA	Pasturelands, Buckden 518671 267969	0.03	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/01182/PMBPA	Wilobe Farm, Pidley 533516 278667	0.04	Greenfield. Estimated.	0	3	3	3	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Prior Approval 15/01366/PMBPA	Safeheld Farm, Alconbury Weston 519451 278279	0.01	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/01515/PMBPA	Part Grass Farm, Pidley 532439 276932	0.03	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/01494/PMBPA	N of Tockey Lodge, Elton 511723 291766	0.02	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/01940/P3PPA	Unit 2 Oak Acres Farm, Somersham 536327 279699	0.01	Greenfield. Under construction	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/01923/PMBPA	Cherry Lodge, Warboys 531707 282442	0.02	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/01636/PMBPA	Dunkirk Farm, Somersham 536611 281612	0.01	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 15/01951/PMBPA	Long Lane Farm, Hemingford Grey 529493 270047	0.03	Greenfield. Estimated.	0	3	3	3	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Prior Approval 15/01987/PMBPA	Southview Farm, Pidley 533789 277838	0.04	Greenfield. Estimated.	0	2	2	2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2

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Prior Approval 15/01989:PMBPA	Southview Farm, Pidley 533789 277838	0.04	Greenfield. Estimated.	0	2	2	2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	
Prior Approval 15/02209:PMBPA	Toons Ldge Farm, Haddon 514370 293128	0.02	Greenfield. Estimated.	0	3	3	3	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	
Prior Approval 15/02379:PMBPA	Red House Farm, Gt Raveley 523858 281889	0.05	Greenfield. Estimated.	0	2	2	2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	
Prior Approval 16/00164:PMBPA	Marshalls Farm, Farcet 521394 293469	0.02	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	
<b>Extant Planning Permissions on Small Sites (under 10 dwellings - aggregate figure)</b>																													
<b>Total Full or Reserved Matters under construction at 31/3/14</b>	N/a	N/a	A 10% discount was applied to the total of small sites not yet under construction to allow for some sites that may not be delivered.	N/a	187	187	187	94	93	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	187	
<b>Total Full or Reserved Matters not started at 31/3/14</b>		236	212	212	46	56	55	55	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	212
<b>Total Outline</b>		25	23	23	0	8	8	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	23	

# Housing Trajectory Data: Local Plan to 2036 Appendix 1

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Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	16/17 Yr 1	17/18 Yr 2	18/19 Yr 3	19/20 Yr 4	20/21 Yr 5	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 16/36	
<b>Residual Allocated Sites</b>																													
<b>Planning application submitted</b> 14022100OUT	St Ives West - Houghton Grange St Ives 529643 272117	4.4	Brownfield. See extant permissions on unallocated sites above and draft allocations below for remainder of St Ives West area. Outline application approved June 2016. The site is now in the ownership of the Homes and Communities Agency.	0	90	90	90	0	0	0	25	65	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>90</b>
<b>Planning applications submitted</b> 05005260OUT & 10017120OUT	Ermine St (South) Huntingdon 522340 273426	23.1	This relates to the part of the site south of Ermine St which was allocated in Local Plan Alteration 2002 (for remainder north of Ermine St see Draft Local Plan allocations below). Greenfield. Reply received from the agent for one of the proposals. Deferred by 2 years as appears optimistic given the transport mitigation required.	0	1050	1050	0	0	0	0	0	0	50	50	100	100	100	100	100	100	100	100	100	50	0	0	0	0	<b>1050</b>
<b>Planning application submitted</b> 15/01423/FUL	Ermine St/Edison Bell Way Huntingdon 523490 272214	0.3	Brownfield. Part of residue of HW4 in HWAAP (for committed sites on HW4 see above). Draft allocation in Local Plan to 2036. Application approved May 16 and site commenced summer 2016.	0	47	47	47	0	47	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>47</b>
<b>Allocation only</b> HWAAP HW4	George St/ Edison Bell Way Huntingdon 523392 271810	0.3	Brownfield. Part of residue of HW4 in HWAAP (for committed sites on HW4 see above). Draft allocation in Local Plan to 2036. Agent says site is	0	40	40	40	0	0	0	20	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>40</b>



# Appendix 1 Housing Trajectory Data: Local Plan to 2036

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Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	16/17 Yr 1	17/18 Yr 2	18/19 Yr 3	19/20 Yr 4	20/21 Yr 5	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 16/36
			currently available for a mixed-use residential/commercial development with George St (in committed sites above).																									
<b>Allocation only</b> LPA Site 19	Whytefield Rd Ramsey 528439 285151	0.8	Brownfield. Land in multi ownership, however an agent is now acting for all the landowners with a view to submitting a planning application in the near future. Agent says there is a realistic prospect the site will be delivered within 5 years.	0	40	40	40	0	0	20	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	40
<b>Allocation only</b> LPA Site 31	Church Farm/ Main St Gt Gidding 511711 283251	0.8	Greenfield. Not considered suitable for residential development as not consistent with Core Strategy. Site will not be carried forward as an allocation in the Local Plan to 2036.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Allocation only</b> LPA Site 32	NW of Main St Gt Gidding 511948 283569	0.2	Greenfield. Not considered suitable for residential development as not consistent with Core Strategy. Site will not be carried forward as an allocation in the Local Plan to 2036.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Sites with a resolution for approval subject to the prior completion of a S106 agreement</b>																												
<b>Planning application approved subject to completion of S106</b> 1300389OUT	Loves Farm Reserved Site St Neots 519794 260331	1	Greenfield. Agent's projection deferred by one year as appears slightly optimistic.	0	41	41	41	0	0	41	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	41

# Housing Trajectory Data: Local Plan to 2036 Appendix 1

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Status/ Site ref	Address easting/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	16/17 Yr 1	17/18 Yr 2	18/19 Yr 3	19/20 Yr 4	20/21 Yr 5	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 16/36
Planning application approved subject to completion of S106 0901288OUT	Cromwell Rd Car Park St Neots 519252 259811	0.5	Brownfield. Agent's projection deferred by 2 years as appears optimistic. Approved subject to revised heads of terms on the S106 agreement December 2016.	0	21	21	21	0	0	21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	21
Planning application approved subject to completion of S106 1301274FUL	W of St Andrew's Way Sawtry 517263 283661	1.4	Greenfield. Application approved June 2016. No reply from agent so estimated.	0	43	43	43	0	10	20	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	43
Planning application approved subject to completion of S106 1401887OUT	S of Farrier's Way Warboys 530897 279900	2.3	Greenfield. Site will be re-joined to Fenton Field Farm as allocation in emerging Local Plan. Delivery spread over 2 years, rather than the 1 year suggested by agent.	0	74	74	74	0	0	24	50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	74
Planning application approved subject to completion of S106 1401852OUT	Field Rd Ramsey 527950 285184	2.6	Greenfield. Approved October 2016. Reserved Matters application submitted Nov 2016 (16/02379/REM). Agent says the site will be delivered within 5 years.	0	90	90	90	0	40	40	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	90
Planning application approved subject to completion of S106 15/00917/OUT	Newlands Somersham 535446 277949	0.8	Greenfield. Application is for 45 dwellings and a residential care home. Agent's projections deferred by 2 years as appear optimistic.	0	45	45	45	0	0	15	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	45
Planning application approved subject to completion of S106 15/00570/FUL	S. of The Rhees, Bluntisham Rd, Colne 537167 275654	1.4	Greenfield. Rural exceptions site for 10 affordable and 2 open market dwellings. Approved August 2016.	0	12	12	12	0	10	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12

# Appendix 1 Housing Trajectory Data: Local Plan to 2036

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Status/ Site ref	Address easting/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	16/17 Yr 1	17/18 Yr 2	18/19 Yr 3	19/20 Yr 4	20/21 Yr 5	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 16/36
<b>Planning application approved subject to completion of S106</b> 16/00194/OUT	North West End Of Dorling Way, Brampton 519609 271731	7.6	Greenfield. Outline permission granted Sep 16. Agent says there is a realistic prospect that housing will be delivered within 5 years.	0	150	150	150	0	75	75	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	150
<b>Planning application approved subject to completion of S106</b> 1201274OUT	RAF Upwood & Upwood Hill House 527513 283586	8	Brownfield. Approved for up to 160 dwellings subject to satisfactory completion of S106 Apr 15. Trajectory figure raised to better reflect draft Local Plan capacity. Agent's projections deferred by one year as appear optimistic.	0	450	450	180	0	0	30	60	90	90	90	90	0	0	0	0	0	0	0	0	0	0	0	0	450
<b>Planning application approved subject to completion of S106</b> 516270 283642	E of Glebe Farm Sawtry 516228 283661	2.0	Greenfield. Approved April 2016. Reserved Matters application for 80 dwellings refused Oct 2016 (16/01109/REM) on grounds of excessive scale of development, and discussions are ongoing with a view to reducing the capacity to 60 dwellings. The site is in the control of a housebuilder who is actively pursuing Reserved Matters.	0	60	60	60	0	40	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	60	
<b>Draft Local Plan to 2036: proposed allocations</b>																												
<b>Application submitted</b> 1300388OUT	St Neots East - Loves Farm East 520734 260742	60	Greenfield. 1300388OUT submitted for mixed uses including 1020 dwellings + 120 C2 beds for older people. Agent says there are no constraints on delivery subject to positive discussions between the parties on a S106 agreement. Agent's projection for	0	1020	1020	330	0	0	0	145	185	185	185	115	115	65	25	0	0	0	0	0	0	0	0	0	1020

# Housing Trajectory Data: Local Plan to 2036 Appendix 1

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Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	16/17 Yr 1	17/18 Yr 2	18/19 Yr 3	19/20 Yr 4	20/21 Yr 5	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 16/36	
			2018/19 (50 dwellings) added to 2019/20 figure of 95 to make 145, as 50 completions in 2018/19 appears optimistic.																										
<b>Application submitted</b> 1300178OUT	St Neots East - Wintringham Park 519797 259471	50	Greenfield. 1300178OUT refused because of the inadequate provision of affordable housing April 16. An appeal has been lodged, and has been recovered by the Secretary of State. A public inquiry is scheduled for May 2017. Agent anticipates site commencement in 2019. The Council considers the site could be delivered sooner, with more completions contributing to the 5 year supply.	0	2800	2800	25	0	0	0	0	25	100	100	100	250	250	250	250	250	250	250	250	250	225	0	0	<b>2800</b>	
<b>Draft Local Plan allocation</b>	Wyton Airfield & Wyton-on-the-Hill 529196 274983	140	Brownfield. Agent says site could deliver from 2018/19. however the Council has deferred delivery rates to allow for transport mitigation measures to be fully addressed.	0	4500	4500	0	0	0	0	0	0	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	<b>4500</b>	
<b>Planning application submitted</b> 16/00304/FUL	Former Forensic Laboratory Huntingdon 522180 272089	1.5	Brownfield. Developer confirms site's immediate availability.	0	105	105	105	0	45	45	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>105</b>		

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Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	16/17 Yr 1	17/18 Yr 2	18/19 Yr 3	19/20 Yr 4	20/21 Yr 5	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 16/36	
<b>Planning application submitted</b> 15/00486/FUL	Hinchingbrooke Campus- Hinchingbrooke Nursery 522425 272236	1.4	Brownfield. Public sector land. Approved by DM Panel subject to S106 agreement May 16. Developer says site will be developed on provision of an alternative car park.	0	45	45	45	0	0	0	0	45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	45
<b>Planning application submitted</b> 15/01264/OUT	Hinchingbrooke Health Campus - Hinchingbrooke Hospital 522564 272105	2.4	Brownfield. Public sector land. The NHS Trust considers the site could accommodate higher housing numbers, but until a detailed masterplan is available the capacity has been kept at a cautious 385 in line with the submitted outline application. The Trust's projections have also been deferred by 2 years.	0	385	385	0	0	0	0	0	0	248	0	137	0	0	0	0	0	0	0	0	0	0	0	0	0	385
<b>Draft Local Plan allocation</b>	Ermine Street (North) Huntingdon 522859 274078	14	Greenfield. This relates to the part of the site north of Ermine St (for remainder south of Ermine St see Residual Allocations above). Outline application approved Nov 15 (1300730OUT) for business park. Agent confirms the site can be viably developed within the plan period.	0	400	400	0	0	0	0	0	0	0	80	80	80	30	80	0	0	0	0	0	0	0	0	0	0	400
<b>Draft Local Plan allocation</b>	Gas Depot Mill Common Huntingdon 523787 271325	0.5	Brownfield. Application submitted October 2016 for 11 dwellings (16/02093/FUL).	0	11	11	11	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	

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<b>Draft Local Plan allocation</b>	California Rd Huntingdon 524281 272827	1.0	Greenfield. Landowner considers the site could accommodate a higher capacity, however 54 is considered more appropriate, in line with the draft Local Plan allocation.	0	54	54	54	0	0	0	20	34	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>54</b>
<b>Planning application submitted on part/Draft Local Plan allocation 16/00597/FUL</b>	Main Street Huntingdon 525994 27291	0.8	Greenfield. Application submitted March 16 for 2 dwellings on part of site. No reply from agents so estimated.	0	32	32	32	0	2	0	15	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>32</b>
<b>Draft Local Plan allocation</b>	Tyrell's Marina GMC 524273 271401	0.3	Brownfield. Planning application submitted May 16 for 16 dwellings as part of a mixed-use development (16/00906/FUL). Agent's projection deferred by one year as seems optimistic given flood attenuation required on site.	0	14	14	14	0	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>14</b>
<b>Draft Local Plan allocation</b>	RGE Engineering GMC 524490 271407	1.8	Brownfield. Agent says the existing company's relocation programme is well underway and will be facilitated in the short term. Agent considers site could accommodate a higher capacity, but it has been kept at 70 to reflect the draft Local Plan allocation. Agent's projection deferred by 2 years.	0	70	70	70	0	0	30	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>70</b>

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<b>Draft Local Plan Allocation</b>	Wigmore Farm Buildings GMC 524492 269820	0.5	Greenfield. Planning application submitted for 13 dwellings June 16 (16/01477/FUL). No reply from agent so estimated.	0	13	13	13	0	6	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13
<b>Planning application submitted</b> 15/00634/FUL	Former Youth Centre Prioory Rd St Neots 518194 260604	0.4	Brownfield. Agent's projection deferred by one year.	0	14	14	14	0	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14
<b>Draft Local Plan allocation</b>	Huntingdon St St Neots 518554 260722	0.4	Brownfield. This site is not now expected to be allocated for housing development as it is considered contrary to policies in the St Neots Neighbourhood Plan, 'made' in February 2016, which seek to protect employment premises.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Planning application submitted (part of site)</b>	St Mary's Urban Village St Neots 518369 260199	0.4	Brownfield. See Windmill Row in extant planning permissions on allocated sites above for rest of site with planning permission. Included in St Mary's Urban Village Framework & Masterplan 2006. Draft Local Plan allocation will be wider area than 2002 allocation. 3 dwellings permitted May 14 on part of site (1301969FUL) which commenced summer 2016.	0	12	12	12	0	3	0	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12

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<b>Draft Local Plan allocation</b>	Cromwell Rd North St Neots 519367 260052	1	Mixed green/brown. Agent confirms site's availability and says site could realistically be developed in 5 years.	0	80	80	80	0	0	0	30	50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>80</b>
<b>Planning application submitted</b> 1201890 & 1201891FUL	St Ives West - north & east of The How 530174 271981	1.3	Greenfield. See Houghton Grange in Residual Allocated Sites and The Spires in Extant Permissions on Unallocated Sites above for the remainder of the St Ives West area.	0	8	8	4	0	0	0	0	4	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>8</b>
<b>Planning application submitted</b> 1301056OUT	St Ives West - Land Between Houghton Grange & The How 529915 272036	7	Greenfield. See Houghton Grange in Residual Allocated Sites and The Spires in Extant Permissions on Unallocated Sites above for the remainder of the St Ives West area. The site is now in the ownership of the Homes and Communities Agency, who will be carrying out a master planning exercise to determine the capacity of the site which they consider could be higher. Capacity kept at 224 in line with the planning application currently under consideration.	0	224	224	50	0	0	0	0	50	50	50	50	24	0	0	0	0	0	0	0	0	0	0	0	0	<b>224</b>
<b>Planning application submitted</b> 1401554OUT	St Ives Football Club 530740 272016	1.3	Greenfield. Development dependent on successful relocation of Football Club (for which permission was granted Oct 15). Outline application for up to 50 dwellings refused July 15. New	0	30	30	30	0	0	15	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>30</b>	



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			application submitted August 2016 (16/01485/OUT) for 30 dwellings.																									
<b>Draft Local Plan allocation</b>	Former Car Showroom London Rd St Ives 531073 270731	0.6	Brownfield. Previous buildings demolished late summer 2016. Site's agent considers site could accommodate 60 dwellings, however the capacity has been kept at 46 for now to reflect the draft Local Plan capacity. A full application is anticipated in the near future.	0	46	46	46	0	5	18	18	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	46
<b>Draft Local Plan allocation</b>	Vindis Showroom St Ives 530974 270460	1.3	Brownfield. This site is now unlikely to be allocated for housing development due to flooding issues.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Planning application submitted</b> 16/00311/FUL	Ramsey Gateway (Land Adjacent St Marys Road Industrial Estate) 528270 285725	1.3	Brownfield. Application for 52 dwellings submitted Feb 2016.	0	52	52	52	0	0	0	20	32	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	52
<b>Draft Local Plan allocation</b>	West Station Yard & Northern Mill 528239 285677	0.6	Brownfield. The site is known to be available for re-development.	0	34	34	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	17	17	34
<b>Planning application submitted</b> 15/02384/FUL	94 Great Whyte Ramsey 528512 285398	0.4	Brownfield. Application submitted for 33 dwellings Dec 2015. Estimated.	0	33	33	33	0	0	0	16	17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	33
<b>Draft Local Plan allocation</b>	E of Silver St Buckden 519560 268077	0.3	Mainly greenfield. Agent considers site could accommodate up to 20 dwellings, but	0	14	14	14	0	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14

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Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	16/17 Yr 1	17/18 Yr 2	18/19 Yr 3	19/20 Yr 4	20/21 Yr 5	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 16/36
			the capacity has been kept in line with the draft Local Plan allocation. 14 net dwellings.																									
<b>Planning application submitted</b> 15/01343/FUL	Former Dairy Crest Fenstanton 531639 268308	2.2	Brownfield. Site is vacant. Revised application submitted June 2016 for 88 dwellings (16/01206/FUL). Approved subject to satisfactory completion of a S106 agreement Nov 2016.	0	88	88	88	0	44	44	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>88</b>
<b>Planning application submitted</b> 16/00582/FUL	Cambridge Rd Fenstanton - West 531825 268117	4	Greenfield. Application for 89 dwellings submitted Mar 2016. Agent says site is immediately available for development. Ecology and archaeology are programmed into the timetable.	0	89	89	89	0	0	40	49	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>89</b>
<b>Draft Local Plan allocation</b>	Cambridge Rd Fenstanton - East 532231 267998	1.6	"Greenfield. Agent considers site could accommodate up to 40 dwellings. Capacity kept at 31 to reflect the draft Local Plan allocation. A planning application is in preparation for which a considerable amount of technical work has been completed. Agent's projections deferred by 2 years as appear optimistic.	0	31	31	31	0	0	10	21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>31</b>
<b>Draft Local Plan allocation</b>	W of Station Rd Kimbolton 509553 268354	0.7	Greenfield. Agent says site can be delivered within 5 years. A scheme is in preparation for 20-25 dwellings.	0	20	20	20	0	0	0	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>20</b>

# Appendix 1 Housing Trajectory Data: Local Plan to 2036

Huntingdonshire District Council Local Plan | Annual Monitoring Report 2016

Status/ Site ref	Address eastings/ northings	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	16/17 Yr 1	17/18 Yr 2	18/19 Yr 3	19/20 Yr 4	20/21 Yr 5	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 16/36
<b>Draft Local Plan allocation</b>	The Pasture Somersham 535696 278051	0.3	Greenfield. Agent considers the site could accommodate up to 26 dwellings. Capacity kept at 20 to reflect draft Local Plan allocation. A planning application is in preparation with a considerable amount of technical work already completed. Agent's projections deferred by 2 years as appear optimistic.	0	20	20	20	0	0	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	20
<b>Draft Local Plan allocation</b>	Somersham Town FC Somersham 535829 277740	1.2	Greenfield. Agent says site could accommodate 50 dwellings, but capacity kept at 47 to reflect the draft Local Plan allocation. Planning application anticipated in near future.	0	47	47	47	0	2	15	15	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	47
<b>Draft Local Plan allocation</b>	N of The Bank Somersham 536995 278143	1.2	Greenfield. Landowner considers site could be extended and accommodate higher capacity, but kept to 55 as per the draft Local Plan allocation.	0	55	55	55	0	0	20	35	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	55
<b>Draft Local Plan allocation</b>	W of Ramsey Rd Warboys 530160 280142	1.1	Greenfield. Site in dual ownership. Reply received from one of the agents.	0	45	45	0	0	0	0	10	35	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	45
<b>Draft Local Plan allocation</b>	Manor Farm Buildings Warboys 530247 279955	0.3	Greenfield. Agent says the site will be re-developed on relocation of the current farm yard, and is achievable within 5 years.	0	10	10	10	0	0	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10

# Housing Trajectory Data: Local Plan to 2036 Appendix 1

Huntingdonshire District Council Local Plan | Annual Monitoring Report 2016

Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	16/17 Yr 1	17/18 Yr 2	18/19 Yr 3	19/20 Yr 4	20/21 Yr 5	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 16/36
<b>Draft Local Plan Allocation</b>	Fenton Field Farm Warboys 531161 279881	1.1	Greenfield. Site will be re-joined to South of Farriers Way as allocation in emerging Local Plan. Application submitted for 10 dwellings Apr 2016 (16/00728/OUT).	0	10	10	10	0	0	0	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10
<b>TOTAL</b>					<b>21,036</b>	<b>22,977</b>	<b>5,941</b>	<b>567</b>	<b>1,135</b>	<b>1,428</b>	<b>1,487</b>	<b>1,324</b>	<b>1,576</b>	<b>1,335</b>	<b>1,320</b>	<b>1,139</b>	<b>1,065</b>	<b>1,005</b>	<b>900</b>	<b>900</b>	<b>950</b>	<b>950</b>	<b>950</b>	<b>900</b>	<b>825</b>	<b>567</b>	<b>567</b>	<b>20,890</b>

**APPENDIX F – 2015 AMR EXTRACTS**

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# Annual Monitoring Report

December 2015

Planning Services

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# Housing Trajectory Data: Local Plan to 2036 Appendix 1

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## Appendix 1 Housing Trajectory Data: Local Plan to 2036

Status/ Site ref	Address eastng/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36		
<b>Extant Planning Permission on Allocated Sites</b>																															
Full 1001750FUL	George St Huntingdon 523521 271848	0.19	Brownfield. Part of allocation HW4 in HWAAP (200 dwellings in total - for residue see below in residual allocations). No reply from agent so estimated.	0	28	28	0	0	0	0	0	0	0	0	14	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	28
Full 1201698FUL	Knights Park Barford Rd Eynesbury 518148 258300	4.1	Greenfield. Site progressing well. Estimated based on CCC quarterly monitoring.	184	66	250	66	55	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	66	
Full 1300535REP	Adj 25 St Giles Close Holme 519025 287754	0.2	Part brownfield. Application submitted Feb 2015 (15/00079/FUL) with revised scheme. No response from agent so estimated.	0	8	8	8	0	0	0	4	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8	
Part Reserved Matters, Part Outline, part allocation only 1300151REM	Woodlands Warboys 530701 280207	0.5	Brownfield. Reserved Matters for 3 dwellings (under construction), remainder allocation only. however work on emerging Local Plan to 2036 found that part of the site is no longer available. The site will not therefore be carried forward as an allocation in the Local Plan to 2036.	0	3	3	3	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3		

# Appendix 1 Housing Trajectory Data: Local Plan to 2036

## Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36
<b>Reserved Matters</b> 0101550OUT	E. of the Railway (Loves Farm) St Neots 520045 260690	30.5	Greenfield. Multiple developers. Estimated based on CCC quarterly monitoring.	1301	137	1438	137	50	70	17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	137
<b>Reserved Matters</b> 1401849REM	Ferrars Hall, Ferrars Road Huntingdon 523422 272029	0.16	Brownfield. Part of allocation HW4 in HWAAP (200 dwellings in total - for residue see below in draft LP allocations). 66 bed care home which equates to 40 dwellings (applying 60% formula). Development commenced on site May 2015 and is progressing well. Estimated.	0	40	40	40	0	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	40
<b>Full</b> 0900411FUL	Windmill Row St Neots 518375 260191	0.4	Brownfield. Site in multiple ownership. Allocated in Local Plan Alteration 2002. Included in St Mary's Urban Village Framework & Masterplan 2006. 24 units permitted on part (0900411FUL) Dec 14. 2 dwellings on another part (1201442FUL) permitted Apr 13. See SN6 in Draft Local Plan sites below for draft Local Plan allocation which will be 38 dwellings in total on a larger site than original 2002 allocation. No	0	26	26	26	0	0	2	12	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	26	



# Housing Trajectory Data: Local Plan to 2036 Appendix 1

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Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36		
			response from agents so estimated.																												
<b>Outline</b> 1101937OUT	St Ives West - Houghton Grange St Ives 529643 272117	4.4	Brownfield. See draft allocations below for remainder of St Ives West area. New outline application for residential development submitted Dec 14 (1402210OUT), approved subject to satisfactory completion of S106 agreement. No reply from agent so estimated.	0	90	90	90	0	0	30	40	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	90		
<b>Outline</b> 1301836OUT & 1301837OUT	North & South of Edison Bell Way, Huntingdon 523487 272111	1.0	Brownfield. Part of allocation HW4 in HWAAP (200 dwellings in total - for residue see below in residual allocations). North of Ermine St unlikely to have residential element now. Agent for South of Ermine St anticipates submitting reserved matters application late Jan/early Feb 2016 with intention of commencing construction in May 2016, with initial phases being completed 2017/18.	0	75	75	75	0	0	38	37	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	75		
<b>Extant Planning Permission on Unallocated Sites 10+ dwellings</b>																															
<b>Full</b> 9201500FUL	Carters Boatyard Buckden 521460 267311	0.8	Brownfield. Last 2 units under construction Mar 2015.	19	2	21	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2		

# Appendix 1 Housing Trajectory Data: Local Plan to 2036

## Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

Status/ Site ref	Address easting/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36
Full 1200056FUL	Abbey Gardens 42 Huntingdon St St Neots 518659 260593	0.2	Brownfield. Last 11 units completed autumn 2015.	14	11	25	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11
Full 0302792FUL	Papermill Lock Little Paxton 813391 262036	5.9	Brownfield. Planning application submitted June 13 to increase number of dwellings by 18 units (1300678FUL) - approved June 15 subject to satisfactory completion of a s106 agreement. Estimated based on CCC quarterly monitoring.	352	94	446	94	50	44	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	94
Full 0801663FUL	115 High St Brampton 520830 271023	0.2	Brownfield. Site completed summer 2015.	0	12	12	12	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12
Full 1300837FUL	Sarah Grace Court New Rd St Ives 531575 271065	0.1	Brownfield. Site progressing well and anticipated for completion by March 2016.	0	14	14	14	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14
Full 0901684FUL	2 Park Close Yaxley 518594 292484	0.2	Brownfield. 42 C2 beds for elderly equivalent to 25 dwellings. Material start made on site and conditions being discharged autumn 2015.	0	25	25	25	0	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25
Full 1400693FUL	Elm Tree Court, Cromwell Walk, Huntingdon 523643 272123	0.18	Brownfield. 'Retirement Living' apartments. Site commenced Spring 2015.	0	26	26	26	0	26	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	26

# Housing Trajectory Data: Local Plan to 2036 Appendix 1

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Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36
			Anticipated for completion by June 2016.																										
Full 1300679FUL	Hill Rise & Hill Close, Brington 508267 276314	4.5	Brownfield. 56 dwellings following demolition of 40 existing former MOD dwellings so 16 net new. 12 affordable. Under construction.	0	16	16	16	4	4	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	16
Full 1400102FUL	N. of Pathfinder House, Huntingdon 523976 271566	0.12	Brownfield. Site commenced summer 2015 and making good progress.	0	14	14	14	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14
Full 1301798FUL	3-5 Bridge Place, Godmanchester 524318 271414	0.02	Brownfield. Under construction.	0	12	12	12	0	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12
Full 1400010FUL	W of 94 Ramsey Rd, Warboys 529949 280641	0.53	Greenfield. Rural exception site. 100% affordable. No reply from agent so estimated. Development commenced Oct 15.	0	19	19	19	0	10	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	19
Full 1301316FUL	R/o of 64 High St Warboys 530796 280049	0.4	Brownfield. Under construction Mar 15.	0	13	13	13	6	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13
Full 1401248FUL	20 Little End Road (Nelson Road), Eaton Socon, St Neots 516482 258702	1.0	Brownfield. 70 bedroom residential care home (class C2 equivalent to 42 dwellings) and 45 dwellings. No reply from agent so estimated based on previous year's response.	0	87	87	87	0	0	25	62	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	87

# Appendix 1 Housing Trajectory Data: Local Plan to 2036

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Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36
			Demolition commenced summer 15.																										
<b>Reserved Matters</b> 0700364REM	Old Grarary Sawtry 516325 283533	0.6	Brownfield. Rough foundations in place so material start has been implemented. No reply from developer so estimated. In view of lack of recent activity on site, estimated after first 5 years.	0	10	10	0	0	0	0	0	0	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10
<b>Reserved Matters</b> 0200293REM	Water's Edge Wansford 507951 298077	2.3	Brownfield. Estimated based on officer knowledge of progress on site.	20	7	27	7	1	6	0	0	0	4	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7
<b>Reserved Matters</b> 1100722REM	The Mulberries Gidding Rd Sawtry 516447 283351	6.7	Greenfield. Site is progressing well and approaching completion. Estimated based on CCC quarterly monitoring.	167	23	190	23	23	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	23
<b>Reserved Matters</b> 1201953REM	Saxon Gardens California Rd Huntingdon 524363 272925	3.9	Greenfield. Site progressing well. Estimated based on CCC quarterly monitoring.	101	79	180	79	40	39	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	79
<b>Reserved Matters</b> 1101894REM	R. Gateway High Lode Ramsey 528360 285818	2.5	Part brownfield. Application submitted for 55 bed extra care facility on eastern part of site Apr 2015 (1101894REM). Agent says site could commence 2016/17.	0	110	110	55	0	0	15	15	25	25	20	10	0	0	0	0	0	0	0	0	0	0	0	0	0	110
<b>Outline</b> 1201158OUT	Alconbury Weald 519713 276509	200	Brownfield. Reserved matters application approved Dec 15	0	5000	5000	725	0	125	200	200	200	200	200	200	200	200	200	300	300	320	320	320	320	320	320	235	5000	

# Housing Trajectory Data: Local Plan to 2036 Appendix 1

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Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36
			for first phase of housing 128 dwellings (15/01117/REM). Agent says 25 dwellings could be completed in 2015/16, however this seems optimistic, so have rolled them into the figure for 16/17.																										
<b>Outline</b> 13017900UT	West of Station Rd, Warboys 531051 280593	3.3	Greenfield. Reserved matters application submitted October 15 (15/01817/REM).	0	120	120	115	0	25	30	30	30	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	120
<b>Outline</b> 11003790UT	Former Youth Centre Priory Rd St Neots 518194 260604	0.4	Brownfield. Reserved matters application submitted Apr 2015 (15/00634/REM). Agent says site is immediately available for development.	0	14	14	14	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14
<b>Outline</b> 12006850UT	Bearscroft Farm GMC 525533 269869	25	Greenfield. Reserved matters application submitted Jul 15 for 1st phase of 223 dwellings (15/01158/REM). 1401813REM approved Jul 15 for enabling infrastructure on whole site.	0	753	753	390	0	60	110	110	110	110	110	110	33	0	0	0	0	0	0	0	0	0	0	0	0	753
<b>Outline</b> 12005900UT	Ivy Nursery Fenstanton 532402 268077	0.8	Mainly greenfield. Developer says site will be delivered within 5 years. Reserved matters application for 35 dwellings submitted Oct 15 (15/01711/REM)	0	34	34	34	0	4	18	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	34	

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Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36		
<b>Outline</b> 1300164OUT	Land inc Snowcap Mushrooms Mere View Yaxley 519336 293034	1.8	Brownfield. Reserved Matters application (1402198REM) permitted Apr 2015. Developer says site will be completed within 5 years.	0	78	78	78	0	8	35	35	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	78		
<b>Outline</b> 1301377OUT	Eaton Court Gt North Rd St Neots 517302 261082	1.2	Brownfield. Outline approval for up to 50 units but application submitted for 29 dwellings Jan 2015, resolved for approval pending satisfactory completion of a S106 agreement summer 2015 (15/00016/FUL). No reply from agent so estimated.	0	50	29	29	0	9	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	29		
<b>Extant 'Prior Approval' Conversions to C3 residential Use under GPDO</b>																															
<b>Prior approval</b> 1301167PACOU	Graphic House Ferrars Rd Huntingdon 523571 272030	0.1	Brownfield. Completed summer 2015.	0	15	15	15	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	
<b>Prior approval</b> 1300950PACOU	15A Huntingdon St St Neots 518532 260428	0.05	Brownfield. Premises under offer summer 2015. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	
<b>Prior approval</b> 1300951PACOU	17A Huntingdon St St Neots 518538 260441	0.05	Brownfield. Premises under offer summer 2015. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	

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Status/ Site ref	Address eastng/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36
Prior approval 1300952PACOU	21A Huntingdon St St Neots 518535 260451	0.05	Brownfield. Premises under offer summer 2015. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior approval 1301362PACOU	Kings Hall Parsons Green St Ives 532387 271813	0.4	Brownfield. Understood to be remaining as offices and no housing now expected on this site.	0	22	22	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prior approval 1301500PACOU	145 High St Huntingdon 524128 271596	0.02	Brownfield. Estimated.	0	3	3	3	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Prior approval 1400013PACOU	25A Huntingdon St St Neots 518554 260476	0.05	Brownfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior approval 1400029PACOU	Grammar School Walk Huntingdon 523811 271889	0.07	Brownfield. Completed summer 2015.	0	14	14	14	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14
Prior approval 1400791PACOU	Storage Building, Fen Rd, Pidley 533078 278238	0.01	Greenfield. Under construction Mar 15.	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 14/01986/PMBPA	Manor Farm, Chesterton 512653 295371	0.07	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 1400929PACOU	Hereford Farm, Pidley 532631 278481	0.07	Greenfield. Commenced Oct 15. Estimated..	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1

# Appendix 1 Housing Trajectory Data: Local Plan to 2036

## Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

Status/ Site ref	Address eastng/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36
Prior Approval 14/01223PACOU	Two Hoots Farm, Wyton 528834 272897	0.01	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 14/01345PMBPA	Capricorn House, Fildley 533194 278150	0.05	Greenfield. Commenced summer 15. Estimated..	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 14/01703PMBPA	Lockers Barn, Somersham 535159 277752	0.05	Greenfield. Estimated.	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 14/02009P3JPA	6 All Saints Passage, Huntingdon 523866 271775	0.01	Brownfield. Completed July 2015.	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prior Approval 14/01222PACOU	Adj. Albion Rose, Fildley 532844 278215	0.02	Greenfield. Under construction Mar 15.	0	2	2	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
Prior Approval 15/00147PMBPA	Avenue Farm, Fenton 531899 279611	0.03	Greenfield. Estimated.	0	3	3	3	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Prior Approval 14/00897PACOU	Unit 5 Fen Rd Industrial Estate, Fildley 533041 278236	0.01	Brownfield. Estimated.	0	3	3	3	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Prior Approval 14/01702PMBPA	Adj Mancr Farm, Wyton 527275 273129	0.08	Greenfield. Estimated.	0	3	3	3	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Prior Approval 14/01334PACOU	Top Farm, Old Hurst 529889 277045	0.05	Greenfield. Under construction summer 15.	0	3	3	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Prior Approval 14/01516P3JPA	Hill Farm Industria Est., Wennington 523671 279331	0.07	Brownfield. Application submitted for external alterations in connection with	0	5	5	5	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5



# Housing Trajectory Data: Local Plan to 2036 Appendix 1

Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36		
			residential scheme Oct 15 (15/01880/FUL). Estimated.																												
<b>Prior Approval</b> 14/01993/P3JPA	1 The Meadow, St Ives 531762 271238	0.02	Brownfield. Estimated.	0	6	6	6	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6		
<b>Prior Approval</b> 1400856PACOU	Cannon House, Huntingdon 523689 271847	0.02	Brownfield. Completed autumn 2015.	0	6	6	6	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6		
<b>Prior Approval</b> 1400194PACOU	The Priory, St Ives 531484 271103	0.1	Brownfield. Under construction summer 2015.	0	11	11	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11		
<b>Prior Approval</b> 14/01488/P3JPA	The Beeches, 42 West St, Godmanchester 524362 270352	0.6	Brownfield. Under construction Mar 2015.	0	28	28	28	28	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	28		
<b>Prior Approval</b> 15/00349/P3JPA	Anglian House, Huntingdon 523830 271959	0.3	Brownfield. Prior approval issued April 2015. Under construction autumn 2015.	0	56	56	56	0	56	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	56		
<b>Extant Planning Permissions on Small Sites (under 10 dwellings - aggregate figure)</b>																															
<b>Total Full or Reserved Matters under construction at 31/3/14</b>	N/a	N/a	A 10% discount was applied to the total of small sites not yet under construction to allow for some sites that may not be delivered.	N/a	174	174	174	146	28	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	174		
<b>Total Full or Reserved Matters not started at 31/3/14</b>		174		174	174	43	44	43	44	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	174	
<b>Total Outline</b>		38		38	38	0	12	13	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	38

# Appendix 1 Housing Trajectory Data: Local Plan to 2036

## Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36		
<b>Residual Allocated Sites</b>																															
<b>Planning applications submitted</b> 05005260OUT & 10017120OUT	Ermine St Huntingdon 522340 273426	23.1	This relates to the part of the site south of Ermine St allocated in Local Plan Alteration 2002 (for remainder north of Ermine St see Draft Local Plan allocations below). Greenfield. Response received from agent for one of the applications submitted who was unable to confirm when delivery will commence. Agent for other application says intention is to start preparing a new application during 2016 but timescales will depend to some extent on progress made on road issues in and around Huntingdonshire. Estimated.	0	1040	1040	0	0	0	0	0	0	0	0	40	150	200	200	200	200	50	0	0	0	0	0	0	0	0	0	1040
<b>Allocation only</b> HWAAP HW4	George St/ Edison Bell Way Huntingdon 523392 271810	0.3	Brownfield. Part of residue of HW4 in HWAAP (for committed sites on HW4 see above). Draft allocation in Local Plan to 2036. No reply from agent so estimated.	0	40	40	0	0	0	0	0	0	0	0	20	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	40
<b>Allocation only</b> HWAAP HW4	Ermine St/ Edison Bell Way Huntingdon 523490 272214	0.3	Brownfield. Part of residue of HW4 in HWAAP (for committed sites on HW4 see above). Draft	0	44	44	44	0	44	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	44	

# Housing Trajectory Data: Local Plan to 2036 Appendix 1

Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

Status/ Site ref	Address eastng/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36	
			allocation in Local Plan to 2036. Application submitted for 51 retirement flats Aug '15 (15/01423/FUL). Agent says site could be built by 2017.																											
<b>Allocation only</b> LPA Site 19	Whytefield Rd Ramsey 528439 285151	0.8	Brownfield. Land in multi ownership. Owner of part of site confirms its immediate availability.	0	35	35	0	0	0	0	0	0	0	0	0	0	5	15	15	0	0	0	0	0	0	0	0	0	35	
<b>Allocation only</b> LPA Site 31	Church Farm/ Main St Gt Gidding 511711 283251	0.8	Greenfield. Not considered suitable for residential development as not consistent with Core Strategy. Site will not be carried forward as an allocation in the Local Plan to 2036.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
<b>Allocation only</b> LPA Site 32	NW of Main St Gt Gidding 511948 283569	0.2	Greenfield. Not considered suitable for residential development as not consistent with Core Strategy. Site will not be carried forward as an allocation in the Local Plan to 2036.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
<b>Sites with a resolution for approval subject to the prior completion of a S106 agreement</b>																														
<b>Planning application approved subject to completion of S106</b>	Loves Farm Reserved Site St Neots 519794 260331	1	Greenfield. Agent says there are no constraints on	0	41	41	41	0	41	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	41	

# Appendix 1 Housing Trajectory Data: Local Plan to 2036

## Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

Status/ Site ref	Address eastng/ northing	Appox site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36
1300389OUT			development and the site is immediately available.																										
<b>Planning application approved subject to completion of S106</b> 0901288OUT	Cromwell Rd Car Park St Neots 519252 259811	0.5	Brownfield. Agent says site is immediately available for development. Agent's projected delivery deferred by one year as appears optimistic.	0	21	21	21	0	21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	21
<b>Planning application approved subject to completion of S106</b> 1301274FUL	W of St Andrew's Way Sawtry 517263 283661	1.4	Greenfield. No reply from agent so estimated.	0	43	43	43	0	10	20	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	43
<b>Planning application approved subject to completion of S106</b> 1301178OUT	Brampton Park (formerly RAF Brampton) 520942 270184	12	Brownfield. Approved July 14 subject to the prior completion of a S106. New applications submitted Mar/Apr 2015: 15/00368/OUT for 437 dwellings & 15/00643/OUT for additional 78 dwellings & 70 bed care home (equivalent to 42 dwellings) - approved by DM Panel Nov 15 subject to satisfactory completion of a S106. Further application for 32 dwellings submitted Nov 15 (15/02016/FUL).	0	589	589	350	0	50	80	110	110	110	80	49	0	0	0	0	0	0	0	0	0	0	0	0	0	589
<b>Planning application submitted (approved Jun 15)</b>	Former Clinic RAF Upwood 527744 283587	2.0	Brownfield. Demolition carried out autumn 2015. No reply from agent, so estimated.	0	60	60	60	0	30	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	60

# Housing Trajectory Data: Local Plan to 2036 Appendix 1

Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

Status/ Site ref	Address eastng/ northing	Appox site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36		
subject to signing of S106 15/00029/FUL																															
<b>Draft Local Plan to 2036: proposed allocations</b>																															
<b>Application submitted 1300388OUT</b>	St Neots East - Loves Farm East 520734 260742	60	Greenfield. 1300388OUT submitted for mixed uses including 1020 dwellings + 120 C2 units for older people (equivalent to 72 dwellings). Agent says there are no constraints on delivery subject to positive discussions on S106 agreement.	0	1092	1092	330	0	0	50	95	165	221	221	115	115	65	25	0	0	0	0	0	0	0	0	0	0	0	0	1092
<b>Application submitted 1300178OUT</b>	St Neots East - Wintringham Park 519797 259471	50	Greenfield. 1300178OUT submitted for mixed uses including up to 2800 dwellings. Partial response received from agent - rest estimated.	0	2800	2800	110	0	0	0	55	55	180	220	230	230	230	230	230	230	230	230	220	130	100	0	0	0	2800		
<b>Draft Local Plan allocation</b>	Wyton Airfield & Wyton-on- the-Hill 529196 274983	140	Brownfield. Includes 100 C2 beds for older people = 60 dwellings equivalent. Agent anticipates housebuilding to commence early 2018 taking account of upgrades to utility networks and local strategic highway improvements. However the Council considers this timeframe too optimistic given the necessary	0	4560	4560	0	0	0	0	0	0	233	289	300	300	300	300	360	300	300	300	300	300	300	300	275	225	178	4560	

# Appendix 1 Housing Trajectory Data: Local Plan to 2036

## Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36
			transport modelling to be completed and has deferred commencement by 2 years.																										
<b>Draft Local Plan allocation</b>	Ermine Street Huntingdon 522859 274078	14	This relates to the part of the site north of Ermine St. Greenfield (for remainder south of Ermine St see Residual Allocations above). Outline application approved Nov 15 (1300730OUT) for business park. No reply from agent so estimated.	0	400	400	0	0	0	0	0	0	0	0	80	80	80	80	80	0	0	0	0	0	0	0	0	0	400
<b>Draft Local Plan allocation</b>	Former Forensic Laboratory Huntingdon 522180 272089	1.5	Brownfield. Developer says site is immediately available for development, and all necessary technical & survey work has been carried out. Planning application anticipated imminently. Deferred by one year as appears optimistic...	0	108	108	108	0	0	10	50	43	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	108
<b>Draft Local Plan allocation</b>	Hinchingsbrooke Health Campus 522559 272048	1.4	Brownfield. Public sector land. Application for Phase 1 submitted Apr 2015 for 46 dwellings (15/00486/FUL). 15/01264/OUT submitted July 15 for up to 385 dwellings. The NHS Trust has yet to finalise the	0	214	214	120	0	0	0	58	62	0	0	47	47	0	0	0	0	0	0	0	0	0	0	0	0	214

# Housing Trajectory Data: Local Plan to 2036 Appendix 1

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			exact breakdown of proposed use classes on the site, however it is anticipated to be a mix of C3 and C2/sui generis hostel-type accommodation. The Trust is confident that the first phase of 120 C3 dwellings will be developed within 5 years.																											
<b>Draft Local Plan allocation</b>	Gas Depot Mill Common Huntingdon 523787 271325	0.5	Brownfield. Agent says remediation work is in progress on site, and the site can be developed in 2016/17. Deferred by one year as appears optimistic given planning application not yet submitted.	0	12	12	12	0	0	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12
<b>Draft Local Plan allocation</b>	California Rd Huntingdon 524281 272827	1.0	Greenfield. Developer considers site could accommodate 70 dwellings, however 54 is considered a more appropriate capacity given site constraints. Developer's timeframe for development deferred by 1 year as a planning application is yet to be submitted.	0	54	54	54	0	0	20	34	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	54	
<b>Draft Local Plan allocation</b>	Main Street Huntingdon 525994 27291	0.8	Greenfield. Application submitted July 15 for 2 dwellings on part of site (15/01172/FUL) - withdrawn Nov	0	32	32	32	0	2	0	15	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	32	

# Appendix 1 Housing Trajectory Data: Local Plan to 2036

Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36
			15 with intention to re-submit amended scheme. No reply from agent so estimated.																										
<b>Draft Local Plan allocation</b>	Tyrell's Marina GMC 524273 271401	0.3	Brownfield. Suitable for mixed-use development. Site is being advertised for sale for redevelopment. Estimated.	0	15	15	15	0	0	0	5	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15
<b>Draft Local Plan allocation</b>	RGE Engineering GMC 524490 271407	1.8	Brownfield. Agent considers site could potentially accommodate a higher capacity. Existing occupier's relocation programme is well under way.	0	80	80	80	0	40	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	80
<b>Draft Local Plan allocation</b>	Corpus Christi Lane GMC 524453 270230	0.3	Mixed green/brown. 11 dwellings gross, so 5 net additional dwellings as 6 existing to be lost. Developer says site could accommodate 20 dwellings but capacity kept at 11 to better reflect draft Local Plan capacity. Developer says site could be built out in one year. Application 15/01955/FUL submitted Oct 15 for 20 dwellings on wider site (14 net)	0	5	5	5	0	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5



# Housing Trajectory Data: Local Plan to 2036 Appendix 1

Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

Status/ Site ref	Address eastng/ northing	Appox site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36
<b>Planning application submitted</b> 1401393OUT	Wigmore Farm Buildings GMC 524492 269820	0.5	Greenfield. Outline application withdrawn May 15. No reply from agent so estimated.	0	13	13	13	0	0	6	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13
<b>Draft Local Plan allocation</b>	Huntingdon St St Neots 518554 260722	0.4	Brownfield. Land in multi-ownership. Owner of part of site confirmed its availability. Estimated	0	64	64	0	0	0	0	0	0	0	32	32	0	0	0	0	0	0	0	0	0	0	0	0	0	64
<b>Planning application submitted (part of site)</b>	St Mary's Urban Village St Neots 518369 260199	0.4	Brownfield. See Windmill Row in extant planning permissions on allocated sites above for rest of site with planning permission. Included in St Mary's Urban Village Framework & Masterplan 2006. Draft Local Plan allocation will be wider area than 2002 allocation. 3 dwellings permitted May 14 on part of site (1301969FUL). Estimated.	0	12	12	12	0	0	0	3	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12
<b>Draft Local Plan allocation</b>	Cromwell Rd North St Neots 519367 260052	1	Mixed green/brown. Application anticipated early 2016. Estimated based on last year's response.	0	78	78	78	0	0	10	30	38	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	78
<b>Planning application submitted</b> 1301895OUT	St Ives West - Former Golf Course 530307 271995	6	Greenfield. Hybrid application for 125 dwellings in outline and 59 in full, refused on grounds of prematurity to Local Plan Jan	0	184	184	0	0	0	0	0	0	20	44	40	40	40	0	0	0	0	0	0	0	0	0	0	0	184

# Appendix 1 Housing Trajectory Data: Local Plan to 2036

Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36	
			15. now subject of appeal. Public inquiry held Nov 15. Inspector's decision anticipated Jan 16. See Houghton Grange (other part of St Ives West area) in Extant Permission on Allocated Sites above. Agent would be happy for 184 units to be included in the 5 year housing land supply in totality, commencing from Summer 2016 through to 2020. however the Council considers delivery should not be before the adoption of the Local Plan to 2036.																											
<b>Planning application submitted</b> 1201890 & 1201891FUL	St Ives West - north & east of The How 530174 271981	1.3	Greenfield. The Council will not be looking to make a decision on the submitted applications until the appeal inspector's decision on the former Golf Course site is received (anticipated Jan 16). See Houghton Grange (other part of St Ives West area) in Extant Permission on Allocated Sites above. Estimated.	0	8	8	0	0	0	0	0	0	4	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8

# Housing Trajectory Data: Local Plan to 2036 Appendix 1

Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36	
<b>Planning application submitted</b> 1301056OUT	St Ives West - Land Between Houghton Grange & The How 529915 272036	7	Greenfield. 1301056OUT submitted July 13 for 224 dwellings. See Houghton Grange (other part of St Ives West area) in Extant. Permission on Allocated Sites above. The Council will not be looking to make a decision on the submitted applications until the appeal inspector's decision on the former Golf Course site is received (anticipated Jan 16). No reply from agent so estimated.	0	224	224	0	0	0	0	0	0	20	54	50	50	50	0	0	0	0	0	0	0	0	0	0	0	0	224
<b>Planning application submitted</b> 1401554OUT	St Ives Football Club 530740 272016	1.3	Greenfield. Development dependent on successful relocation of Football Club (for which permission was granted Oct 15). Outline application refused July 15. No response from agent so estimated based on last year's trajectory	0	39	39	20	0	0	0	0	20	19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	39
<b>Draft Local Plan allocation</b>	Former Car Showroom London Rd St Ives 531073 270731	0.6	Brownfield. Agent says site is in the ownership of a developer who intends to bring it forward within 5 years. Agent's phasing deferred by one year as appears optimistic given no application yet submitted.	0	46	46	46	0	0	34	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	46	

# Appendix 1 Housing Trajectory Data: Local Plan to 2036

## Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

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Draft Local Plan allocation	Vindis Showroom St Ives 530974 270460	1.3	Brownfield. No reply from agent so estimated based on last year's response.	0	56	56	56	0	0	0	28	23	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	56
Draft Local Plan allocation	Ramsay Gateway 528270 285725	1.3	Brownfield. No reply from developer, although their website indicates site will be developed soon. Estimated.	0	45	45	45	0	0	20	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	45
Draft Local Plan allocation	West Station Yard & Northern Mill 528239 285677	0.6	Brownfield. Owner confirmed site is available for development. Estimated.	0	34	34	19	0	0	0	0	19	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	34
Draft Local Plan allocation	94 Great Whyte Ramsay 528512 285398	0.4	Brownfield. No reply from developer, although their website indicates site is programmed to be developed soon. Estimated.	0	32	32	32	0	0	5	17	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	32
Draft Local Plan allocation	Field Rd Ramsay 527950 285184	2.6	Greenfield. Resolved for approval subject to satisfactory completion of S106 agreement June 15. Agent's phasing deferred by one year as appears optimistic given site does not yet have benefit of outline permission.	0	91	91	91	0	0	40	40	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	91
Application submitted 1201274OUT	RAF Upwood & Upwood Hill House 527513 283586	8	Brownfield. Approved for up to 160 dwellings subject to satisfactory completion of S106 Apr 15. Trajectory figure raised to better reflect draft Local	0	462	462	137	0	0	25	56	53	75	75	75	75	25	0	0	0	0	0	0	0	0	0	0	0	462

# Housing Trajectory Data: Local Plan to 2036 Appendix 1

Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

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			Plan capacity. Agent confirmed site's availability for immediate development with no constraints. Deferred agent's phasing by one year as appears slightly optimistic. Second phase outline application anticipated early 2016.																										
<b>Draft Local Plan allocation</b>	E of Silver St Buckden 519560 268077	0.3	Mainly greenfield. Agent considers site is capable of accommodating up to 20 dwellings and is immediately available. Capacity kept at 14 to better reflect the draft Local Plan allocation which is considered more appropriate to the site.	0	14	14	14	0	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14
<b>Draft Local Plan allocation</b>	Former Dairy Crest Fenstanton 531639 268308	2.2	Brownfield. Site is vacant. Planning application submitted Sep 15 for 85 dwellings (15/01343/FUL). Agent says site is anticipated to be completed by 2018.	0	79	79	79	0	0	40	39	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	79
<b>Draft Local Plan allocation</b>	Cambridge Rd Fenstanton - West 531825 268117	4	Greenfield. Developer says there are no constraints on delivery that cannot be overcome, and a planning application is to be submitted shortly.	0	81	81	81	0	0	40	41	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	81

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## Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

Status/ Site ref	Address eastings/ northing	Approx site area net (ha)	Notes	Units built	Extant	Total no. units on site	No. units in years 1-5	15/16 Yr 1	16/17 Yr 2	17/18 Yr 3	18/19 Yr 4	19/20 Yr 5	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 15/36
Draft Local Plan allocation	Cambridge Rd Fenstanton - East 532231 267998	1.6	Greenfield. No reply from agent so estimated.	0	31	31	31	0	0	0	0	31	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	31
Draft Local Plan allocation	W of Stator Rd Kimbolton 509553 268354	0.7	Greenfield. Agent says site is available and can be delivered within 5 years.	0	32	32	32	0	0	0	16	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	32
Draft Local Plan allocation	E of Glebe Farm Sawtry 516228 283661	2.0	Greenfield. Approved subject to satisfactory completion of S106 agreement Apr 15. Agent's phasing deferred by one year as appears optimistic given site does not yet have benefit of outline permission.	0	80	80	80	0	0	40	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	80
Draft Local Plan allocation	The Pasture Somersham 535696 278051	0.3	Greenfield. No reply from agent so estimated based on last year's response.	0	19	19	19	0	0	0	19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	19
Draft Local Plan allocation	Newlands Somersham 535446 277949	0.8	Greenfield. Outline permission for care home on part of site lapsed Jan 15. 15/00917/OUT submitted Jun 2015 for 45 dwellings and a residential care home. DM Panel resolved to approve subject to S106 Dec 15. Agent says site is available and can be immediately developed. 50 C2 beds would equates to 30 dwellings.	0	75	75	75	0	15	30	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	75	

# Housing Trajectory Data: Local Plan to 2036 Appendix 1

Huntingdonshire District Council Local Plan | Annual Monitoring Report 2015

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Draft Local Plan allocation	Somersham Town FC Somersham 535829 277740	1.2	Greenfield. Any re-development is dependent on successful relocation of Somersham Town Football Club to appropriate premises. Agent anticipates this in 2017. Agent's timetable deferred by one year as appears optimistic. Agent states site could accommodate up to 50 dwellings but capacity kept at 47 to better reflect draft Local Plan allocation.	0	47	47	47	0	0	0	20	27	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	47
Draft Local Plan allocation	N of The Bank Somersham 536995 278143	1.2	Greenfield. No reply from landowner so estimated.	0	55	55	15	0	0	0	0	15	20	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	55
Draft Local Plan allocation	W of Ramsey Rd Warboys 530160 280142	1.1	Greenfield. Site in dual ownership. Response received from agent for one part of site - deferred by 2 years as appears too optimistic given no planning application submitted.	0	45	45	45	0	0	10	35	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	45	
Draft Local Plan allocation	Manor Farm Buildings Warboys 530247 279955	0.3	Greenfield. Agent says site is available subject to relocation of current active farm use. Agent's phasing deferred by one year given that alternative location remains to be resolved.	0	11	11	11	0	0	0	5	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	

# Appendix 1 Housing Trajectory Data: Local Plan to 2036

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Planning application submitted 1401887OUT	S of Farrier's Way Warboys 530897 279900	2.3	Greenfield. Agent says site is available and can be delivered within 5 years. Outline application submitted Nov 2014 for up to 74 dwellings. Received DM Panel approval in Sep 15 subject to S106.	0	74	74	74	0	0	0	0	74	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	74
Planning application submitted 15/00120/OUT	Fenton Field Farm Warboys 531161 279881	1.1	Greenfield. Application refused Jun 15 due to issues of access. Site will be joined to South of Farriers Way in Local Plan. Agent says site can be delivered within 5 years subject to highway improvements.	0	15	15	15	0	0	10	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15
Planning application submitted 1401547OUT	Askew's Lane Yaxley 518349 291991	0.5	Part brownfield. Approved June 2015. No reply from agent so estimated based on last year's response.	0	12	12	12	0	2	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12	
<b>TOTAL</b>					<b>21,016</b>	<b>23,153</b>	<b>5,498</b>	<b>541</b>	<b>940</b>	<b>1,214</b>	<b>1,557</b>	<b>1,246</b>	<b>1,262</b>	<b>1,374</b>	<b>1,412</b>	<b>1,354</b>	<b>1,195</b>	<b>1,050</b>	<b>1,185</b>	<b>1,030</b>	<b>900</b>	<b>850</b>	<b>840</b>	<b>750</b>	<b>720</b>	<b>595</b>	<b>545</b>	<b>413</b>	<b>20,973</b>



**APPENDIX G – LETWIN PRELIMINARY UPDATE LETTER  
DATED 9 MARCH 2018**

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

*c/o Ministry of Housing, Communities and  
Local Government*

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Ministry of Housing, Communities and Local Government  
2 Marsham St  
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9<sup>th</sup> 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

