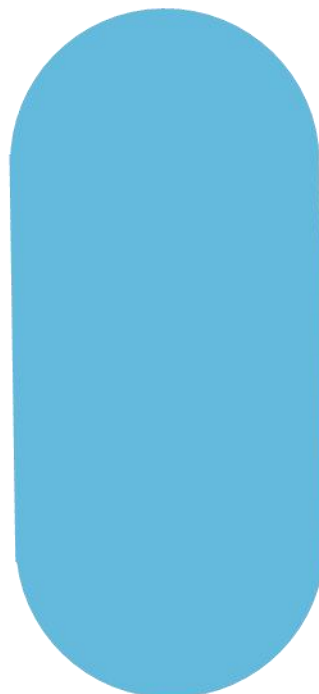


**WRITTEN STATEMENT IN RESPECT OF THE
HUNTINGDONSHIRE LOCAL PLAN TO 2036 FINAL DOCUMENT
FOR SUBMISSION MARCH 2018**

MATTER 12 – THE SUPPLY AND DELIVERY OF HOUSING LAND

On Behalf of Larkfleet Homes
HLP2036-PS:688/690/674/689



1. INTRODUCTION

- 1.1 This Written Statement is made on behalf of our client, Larkfleet Homes, in respect of its interests at Land at Glatton Road, Sawtry and at Upwood Road, Bury as part of the forthcoming examination (EIP) of the Huntingdonshire District Submission Local Plan (March 2018).

2. MATTER 12: THE SUPPLY AND DELIVERY OF HOUSING LAND

- 2.1 The specific representations made below follow the form of the specific questions raised in the Inspector's Matters and Issues paper for the Examination and are applied to the proposed Key Service Centre sites that we have specific comments on. It is not considered necessary to answer every single question in respect of each site, therefore responses have been provided only where relevant.

- 2.2 The Inspector's specific questions in respect of the supply and delivery of housing land are as follows:

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

- 2.3 Larkfleet have some concerns regarding the estimated delivery timescales set out in the Annual Monitoring Report 2017 (AMR). These concerns are outlined below in detail in relation to specific sites.

Extant Planning Permission on Allocated Sites

South of Edison Bell Way, Huntingdon (523487 272111)

- 2.4 The AMR indicates that 37 units per annum will be completed per annum during years 2 (19/19) and 3 (19/20). It is considered that these build out rates are about right for a volume house-builder, however, the site is being built out by Aspen Build, a privately owned medium sized regional Management Contractor. It is considered that the delivery of 37 units per annum from this site by a single medium-sized contractor is a significant

over-estimation by the Council.

St Ives West – Houghton Grange (529643 272117)

- 2.5 An outline application for 90 units was approved in 2016 (1402210OUT). Another outline application for 224 dwellings was submitted in July 2013 (5 years ago) and is still pending determination (1301056OUT). Two smaller applications (1201890FUL and 1201891FUL) for 4 and 3 dwellings were submitted in 2012 (6 years ago) and remain undetermined. There appears to be no indication from the Homes and Communities Agency (HCA) that it intends to build out and of the schemes, and application 1402210OUT has less than 1 year to go before it expires. It is thus considered that the inclusion of 25 units to be delivered on this site within the 5 year period is totally unrealistic and there is no evidence to support this position.

Former Clinic RAF Upwood (527744 283587)

- 2.6 The site does not appear to have been appraised in the Housing and Economic Land Availability Assessment (HELAA), and the Housing Trajectory Sites Survey (July 2017) provides very little detail in relation to this site. Consequently, there appears to be no indication of whether the site is being built-out by Upwood Estates Ltd or whether they intend to sell the site on the open market. As yet, there is no indication that and development has started, however, 10 units are expected to be delivered in 9 months' time. It is considered that there is inadequate evidence to support these delivery rates.

Brampton Park (former RAF Brampton) (520942 270184)

- 2.7 The AMR indicates that 0 units were built out at December 2017, yet 52 units were to be built out in the 2017/2018 year 1 period. The delivery rates then jump up to 224 units pa in year 2 (18/19). It is clear that Linden Homes are currently on-site, however, there appears to be no further evidence that other house-builders are progressing on site, and therefore that the delivery of 224 units in year 2 (of which there are 9

months left) or 117 units in year 3, are achievable.

South of Farriers Way, Warboys (530897 279900)

- 2.8 The AMR anticipates delivery of 24 units in year 2 (18/19), of which there is only 9 months left, and 50 units in year 3 (19/20). It is understood that the reserved matters application (18/00531/REM) for 74 units by Bellway Homes remains undetermined. Once the reserved matter application is determined and pre-commencement conditions have been discharged, it is likely that a start on site could take place early 2019. As such, the delivery of 24 units from the site by April 2019 is very unrealistic.

Brampton Park Golf Club (521201 269790)

- 2.9 The AMR trajectory anticipates delivery of 49 units by April 2019 (year 2). There remain several pre-commencement condition applications yet to be determined, with the most recent being submitted in July 2018 (target date – 5th September 2018). Factoring in potential slippage with these discharge of condition applications, as well as a number of months for contractor preparations/logistics, it is unlikely that a start will be made on site until winter 2019. Therefore, the delivery of 49 units by April 2019 is highly unrealistic.

Draft Local Plan to 2036: Proposed Allocations

SM4 – Somersham Town Football Club, Somersham

- 2.10 The Council's assessment of SM4 contained within the HELAA states that before it can be developed, the football club would need to be relocated to an alternative appropriate recreational facility.

- 2.11 Footnote 11 of para 47 of the NPPF is clear that in order for a site to be deliverable, and therefore included within the 5 year tranche, it should be 'available now' for development. Since the football club will require relocation to an appropriate facility elsewhere, it is not 'available now' for development. As such, the 25 units included within year 5 (2021/2022) in the Council's AMR should be pushed back to later in the plan period.

SM5 – East of Robert Avenue, Somersham

- 2.12 Based on the red line site location plan assessed within the HELAA, there appears to be insufficient land available to secure an access on to Robert Avenue. Instead, it would appear that a property (or two) on Loftsteads or Robert Avenue would need to be purchased in order to achieve access to the site.
- 2.13 Furthermore, the site is bound to the east by St Ives – March Disused Railway County Wildlife Site. This will be a significant ecological constraint to development and a substantial green buffer (probably in the region of 20m) will be required by the County Ecologist/Local Wildlife Trust. This is likely to impact substantially on the 50 dwelling capacity of the site.
- 2.14 Furthermore, the Council envisage that all 50 of the dwellings will come forward in years 4 and 5 of the trajectory; in light of the unknown extent of the access problems, it is considered that this is unrealistic and that this delivery should be pushed back to later in the plan period.

SM6 – North of the Bank, Somersham

- 2.15 The site is in close proximity to St Ives March Disused Railway County Wildlife Site and any appropriate mitigation buffer is likely to sterilise most of the western edge of the site; the site is also bound to the east by a bus depot, against which on-site mitigation is likely to be required in the form of structural planting or a noise bund. Again, it is considered that this is likely to sterilise part of the eastern edge of the site.

WB1 – West of Ramsey Road, Warboys

- 2.16 The access area of the site is located within a Conservation Area and within close proximity to a number of Listed Buildings. In light of the fact that demolition of a good-quality building and the removal of mature trees are required (both of which are situated within the Conservation Area), there is a strong likelihood that a scheme that is acceptable in planning terms will not be achievable and that planning consent will be refused.
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2.17 It is noted that the 'Availability' part of the HELAA in respect of this site refers to the fact that the agent for only 'part of the site' has confirmed its availability in response to the 2016 AMR Survey. Therefore, the Council cannot claim that this site is entirely 'available now', as required by footnote 11 of para 47 of the NPPF. Therefore, the 45 units to be delivered from this site shown in the 5 year tranche should be pushed back to later in the plan period. Notwithstanding the availability uncertainty, it is still considered that the above-mentioned technical issues and the fact that there is currently no developer interest or planning application for the site, means that the delivery of 10 units in year 3 (2019/2020) is considered extremely unlikely.

WB2 – Manor Farm Buildings, Warboys

2.18 Given the presence of the Conservation Area, which completely surrounds the site, and the extent and proximity of Listed Buildings around the site, as well as the extensive demolition and site clearance required to facilitate development, it is considered that development of the site for circa 11 units (the identified capacity of the site) is unlikely to be viable.

2.19 Furthermore, the HELAA indicates that the site will only be available once the 'farmyard is suitably relocated.' As such, in accordance with footnote 11 of the para 47 of the NPPF, the site is not considered to be 'available now' and the 10 units envisaged as coming forward in years 3 (2019/2020) and 4 (2020/2021) of the trajectory, should be moved back towards the latter stages of the plan period.

WB5 – Extension to West of Station Road, Warboys

2.20 The site is to be an extension of an existing residential development to the east and will be accessed through this site accordingly, on to Station Road. The Council indicate that WB5 will deliver 20 units in year 3 (19/20), 30 units in year 4 (20/21) and 30 units in year 5 (21/22). However, clearly a start on the site will not be made (particularly if it's under control by the same developer as land to the east) until the site to

the east has been built out – this is a typical and logical approach; developers will build out the farthest away units last, rather than spend money on infrastructure at the outset to link these farthest units up in terms of utilities and access. Since, as indicated by the AMR (December 2017), only 18 of the 96 units permitted on land to the east are completed, it is unlikely that 20 units will be constructed on the extension site by the end of year 3 of the trajectory. It is considered that delivery from this site should be pushed back to 20 units in year 5 only and the remaining units to be delivered in years 6 and 7.

RA1 – Ramsey Gateway (High Node)

- 2.21 Comments relating to the deliverability of units from this site are contained in our Matter 9 Statement prepared on behalf of Larkfleet Homes.

RA2 – Ramsey Gateway

- 2.22 Comments relating to the deliverability of units from this site are contained in our Matter 9 Statement prepared on behalf of Larkfleet Homes.

RA3 - West Station Yard and Northern Mill

- 2.23 Comments relating to the deliverability of units from this site are contained in our Matter 9 Statement prepared on behalf of Larkfleet Homes.

RA5 - Whytefield Road

- 2.24 Comments relating to the deliverability of units from this site are contained in our Matter 9 Statement prepared on behalf of Larkfleet Homes.

RA7 - East of Valiant Square

- 2.25 Comments relating to the deliverability of units from this site are contained in our Matter 9 Statement prepared on behalf of Larkfleet
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Homes.

SEL2 - St Neots East – Wintringham Park

2.26 An application for outline planning permission for development of a mixed-use urban extension (17/02308/OUT) was given a resolution to grant at planning committee in March 2018. The application included; residential development of up to 2,800 dwellings (C3), up to 63,500 sqm of employment development (B1-B8), District Centre including shops, services, community and health uses (A1-A5, D1 & D2), Local Centre (A1-A5), Temporary Primary School, Two Permanent Primary Schools, open space, play areas, recreation facilities and landscaping, strategic access improvements including new access points from Cambridge Road & A428, associated ground works and infrastructure. All matters reserved with the exception of means of access. In addition to this, a full application for the construction of new roads, hard & soft landscaping, creation of SUDS and all associated infrastructure and engineering works including creation of haul routes, was submitted and given a resolution to grant at the same committee. The resolution to grant for both elements of the application is dependent upon the signing of a satisfactory s.106 agreement.

2.27 The AMR trajectory indicates that 25 units will be delivered within the 2018/2019 period (year 2), of which there is only circa 9 months left. Given that the detailed element of the hybrid application does not include the construction of any dwellings (only infrastructure), it is highly unlikely that the site will deliver any units in year 2 whatsoever. Furthermore, depending on how long it takes to complete and sign the s.106 agreement, as well as discharge the pre-commencement conditions, the anticipated 150 units in year 3 (19/20) may also be at risk.

HU8 - Land South of Colebrook Road, Huntingdon

2.28 Application 17/02123/OUT for 'residential development of between 50 and 60 dwellings with new access and open space' remains undetermined. Given that the application is in outline form and will need

to have a s.106 agreement prepared/signed, a reserved matters application submitted and approved and pre-commencement conditions discharged, the delivery of 18 dwellings in year 2 (18/19) is considered extremely unlikely.

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

and

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

2.29 The Council has allowed a 20% buffer within its 5 year supply; this is to be moved forward from later in the plan period in order to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.

2.30 However, Larkfleet Homes consider that an additional flexibility contingency should be applied to the overall housing land supply in order that the Plan is responsive to changing circumstances and the adopted housing requirement is treated as a minimum rather than a maximum ceiling on overall housing land supply. It is acknowledged that there can be no numerical formula to determine the appropriate quantum of such a flexibility contingency, however, where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites, greater numerical flexibility is necessary than in cases where supply is more diversified. As identified in Sir Oliver Letwin's interim findings, large housing sites may be held back by numerous constraints including discharge of pre-commencement planning conditions, limited availability of skilled labour, limited supplies of building materials, limited availability of capital, constrained logistics of sites, slow speed of installation by utility companies, difficulties of land remediation, provision of local transport infrastructure, absorption sales rates of open market housing and limitations on open market housing receipts to cross

subsidise affordable housing. Larkfleet Homes would recommend as large a contingency as possible (at least an additional 20%) especially given the Council's past experience of difficulties with housing land supply. The Council claims it will have a 5.78 year supply of housing in the Plan (using Sedgefield methodology to deal with shortfall and using a 20% buffer moved forward from later in the plan period). Equally, the Council is proposing to deliver 22,068 dwellings against a total requirement of 20,100; this represents a circa 9.8% buffer overall. If any of the Council's assumptions on lapse rates, windfall allowances and delivery rates were to be adjusted or any proposed housing site allocations were to be found unsound, then the Council's modest contingency would be quickly eroded. The smaller the contingency becomes, the more the in-built flexibility of the Local Plan reduces. The Department of Communities & Local Government (DCLG) presentation slide from the HBF Planning Conference in September 2015 illustrated a 10 – 20% non-implementation gap together with a 15 – 20% lapse rate. The slide emphasised "the need to plan for permissions on more units than the housing start / completions ambition".

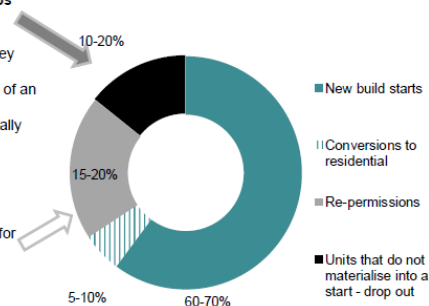


Department for
Communities and
Local Government

In recent years there has been a 30-40% gap between permissions and housing starts

- **Gap of around 30-40%** between the number of permissions given for housing and starts on site within a year. Estimate that for a year's permissions for housing around:
- **10-20%** do not materialise into a start, the permission '**drops out**'; this could be because -
 - the landowner cannot get the price for the site that they want
 - a developer cannot secure finance or meet the terms of an option
 - the development is later not considered to be financially worthwhile
 - there are supply chain constraints hindering a start.

There may be scope to reduce this through policy.
- **15-20%** are not abandoned but a **re-permission** is sought, for example to make a major change to plans or to extend the development period.
- Recent data and realities of private market suggests need to **plan for permissions on more units than housing start/completion ambition.**



Extract from slide presentation "DCLG Planning Update" by Ruth Stanier Director of Planning - HBF Planning Conference Sept 2015

2.31 The Local Plans Expert Group (LPEG) Report also recommended that “the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF” (para 11.4 of the LPEG Report). Larkfleet Homes therefore suggests that the Council considers the allocation of additional or reserve sites as a means of providing greater flexibility. As set out in other Matter Statements prepared on behalf of Larkfleet Homes, Land at Upwood Road, Bury and Land at Glatton Road, Sawtry represent deliverable sites that would assist the Council in this regard.

Has there been persistent under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 47 of the NPPF?

2.32 It is considered that the Council has a track-record of previous under-delivery and as such should be required to provide a 20% buffer as part of the 5-year supply.

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

2.33 It is considered that the past shortfall should be dealt with within the first 5 years of the plan period (Sedgefield method).

Would the Local Plan realistically provide for a five year supply on adoption?

2.34 As argued above, the Council claims it will have a 5.78 year supply of housing in the Plan (using Sedgefield methodology to deal with shortfall and using a 20% buffer moved forward from later in the plan period). If, as argued above, any of the Council’s assumptions on lapse rates, windfall allowances and delivery rates were to be adjusted or any proposed housing site allocations were to be found unsound, then the

Council would quickly find itself with a sub-5 year supply in the Plan.