

Reference ID 1118740

Larkfleet Homes

# Huntingdonshire Local Plan Examination

Matter 3: Development Strategy

**Issue 3: Development Strategy****Overall**

**Q1) What is the basis for the overall strategy for development and the broad distribution of growth set out in Policy LP2? What options were considered and why was this chosen? Is it justified?**

1. RPS set out on behalf of Larkfleet Homes in representations to the Proposed Submission Local Plan how the strategy and broad distributions of growth was not considered to be sound. The Council should be adopting a flexible approach to boost the supply of housing instead of employing the current narrowly focused approach which relies too heavily on existing settlements and uncertainties about their market and infrastructure capacity to deliver the required levels of growth. Without further flexibility, this approach is likely to lead to a 5 year housing land supply shortfall soon after adoption, as has been the case with other authorities adopting a similarly narrow approach, i.e. Charnwood, Blaby and Rushcliffe.
2. A critical point is that concentrating development in or adjacent to the existing constrained settlements is already a failing strategy of the existing Core Strategy adopted in 2009.
3. In the appeal Ref: APP/H0520/W/16/3159161 Land off Lucks Lane, Buckden, Cambridgeshire, July 2017, the Inspector set out that the “Core Strategy policies are incapable of meeting the full OAN in the area and that development will need to be approved contrary to them in order to do so” (paragraph 9). He also recognised that a step change in delivery was needed and that *“the development plan is not delivering the housing needed and that even the lower Local Plan target has not been achieved in 3 out of the last 4 years, suggesting a worsening delivery situation”* (paragraph 15). The Inspector also recognised that the Council’s delivery record against the increased housing target was poor, with 4 consecutive years of significant under supply, suggesting to him *“the current policy position is acting as a constraint to delivery in Huntingdonshire”* (paragraph 17).
4. It should be noted that the strategy of the 2009 Core Strategy also concentrates development predominantly in the main towns of Huntingdon and St Neots, and includes sites at Ermine Street, Huntingdon and St Neots East, both sites which have been carried over into the current Proposed Submission Plan.
5. The table below shows just how reliance on this strategy has failed to deliver the homes needed in recent years.

Year	Net Dwellings Completed	Housing Requirement			
		Adopted Local Plan 1995: 1060 dpa 1986-2001	Local Plan Alteration 2002: 820 dpa 1991-2006	Core Strategy 2009: 560 dpa 2001-2021	Emerging Local Plan (2011-2034): 804 dpa
2001/02	294		-526	-266	
2002/03	541		-279	-19	
2003/04	535		-285	-25	
2004/05	658		-162	98	
2005/06	702		-118	142	
2006/07	609		-211	49	
2007/08	715			155	
2008/09	782			222	
2009/10	769			209	
2010/11	758			198	
2011/12	875			315	71
2012/13	418			-142	-386
2013/14	682			122	-122
2014/15	515			-45	-289
2015/16	535			-25	-269
2016/17	682			122	-122
	<b>10,069</b>	<b>0</b>	<b>-1,582</b>	<b>1109</b>	<b>-680</b>

6. Furthermore, there is a critical need for affordable housing in the district and the strategy will not be able to deliver the required levels of affordable housing needed. This is evident from the over reliance on two SELs, which have thus far proved unable to commit to the target 40% affordable housing set out in Policy LP25.
  
7. The Huntingdonshire Objectively Assessed Housing Need report April 2017 (HOUS.01) concluded that the need for affordable housing from 2011-2036 was 7,897 (paragraph 6). The OAN report also sets out at paragraph 128 that the unmet (gross) need for affordable housing was 3,168 households. There is a lack of evidence which considers how alternative sites could more appropriately deliver an increased level of affordable housing. The availability of housing that is affordable is a major issue as recognised by the Council in paragraph 1.10 of the Annual Monitoring Report (December 2017) (MON.01). The Delivery Document for Sibson Garden Village, which supported the Expression of Interest stated that “Sibson Garden Village will have a dramatic influence on the provision of affordable homes in Huntingdonshire by providing 40% of dwellings as affordable housing” (page 19).
  
8. In terms of options considered, RPS has set out in representations made that limited consideration has been given to the site at Sibson Aerodrome as a reasonable alternative to Wyton Airfield as a third SEL. It is unclear (and unjustified) why the Council have moved away from their original preferred strategy of including a third SEL.

9. Policy LP1 Strategy and principles for development in the Huntingdonshire Local Plan Full Draft (Stage 3) (PREP.05) consulted on in 2013 sought to focus development at three SELs. This approach was continued in the Local Plan Targeted Consultation produced on 21 January 2015 (PREP.04). The Local Plan Consultation Draft (28 June 2017) (PREP.02) removed the SEL at Wyton Airfield, as set out in paragraphs 4.18-4.22 of that Plan. As set out in RPS response to Issue 1 questions 4-6, Sibson Aerodrome was well known to the Council at this time due to the Council submitting the site as an Expression of Interest to the Homes and Communities Agency's (HCA's) Garden Villages Programme in July 2016. Indeed, the Council stated in their letter of 28 July 2016 that it "*is therefore pleased to be submitting this Expression of Interest*" as they recognised it as "*an exciting opportunity*".
10. As referenced within RPS' response to Issue 1 and Questions 4-6, once Wyton Airfield SEL was removed then a reasonable alternative option should have considered allocating a new SEL/settlement. This is because of the three options appraised for distributing development undertaken at Stage B of the SA methodology, as identified in the final SA report (CORE.07, para 4.25), the preferred option taken forward by the Council was to include three SELs which together would together deliver approximately 12,450 new homes.
11. At Stage D2, the Council gave consideration as to whether the changes taken forward in the Consultation Draft Plan (PREP.02) proposing removal of one SEL at Wyton Airfield was significant, concluding that it wasn't (CORE.07, p597-602). However, in RPS' view the scale of the change is not in accordance with the preferred distribution strategy and is significant because:
  - a. Alternative SEL locations have not been suitably considered;
  - b. the amount of housing allocated to SELs has been reduced from 12,450 to 8,820
  - c. the net result is unclear and unjustified but has partly been to add further development at RAF Alconbury, part of Alconbury Weald, placing more pressure on existing sites/locations to deliver higher numbers of homes and therefore reducing the flexibility of the Plan and more closely aligning it's strategy with the existing (failing) Core Strategy.
12. Finally, the overall strategy is not justified because it ignores inherent links between Huntingdonshire and Peterborough. It is clear that the Council have disregarded the District's close proximity and good connections with Peterborough to the north by the apparent lack of significant allocations in the northern half of the Borough. Functional links to Peterborough in the form of the regional economy, commuting links and migration patterns, as identified in the Peterborough SHMA (HOUS.08) have been ignored.

### **Spatial Planning Areas**

#### **Q3) Is the approach to the scale and type of development set out in Policies LP2 and LP7 justified?**

13. Concerning Policy LP2, we have already set out previously that the Development Strategy greatly depends on the rather optimistic high delivery rates of SELs at Alconbury Weald and St Neots East (as noted in our representations in respect of the Huntingdonshire Local Plan 2036 Proposed Submission 2017 dated February 2018). In respect of those comments made, it is noted that the Council have responded in their Statement of Representations March 2018

(examination document reference CORE/04) (SR) and have provided some justification as to why they believe the higher delivery rates can be achieved at Alconbury Weald.. Whilst we maintain that it is wholly unrealistic to expect the same or higher delivery rates throughout the lifetime of those projects and no contingency scenario is being set out, it is also noted that the Council did not provide any justification as to why they expect similarly high rates of delivery from the St Neots East SEL.

14. We maintain that the delivery rates that the Council is predicting for the two SELs are higher than those which have previously been achieved locally as well as substantially higher than national delivery rates on similar sized sites (source; Lichfield's Start to Finish).
15. The vast majority of growth (over 70%) is proposed in Huntingdon and St Neots alone. The SEL at Alconbury Weald is now responsible for delivering 6,680 dwellings (with incorporation of RAF Alconbury). The other significant site in the Huntingdon Spatial Planning Area is Ermine Street (Policy HU1) for 1,440 homes. This site is allocated within the existing Core Strategy, having been identified many years previously, but is yet to come forward for development due to significant infrastructure constraints. There is, more broadly, an over reliance on sites subject to infrastructure constraints.
16. The approach is unjustified as indicated in our response to Q1 because it is unlikely to achieve the 'step change' needed to achieve the higher rates of delivery required. It does not provide a flexible framework for sustainable development. A strategy of concentrated delivery only is a continuation of a failed strategy within the existing Core Strategy. It is interesting to note that the Council anticipate a sharp spike in delivery in the first five years following adoption of the Plan as indicated in the Housing Trajectory within the Council's Annual Monitoring Report 2017 (MON.01). This was similarly the case when the current Core Strategy was adopted, but of course delivery rates of the scale anticipated did not materialise.
17. The inability of the Plan to deliver at the rates anticipated is supported by the past delivery record of Huntingdonshire but also by the findings of a report by the HBF on larger development schemes in August 2015 entitled 'Responding to demand; Understanding private housing supply'. This report indicated that when development is concentrated on a few large sites this stifles the market-responsiveness of supply. RPS would raise concern that both Alconbury Weald and a significant proportion of St Neots East are controlled by a single land promoter.
18. It is consequently upheld that the Council should be adopting a more flexible approach to development and this should be reflected in policy LP2. They should be providing for further development elsewhere in the Borough and especially (as noted above) in the north of the Borough. Given the preferred strategy was originally to include a third SEL, and sufficient justification for moving away from this approach has not been provided, this should be the first option. Economic ties and commuting patterns indicate strong ties with Peterborough that should be considered when considering additional sites for development.
19. At the very least, the plan should identify a contingency figure for additional housing numbers and/or possible 'reserve' site allocations in the eventuality that the proposed SEL's do not deliver as expected and a 5-year housing land supply shortfall emerges during the early part of the plan period.

**Q4) What is the scale of development actually planned (including commitments) and is this in line with the distribution set out in Policy LP2?**

20. Policy LP2 is misleading in that the Council indicate that approximately three quarters of the objectively assessed need for housing will be focused in the spatial planning areas. In reality, virtually all of this, (over 70%) will be in Huntingdon or St Neots.
21. The Council have not set out any real justification for including the site allocations at section 12 of the emerging Local Plan. The Council have no clear methodology with reference to population size or sustainability criteria to demonstrate how the current site allocations and indeed numbers of houses for each settlement is derived. There should be a clear delineation of what numbers would be acceptable in each, particularly given past delivery records.

**Q5) Are the strategic expansion locations at Alconbury Weald and St Neots East justified in principle? What alternative strategies for accommodating development were considered and why was this approach preferred? (detailed issues concerning these site allocations are dealt with under Matters 6 and 7)**

22. Also see response to Question 1 of this Matter alongside Ch.7 and Appendix 12 of RPS representations to the Proposed Submission Plan. Many of the key points in respect of the SELs are noted in commentary made above and our accompanying representations and thus are not repeated. However, it is maintained that a more appropriate strategy to allocating the majority of development in just two proposed SELs would be to allocate a further SEL to ensure greater flexibility. Given the functional links to Peterborough and absence of development in the north of the district, Sibson Aerodrome presents a suitable option.
23. Without firm implementation strategies and a lack of alternative strategic allocations, there is a significant risk that SELs may not be developed and the Council will fail to meet the strategic objectives of the Local Plan. To ensure that this does not occur, the Local Plan must be more flexible in line with paragraph 14 of the NPPF by re-considering the need for more deliverable locations. This will ensure choice and competition in the local housing market, which will ensure delivery can be achieved.
24. RPS has provided evidence in its representations and provides specific commentary on why the site at Sibson Aerodrome should be considered. This demonstrates the suitability, availability and deliverability of a sustainable site for circa 2,500 homes, can deliver infrastructure and is consistent with the Council's preferred strategy to include 3 SELs. This would represent an appropriate and necessary approach to provide for both housing and employment needs throughout and beyond the Plan period.

**Infrastructure**

**20) What are the implications/requirements for transport infrastructure and how have these been taken into account? How will improvements be delivered and funded?**

25. Also see answer to question 23. The Spatial Vision of the Local Plan includes reference to providing sufficient infrastructure and the Objectives include promoting high quality sustainable

development and maximising funding available for required infrastructure through developer contributions.

26. Paragraphs 156 and 157 of the NPPF refer to planning positively for the development and infrastructure required. Paragraph 162 refers to assessing the quality and capacity of infrastructure to meet forecast demands. Paragraph 173 refers to ensuring that the scale of obligations and policy burdens should not threaten deliverability and paragraph 177 refers to delivering planning infrastructure in a timely fashion. Paragraph 180, 181 and 182 refers to co-operation that will result in a plan that can meet infrastructure requirements. The Draft NPPF sets out similar requirements, such as under paragraph 34 in terms of making sure that development is viable but also recognises (at paragraph 73) that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements.
27. A significant amount of infrastructure is required within the District and anticipated from the Council's SELs as set out in the Council's Infrastructure Delivery Plan (IDP) (INF.01); Infrastructure Schedule (June 2017) (INF.02) and IDP Addendum Report (December 2017) (INF.03).
28. With regard to transport infrastructure, Table 3: St Neots East SEL Infrastructure Requirements in the Infrastructure Schedule (INF.02) shows that access improvements to Wintringham Park, including roundabout upgrades and a new T-junction on the A428 Northern access, and provision of a new roundabout on the A428 Southern Access are critical, yet the cost is unknown. Paragraph 10.6 of the Plan (CORE/01) references that delivery of the site will need to take into account the timing of highway improvement works. Other transport improvements, including pedestrian and cycle links as identified under references HT9 and HT10 have not been costed.
29. There is therefore considered to be a consequential impact on housing delivery, as set out in RPS' representations where RPS considers that no residential completions will be delivered in years 1-5,
30. For Alconbury Weald, Table 2 of the Council's Infrastructure Schedule (INF.02) identifies that the costs of essential priorities are not known, including public transport interchanges (SEL AW3, AW4 and AW5).

**23) What are the implications/requirements for other forms of infrastructure and how have these been taken into account? How will improvements be delivered and funded? Is Policy LP4 justified, effective and consistent with national policy?**

31. Also see answer to question 20. As well as not identifying some of the costs for transport infrastructure; other infrastructure for St Neots has not been costed. This includes 'Additional fitness stations' referenced as SEL SN8; Children's Play (SEL SN18 and SEL19) and Utilities (gas), HT8, the latter which is identified as critical;
32. For Alconbury Weald, the costs of other types of infrastructure are not known. This includes fitness station provision referenced as AW16; open space (AW25 and AW26; AW28-AW31); community facilities x 4 (AW32) and library space (AW33).

33. The IDP Schedule (INF.02) acknowledges on page 2 that there are several schemes where the costs are currently unknown and that the *“tables are therefore likely to show understated costs”*. Even where costs are known, in many cases for both of the SELs there is no identified funding so therefore this will impact on delivery of the infrastructure as well as on delivery of housing. For Alconbury Weald, this unknown funding includes floorspace to accommodate 2.5 FE primary school at a cost of £10,750,000 (SEL AW11) and 1.6 FE Secondary School at a cost of £6,800,000 (SEL AW12). For St Neots SEL, this includes a 5.5 FE Secondary School at a cost of £23,375,000 (SEL SN5). Taking the example of education funding, the IDP (INF.01) identifies under the heading of ‘6.5 Funding Mechanisms’ (page 76-77) that *“Cambridgeshire County Council have to borrow a significant amount to meet the funding gap, which comes with significant additional borrowing costs”* and that *“CCC noted the difficulties in securing revenue funding for the operating and maintenance of growing and new schools”*.
34. The Local Plan Viability Study (June 2017) (INF.04) sets out at paragraph 5.3 (page 28) that viability negotiations are ongoing at the St Neots SEL (Wintringham Park and Loves Farm II) and the INF.05 Local Plan Viability Addendum (December 2017) makes a similar reference at paragraph 3.1 in terms of needing to resolve site specific viability negotiations. It suggests that infrastructure requirements have not been fully costed and that funding has not been established. This will need to be the case if the policy is considered to be justified, effective and consistent with national policy.