

Proposed Submission Local Plan Examination Hearing Statement – Matter 4

Huntingdonshire District
Council Proposed
Submission Local Plan
Examination

Directors:
D J Mead MRTPI
C A Bussetil MRTPI

Registered No:
8454299

- 1) We are instructed by various clients (RRS 477 and 560) to submit Hearing Statements and appear at the Huntingdonshire Local Plan Examination on their behalf in relation to the Huntingdonshire Proposed Submission Local Plan and associated evidence base.
- 2) This Statement details our clients' responses to Matter 4 of the Matters and Issues identified by the Inspector.
- 3) **Matter 4 – Overall Provision for Housing**

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

Question 2

Was the methodology employed in the Huntingdonshire Objectively Assessed Housing Need Update of 2017 appropriate and does it provide a robust basis for establishing the OAN?

- 4) Question 2 seeks comment on whether the methodology employed in the Huntingdonshire OAN Update 2017 is appropriate and provides a robust basis for establishing the OAN. We believe that this approach is flawed. The LPA have relied on the 2013 SHMA which we feel is now too old to be reliable and takes into account out of date of evidence. It is considered that by simply checking the data against the rest of England and similar areas will simply exacerbate matters in terms of the housing crisis. In addition the household formation rates should be adjusted upwards for younger households. Adjustments to population and household projections to account for economic growth have been made on a flawed basis. A 4% uplift to the starting projections to respond to jobs growth has not been justified and appears highly conservative and will restrict economic development in the District in the future.

Question 5

How have market signals been taken into account? What do they show? What is the basis for the 5% uplift? Is this appropriate or should it be higher? Is it appropriate to include the uplift for economic/jobs growth within this figure?

- 5) We submit that a 5% uplift is not appropriate and is too low having regard to house price data and affordability ratios. A 5% adjustment to the Council's proposed OAN amounts to an extra 960 dwellings in 20 years or only 38 per annum. At current levels of housing stock, an increase of 38 dwellings a year over and above assessed demand from the household projections figures (765 dpa) would represent just a 0.05% uplift. This is not going to impact positively on levels of affordability in the district.

Question 6

Given the scale of identified affordable housing need, should the OAN be increased to assist in delivering more? If so to what extent?

- 6) Yes, the OAN should be increased to assist in the delivery of affordable housing. The OAN should be increased by 20%.

Question 7

In overall terms is the OAN of 20,100 between 2011-2036 (804/yr) appropriate and justified? Is there a basis to arrive at an alternative figure and if so what?

- 7) We believe that there is a clear argument why the OAN of 804 dpa is inappropriate and that the alternative figure promoted by Regeneris Consulting and RPS of 950 dpa would be a more robust basis for the draft Local Plan to adopt.

Question 8

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

- 8) According to paragraph 4.10 of the draft Local Plan, the Council consider that the total number of housing completions since 2011, commitments as at 1 April 2017, and the allocations provided in the Plan account for approximately 22,500 new homes or 112% of the Objectively Assessed Need. However, this is based on the assumption that sites will come forward without delay and does not address the historic under delivery within the District.
- 9) As has been agreed at a number of recent planning inquiries, the Council has failed to deliver sufficient housing to meet current annual average target every year since 2012/13 and has achieved a total of 67% of their annual average target between 2012-2017. This was considered sufficient evidence of persistent under delivery for Inspectors to apply a 20% buffer as required by paragraph 47 of the NPPF in order *“to provide a realistic prospect of achieving the planned supply and ensure choice and competition in the market for land”*. The same principles should be applied to the Local Plan target and sufficient allocations to meet 120% (24,120 new homes) of the Objectively Assessed Need if that figure is found to be sound. This will ensure that the Local Plan is consistent with the requirements of national policy to ensure that the Council has a realistic prospect of achieving its OAN and there is sufficient choice and competition in the market.
- 10) Additionally, the Council has been overly optimistic in relation to the delivery of houses and forecasts delivery rates have not been achieved over successive years. In 2016/17 there were 682 completions against a 2015 AMR forecast of 940. The 2016 AMR further revised this forecast to 567. A similar pattern emerges for the years 2017/18 where the 2016 AMR forecast of 1,135 has now been dramatically reduced to 689. There is therefore clear evidence regarding the robustness of the Council's assumptions in relation to the number of units which are being delivered. The Council should ensure they make provision for a higher number of units which should enable more dwellings to be delivered. As set out in our Hearing Statement in relation to Matter 3, we consider that these dwellings should be delivered on smaller sites which can be delivered earlier in the Plan period.

11) Furthermore, we have concerns regarding the timely delivery of a number of the current proposed allocations and whether the Council can provide the 22,500 new homes suggested during the Plan period.