Countryside Properties (UK) Ltd and the Huntingdon Freemans Trust

ID: 1151775

Matter 12 Hearing Statement

Huntingdonshire Local Plan Examination

Matter 12: The supply and delivery of housing land

Issue

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

Question 3: What are the assumptions about the scale and timing of supply and annual rates of delivery from these various sources? Are these realistic?

and

Question 4: Specifically, are the timescales and rates of delivery on large strategic sites realistic?

We do not consider the 2017 AMR predicted delivery rates of the two SELs (Alconbury Weald and St Neots East) to be realistic. The lead in times for planning applications to be determined need to be factored in, along with the application type i.e. the steps necessary to get to the stage of having an implementable consent.

Following on, the ability for these larger sites to withstand more than 3-4 sales outlets can be difficult due to competition. A UK wide analysis was undertaken by Lichfields (NLP) in November 2016 titled Start to Finish. This study assessed the average delivery rates from large housing sites throughout the UK. The larger sites of 2000+ dwellings delivered, on average, 171 dwellings per annum. The past performance of the previous strategic allocation from the 2002 Local Plan Alteration known as Loves Farm, St Neots supports the conclusions drawn by Lichfields. They concluded sites of 1500 dwellings averaged about 142 dwellings per annum across the UK. Loves Farm is nearing completion and has averaged around 140 dwellings per annum over the development cycle.

Alconbury Weald was granted outline planning permission in 2014 and is currently under construction. The reported completions are shown as 48 for 2016/2017 [HDC AMR 2017]. We expect this to have increased in the subsequent period to 31 March 2018 due to the further sales outlets which is currently understood to be 3. This provides a good example of the lead in times for the other strategic development site at St Neots East which is being progressed by the same master developer and the assumptions should be updated to reflect its current status – i.e resolution to grant.

The ability for strategic sites to keep apace throughout the plan period has not been established through previous evidence from Huntingdonshire district or across the UK. We suggest average completions per sales outlet is 40-50 units per annum/4 units per month with between 3-5 sales outlets ranging across the plan period, rather than sustained year on year to reflect the need for additional planning consents, delivery triggers and disposal strategies.

Question 5: 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?

A flexible supply is required to protect against the likely fluctuations within the delivery of the strategic sites. Due to the reliance on strategic sites, a general buffer should be applied to account for any fluctuations in the pace of delivery which source should be directed at small to medium size sites.

Question 6

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?

Following our assertions in the Reg 19 Statement, it is now confirmed that the Council has not met its 2017/18 delivery targets, delivering only 80 completions in the last Q1,2018. This fell short by 204 units (75%) overall.

From the start of the plan period, stated as 2011, the supply falls short by 1,353 dwellings or 1.68 years supply.

This confirms a 20% buffer on 5 years supply is necessary.

Question 7

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

From past completions, the shortfall should be dealt with in the first 5 years from adoption. To achieve this, it is likely that additional small to medium sites should be identified that are clearly capable of contributing to the 5YHLS on adoption.

Question 9

Would the Local Plan realistically provide for a five-year supply on adoption? Will a five-year supply be maintained?

Based on the average number of starts per quarter in the past year, averaging 230 per quarter, we do not expect this to rise significantly in 2018/2019 or 2019/2020 period to justify the significant rise in projected completions by 2020/21 which are predicted to triple, based on the number of implementable consents granted or in the pipeline at Reserved Matters stage.

Question 10

Is there a case for a staggered or phased housing requirement with a lower figure in the early years of the plan period to take account of the large strategic allocations? If so, what would be appropriate phasing?

We do not consider there is any justification for a staggered or phased housing requirement within Huntingdonshire District. The strategic sites are proving difficult to deliver the policy target of 40% affordable housing and any further delays to meaningful delivery will only exacerbate the affordability issue.

Question 11

In overall terms, would the Local Plan realistically deliver the number of houses required over the plan period?

We consider there is sufficient justification to require a buffer to be built in to protect against any under delivery from the spatial strategy opted for which includes two major SELs. This will provide flexibility in supply to ensure the plan can respond to any changing circumstances during the plan period.

Stacey Rawlings MRTPI AIEMA
Partner, Planning
Bidwells
John Ormond House
899 Silbury Boulevard
Central Milton Keynes, MK9 3XJ
stacey.rawlings@bidwells.co.uk