

Huntingdonshire Local Plan 2036

Response to Examination Documents 40, 41 & 42 (5th October 2018) on behalf of Bellway Homes and Henry H Bletsoe & Son LLP (Representor ID: 1117482)

EXAM/41 & EXAM/42: Implications for the housing trajectory (from EXAM/26)

The revised Housing Trajectory presented in EXAM/41 is accompanied by an email stating the number of units now estimated to be under construction at Alconbury Weald (EXAM/42). Over 400 units under construction was quoted by the developer's agent at the examination hearings with 259 now suggested. It is therefore clear that the number of units under construction was significantly overstated at the Matter 12 hearing and only discovered through the Inspector questioning the developer's figures.

The Inspector questioning and scrutinising the developer's figures is the approach that the Council should pursue in preparing their trajectory to ensure that it is robust and realistic. However, it was confirmed via Matter 12 that the Council does not make any adjustments to annual rates of delivery and takes developer assumptions at face value. The risks associated with not scrutinising developer trajectories are set out in my Matter 12 statement and appeal decisions at appendices A and B (Ottery St Mary and Engine Common).

Scrutinising annual delivery rates is essential to ensuring a housing trajectory which is 'realistic' and not the optimistic or 'ambitious' numbers consistently referred to by the Council throughout the Matter 6 and Matter 12 hearings in particular.

It is also important to note that even if 259 units were currently under construction then not all of these will necessarily convert into completions for annual monitoring / 5 year housing land supply purposes. At a conversion rate from under construction to legal completions of between 70-80% (which is a rate typically assumed by Bellway Homes) this would equate to completions of 181-207 dwellings against the 259 units currently under construction.

A range of 181-207dpa also aligns with the empirical evidence submitted by Turley as part of their Matter 12 submissions, presenting a more realistic trajectory for Alconbury Weald averaging 180dpa. This type of empirical evidence is what the Council should have produced to justify its trajectory and help scrutinise whether developer assumptions are realistic or not.

Furthermore, at the Matter 12 hearing, we also made specific reference to the Loves Farm, St Neots site as the largest site developed in Huntingdonshire in recent years and therefore an invaluable proxy for what future allocated strategic sites could realistically deliver in the district. This site has average 138dpa. Whilst Loves Farm encountered a recessionary period during its build out, peaks and troughs in the market are common during the build out of any strategic site and clearly useful to understand what is likely to be 'realistic' on strategic sites in Huntingdonshire looking ahead.

All of this evidence shows that the high delivery rates assumed for the strategic site allocations in the plan at both Alconbury and St Neots cannot be justified.

EXAM/41: Other sources of supply

There is no 'compelling evidence' that the other sources of supply – particularly 'Small sites at 116 per year' and 'Rural exceptions at 45 per year' – can realistically come forward:

- The Council's HELAA and Brownfield Land Register do not identify 'small sites' of 9 dwellings or less. There is therefore no evidence to suggest where the contribution will come from.
- The need to release further 'rural exceptions' will clearly be affected by the adoption of the new local plan (allocating sites which will also provide affordable housing). Previous rural exceptions were needed due to the lack of local plan allocations. With a new plan in place the need to release such sites will clearly be reduced.

Conclusions

Additional deliverable sites need to be allocated to meet Huntingdonshire's housing needs and support a realistic and robust housing trajectory. My client's site at Dexter's Farm is clearly an available, suitable and achievable opportunity to do so.

With flood risk being one of the key issues facing development allocations in the district the site, the fact that the site is sequentially preferable when considering all forms of flood risk *and* lies in a sustainable location next to the Bearscroft development site are considerable advantages. For the Council to reject the site via its sequential test due to perceived landscape impacts remains unjustified. Other than the effects of developing a greenfield site, landscape impacts are limited and any residual effects can be mitigated through LVIA, design and masterplanning. If the Council had treated landscape in the same way for other sites it is clear that little greenfield land would actually have been allocated in the plan. Furthermore, Dexter's Farm certainly does not affect landscape at the scale and level accepted by the Council for a number of allocations throughout the plan¹.

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¹ See representations to the submission draft of the plan, response to LP2, for a list of those site allocations where landscape impacts are likely to be significant.