

Huntingdonshire Local Plan Examination

Statement for Matter 4: Overall provision for housing

On behalf of Crest Nicholson Regeneration and the Defence Infrastructure Organisation

ID: 898485

This Pre-Hearing Statement has been prepared by Savills (UK) Limited on behalf of Crest Nicholson Regeneration and the Defence Infrastructure Organisation (DIO). In partnership with the DIO, Crest Nicholson are promoting the opportunity for a new garden village at the Airfield and are seeking the allocation of 'Phase 1' for approximately 1,000 units in this emerging Local Plan.

- 1) Is it justified to identify an updated OAN for housing for Huntingdonshire rather than the wider HMA? What are the implications of this for other authorities in terms of plan preparation and meeting identified needs?**
 - 1.1. No. The duty-to-cooperate is embedded in the NPPF. Whilst the Cambridgeshire SHMA (2013) considered the wider housing market, no report since has considered the needs of the HMA as a whole. The joint Examination on the Cambridge City and South Cambridgeshire has concluded and the Inspector's Report awaited. As part of this Examination, PBA were commissioned to assess the Councils OAN. In assessing household projections, PBA used use alternative demographic scenarios from the Greater Essex Demographic Forecasts to the rest of the HMA.
 - 1.2. The Huntingdonshire OAN Report has not considered the implications of Cambridge and South Cambridgeshire using different models, and consequently the OAN cannot be found sound.
 - 1.3. **3) Is it justified in not making adjustments to the demographic led figure derived from the 2014 based household projections in terms of alternative migration trends, evidence on household formation rates or other factors?**
 - 1.4. No. The HDC OAN Report does not appropriately assess the impact of household formation rates. The report concludes that as the CLG 2014 formation rates closely follow national trends, there is no requirement to adjust the CLG household formation rates.
 - 1.5. Paragraph 2a-015-20140306 of the PPG notes household formation rates should be considered when considering the starting point to establish the need for housing. In Huntingdonshire, and nationally, household formation rates may have been suppressed historically by under-supply and worsening affordability of housing, and the assessment may therefore need make an adjustment to household representative rates to reflect and respond to the consequences of this.
 - 1.6. The Local Plan Expert Group also recommends that to arrive at an estimate of a number of dwellings associated with demographic starting point, an allowance should be added for the local rates of vacancy and second homes. Again, this is not something the HDC OAN appropriately assesses.
 - 1.7. In light of the above, the HDC OAN Report does not provide a clear understanding of housing needs in the area as required by paragraph 159 of the NPPF and the Local Plan itself cannot be considered 'effective' or 'consistent with national policy'.
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 forecasts growth within this figure?

- 1.8. As noted in our response to the Regulation 19 Local Plan (Appendix 1), it is not considered that an uplift of 5% is sufficient to address market signals.
- 1.9. The Huntingdonshire OAN Report concludes at paragraph 112 that as the District's average prices and rents follow the England trend 'very closely', the market signals in the District are 'very modest' and suggest a less than moderate level of under provision, relative to need.
- 1.10. The Government's consultation paper "Planning for the Right Homes in the Right Places" suggests a housing need across the country of 266,000 homes between 2016 and 2026. Over this period, the 2014 Household Projections (the base projections) project that household growth will be 221,725 per annum. The uplift then is 44,275 per annum which equates to a 20% increase. Therefore, across England, the standard need results in a 20% increase from baseline household formation to account for market signals.
- 1.11. Furthermore, in "Planning for the Right Homes in the Right Places" and the draft NPPF, the Government has given some indication as to how market signals should be taken into account when calculating an authorities OAN. In Huntingdonshire, the application of the proposed standard methodology suggests an uplift of 26%. Whilst it is acknowledged that the use standard methodology in plans which are currently being examined carries limited weight, a discrepancy of 16% is an indicator in itself that market signals in Huntingdonshire have not been appropriately assessed.
- 1.12. In accordance with the PPG, local authorities should make an upward adjustment in areas where there are affordability constraints. Deliverability has significantly worsened since 2012 and this was echoed by the Inspector for Luck's Lane, Buckden (appeal reference APP/H0520/W/16/315161) who concluded that the Council has a record of persistent under delivery. This suggests that affordability will have significantly worsened in recent years, and an adjustment of just 5% cannot be considered appropriate.

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?

As noted above and our Regulation 19 response, it is not considered that the HDC OAN Report identifies an appropriate OAN in accordance with the NPPF and NPPG.

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?

The Local Plan is justified in seeking to make provision for its OAN, albeit as noted above the OAN should be higher.

The authority is not constrained by Greenbelt, nor are there any landscape designations (i.e. AONB or national parks) which would justify the authority not meeting its needs. In order to meet the additional homes which will be required following an appropriate assessment of the Council's OAN, Phase 1 Wyton Airfield is an available and sustainable brownfield site which can deliver much needed new market and affordable homes.

9) Is the approach of the Local Plan towards housing provision and jobs growth/employment land provision consistent?

As noted in our response to Matter 3, the allocation of Phase 1 Wyton Airfield will help to meet a local housing need. The site is located adjacent to RAF Wyton which has secured funding for expansion and is set to accommodate 500 additional employees following the closure of RAF Feltham.