

Reference ID 1118740

Larkfleet Homes

Huntingdonshire Local Plan Examination

Matter 6: Proposed Site Allocations
. Huntingdon Spatial Planning Area

Issue: Whether the proposed site allocations for the Huntingdon Spatial Planning Area are justified, effective and consistent with national policy.

Relevant Policies SEL1.1, SEL1.2 and HU1 – HU19

Questions:

- 1) What is the background to the site allocation? How was it identified and which options were considered?
- 2) What is the scale and type/mix of uses proposed?
- 3) What is the basis for this and is it justified?
- 4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?
- 5) What are the benefits that the proposed development would bring?
- 6) What are the potential adverse impacts of developing the site? How could they be mitigated?
- 7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?
- 8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
- 9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved?
- 10) Is the site realistically viable and deliverable?
- 11) What is the expected timescale and rate of development and is this realistic?
- 12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?
- 13) Are the detailed policy requirements effective, justified and consistent with national policy?

Introduction

1. RPS set out on behalf of Larkfleet Homes in representations to the Proposed Submission Local Plan (**Appendix 1**) how the Plan relies too heavily on concentrated development allocations within the Spatial Planning Areas (SPAs) and in particular on just two large strategic sites (SELs). The anticipated rates of delivery do not appear to have been robustly justified against either national or local delivery rates in formulating the housing trajectory in the Annual Monitoring Report (MON.01).
2. RPS response to Matter 3 Development Strategy, demonstrated how reliance on this strategy, which has been carried over from the existing 2009 Core Strategy, has failed to deliver the homes needed in Huntingdonshire and that greater flexibility is required by allocating more sites for development at different locations. On the basis that the proposed OAN is not an appropriate figure, as set out in evidence previously submitted on behalf of Larkfleet by DLP, it is considered appropriate for the Council to allocate an additional SEL to ensure there is a comfortable housing supply.
3. In terms of the Huntingdonshire SPA, Alconbury Weald (SEL1.1) is responsible for delivering 6,680 dwellings when naturally incorporated with RAF Alconbury (SEL1.2). The other significant site in the Huntingdon SPA is Ermine Street (Policy HU1) for 1,440 homes. These 3 sites alone, which all neighbour each other, are proposed to deliver 38% of the overall housing development of 20,100 dwellings. It is worth noting here that Huntingdonshire itself

has a population of 25,100, which represents just 14% of the district as a whole as indicated on p3 of the Huntingdonshire Strategic Transport Study (INF.10).

4. RPS response to Matter 6 focuses principally on SEL1.1 . Former Alconbury Airfield and Grange Farm; SEL1.2 . RAF Alconbury and at HU1- Ermine Street. Huntingdon and in particular *Inspector's Q11: What is the expected timescale and rate of development and is this realistic?*
5. More detailed analysis on the supply and delivery of housing land from these sites is contained within DLP response on behalf of Larkfleet Homes to Matter 12.

Policy SEL1.1 . Former Alconbury Airfield and Grange Farm and SEL1.2 . RAF Alconbury

6. The former Alconbury Airfield (Alconbury Weald) benefits from outline permission for up to 5,000 dwellings, approved in October 2014 (1201158OUT), having been submitted in August 2012. The Council's Housing Land Supply Position (August 2017) (MON.02) states on page 15 that there are currently 48 completions albeit completion data is not yet available for the 2017/18 monitoring year.
7. Since consent was granted in 2014, there has been a number of reserved matters applications approved for housing at the site between 2015 and 2017. There appear to be three housebuilders involved on the site, which are Hopkins Homes, Morris Homes and Redrow Homes.
8. The Council anticipate that 4,952 homes will be delivered within the Plan period, with delivery rates expected to rise to a minimum of 220 dwellings per annum (dpa) from 2018/19 and be maintained at an average of 272dpa for the remaining years of the plan thereafter (2019/20-2035/36). RPS regard this rate of delivery as highly optimistic and is not aware of any tangible evidence to demonstrate that this is realistic.
9. Having regard to past local rates of delivery, the only comparable (and available) large strategic site developed recently in Huntingdonshire is Loves Farm, St Neots. Evidence submitted by RPS to the HELAA consultation in November 2017 and conducted by DLP (**Appendix 2**) shows that the average annual build out of this site was 144dpa over a 10 year build out period. RPS observes that the number of outlets at any one time during build out varied from one to five, but averaged three. At different times during the 10 year build out period there were in total eight developers on the site, indicating an annual average rate per developer of only 20dpa.
10. Whilst the number of housebuilder outlets may also reach four or five at Alconbury, this number of outlets is unlikely to be sustained throughout the plan period. Even allowing for up to 50 completions per annum per developer, this would only result in 250dpa if five outlets were in operation. In reality, this level of development is unlikely to be sustained throughout the plan period due to site phasing, periods needed to obtain additional consents, infrastructure implementation and absorption rates.
11. RPS maintains that the Council's delivery rate assumptions for Alconbury Weald are higher than those which have previously been achieved locally but also substantially higher than national delivery rates on similar sized sites, as referenced in the Lichfield's Start to Finish document (November 2016). This report, which considered seventy large sites suggested that the average annual build out of large sites (over 2,000 dwellings) was 170 dwellings per

annum. This is clearly some way away from the Council's anticipated delivery rates at Alconbury Weald. The Lichfield report also states that the maximum annual delivery rate any site had achieved was 321dpa but that the site had only delivered at this rate for three years. (p14). The highest rate achieved over a longer period was 268dpa.

12. Without tangible evidence to demonstrate otherwise, RPS do not regard delivery rates anticipated by the Council at Alconbury Weald to be realistic.
13. RPS would regard the inclusion of RAF Alconbury (SEL1.2) within the plan as likely to suppress the consistent supply of housing within the district. The proposed allocation of RAF Alconbury for 1,640 dwellings means that in effect, Alconbury Weald forms a single site. The plan projects for Alconbury Weald up to 300 completions per annum from 2029/30, and for RAF Alconbury up to 185 dwellings per annum from 2029/30. In total therefore, the site as a whole is projected to deliver 485 completions per annum, a figure which is assumed to be sustained continuously for 7 years during the plan period. This would be higher than any strategic site has achieved nationally.
14. The 2015 HBF report on larger development schemes entitled *'Responding to market demand; Understanding private housing supply'* found that when development is concentrated on a few large sites, this stifles the market-responsiveness of supply. In essence, whilst average annual delivery rates are highest on the largest sites, to ensure consistent private housing supply requires many more sales outlets, allowing homebuilders to offer the widest range of products in different market areas and ensuring the widest range of housing by site and location. As observed above, SEL1.1 and 1.2 and HU1 Ermine Street all neighbour each other, two are controlled by the same land promoter, and together they are proposed to deliver 38% of the overall housing development.
15. To emphasise the point, as set out in the PBA report for Birmingham City Council *"Sutton Coldfield Green Belt Sites Phase 2 Report of Study"* (June 2014), this recognises that where sites are in close proximity to one another, this is likely to have an effect of suppressing housing delivery (paragraph 3.18) rather than boosting it. The report refers back to an earlier University of Glasgow Report *"Housing Markets and Planning Analysis Expert Panel – Factors Affecting Housing Build-out Rates"* published in February 2008 by Professor David Adams which suggests that developers of sites on the edge of small and medium sized towns would regard sites within a range of 5.62 miles as representing competition. Competition in the market plays an important role in suppressing housing delivery. In considering the delivery from larger sites with substantial infrastructure costs, future competition, and hence concerns regarding pricing, is likely to mean that cautious rather than optimistic planned rate of delivery are necessary. (PBA paragraphs 6.4 and 6.5).
16. The matter of market saturation is dealt with to some extent in Sir Oliver Letwin's who within his draft analysis report *Independent Review of Build Out Rates June 2018* which examines whether the build out rates would be increased if the reliance on large sites to deliver local housing were reduced, the conclusion being (para 4.21) that we need to continue building housing on *both* smaller sites and large sites. Large sites are often only able to deliver the high levels of infrastructure required but there must be able to be a range of products and

outlets available. However, as the reports attests to at para 4.18 *‘the market absorption rate for a given type of home is to some considerable degree highly location-specific; there is given depth of market at a given price for a given type of home of a given tenure in this particular place. Move away and you enter a slightly different market, composed at least partly of people with somewhat differing patterns of life which make that other place more attractive to them’.*

17. This matter gets to the heart of RPS objections to the Local Plan, which concentrates too much housing on large sites not only within the same market area but in close proximity to each other. The likely delivery rates expected do not take any account of the inherent competition in the market that will inevitably result from that. Huntingdonshire is, in fact made up of two housing market areas, with large parts of the north of the district exhibiting much stronger links to Peterborough and within the Peterborough HMA . please see RPS response to Matter 2 DtC. Accommodating a greater level of growth away from Huntingdon, as an alternative to RAF Alconbury, would provide the Plan with greater flexibility and reliance of supply.
18. Furthermore, the inability of the Plan to deliver at the rates anticipated is supported by the past delivery record of Huntingdonshire. Only one year (2011/12) of the last 16 has the Council previously delivered its proposed housing requirement of 804dpa. The sites at Loves Farm and Land at Riverside Mill (PA Ref 03/02792FUL) have delivered an average of 20 and 23 dwellings per annum per developer.
19. The rates proposed by the Council for SEL1.1 and 1.2 are extremely optimistic and considerably in excess of the average annual national build rate for sites of over 2,000 dwellings, which is only 171 dwellings. Therefore, the housing trajectory should be altered accordingly. Further details will be provided in response to Matter 12.
20. With specific regard to RAF Alconbury (SEL1.2), whilst the Council envisages that the site will come forward from 2028/29 onwards, as referenced in the Council’s Annual Monitoring Report (December 2017) (MON.01) (page 84), the Leader of the Council in April 2017 has acknowledged¹ that this if the site is not vacated then this could affect the Council’s ability to deliver housing. The AMR (MON.01) does acknowledge that the time frame for vacating RAF Alconbury has been delayed by 2 years in recent months and therefore 360 dwellings are anticipated to be delivery post 2036.
21. If the RAF Alconbury site was to come forward, the planning process will not be as straightforward as for an alternative large greenfield site, particularly as it is an ex-MOD site. There will be a need to navigate the DIO / MOD / Homes England disposals process; demolition works and the site will need remediating. Proposed policy SEL1.2 acknowledges that there will be many (17) other considerations including masterplanning; how it will be incorporated into a wider Alconbury Weald development; phasing of development; provision of infrastructure and services.

¹ <http://www.huntspost.co.uk/news/decision-to-close-huntingdonshire-bases-could-be-set-for-rethink-1-4980758>

22. Even if outline planning permission is granted, there are clearly additional steps that will need to be taken prior to the commencement of development. Having regard to the above and the continued uncertainty about whether the United States Air Force (USAF), will vacate the site, RPS do not consider that the Council can have sufficient certainty that the site can be delivered within the Plan period. Therefore this site should not be considered to be developable in line with footnote 12 to Paragraph 47 of the NPPF, which states that *“there should be a reasonable prospect that the site is available and could be viably delivered at the point envisaged”*. By way of a reference, the site at RAF Alconbury Airfield was disposed of in 1996, and first yielded housing completions in 2016.
23. In response to Q8: *What are the infrastructure requirements/costs and are there physical or other constraints to development?*, as referenced in our response to Matter 3 Development Strategy, 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). 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). 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 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). This uncertainty about delivery of infrastructure is also likely to have a consequential impact on the delivery of housing.

Policy HU1: Ermine Street, Huntingdon

24. The other significant site in the Huntingdon Spatial Planning Area is Ermine Street (Policy HU1) for 1,440 homes. This site was originally allocated in the Local Plan Alteration 2002 under policy HL2, but is yet to come forward for development due to significant infrastructure constraints.
25. The Council’s Housing & Economic Land Availability Assessment (HELAA) (December 2017) (HOUS/02) under the reference of *South of Ermine Street* refers on pages 226-229 that *“there are currently two planning applications (0500526OUT & 1001712OUT) being considered by the Council, each for a mix of uses including residential development of approximately 1050 homes”*.
26. With regard to 0500526OUT for 1,050 homes, this reference in the HELAA (HOUS/02) to the application being considered by the Council is now factually incorrect as a letter dated 2 June 2017 from Huntingdonshire Council to Pegasus Planning Group confirms the application as withdrawn. Prior to the application being withdrawn, there are a number of letters from Pegasus Group to the Council, which relate to extensions of times for determining the applications dating back to 2012, to allow time for ongoing Section 106 negotiations to be concluded.

27. With regard to application 1001712OUT for approximately 1021 units, the expiry date was 26 March 2013. The application remains undetermined.
28. Page 78 of the HELAA (HOUS/02) references Ermine Street (South) for 1,040 dwellings and refers to the submitted Outline application (1001712OUT). Whilst in the %Housing Trajectory Sites Survey, July 2017 (MON.04), the agent considers the site to be deliverable by 2036 with 50 dwelling completions in 2019/20 increasing to 100 in 2021-2030 and with development completed in 2030/31 (pages 88-89), the Council's Housing Land Supply position (August 2017) (MON.02) and the Council's Annual Monitoring Report (December 2017) on page 18, make it clear that the agent's projections have been deferred by 3 years given the transport mitigation required in advance of development. The first completions are indicated therefore considered to be in 2022/23 with build out completed by 2033/34 (p25). In light of the withdrawn 2005 application and the lack of progress on the 2010 application, there is considerable uncertainty about when the 2010 outline application will be determined, if at all.
29. Even if outline planning permission is granted, there are clearly additional steps that will need to be taken prior to the commencement of development. This will include successfully negotiating and signing the Section 106 agreements; undertaking any land transaction as necessary; submission of reserved matters applications and discharging all pre-commencement conditions. On the basis that the 2005 outline application was not determined within 12 years, then this highlights that any timescales for future determination of applications and subsequent housing delivery need to be more realistic.
30. There is also uncertainty about the delivery of infrastructure required for the successful implementation of development. As referred to within our representations to the Proposed Submission Plan, the Huntingdonshire Strategic Transport Study (undertaken by Mott MacDonald in May 2017 (INF.09), supplemented by an addendum in December 2017 by CCC (INF.11), assessed the highway network implications of six different development scenarios in Huntingdon to consider the impact of a number of potential residential developments. As referred to within the RPS representations, the study suggested that investment of c.£5 million to undertake the works at Ermine Street are required which would be achieved through developer contributions. However, the study does not detail whether the required junction improvements are realistically deliverable within the highway boundary or whether third party ownerships would need to be required. Furthermore, the mitigation works do not solve existing congestion problems in and around Huntingdon. As such, even if Ermine Street were to come forward, significant improvements would still be required on the A141 to improve existing capacity issues. The Council's HELAA (HOUS.02) on page 226-229 acknowledges that deliverability issues including the impact on the A14 and A141 will need addressing. Therefore, RPS would suggest the cost of the infrastructure works would be significantly more than the c.£5 million quantified which, again, questions the deliverability and viability of the development. The Strategic Transport Study has estimated the costs for the A141 upgrades alone would be approximately £80 million.
31. It is clear from the withdrawn 2005 Outline application and lack of progress on the 2010 Outline application since 2013 that there is considerable uncertainty about whether this site will come forward. It is clear from correspondence between the Council and Pegasus Planning Group that the S106 discussions were not resolved. Therefore, it is considered



unlikely that Ermine Street will deliver housing within the timeframes envisaged by the Council.

Appendix 1: RPS Representation to Proposed Submission Local Plan February 2018.

Appendix 2: DLP Report on Deliverability of potential new settlement sites in Huntingdonshire November 2017