

Huntingdonshire Local Plan Examination
Hearing Statement submitted on behalf of
Bellway Homes Limited in relation to Matter 12
– The Supply and Delivery of Housing Land

July 2018

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1. Introduction

- 1.1 This hearing statement has been prepared on behalf of Bellway Homes Limited and the landowners (The Trustees of the EJ and BH Smith 2007 Discretionary Settlement and Mr Smith) (hereafter referred to as 'Bellway') in response to Matter 12 (The Supply and Delivery of Housing Land) of the Huntingdonshire Local Plan Examination.
- 1.2 Bellway is promoting approximately 14.3 hectares of land to the north of Houghton Road in St Ives ('the site'), which represents a sustainable and deliverable residential land opportunity for up to 350 market and affordable dwellings and public open space. The site is not currently proposed for allocation at this stage.
- 1.3 Pre-application discussions with the Council in respect of the site are at an advanced stage. To date, no physical or other impediments to the delivery of the site have emerged. A public exhibition in St Ives was undertaken on 23 May 2018 and a pre-application meeting with Huntingdonshire District Council held on 7 June 2018. We have also met separately with Cambridgeshire County Council as the Highways Authority on 17 April 2018.
- 1.4 This hearing statement provides written responses to Q1 to Q11 of Matter 12 inclusive, with appendices.
- 1.5 Bellway welcomes the opportunity to participate in the Matter 12 hearing session on Tuesday 25 September 2018.

2. Response to Inspector's Questions

- 2.1 This section sets out our response on behalf of Bellway to the questions that have been raised by the Inspector in his Matters and Issues Paper issued on 16 May 2018. We provide written responses to questions Q1 to Q11 inclusive, with appendices.

Matter 12 – The Supply and Delivery of Housing Land

Q1) What is the estimated total supply of new housing in the plan period 2011 – 2036 and how does this compare with the planned level of provision of 20,100?

- 2.2 The Council's estimated total supply of new housing up to 2036, as set out in their Annual Monitoring Report ('AMR') 2017, is 22,068 dwellings. Against the housing requirement of 20,100 dwelling, this stands at an excess of 1,968 dwellings.
- 2.3 However, it is considered that the timing and delivery assumptions on a number of sites included in the Council's housing trajectory up to 2036 are unrealistic and not based upon a tangible evidence base. Turley has undertaken a detailed assessment of the Council's supply of housing and based upon these assessments, which have used local lead in times and average delivery rates evidence to inform the assessment, significant reductions to the total supply have been made.
- 2.4 Overall, based on these reductions, we consider the total deliverable supply of new housing up to 2036 to be **20,231 dwellings**. Whilst this is slightly above the planned provision of 20,100 this represents only a small excess of 131 dwellings and it is reasonable that there may be delays on some sites, as well as sites falling away or delivering at lower rates than anticipated and therefore additional sites would reduce the risk of failing to meet the District's housing requirement.
- 2.5 Moreover, it is important for Huntingdonshire District Council to demonstrate a good contingency in housing delivery against the housing requirement of 20,100 dwellings. With the reductions made in Turley's assessment (see the report enclosed at **Appendix 1**), if one were to apply a 10% contingency (2,010 dwellings) to the Council's housing supply, their supply of 20,231 would fall well below this.
- 2.6 It should also be noted that the planned level of provision of 20,100 is not considered to be an appropriate objectively assessed need ('OAN') for the District. This is discussed in greater detail in the enclosed Housing Delivery Report (**Appendix 1**), as well as Turley's Hearing Statement response on behalf of Bellway to the Matter 4 hearing session. A 15% adjustment should be made to the OAN to account for market signals and housing demand pressures, and thus an OAN of 22,000 dwellings is considered to be appropriate (880 dwellings per annum).
- 2.7 If this adjusted OAN is applied, Turley's estimated total supply of housing for the District would fall 1,769 dwellings below the provision required.

Q2) What is the estimated total supply in the plan period from:

a) Completions since 2011

- 2.8 Completions since 2011 – 2017 account for 3,675 dwellings of the total plan period supply.

b) Existing planning permissions

- 2.9 The Council have 5,733 dwellings committed with outline planning permission and 1,992 dwellings committed with reserved matters or full permission.

c) Other commitments e.g. sites subject to S106

- 2.10 The full breakdown of other such commitments is set out in Appendix 1 of the Council's AMR 2017.

d) Proposed site allocations

- 2.11 The full estimated supply from proposed allocations is set out in Appendix 1 of the Council's AMR 2017. These proposed allocations appear to total the delivery of 7,732 dwellings in the plan period.

e) Other sources?

- 2.12 The full breakdown of other supply sources is set out in Appendix 1 of the Council's AMR 2017.
- 2.13 However, we consider that the total supply in the plan period from the above sources is not an accurate reflection of what the council can expect to deliver by 2036 and this is discussed in further detail in subsequent responses below. Moreover, we consider that the planned provision of 20,100 up to 2036 is not an appropriate reflection of the overall housing need in Huntingdonshire over the plan period (as set out in our response to Q1 above).

Q3) What are the assumptions about the scale and timing of supply and annual rates of delivery from these various sources? Are these realistic?

- 2.14 The PPG makes it clear that local authorities must make realistic assumptions when it comes to seeking to demonstrate its five year supply. The guidance states that:

“Local planning authorities should ensure that they carry out their annual assessment in a robust and timely fashion, based on up-to-date and sound evidence, taking into account the anticipated trajectory of housing delivery, and consideration of associated risks, and an assessment of the local delivery record. Such assessment, including the evidence used, should be realistic and made publicly available in an accessible format.”
(Reference ID: 3-033-20150327) (Our emphasis)

- 2.15 The above advice from the PPG emphasises to LPAs that they should ensure that their annual assessments are robust, timely, based on up-to-date evidence, are considerate of associated risks, consider local delivery records, and are realistic.
- 2.16 The Council state the following in their Housing Land Supply Position (August 2017) at paragraph 1.11 to 1.14:

“Questionnaires were sent out in July 2017 to developers and agents of allocated sites which had not yet been built out as at 31 March 2017, and to those representing sites of 10+ dwellings with either outline or full planning permission and not yet completed, as well as those representing sites with applications submitted where the principle of development had been accepted, and sites identified as having potential to deliver housing in the Local Plan to 2036. Those contacted were asked to provide information on their aspirations for their sites, any constraints to development, and whether they considered them to be available, suitable and achievable. In instances where no reply was received an estimate was made based on the most up-to-date knowledge of the site by the relevant planning officer. Where it was felt that agents/developers were being over-optimistic in their predictions, the building programme was deferred to give a more cautious timeframe. This is noted in the 'comments' field of relevant sites in the trajectory data table in 2 'Housing Trajectory Sites Data'.

Sites of less than 10 dwellings with outline or full planning permission were added together and a prediction made for phasing on the aggregate figure. It would not have been practical to contact developers of each and every small site. A 10% discount was applied to those small sites not yet under construction to allow for some sites which may not be developed. It should be noted that historically small sites often have the advantage of being built out more quickly than some larger sites.

Site by site results of the 2017 survey can be found in 2 'Housing Trajectory Sites Data'.

It must be noted that the trajectory is an attempt at providing a reasonable and pragmatic forward planning tool. It is acknowledged that trajectories are not intended to produce perfect forecasts of the future. They should however provide as good an understanding as possible of the prospects for housing delivery, based on developers' and agents' aspirations, or officers' best estimates of delivery based on site knowledge.”

- 2.17 The above approach was reiterated in paragraph's 7.11 to 7.14 of the Council's AMR 2017. There is no further evidence available on the delivery assumptions used in the five year supply statement, or evidence base for the Local Plan 2036.
- 2.18 The Council appears to have surveyed developers and promoters for their anticipated delivery rates, and whilst in some cases adjustments have been made by the Council to these predictions, in our view, any adjustments have not been based on any justified or empirical evidence or the proper scrutiny of the evidence to support them. Planning Practice Guidance (ID: 3-033-20150327) states that local authorities should consider “the local delivery record” when carrying out its assessment of housing delivery. Such local delivery records can include an assessment of how long it takes for sites to come forward in an authority before first homes are built and also how quickly those sites then build homes. We are not aware that any such assessment has been undertaken in Huntingdonshire.
- 2.19 Overall, we consider that the Council's assumptions cannot be deemed to be realistic based on the above approach. Turley have undertaken a detailed assessment of both average lead in times from validation of an outline application through to reserved matters approval in order to understand the timing of supply, as well as an assessment of average delivery rates in the District on sites of different sizes and based on the

number of sales outlets. Both of these assessments have been conducted using the District's local empirical evidence. Moreover, the assessment of average delivery rates has been benchmarked against both national housebuilder delivery rates, as well as previous national analysis undertaken by Lichfields in November 2016¹. This is set out in full in Section 5 of the enclosed Housing Delivery Report and summarised below (**Appendix 1** of this Hearing Statement).

Local Lead in Times

2.20 Turley's analysis, as set out in the Housing Delivery Report, identifies the following local lead in times:

- For sites of 50 to 99 dwellings; the average length of time from the validation of an outline application through to obtaining an approval of first reserved matters is **3 years and 4 months**;
- For sites of 100 to 249 dwellings, the average length of time from the validation of an outline application through to obtaining an approval of first reserved matters is **5 years and 3 months**; and
- For sites of 250 dwellings or more, the average length of time from the validation of an outline application through to obtaining an approval of first reserved matters is **4 years and 7 months**.

Average Delivery Rates

2.21 Turley's assessment of average delivery rates has identified that the average delivery rate per sales outlet for sites of 100 units or more is **44.9 dwellings** per annum. This is in accordance with the average national housebuilders delivery rate, which stands at 45 dwellings per annum, based on their latest 2017 Annual Reports figures².

2.22 Furthermore, our assessment identified that when delivery is broken down into the overall average delivery rates on sites of different sizes, this results in the following rates³:

- Sites of 200 units or less: **47 dwellings per annum**;
- 201 – 600 units: **62 dwellings per annum**;
- 601 – 1000 units: **62 dwellings per annum**⁴; and
- 1001 units or more: **138 dwellings per annum**⁵.

2.23 This empirical data, along with experience from working with housebuilders, leads to the following reasonable assumptions on delivery rates:

¹ Lichfields (was NLP): Start to Finish: How Quickly do Large-Scale Housing Sites Deliver? November 2016

² Table 5.2 of the enclosed Housing Delivery Report at Appendix 1

³ Average figures have been rounded to the nearest whole number.

⁴ Only one site falls within this category.

⁵ Only one site falls within this category.

Table HS1: Delivery Assumptions		
Site Size	Anticipated Number of Sales Outlets	Average Completions/Annual Delivery
200 units or less	1 outlet	45 units
201-600 units	2 outlets	90 units
601-1000 units	3 outlets	135 units
1001 units or more	3 to 5 outlets (although it is likely to take more than one year from commencement for the number of sales outlets on site to increase)	135 to 225 units

2.24 The above empirical evidence has also been benchmarked using the Lichfield's data from their Start to Finish Report November 2016. The average delivery rates for greenfield sites were identified as:

- On sites of 500 – 999 dwellings, the average annual delivery rate was **86 dwellings per annum**;
- On sites of 1,000 to 1,499 dwellings, the average annual delivery rate was **122 dwellings per annum**;
- On sites of 1,500 to 1,999 dwellings, the average annual delivery rate was **142 dwellings per annum**;
- On sites of 2,000 or more dwellings, the average annual delivery rate was **171 dwellings per annum**;

2.25 When both the empirical data and Lichfield's data are aligned, the results demonstrate the following:

Table HS2: Assumptions on completions on sites of different scales and years		
Site Size	Turley Average Annual Delivery Rates	Lichfields Average Annual Delivery Rates
500-999 units	90 units to 135 units	86 units
1000 units +	135 units to 225 units	122 units to 171 units

2.26 The assumptions set out in Table HS1 are therefore higher than the findings of the Lichfields report, and a generous assumption against the assessment of the Council's own historic average delivery rates.

Q4) Specifically, are the timescales and rates of delivery on large strategic sites realistic?

- 2.27 It is considered that the timescales for delivery and average rates of completions on a number of large strategic sites, including RAF Alconbury, Alconbury Weald (Former Airfield) and St Neots Wintringham Park and Loves Farm East are unrealistic and not based on tangible evidence. A full response and detailed assessment of this is set out in Section 5 of the enclosed Housing Delivery Report by Turley.
- 2.28 The Council is suggesting rates as high as 300 dwellings per annum in a number of years on Alconbury Weald, as well as rates of up to 250 dwellings per annum on Wintringham Park. Such rates are substantially higher than that seen on other large strategic sites in the District, whereby the average delivery on Land at Loves Farm has been 138 dwellings per annum. Moreover, the Council's anticipated rates substantially exceed Lichfield's national assessment of delivery of large sites, whereby this spanned from 122 dwellings per annum on sites of between 1,000 – 1,499 dwellings up to 171 dwellings per annum on sites of 2,000+ dwellings.
- 2.29 With regards to timescales for sites to come forward and begin delivering, the Council have not applied a consistent approach on large strategic sites, nor has this been based upon any substantial evidence (as highlighted in our response to Q3 above). Full consideration has not been given to large strategic site's planning status, site constraints, ownership constraints or local empirical evidence.
- 2.30 By applying lead in times and average delivery rates produced by Turley, which have been derived from the Council's own empirical evidence of timescales for gaining planning permission and average completions on historic sites, as well as a detailed assessment of a site's planning status and constraints, significant reductions have been made to both the five year housing land supply and housing supply over the plan period. These are set out in full in Section 6 of the enclosed Housing Delivery Report and clearly demonstrate how unrealistic the Council have been in their assumptions on a number of large strategic sites.
- 2.31 A more detailed and realistic approach to the timescales and average delivery rates should be taken by the Council, making use of their local delivery record in accordance with the PPG as set out in Q3.

Q5) How has flexibility been provided in terms of the supply of housing? Are there potential sources of supply not specifically identified? Can this be quantified?

- 2.32 Please see our response to Q11.

Q6) 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?

- 2.33 As noted in Section 4 of the enclosed Turley Housing Delivery Report Stage 2 Assessment, the Council has persistently under-delivered against the annual housing requirement since 2012/13 and the cumulative shortfall stands at **1,149** homes. The breakdown of under-delivery is set out below:

Table HS3: Breakdown of Under-delivery

Monitoring Year	Annual Requirement	Cumulative Requirement	Actual Completions	Cumulative Completions	Shortfall	Cumulative Shortfall
2011/12	804	804	847	847	+43	+43
2012/13	804	1608	412	1259	-392	-349
2013/14	804	2412	686	1945	-118	-467
2014/15	804	3216	514	2459	-290	-757
2015/16	804	4020	534	2993	-270	-1027
2016/17	804	4824	682	3675	-122	-1149

2.34 Paragraph 7.25 of the Council’s AMR 2017 states that the Inspector’s Decision on an appeal at Luck’s Lane in Buckden (Appeal Ref. 315161) concluded that applying a 20% buffer was appropriate to ensure the supply of housing is boosted significantly as soon as possible, thus considering the above shortfall to be persistent. A 20% buffer has therefore been applied by Huntingdonshire District Council.

2.35 As highlighted above, between 2011 and 2017, completions in the District totalled 3,675 dwellings. Against an annual requirement of 804 dwellings, target completions for this period were 4,824 dwellings. On this basis, the Council had a shortfall of 1,149 dwellings against the housing requirement in this 6 year period. Whilst completions data for 2017/18 is not yet available, this shortfall would increase to 1,264 dwellings against the Council’s own delivery predictions for 2017/18 of 689 new homes.

2.36 In light of this performance on delivery, it is clear that a 20% buffer should be applied in Huntingdonshire to ensure that the shortfall in delivery is made up as a matter of urgency.

Q7) How should the shortfall in delivery since 2011 be dealt with?

2.37 The shortfall in delivery since 2011 should be dealt with in the five year period using the Sedgefield approach. This is considered entirely appropriate to do so, for the following reasons:

- Such an approach is in accordance with the National Planning Practice Guidance, which states that “*Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible*”⁶;
- Paragraph 47 of the NPPF requires local planning authorities to boost significantly the supply of housing. To boost significant the supply of housing land, any previous undersupply should be dealt with now;
- This approach is consistent with the vast majority of appeal decisions that consider this matter; and

⁶ NPPG Paragraph: 035, Reference ID: 3-035-20140306

- It has been shown that Huntingdonshire District Council has fallen increasingly short of its housing delivery requirements for many years. There is a danger that by not seeking to deal with previous undersupply in the short term, that undersupply will continue to be carried forward, with the potential that it will never be dealt with or will continue to worsen.

Q8) What would the requirement be for a five year supply including a buffer and accommodating any shortfall since 2011?

2.38 The inclusion of the shortfall since 2011, as well as the application of a 20% buffer (applied to both the initial requirement and any shortfall) is considered to be the correct approach to apply in Huntingdonshire District, based on its persistent under-delivery and in accordance the guidance set out on Page 14 of the draft Planning Practice Guidance which states that:

“Paragraph 74 of the National Planning Policy Framework sets out the buffers, which should be added at the end of the five year supply calculations” (Turley emphasis).

2.39 On this basis, the five year housing land supply requirement, against the Council’s OAN of 20,100 and Turley’s OAN of 22,000 is set out below.

Table HS4: Five Year Housing Requirement Calculation			
		Council OAN	Turley OAN
A	Housing Requirement per annum	804	880
B	Five year requirement (A x 5)	4020	4400
C	Previous under delivery	-1149	-1605
D	Five year requirement incl. shortfall ⁷ (B + C)	5169	6005
E	Five year requirement incl. shortfall and 20% buffer (D x 1.2)	6203	7206

2.40 If Turley’s OAN were applied (which is considered appropriate), the housing requirement for a five year supply would be just over 1,000 units greater than the current OAN.

Q9) Would the Local Plan realistically provide for a five year supply on adoption? Will a five year supply be maintained?

2.41 Assuming that the Local Plan were to be adopted this year, the appropriate five year period upon adoption would therefore comprise the 2018/19 – 2022/23 period.

2.42 Completions data has not yet been released for the 2017/18 monitoring year. However, reasonable assumptions can be made using the Council’s anticipated

⁷ Under-delivery from 2011/12 – 2016/17. This shortfall does not include the 2017/18 monitoring year, as completions data for this year have not yet been released by the Council.

completions for that year, as well as Turley’s assessment of anticipated completions set out in the enclosed Turley Housing Delivery Report (Appendix 1 of this Hearing Statement). Using Turley’s assessment of the Council’s supply and the reductions made to delivery in this period 2018 - 2023, a number of scenarios in respect of the five year supply upon adoption can be set out:

Table HS5: 5YLS on adoption			
Turley Anticipated Supply	OAN	Assumed 2017/18 Completions	Five Year Supply on Adoption
6,096	Council OAN of 804	Council completions of 689	4.80
6,096	Council OAN of 804	Turley completions of 736	4.84
6,096	Turley OAN of 880	Council completions of 689	4.09
6,096	Turley OAN of 880	Turley completions of 736	4.12

2.43 The above therefore demonstrates that, based upon realistic reductions to the Council’s housing land supply in the 2018 – 2023 five year period, the Council will not be able to demonstrate a five year housing land supply upon adoption against any of the above scenarios. This has significant implications for the soundness of the Local Plan to 2036, whereby this has not been positively prepared and cannot be considered effective if a five year housing land supply cannot be demonstrated upon adoption⁸.

Maintaining a five year supply

2.44 In respect of the second part of Q9 above, Section 7 of the enclosed Housing Delivery Report by Turley considers the Council’s rolling five year housing land supply position. We set out the position adopting firstly the Council’s proposed Local Plan OAN of 804 dwellings p/annum, and secondly adopting the Turley OAN of 880 dwellings p/annum.

2.45 Both calculations adopt the Council’s methodology for the calculation of five year supply (using the Sedgefield method, currently applying a 20% buffer, and applying the buffer to the shortfall).

2.46 We have amended the methodology for calculating the five year supply as the plan period goes on, by applying a 20% buffer up to the monitoring year at which the Council have delivered a cumulative surplus of housing, at which point onwards a 5% buffer is applied. Furthermore, from this point, where the Council have delivered a cumulative surplus against requirements, we have used the Liverpool approach when taking the surplus away from the five year requirement. This is a pragmatic approach consistent with the Government’s clear policy imperative of boosting significantly the supply of housing.

2.47 We have calculated the rolling five year supply position based on both our assessment of deliverable supply, which we consider to represent the most reliable assessment of how many dwellings are likely to come forward in the District in the plan period, but

⁸ Paragraph 182 of the National Planning Policy Framework

also against the supply identified in the Council’s housing trajectory as set out in the December 2017 AMR.

2.48 The following table shows the rolling five year supply position against the Local Plan OAN of 804 dwellings p/annum:

Table HS6: Rolling Supply Position Local Plan OAN										
Base Date	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
Council Supply	5.78	6.39	7.05	8.98	8.65	8.21	7.66	7.43	7.74	8.08
Turley Supply	4.56	4.84	5.22	5.52	6.58	6.45	6.23	5.97	5.69	5.30
Base Date	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
Council Supply	8.43	8.99	9.81	11.95	19.03	N/A				
Turley Supply	5.06	4.99	4.97	5.04	5.00	N/A				

2.49 Basing the calculation of five year housing land supply on the draft Local Plan OAN (804 dpa), we have found the following:

- When assessed against our proposed deliverable supply figures, the Council cannot demonstrate a five year supply of housing using the base date of either 1 April 2017 or 1 April 2018;
- When assessed against our proposed deliverable supply figures, the Council will only be able to show a five year supply by a very narrow margin in the latter years of the plan period, and in two later monitoring years will not be able to demonstrate a five year supply.

2.50 Alternatively, the following table bases the five year supply calculation on the Turley proposed OAN of 880 dwellings p/annum:

Table HS7: Rolling Supply Position Turley OAN										
Base Date	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
Council Supply	4.97	5.45	5.85	6.22	7.37	6.81	6.13	5.71	5.69	5.62
Turley Supply	3.93	4.12	4.35	4.46	4.57	4.57	4.51	4.87	4.53	4.09
Base Date	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036
Council Supply	5.50	5.44	5.28	5.03	4.89	N/A				
Turley Supply	3.77	3.57	3.37	3.23	3.00	N/A				

2.51 Basing the calculation of five year housing land supply on the proposed Turley OAN (880 dpa), we have found the following:

- When assessed against our proposed supply figure, the Council cannot demonstrate a five year supply of housing at any base date of the remainder of the plan period;
- When using the Council’s anticipated housing delivery trajectory, without any reductions made to any sites in the initial five year period there is not a demonstrable five year supply of housing at the 1st April 2017 base date;
- When assessed against our proposed deliverable supply figures, the Council cannot demonstrate a five year supply of housing using the base date of either 1 April 2017 or 1 April 2018, with substantial five year supply shortfalls of 1,545 or 1,300 dwellings respectively; and
- When using the Council’s anticipated housing delivery trajectory, the Council will be in deficit of a five year supply of housing by the 2031 monitoring year.

Q10) 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 an appropriate phasing?

2.52 In our view, a staggered or phased housing requirement is counterintuitive to the Government’s policy imperative of boosting significantly the supply of housing. There is a danger that by setting lower initial annual requirements, shortfalls in delivery against overall plan requirements increase making it difficult, and sometimes extremely unlikely, that overall plan requirements will be met.

2.53 Housing needs are arising now and not a number of years into the plan. By delaying the delivery of such homes will create issues with regards to meeting housing needs that arise now with potential implications on affordability. There is a danger that addressing such needs will continue to be delayed or, indeed, never met.

Q11) In overall terms would the Local Plan realistically deliver the number of houses required over the plan period?

- 2.54 Turley's Housing Delivery Report at Appendix 1 has assessed a number of large strategic sites within the Council's housing trajectory. This assessment, which has considered local empirical evidence of lead in times and delivery rates, planning status, land ownership and site constraints has led to a reduction of 1,837 units from the Council's housing supply up to the end of the plan period (2036).
- 2.55 This results in the delivery of 20,231 dwellings, rather than the Council's anticipated 22,068. An excess of only 131 dwellings remains when the Council's anticipated delivery is considered against their housing requirement of 20,100 dwellings.
- 2.56 As highlighted in the enclosed Turley Housing Delivery Report, it is important for Huntingdonshire Council to demonstrate a good contingency in housing delivery against the housing requirement of 20,100 dwellings. With the reductions made in this assessment, if one were to apply a 10% contingency (2,010 dwellings) to the Council's housing supply, their supply of 20,231 would fall well below this. It is therefore considered appropriate and important for the Council to be looking for additional sites which can contribute to the housing supply across the plan period to ensure that there is a comfortable housing supply. It is reasonable that there may be delays on some sites, as well as sites falling away or delivering at lower rates than anticipated and therefore additional sites would reduce the risk of failing to meet the District's housing requirement.
- 2.57 Moreover, as noted in the enclosed Housing Delivery Report, as well as hearing statements submitted by Turley Economics in response to the Matter 4 hearing session, it is considered that the current OAN is not an appropriate figure, and should be increased to 22,000 dwellings in order to suitably respond to market signals and housing demand pressures. On this basis, the supply of 20,231 dwellings in the plan period would lead to a shortfall 1,769 dwellings.
- 2.58 Realistically, where an appropriate OAN is applied in the District, as well as reasonable reductions made to the Council's housing supply based upon local empirical evidence and an assessment of a site's planning status and constraints, the Council will fall short of delivering the number of houses required over the plan period. Additional sites are required to contribute to making up this shortfall.
- 2.59 This has significant implications for the soundness of the Local Plan, in line with Paragraph 182 of the NPPF, for the following reasons:
- **Positively prepared** – the plan is not positively prepared; it does not include a strategy which will meet objectively assessed development requirements.
 - **Justified** – the plan is not justified, it does not propose the most reasonable strategy, as it is based upon unrealistic delivery assumptions in relation to key housing allocations.
 - **Effective** – the plan is not effective, its strategy is not deliverable over the plan period.

- **Consistent with national policy** – the LPP2 is not consistent with national policy specifically in relation to the housing policies of the Framework with seek for the supply of housing to be significantly boosted.

**Appendix 1: Turley Housing Delivery Report:
Stage 2 Assessment July 2018
(ENCLOSED SEPARATELY)**

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