

Proposed Submission Local Plan Examination Hearing Statement – Matter 12

Huntingdonshire District
Council Proposed
Submission Local Plan
Examination

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- 1) We are instructed by various clients (RRS 479 and 561) to submit Hearing Statements and appear at the Huntingdonshire Local Plan Examination on their behalf in relation to the Huntingdonshire Proposed Submission Local Plan and associated evidence base.
- 2) This Statement details our clients' responses to Matter 12 of the Matters and Issues identified by the Inspector.
- 3) **Matter 12 – The Supply and delivery of housing land**

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

Question 1

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.

- 4) According to Huntingdonshire's Annual Monitoring Report December 2017 (AMR 2017) (MON/01) there have been a total of 3,675 completions between 2011 and 2017 with a further 18,393 completions projected between 2017-2036. Therefore, Huntingdonshire District Council (HDC) considers it will supply a total of 22,068 dwellings during the plan period. Should all these dwellings be provided it would result in a surplus of 1,968 (9%) above the planned provision.
- 5) The draft plan suggests 22,500 dwellings will be provided over this period. The basis of this figure and the calculations behind this figure is however questioned.
- 6) To date the Council has a record of over estimating the delivery of housing and the total number of dwelling completions in each year. This has resulted in a shortfall of 1,149 housing completions between the period of 2011 – 2017.
- 7) Having reviewed the table submitted by RPS – HDC completion achieved vs target and previous AMR forecasts. We also question the assumptions made in the AMRs and whether the forecasts can be relied upon.
- 8) Partners and Planning and Architecture have genuine concerns regarding HDC's longer term housing trajectory. The delivery figures set out for each year on the large strategic allocations of SEL 1.1, SEL 1.2 and SEL 2 is extremely over optimistic. It is suggested by HDC that each of the site is forecast to deliver over 100 dwellings per annum following the initial years of construction with the Former Alconbury Airfield and Grange Farm (SEL 1.1) set to deliver 300 units per annum between 2028/29 and 2033/34. There is no evidence produced by HDC that these sites will deliver the number of dwellings suggested and the delivery rate is incredibly ambitious, especially when only 630 of the suggested 5,000 units have a detailed planning permission.

- 9) Furthermore, it is also questioned whether the number of proposed allocated sites which have significant constraints, including the total of dwellings proposed by HDC to be delivered in flood risk areas, such as flood zones 2, 3a or 3b can be delivered in accordance with the NPPF. If the Inspector agrees that the sites cannot be allocated due to the flood risk issues, there would be a marked reduction in housing delivery over the plan period to 21,695. The reduction of 373 dwellings would further reduce the housing surplus to 1, 595 before the forecasted delivery rates are brought into question.
- 10) The Council has not sought to justify sufficiently its delivery assumptions for these sites nor has it outlined a fall-back position should these strategic sites fail to deliver as predicted. In the absence of clear justification to support what are extraordinarily high delivery assumptions, the Council's evidence base is not considered to be credible.
- 11) Partners in Planning and Architecture believe the authority have not provided sufficiently robust evidence to justify the delivery schedule and we therefore have serious concerns whether the level of provision required for the local plan to be found sound.

Question 3

What are the assumption about the scales and timing of supply and annual rates of delivery from these various sources, are they realistic?

- 12) We have been unable to find any evidence regarding the scale and timing and proposed annual rates of delivery on the Councils website. For the number of sites identified within the AMR 2017 (MON/01) where delivery and scale of development on the site has been estimated there is seemingly no evidence provided to support the Council's conclusions.
- 13) For the sites that have been identified within MON/01 the delivery has been estimated based on the housebuilders website only. The lack of evidence provided and the historic inaccuracies in relation to forecasting rates of completion, Partners in Planning and Architecture firmly believe there is no evidence to the Councils assumptions regarding the scale, annual rates and times of supply can be considered realistic.

Question 4

Specifically, are the timescales and rates of delivery on large sites realistic.

- 14) As stated above We consider HDC delivery rates and the timescales for the large sites to be very optimistic. The delivery rates for example on Alconbury Weald have been extremely over estimated. The AMR suggested in 2016/2017 the site would delivery 125 in its forecasting yet according the to the more recent AMR in 2017 only 48 units were delivered in that monitoring year. The estimated 200 housing delivery figure in the 2015 AMR was clearly unrealistic, as in the previous years. It is evident

that HDC continuously use Alconbury Weald year on year to overestimate the houses that can be delivered. It is clear these over estimates are also reflected in the future trajectories.

- 15) We consider that HDC's reliance on large strategic sites fundamental driver of slow build out rates for large sites appears to be the 'absorption rate'. Large sites create the opportunity for house-builders to control sales rates and limit opportunities for rivals to enter the market and compete for customers. This reduces the absorption rate as the homes on offer will typically be fairly homogeneous and provide limited choice for customers. Therefore, housebuilders operating on large sites are unlikely to deliver the high number of dwellings expected by the Council as these cannot be absorbed by the market or sold by the house builder at a quick enough rate.
- 16) HDC proposed build rates can not be supported by any evidence and therefore we consider them not to be realistic.

Question 6

- 17) **Has there been persistent under delivery of housing? In terms of a buffer for five-year supply of housings sites, should this be 5% or 20% in relation to para. 47 of the NPPF? any short since 2011?**
- 18) It has been accepted by HDC that a 20% buffer should apply, reference has been made to this stance on buffer zones in the Lucks Lane appeal decision (ref: APP/H0520/W/16/3159161) There has been 5 consecutive years where HDC has failed to deliver against its housing target since 2013 up to 2016/17. The failure to deliver its housing targets has resulted in a cumulative shortfall of 1, 149 dwellings. It is therefore clear that there is a substantial under-supply of housing.

Question 7

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

- 19) We believe that MON/01 was correctly applied in the using the Sedgefield approach, as this is the most appropriate method to address accrued housing short fall in order to boost the supply of housing.

Question 8

What would the requirement be for a five year supply on including a buffer accommodating an shortfall since 2011?

- 20) Based on Table 3 of MON/01 the requirement for a five-year supply including a buffer and shortfall is 6,203 dwellings. We consider this to be an under-estimate for the reasons set out in this Hearing Statement.

Question 9

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

- 21) We do not believe the Local Plan has provided for a five year land supply as the delivery of dwellings set out in the trajectory within the Mond/01 has been over estimated. The Council names key sites which the Council believe can be delivered in the next 5 years however, as stated in the table reported by RPS these sites are highly unlikely to be delivered at the rate assumed by HDC, particularly based on the history of under delivery. This would clearly have a significant impact on the five-year land supply.

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 allocation? If so, what would be an appropriate phasing?

- 22) As clearly set out above, the Council have historically failed to forecast delivery of dwellings using a consistent approach for more than one year in advance of an AMR period. Therefore, a staggered or phased would not be appropriate for the District as it may result in annual requirement later in the plan period should larger housing site not be delivered in line with the Housing Trajectory.
- 23) If HDC were to adopt a staggered approach it would result in a further overreliance on the strategic sites, and therefore result in an unrealistic housing figure.

Question 11

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

- 24) Partners in Planning and Architecture contend that the Local Plan cannot demonstrate a 5 year housing or land supply over the plan period as HDC has been historically overly optimistic in its housing trajectory.