

5 October 2018  
**Delivered by email**

Mr Kevin Ward  
C/o Annette Feeney  
Local Plan Programme Officer  
Huntingdonshire District Council  
Pathfinder House  
St Mary's Street  
Huntingdon  
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Ref: BELQ3008

Dear Mr Ward

## **HUNTINGDONSHIRE LOCAL PLAN EXAMINATION – COMMENT ON THE COUNCIL'S ADDITIONAL HOUSING SUPPLY EVIDENCE**

We write on behalf of our client, Bellway Homes Limited, in response to the Council's additional housing supply evidence submitted following the Matter 12 hearing session held on 25 September 2018.

### **Potential Other Sources of Housing Supply (Document: EXAM/41)**

Within this document the Council incorrectly asserts that an additional 3,478 dwellings from 'other sources of housing supply' and can be included in the trajectory. These sources include:

- known windfalls;
- small sites (1-9 dwellings);
- prior approvals; and
- rural exceptions.

All of these categories however fall within the definition of windfall development. Paragraph 48 of the National Planning Policy Framework (NPPF1) published in March 2012 is clear that any allowance for windfall development should be realistic, having regard to the Strategic Housing Land Availability Assessment (the Housing and Economic Land Availability Assessment (HELAA) in Huntingdonshire's case) historic windfall delivery rates and expected future trends.

### ***Small sites***

Huntingdonshire's HELAA and Brownfield Land Register does not identify any 'small sites' of nine dwellings or less, despite Planning Practice Guidance being clear that both should consider all sites capable of delivering five or more dwellings.

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Indeed the Brownfield Land Register only includes sites which form proposed allocations in the emerging Local Plan. However in the context of NPPF1 paragraph 47, the Council has not identified any supply of specific, developable small sites for growth for years 6-10 or years 11-15.

As such there is no compelling evidence for including 1,721 dwellings (116 per annum from 2021/2022 onwards) from small sites in the supply.

### ***Rural exception sites***

The Council's proposed supply from 'rural exception' sites must be seen in the context that the District has not allocated any significant sites for over 16 years, since the Huntingdon Local Plan Alteration was adopted in 2002, other than in the Huntingdon West Area Action Plan in 2011. This has severely impacted upon the supply of affordable housing in the District. This is demonstrated in that since 2011 the Council has delivered just 690 affordable homes against an identified need for 1,896 affordable homes, representing a shortfall of 1,206 dwellings (64% of the overall need).

In the absence of an up to date adopted Local Plan, it is therefore not surprising that applications have been made for a total of 45 dwellings through rural exception sites (29 affordable: 16 market) in the last year. This however does not represent compelling evidence for assuming the Council will deliver 45 dwellings per annum from rural exception sites. Once adopted, the Local Plan will allocate new affordable housing development, therefore it is unlikely the Council will be as reliant on rural exception sites to make up their affordable housing supply. Furthermore, making this assumption for rural exception sites will not assist the Council in addressing its chronic affordable housing shortfall across the plan period.

### **Alconbury Weald (document: EXAM/42)**

The confirmation that only 259 dwellings are under construction at Alconbury Weald (rather than the 400 dwellings suggested by the planning agent for the site, under questioning, during the Matter 12 hearing session) demonstrates that the Council's assumed delivery rates are unreliable. They are simply taking the delivery rates provided by agents at 'face value', rather than sense checking them against any national delivery indicators or any other corroborating evidence.

Our client, Bellway, is a FTSE 250 major PLC housebuilder who delivered 10,300 new homes across the UK in 2017. In Bellway's experience there is a 70-80% conversion rate for houses under construction to completion in a single year. Applying this formula the 259 dwellings currently under construction at Alconbury Weald indicates that the site is likely to deliver between 181 and 207 completions this year.

This broadly reflects the empirical evidence on delivery rates submitted with our Matter 3 (Appendix 2) and Matter 12 hearing statements (Appendix 1), which demonstrated that Alconbury Weald will deliver only 180 completions in 2018/19. This highlights the more robust nature of our evidence when compared with the Council's approach to delivery rates.

### **Conclusion**

The additional evidence submitted by the Council does not provide any certainty that the Local Plan as drafted will deliver the District's housing needs to 2036 and demonstrates that significant issues with the Council's assumed housing supply still remain. This is in addition to the other significant concerns we have raised throughout the Local Plan Examination hearing sessions. These include; the overall housing requirement correctly being a minimum of 22,000 dwellings, the Council's fundamentally flawed approach to the flood risk sequential test and the inequity of the spatial strategy, resulting in the artificial suppression of growth in St Ives - the third most sustainable settlement in the District.

We therefore firmly remain of the view that this Local Plan should be allocating further growth in general and more specifically at St Ives. In this respect, an application has already been submitted for our client's site on land to the north of Houghton Road in St Ives, which is well placed to deliver in the next five years to help ensure that this Local Plan will deliver the District's housing needs.

Yours sincerely



Tom Armfield  
Associate Director

