

Hearing Statement

06/18

Huntingdon Local Plan Examination

Matter 4 Hearing Statement on behalf of The Fairfield Partnership (1140352)



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Matter 4: Hearing Statement

Introduction

1. This Hearing Statement has been prepared on behalf of The Fairfield Partnership (**respondent ref: 1140352**) who submitted representations in response to the Council's decision to exclude land to the east and south east of Bearscroft Farm Godmanchester (now known and referred to as Romans' Edge and land East of Romans' Edge) as a residential allocation in the Huntingdonshire Local Plan 2036 Regulation 19 Proposed Submission.
2. The adjoining land (proposed allocation HU19 – Bearscroft Farm, Godmanchester) is currently being developed by David Wilson and Barratt Homes. The land has approval for the construction of some 750 dwellings and since it was acquired by the homebuilders in 2014 some 222 dwellings have been constructed (as of December 2017) including a primary school and neighbourhood centre.
3. Our client's site is being promoted as an allocation in the emerging Huntingdonshire Local Plan for a mixed-use development of around 1,000 dwellings. The proposed access arrangements include the construction of a new A1198 relief road for Godmanchester.
4. Whilst our clients are generally supportive of the Draft Plan and its overall approach, they strongly believe that due to a heavy reliance upon a small number of large strategic sites, anticipated delivery rates are dangerously over ambitious. Consequently, they consider that there is a necessity for the provision of additional sources of housing supply in sustainable locations within the District where there is strong market demand, such as the market towns, which are capable of delivery at a faster rate that will contribute to meeting the housing trajectory of the Draft Local Plan.



Issue

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the overall provision for housing.

Relevant policies – LP1

Responses to Inspector's Questions

Question 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?

5. We consider it is very important that the wider needs of the Housing Market Area (HMA) are properly and adequately addressed. This is a requirement of the NPPF.
6. Paragraph 47 of the NPPF states that to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period. It is apparent that the NPPF's focus is on ensuring that the needs of the wider HMA are met, not just the Local Authority area. Paragraphs 198 – 181 go on to specify the importance of planning strategically across local authority boundaries.
7. It is however noted that there is a collective agreement across the Cambridge HMA to co-ordinate future housing reviews. The Huntingdonshire OAHN dated April 2017 (HOUS/01) seeks to address this point, but for other reasons our clients have considerable doubt as to whether the identified need will be addressed. Our clients consider that the OAN should be collectively reviewed at the earliest opportunity.

Question 2 – Was the methodology employed in the Huntingdonshire Objectively Assessed Housing Need Update of 2017 appropriate and does it provide a robust basis for establishing the OAN?

8. The update does not provide a new OAN for the Cambridge HMA which includes Cambridge, East Cambridgeshire, Fenland, Huntingdonshire, South Cambridgeshire, Forest Heath, and St Edmundsbury.
9. Paragraph 26 and Figure 1 of the Huntingdonshire Objectively Assessed Housing Need – April 2017(HOUS/01) identify the top twelve origins and destinations of people who moved into and out of Huntingdonshire between March 2010 and March 2011 (i.e. people who had a different address one year before the Census). The top twelve includes four of the six other districts in the Cambridge housing market area (South Cambridgeshire, Fenland, Cambridge, and East Cambridgeshire). The top six also includes Peterborough, Central Bedfordshire, and Bedford.
10. It is not apparent that the OAN Update had had proper regard to whether the same HMA and boundaries which were identified in the 2013 SHMA for Huntingdonshire are still appropriate, or whether they have significantly changed.

Question 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?

11. Our clients have no comments to make in response to this question.

Question 4 – How have economic/jobs growth forecasts and changes to working age population been taken into account? Is the 4% uplift to take account of this justified?

12. Our clients have no comments to make in response to this question.

Question 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 growth within this figure?

13. The identified uplift to the demographic starting point to take account of market signals is very modest. The 5% increase is very low in comparison with that identified in many other recent SHMA's, where increases of 10 – 20% have often been applied to address deteriorating market signals. Especially given that the 2017 Update has identified a 39% affordable housing need for Huntingdonshire. It would seem unlikely that the 5% increase to HDC's planned supply will be an amount that will be capable of resulting in improved affordability. Particularly, if the Strategic Expansion Locations will deliver significantly reduced affordable housing provision due to their infrastructure costs. Therefore, market signals point to the need for more land for housing needing to be allocated to address affordability pressures, particularly if the Alconbury and St Neots growth locations are incapable of delivering the number of dwellings claimed in the Housing Trajectory to meet both market and affordable housing requirements.
14. It is worth noting that the Government's proposed standard methodology formula would result in Huntingdonshire District Council (HDC)'s annual housing requirement increasing from 804 to 1,010 dpa. Whilst this is still subject to final confirmation, it does point to a likely direction of travel that will need to be addressed in a future Local Plan Review. This will necessitate an uplift far greater than the 5% being advocated in the Draft Plan.
15. It is important to be mindful of the fact that HDC's 5 Year Land Supply will eventually be measured against the future updated housing requirement figure. Therefore, it is paramount that the local authority is not disadvantaged by being forced to play catch-up from an existing OAN figure at significant variance to that which will be identified under the new standard methodology. This would be likely to result in it accruing a significant housing backlog.

Question 6 - Given the scale of identified affordable housing need, should the OAN be increased to assist in delivering more? If so to what extent?

16. Draft Policy LP25 sets the affordable housing target at 40%, with the threshold being sites comprising 11 or more dwellings. With no affordable housing to be provided on sites comprising 10 dwellings or fewer, meeting the objectively assessed affordable housing need will be reliant on the major development sites contributing a policy compliant quantum of affordable housing.

17. We have referred in our representations to the fact that Phase 1 at Alconbury Airfield shows that a target of 10% affordable housing has been approved. The quantum of affordable housing to be delivered within later phases of the development will be subject to review but there are significant question marks against whether this site will be capable of delivering the policy requirement of 40% affordable housing on remaining phases. This is clear evidence of the weakness of the housing market in this locality, in comparison with other parts of the District.
18. Similarly, an earlier application for St Neots East, (where a planning appeal was withdrawn), proposed only a 10% affordable housing delivery rate. An updated hybrid planning application has now been submitted for the St Neots East site (reference 17/02308/OUT). This submission advises that for the first 500 units, an affordable allocation of just 25% will be provided. After that the affordable housing percentage will be agreed through a s106 Affordable Housing Review Mechanism.
19. An Officer's Report to HDC's Development Management Committee meeting on 19 March 2018 refers to the commissioning of a viability appraisal of the submission undertaken by Deloitte Real Estate (DRE) paid for by the applicant. It provided its initial assessment of the viability of the site and provided initial thoughts on the review mechanism. In this context, having regard to the desire to see early implementation of the development to help meet the area's housing needs, the acknowledgement of the infrastructure costs required in the early phases of the development and the opportunity to reassess viability and thereby the percentage of affordable housing in later phases and therefore overall through the review mechanism(s), 25% affordable housing in the first phase of 500 with a review mechanism(s) to establish the percentage in later phases, was stated as being considered to be reasonable. Although a resolution exists to approve the application, a formal decision on the application is still pending.
20. Consequently, the two largest strategic sites identified by the Council will not deliver policy compliant levels of affordable housing. With these sites accounting for circa 44% of the overall housing target, the objective of delivering 40% of its identified housing requirement as affordable housing is, it would seem, very

unlikely to be met. Additional medium sized sites that can deliver policy compliant levels of affordable housing are required if the affordable housing objectives are to be met and delivered where needed across the district.

21. The Fairfield Partnership consider that land to the east and south east of Romans' Edge Godmanchester should be identified to deliver a sustainable urban extension to the town of approximately 1,000 dwellings. Unlike the Alconbury and St Neots sites which will result in an undersupply of affordable housing, our client's Godmanchester site can deliver policy compliant 40% affordable housing provision (400 dwellings).
22. The speed at which the adjacent Bearscroft Farm, Godmanchester site has been developed demonstrates that there is strong market demand in locations which are well related to Cambridge. The house builders, David Wilson / Barratt Homes have been making significant progress, as well as delivering a new primary school and local neighbourhood centre. The annual completion rate equated to 2.9 homes per week between December 2016 and December 2017. Furthermore, at a time when affordable housing need has been rising, but delivery falling, the Bearscroft Farm development has been able to deliver policy compliant affordable housing.
23. The level of affordable housing need, which has been calculated in HOUS/01 as being 7,897 dwellings for 2011-2036, clearly demonstrates a higher uplift being needed to improve overall affordability

Question 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?

24. Our client's representation has sought to highlight that the Draft Local Plan is seeking to place over reliance on two large sites at Alconbury and St Neots. The two sites are expected to deliver 10,500 dwellings up to 2036 to the detriment of potential new home purchasers. Furthermore, we would seriously question the 'deliverability' of the Alconbury sites, particularly given the definition of this contained within the glossary to the National Planning Policy Framework: draft text for consultation (March 2018), which refers to housing completions being capable of beginning on site within five years:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Small sites, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”.

25. In our representations we have highlighted the fact that the Annual Monitoring Report (AMR) 2017 shows that delivery assumptions regarding Alconbury Airfield are already showing slippage in terms of completion numbers and timescales. It is now identified as delivering 102 dwellings for 2017/18 (200 dwellings were assumed in the 2016 AMR for this period).
26. Furthermore, the AMR it also refers to a recent two-year delay to the MoD's vacation of RAF Alconbury which is now assumed to only be available for development for housing from “the mid 2020's”, with estimated delivery within the Plan period being reduced to 1,320 dwellings (based on officer knowledge of likely timeframe for the site to be vacated). This would mean that 360 dwellings are anticipated to be delivered post 2036. However, it is clear from the AMR that there is considerable uncertainty surrounding the delivery of the site for development strongly suggesting that the site is not ‘available’ for development and should accordingly be treated in a similar fashion to RAF Wyton until there is clarity over its availability.
27. Notwithstanding this point, The Fairfield Partnership consider that RAF Alconbury should be regarded as an integrated extension to Alconbury Airfield. Given the two sites abut one another, the cumulative trajectory for these two sites must

therefore be considered and tested. HDC is assuming that 6,272 dwellings will be delivered by these two sites between 2017 and 2036 (19 years).

28. This cumulative trajectory indicates that between 2029/30 and 2035/36, annual housing completions from these two adjoining sites will be between 460 – 480 dwellings per annum. In the context of the research findings set out in our Matter 3 Hearing Statement, these rates of delivery are not considered to be realistic and will result in a large shortfall in delivery.
29. We consider that all the available evidence points to the fact that any alternative OAN figure will be higher, rather than lower than 20,100. We note that the HBF has advocated a housing requirement of 22,000 dwellings (880 dwellings per annum) based upon a 15% uplift. We consider this figure to be reasonable.
30. Whatever figure the OAN is set at, it is vital that there is confidence in its deliverability. Consequently, sufficient evidence must be available to demonstrate that sites can realistically deliver at the rates set out in the Council's housing trajectory. We are concerned that HDC's Strategic Expansion Locations are very unlikely (based upon realistic delivery rates) to be capable of delivering the high numbers of annual completions specified in the housing trajectory.
31. Accordingly, there will be a need to bridge this delivery gap with medium-scale urban extensions closer to the main economic driver of the HMA – Cambridge, than the Alconbury sites which are located on the other side of Huntingdon. These sites are reliant upon significant investment into new infrastructure and on the outer edges of the HMA.
32. It is also necessary to have regard to the fact that the future direction of travel for HDC points towards a higher OAN. This is signposted by the Government's proposed standard housing methodology figure for Huntingdonshire, which would increase the annual housing requirement figure from 804 dpa to 1,010 dpa.

Question 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?

33. We note that the 804 dpa target is slightly lower than the annual target of 820 dpa contained in the current Adopted Local Plan – the Huntingdonshire Local Plan Alteration (December 2002) which sought provision of 12,300 dwellings between mid-1991 and mid-2006. This is not a ‘step change’ in our view.
34. It is apparent that against the proposed OAN of 20,100 over the 25-year period 2011-36 of 804 dwellings per annum (dpa) has only been met on one occasion during the current plan period, and only twice before that:

Year	Completions (net)
2002/03	578
2003/04	576
2004/05	698
2005/06	742
2006/07	652
2007/08	728
2008/09	815
2009/10	784
2010/11	829
2011/12	847
2012/13	412
2013/14	686
2014/15	514
2015/16	534
2016/17	682

Source: Cambridgeshire Insight (Cambridgeshire County Council and Huntingdonshire District Council AMR (December 2017)

35. The above annual completion figures show that annual delivery averaged 672 dpa over the 15-year period 2002/03 – 2016/17. Whereas, since the start of the current Plan period in 2011-12, the average annual delivery rate has been lower, at 613 dwellings.



36. The above annual completion figures point to a strong necessity to ensure that housing delivery levels are quickly boosted to bring HDC's housing delivery rates up to the OAN requirement. The means of achieving this will be to ensure that sufficient housing allocation sites are brought forward, and that they are in places where market demand and delivery is strong, such as at Godmanchester, where high housing delivery rates have been achieved at its Roman Edge site. An over concentration of delivery upon just a couple of outlying locations within the District, where there are weaker levels of demand, will not be able to deliver the unrealistically high annual housing completions numbers that are required to satisfy HDC's OAN. Accordingly, our clients do not consider the plan to be 'sound' in this regard.

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

37. Our clients have no comments to make in response to this question.



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