

**HUNTINGDONSHIRE
LOCAL PLAN
EXAMINATION**

**MATTER 7 ALLOCATIONS
– ST NEOTS SPA**

REP ID: 1118661

HEARING STATEMENT

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MATTER 7 – PROPOSED SITE ALLOCATIONS – ST NEOTS SPATIAL PLANNING AREA

Introduction

- 1.1 This Matter 7 Statement has been prepared by Carter Jonas LLP on behalf of Hallam Land Management (HLM), who are promoting land at Gifford's Park in St Ives for a residential-led mixed use development. In HLM's representations to the Proposed Submission Huntingdonshire Local Plan 2036 (PS HLP2036), there are comments about the use of unrealistic housing delivery assumptions generally and for specific larger allocations. This Statement focuses on housing delivery at the strategic allocation within the Huntingdonshire SPA; Policy SEL2: St Neots East including Loves Farm and Wintringham Park (Rep Id. 371)
- 1.2 In this Statement we respond to two questions for the St Neots East site:
- Qu.4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?
 - Qu.11) What is the expected timescale and rate of development and is this realistic?
- 1.3 No representations were made to the proposed allocation at Loves Farm Reserve site for 40 dwellings, and no comments are made about this site in this Statement on the basis that it is a suitable and deliverable residential site which would have some impact on delivery rates at the strategic sites at St Neots East but this would be minor.
- 1.4 The HLM Matter 12 Statement: Supply and Delivery of Housing Land deals with housing delivery matters generally. That Statement identifies a range of information which has informed our assessment of the housing delivery rates that should be applied to the larger and strategic sites allocated in PS HLP2036. The relevant assessment information for the St Neots SPA is as follows:
- National evidence on housing delivery rates contained in the Nathaniel Lichfield & Partners research report 'Start to Finish - How Quickly do Large-Scale Housing Sites Deliver?' (November 2016) provided evidence on the speed and rate of delivery of large-scale housing developments.
 - Cambourne new settlement in South Cambridgeshire provides evidence of housing delivery rates at an established strategic development in the local area over a number of years. The average annual delivery rates at Cambourne is 229 dwellings.
 - There are established strategic scale developments in neighbouring Bedfordshire which provide evidence of housing delivery rates and which have similar characteristics to the proposed development at St Neots East e.g. an urban extension to an existing town located within the A1 and/or A428 Corridors. The annual average housing delivery rates are as follows: Biggleswade East – 202 dwellings per annum; West of Kempston – 120 dwellings per annum; and, Great Denham – 123 dwellings per annum.
 - Loves Farm in St Neots has historically delivered approximately 100 dwellings per year. The recent housing monitoring data for the five years between 2012/13 and 2016/17 show delivery rates of 60, 106, 59, 85 and 49 dwellings respectively.
 - The two strategic scale developments in St Neots are located in close proximity of one another i.e. Loves Farm and Wintringham Park, which will have implications for housing delivery because they will in effect be competing sites and within the same local housing market.
- 1.5 In addition, the assumptions about the commencement of development at the larger strategic sites in the housing trajectory will need realistically to reflect actions that need to be completed once a resolution to grant outline planning permission has been made e.g. complete negotiations on the S106 Agreement, discharge relevant conditions, market land parcels to housebuilders, appoint housebuilders, submit reserved matters, and complete primary infrastructure. These actions do take some time to complete, and this needs to be reflected in the housing trajectory depending on the circumstances at individual sites.

Issue

Whether the proposed site allocations for the St Neots Spatial Planning Area are justified, effective and consistent with national policy.

Relevant policies – SEL2 and SN1-SN6

Questions

Taking each of the following proposed site allocations individually:

Strategic Expansion Location: St Neots East

SEL.2 – St Neots East

4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

- 1.6 St Neots East comprises two separate sites: St Neots East - Loves Farm; and, St Neots East – Wintringham Park. The current planning status for each site is set out below.
- 1.7 In 2013 an outline planning application was submitted for 1,020 dwellings at St Neots East - Loves Farm (Ref. 13/00388/OUT). The application has been reported to Planning Committee on three occasions – in July 2014, November 2017 and April 2018. The Planning Committee has resolved to approve the application, subject to the completion of a S106 Agreement. The S106 has not yet been signed and planning permission has not been issued. The timetable for the submission and determination of reserved matters for infrastructure and dwellings and the construction phase is relevant because it is predicted in the AMR December 2017 that development would commence in 2019/20. It has been agreed through the planning application process that the proposed development will deliver 28% affordable housing; this is below the 40% policy requirement.
- 1.8 In November 2017 a hybrid planning application was submitted for up to 2,800 dwellings at St Neots East – Wintringham Park (Ref. 17/02308/OUT). In March 2018 the Planning Committee resolved to approve the application, subject to the completion of a S106 Agreement. The S106 Agreement has not yet been signed and planning permission has not been issued. We understand that reserved matters submissions are being prepared for the infrastructure works. The timetable for the submission and determination of reserved matters for infrastructure and dwellings and the construction phase is particularly relevant because it is predicted in the AMR December 2017 that development would commence and dwellings would be start be to completed in 2018/19 i.e. this current monitoring year. It has been agreed through the planning application process that 25% of the first 500 dwellings will be affordable, and that an affordable housing review mechanism will be used to determine the proportions to be provided in later phases of the proposed development. The proposed level of affordable housing is below the 40% target contained in policy. It is not clear whether the level of affordable housing within the proposed development will increase in later phases but it is unlikely, and in any event it is probably undesirable to have later phases dominated by affordable housing when balanced mixed tenure housing areas are preferred.
- 11) What is the expected timescale and rate of development and is this realistic?*
- 1.9 The two development sites at St Neots East are located in close proximity of one another, which must have implications for housing delivery because they will in effect be competing sites and within the same local housing market. The close proximity of these sites has not been taken into account in the housing trajectory.
- 1.10 Loves Farm in St Neots has historically delivered approximately 100 dwellings per year. However, it is predicted in the AMR December 2017 that up to 185 dwellings per annum would be delivered from the St Neots East - Loves Farm site. There is no evidence to justify a substantial increase in annual delivery rates above historic levels. It is suggested that the start date for development should be 2020/21 to enable the marketing of parcels of land, purchase by housebuilders, and submission of reserved matters. This also suggests that housing delivery rates at St Neots East – Loves Farm should be reduced to 100 dwellings per annum, which still means that all of the proposed 1,020 dwellings at the site would be delivered during the plan period.

1.11 It is predicted that up to 250 dwellings would be delivered per annum from St Neots East - Wintringham Park site after the initial phases of the development, which is unrealistic since this level is higher than the average delivered nationally from strategic developments, it is higher than delivery rates at Cambourne in South Cambridgeshire, and higher than similar types of developments in Bedfordshire (Biggleswade East, West of Kempston and Great Denham). In addition, this site is immediately adjacent to Loves Farm and the housing market area would be the same for both sites. There is no evidence to justify a higher housing delivery rate for St Neots East - Wintringham Park above historic rates for Loves Farm. It is suggested that the start date for development should be 2020/21 to enable the marketing of parcels of land, purchase by housebuilders, and submission of reserved matters. The housing delivery rates at St Neots East – Wintringham Park should be reduced to 100 dwellings per year while development at St Neots East – Loves Farm is still taking place, and increased to 200 dwellings per year thereafter i.e. from 2029/30. As a result it is estimated that 600 fewer dwellings would be delivered from the St Neots East – Wintringham Park site during the plan period.

1.12 The request in respect of Policy SEL2 is as follows:

We request that annual housing delivery rates for St Neots East are adjusted downwards to more realistic levels in the housing trajectory. It would be appropriate to assume a maximum of 200 dwellings per year could be delivered from these sites i.e. St Neots East – Loves Farm East and Wintringham Park. If evidence shows that housing delivery rates do increase then a subsequent upward adjustment could be made for future trajectories.

A lower housing delivery rate at St Neots East would mean that development at the site would extend beyond the plan period, and as such additional sites will need to be allocated to meet the housing target in PS HLP2036. We request that additional suitable and deliverable sites need to be identified, including a residential-led mixed use development at Gifford's Park.

