

**HUNTINGDONSHIRE  
LOCAL PLAN  
EXAMINATION**

**MATTER 6 ALLOCATIONS  
- HUNTINGDON SPA**

**REP ID: 1118661**

**HEARING STATEMENT**

## CONTENTS

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|  |          |
|--|----------|
| <b>Matter 6 – Proposed site allocations – Huntingdon Spatial Planning Area</b> | <b>1</b> |
| Issue  | 1        |
| Relevant Policies – SEL1.1, SEL1.2 and HU1-HU19                                | 1        |
| Strategic Expansion Location: Alconbury Weald                                  | 2        |
| Huntingdon   | 3        |

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## MATTER 6 – PROPOSED SITE ALLOCATIONS – HUNTINGDON SPATIAL PLANNING AREA

### Introduction

- 1.1 This Matter 6 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 three larger allocations within the Huntingdonshire SPA: Policy SEL 1.1: Former Alconbury Airfield and Grange Farm (Rep Id. 365); Policy SEL 1.2: RAF Alconbury (Rep Id. 368); and, Policy HU1: Ermine Street (Rep Id. 370).
- 1.2 In this Statement we respond to two questions for each 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 The HLM Matter 12 Statement: Supply and Delivery of Housing Land deals with housing delivery matters generally. That Statement identifies the 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 Huntingdon 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 and points in the housing market cycle. The average annual delivery rate at Cambourne is 229 dwellings.
  - A number of the strategic scale developments in Huntingdon are located in close proximity to one another i.e. Alconbury Weald, RAF Alconbury and Ermine Street in Huntingdon which is likely to have significant implications for housing delivery, because they will in effect be competing sites within the same local housing market.
  - There is uncertainty about the availability of some sites included within the housing trajectory, including RAF Alconbury which is currently occupied by the US Air Force. It has not yet been confirmed that the USAF intend to move from the site, and there is no indication or agreed timetable for when this might occur.
- 1.4 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 must be reflected in the housing trajectory depending on the circumstances at individual sites if it is to have any credibility.

### Issue

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

### Relevant Policies – SEL1.1, SEL1.2 and HU1-HU19

### Questions

*Taking each of the following proposed site allocations individually:*

## Strategic Expansion Location: Alconbury Weald

### SEL1.1 – Former Alconbury Airfield and Grange Farm

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

- 1.5 In 2014 outline planning permission was granted for 5,000 dwellings on this site (Ref. 12/01158/OUT). The reserved matters application for key site infrastructure has been approved and the infrastructure required for the initial phase has been provided. Reserved matters have been approved for 260 dwellings, and construction has started on those dwellings. We understand that five housebuilders are currently involved in the initial development phase. The housing monitoring data for the site in the AMR December 2017 shows that 48 dwellings were completed by 2016/17 and that 102 dwellings were completed in 2017/18. It is not clear whether reserved matters are being prepared for the next phase of dwellings; this is relevant because it is predicted in the AMR December 2017 that 220 dwellings will be completed on site during 2018/19, but at present not all of those dwellings have reserved matters approval.
- 1.6 The outline approval for the site included an affordable housing review mechanism for the proposed development to reflect the infrastructure costs associated with the initial phase of development. The agreed affordable housing levels for the proposed development are 0% for the first 300 dwellings and 10% for Phase 1 overall. The policy requirement is that 40% of dwellings should be affordable on sites of 10 dwellings or more. It is not clear whether the level of affordable housing within the proposed development will increase dramatically in later phases but this seems 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?

- 1.7 It is predicted in the AMR December 2017 that approximately 250 dwellings would be delivered per annum at the Alconbury Airfield and Grange Farm site in the early stages, which increases to 300 dwellings per annum once established. It is unrealistic to assume annual delivery rates at Alconbury Weald which are just below the highest average recorded levels nationally and higher than similar developments in higher value neighbouring authority areas. It would be appropriate to assume a maximum of 200 dwellings per annum could be delivered from this site. As a result 1,270 fewer dwellings would be delivered from this site during the plan period.

- 1.8 The request in respect of Policy SEL1.1 is as follows:

*We request that annual housing delivery rates for Alconbury Weald are adjusted downwards to more realistic levels in the housing trajectory. It would be appropriate to assume a maximum of 200 dwellings per annum could be delivered from this site. If housing delivery rates do increase then a subsequent upward adjustment could be made for future trajectories.*

*A lower housing delivery rate at Alconbury Weald 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.*

*In these circumstances, we request that additional suitable and deliverable sites are identified, including a residential-led mixed use development at Gifford's Park, to meet the under supply of housing from the strategic allocations and the non-delivery of policy compliant levels of affordable housing.*

### SEL1.2 – RAF Alconbury

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

- 1.9 The site has no current planning status in terms of planning applications. The site is currently occupied by the US Air Force. We understand from news reports in 2017 that the US Defence Department is reviewing the previous decision to withdraw the USAF from RAF Alconbury. As such, the availability of the RAF Alconbury site for development during the plan period is uncertain.

- 1.10 We note that no representations have been submitted by the landowner to PS HLP2036 to confirm that the site is available for development.

11) *What is the expected timescale and rate of development and is this realistic?*

- 1.11 It is predicted in the AMR December 2017 that development at RAF Alconbury would start in 2028/29, and would deliver between 180 to 185 dwellings per annum once established. However, this site is adjacent to the Alconbury Airfield and Grange Farm site, which is predicted to deliver 300 dwellings per annum at the same time that RAF Alconbury is expected to deliver. It is unrealistic to assume that a combined total of 480 dwellings per annum would be delivered from these two neighbouring sites. In addition, land at Ermine Street located less than 1.5 miles south of Alconbury Weald is also included within the housing land supply, and is also predicted to deliver at the same time, which must raise further concerns over the ability of each site to meet very optimistic housing delivery rates within such close proximity. As set out above, the availability of the RAF Alconbury site for residential development is uncertain because it is currently occupied by the US Air Force, and even if the site is available during the plan period then delivery must be uncertain because of the close proximity of the Alconbury Airfield and Grange Farm site which will still be delivering when the RAF Alconbury site is predicted to become available. It would be appropriate to delete the RAF Alconbury site from the housing supply until evidence is provided that it is available and that delivery will occur during the plan period. As a result 1,320 dwellings would be removed from the housing land supply.

- 1.12 The request in respect of Policy SEL1.2 is as follows:

*We request that evidence is provided to demonstrate that RAF Alconbury is available for development, and, if it is, then a more robust and realistic assessment of housing delivery at the site is made when considered in conjunction with development commitments at Alconbury Weald.*

*If, as is likely, RAF Alconbury is not available for development then additional sites will need to be allocated to meet the housing target in PS HLP2036. In these circumstances, we request that additional suitable and deliverable sites need to be identified, including a residential-led mixed use development at Gifford's Park.*

## Huntingdon

### HU1- Ermine Street

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

- 1.13 The site was allocated in the 2002 Huntingdonshire Local Plan, but no progress has been made to deliver that allocation. The site comprises two parcels of land; Ermine Street North and Ermine Street South. In November 2015 outline planning permission was granted for a business park at Ermine Street North (Ref. 13/00730/OUT), but no reserved matters have yet been submitted for the proposed business park, and we also note that no application has been submitted for the proposed residential development of 400 dwellings on this part of the site. The 2005 application for residential development on the Ermine Street South site (Ref. 05/00526/OUT) was deemed withdrawn by the Council, and there has been no progress on the 2010 application (Ref. 10/01712/OUT) since 2013, but it is still currently pending. In November 2017 a Scoping Opinion Request (Ref. 17/70254/SCOP) was submitted by Bloor Homes South Midlands for up to 1,100 dwellings on the Ermine Street South site; the scope of the proposed Environmental Statement to be prepared for the proposed development was considered acceptable by the Council.
- 1.14 In conclusion, in terms of planning status and planning applications, the land at Ermine Street North has an extant planning permission for a business park but no action has been taken to implement that permission, and no permissions exist for the proposed 400 dwellings on this site. The land at Ermine Street South has a pending application for residential development but no action has been taken to determine that application, and it appears that a new planning application for 1,100 dwellings is currently being prepared.

11) What is the expected timescale and rate of development and is this realistic?

- 1.15 Policy HU1: Ermine Street, Huntingdon is allocated for 1,440 dwellings. It is predicted in the AMR December 2017 that development at Ermine Street North would commence in 2022/23 and would deliver 80 dwellings per annum. It is predicted that development at Ermine Street South would also commence in 2022/23 and would deliver 50 dwellings per annum in the first two years, which increases to 100 dwellings per annum thereafter. It appears that the delivery assumptions for the Ermine Street sites have taken no account of the housing commitment at Alconbury Airfield and Grange Farm and the proposed allocation at RAF Alconbury which are located in close proximity to the site and are expected to be delivered at the same time. There must be some concern that the predicted housing delivery rates would be achieved from all these sites because they would in effect be competing sites within the same local market area.
- 1.16 In addition to concerns about housing delivery, the supporting text to Policy HU1 also highlights some of the challenges to the delivery of development at this site, including uncertainty about the delivery timetable for new highway links and access arrangements and the delivery of safe connections for pedestrians and cyclists. It is not mentioned, but we understand that there are landownership constraints to the delivery of the anticipated pedestrian and cycle link; the land required to deliver a foot/cycle bridge is not controlled by the developer or local authorities. There is no evidence that land at the Ermine Street sites is developable during the plan period, and in fact there is a very significant amount of uncertainty about the delivery of infrastructure required for the successful implementation of development at the site.
- 1.17 On the basis of the above, it would be appropriate to delete the Ermine Street sites from the housing trajectory. As a result, 1,440 dwellings would be removed from the housing land supply.
- 1.18 The request in respect of Policy HU1 is as follows:

*We request that evidence is provided to demonstrate that land at Ermine Street is actually available for development during the plan period. If the site is not developable during the plan period then it should be deleted, with associated adjustments to the housing trajectory. If the site is developable then a more robust and realistic assessment of housing delivery at the site should be made when considered in conjunction with development commitments at Alconbury Airfield and Grange Farm and RAF Alconbury.*

*If, as is likely, land at Ermine Street is not available for development then additional sites will need to be allocated to meet the housing target in PS HLP2036. In these circumstances, we request that additional suitable and deliverable sites need to be identified, including a residential-led mixed use development at Gifford's Park.*

