

Sent by email to: localplan@huntingdonshire.gov.uk

18/08/2017

Dear Sir/ Madam

Response by the House Builders Federation to the Huntingdonshire Local Plan Consultation Draft 2017

Thank you for consulting the Home Builders Federation (HBF) on the Huntingdonshire Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Duty to co-operate

Whilst we acknowledge the co-operation that has been undertaken across Cambridgeshire it is unclear from the Plan, and the supporting evidence, how the Council will seek to ensure that these partnerships will be maintained and cross boundary issues resolved once the plan is in place. For example, the Plan does not appear to set out the Housing Market Area (HMA) within which the area is located nor the number of homes that are expected to be delivered within this HMA. It is important that such details are set out within the plan to ensure that effective monitoring of housing delivery can be undertaken across the HMA and where necessary contingency measures implemented. We consider it important to set out in policy how any shortfall in delivery across the HMA will be addressed. At present, it would appear that housing needs across the HMA will be addressed, however, a sound plan should have a specific policy that sets out the contingency measures that would be applied if any one plan is likely to under deliver.

We also remain concerned that the assumptions being made by the Mayor of London with regard to migratory trends have not been considered in the paper on the Objectively Assessed Housing Need published in April 2017. There is a need for greater co-operation with London on these matters given the potential shortfall in housing delivery being experienced in the Capital at present with supply expectations of 42,000 dwellings per annum (dpa) being significantly below the Mayor's lowest assessment of need at 49,000 dpa. However, even 42,000 dpa may be unachievable given the latest monitoring report published by the GLA indicates delivery of conventional housing (self-contained flat and houses) for the 2015/16 period as being 32,919.

Housing needs

Whilst we are pleased to note that the Council is seeking to meet, and indeed go beyond, its housing needs by setting a housing requirement of 21,000 homes at 840 dpa we are concerned that the assessment of needs does not take sufficient account of market signals. The Local Plan sets out in the para 7.6 that the lower quartile house price to income ratio is 9.4 and that this represents a “substantial gap between average earnings and housing costs”. We would agree with this statement and would suggest that it warrants a more considerable uplift than the 5% set out in the SHMA and the 10% uplift resulting in the Council’s decision to plan for 840 dpa. The Local Plan Expert Group suggested that an uplift of 25% would be appropriate where affordability ratios were over 8.7. Other relevant indicators such as an increasing number of households in temporary accommodation and homeless households in priority need would suggest that the Council must apply a more significant uplift.

Housing Delivery

We welcome in paragraph 4.38 the Council’s commitment to a review of allocations should delivery fall below 20% of the residual annual target for a rolling three-year period. However, we believe that this would be more effective if the Council were to include this as a policy rather than the supporting text. We also welcome the Council’s use of the Sedgefield method in assessing their 5-year housing land supply which is in line with PPG and shows a commitment to ensuring the backlog in housing identified by the Council is addressed early in the plan period. However, we are concerned that the Council’s 5-year land supply is marginal at 5.24 years. This supply is at significant risk of falling below five years given the significant step up in delivery expected from 586 units in 2016/17 to 1135 units in 2017/18. We suggest that the Council seeks further small site allocations to bolster this position and ensure it has a more secure five-year land supply prior to submission.

Strategic Expansion Locations

The Council has identified two development opportunities as being locations for strategic expansion and which will provide a sizable proportion of the housing provision within the area. Whilst we welcome the identification of such strategic development locations the Council needs to ensure that it considers the implications of any delay in delivery of these sites. New communities inevitably take longer to deliver than smaller developments and can face delays and setbacks. To ensure that such eventualities are considered we would suggest that the Council monitor the delivery of these sites separately to the rest of the plan and put in place contingencies to ensure that should delays in delivery occur on these sites any shortfalls are addressed elsewhere in the Borough.

LP29 – Health Impact Assessment

We recognise the importance of ensuring new development supports the wider aims of local authorities and their partners to improve the health and well-being of their residents and workforce. However, the requirement for all major applications to undertake an Health Impact Assessment (HIA) is unnecessary and an additional burden

on applicants. The PPG sets out that HIAs “*may be a useful tool to use where there is expected to be significant impacts*” but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. As such where a development is in line with policies in the local plan an HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring an HIA.

We trust that these issues will be considered carefully by the Council and look forward to further consultation on the next iteration of the Local Plan. I would also like to be placed on your consultee database and receive updates on any further consultations about the emerging Local Plan.

Yours faithfully

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