

HUNTINGDONSHIRE LOCAL PLAN EXAMINATION

Matter 12 – The supply and delivery of housing land

Question 6) Has there been persistent under-delivery of housing? In terms of a buffer for a five year land supply of housing site should this be a 5% or a 10% buffer?

Paragraph 47 of the NPPF establishes the need for a 20% buffer where there has been a persistent under delivery of housing against to planned supply. In assessing whether or not here has been a persistent under supply is considered in paragraph 3-035 of PPG and recognises that it is a question of judgement for the decision maker. PPG also identifies in the same paragraph that factor will vary from place to place and as such there can be no universally applicable test. In looking at delivery during this plan period against identified needs there is clear evidence that the Council has under delivered against its OAN of 804 units since 2011. This has led to an estimated back log of 1,264 homes at the end of 2017/18 and as such would suggest the implementation of the 20% buffer is the correct approach.

Question 7) How should the shortfall in delivery since 2011 be dealt with?

Paragraph 3-035 states that “*Local planning authorities should aim to deal with any undersupply within the first five years of the plan period where possible*” which provides and requires the Council to prioritise the delivery of this backlog and prepare a plan that achieves this aim. The Council have stated in paragraph 1.18 of the Housing Land Supply Position 2017 that they intend to address the backlog within the first five years as required by PPG and we would agree that this is the correct and policy compliant approach.

Question 10) Is there a case for staggered or phased housing requirement with a lower figure in the early years of the plan period to take account of the large strategic allocations? If so what would be appropriate phasing?

No. A staggered or phased housing requirement effectively pushes back the delivery of much needed housing until later on in the plan period and is contrary to paragraph 3-035 of PPG this will mean the existing back log will not be delivered within the first five years. If the Council does not think the strategic site allocations will deliver the required homes early in the plan period then it should allocate additional smaller sites that will achieve this objective. The use of a phased requirement will also increase the risk that the full housing requirement will not be delivered should the strategic sites not

come forward as expected. If there were delays then then there would be less time to be able to rectify the situation and risk delivery of the plan. As such the policy compliant and prudent approach is to maintain a flat annual requirement, as the Council has done, that ensures housing delivery is not pushed back to the end of the plan period and any backlog in delivery is met in the first five years of the plan.

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