

BRECKLAND LOCAL PLAN EXAMINATION IN PUBLIC

HEARING STATEMENT

MATTERS 4, 5 AND 14

ON BEHALF OF THE HANS HOUSE GROUP OF COMPANIES

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED) PLANNING AND COMPULSORY PURCHASE ACT 2004

Pegasus Group

Suite 4 | Pioneer House | Vision Park | Histon | Cambridgeshire | CB24 9NL

T 01223 202100 | **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester
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CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	MATTER 4 - HOUSING: THE SUPPLY OF LAND FOR HOUSING, DELIVERABILITY AND VIABILITY	1
3.	MATTER 5 - HOUSING: THE SETTLEMENT HIERARCHY AND SPATIAL DISTRIBUTION OF NEW HOUSING	4
4.	MATTER 14 - STRATEGIC URBAN EXTENSIONS, HOUSING SITE ALLOCATIONS AND SETTLEMENT BOUNDARIES	5

1. INTRODUCTION

- 1.1 This Hearing Statement is prepared by Pegasus Group on behalf of the Hans House Group of Companies which has development interests over circa 20.2 hectares of land at White House Lane, Attleborough.
- 1.2 The Hans House Group of Companies regards the Local Plan's reliance upon the Attleborough Sustainable Urban Extension (SUE), to deliver a significant proportion of the District's housing need and practically all of Attleborough's planned growth, to be unsound. It is considered strongly that a wider range of housing sites in Attleborough should be allocated to provide choice and flexibility and to secure sustainable development in this well-served location.

2. MATTER 4 - HOUSING: THE SUPPLY OF LAND FOR HOUSING, DELIVERABILITY AND VIABILITY

4.3: Are the projected completions in the Housing Trajectory based on a realistic assessment of the likely timing of housing delivery? What evidence is there to support the completions shown for each year, and what assumptions have been made?

- 2.1 The projected completions are overly optimistic in terms of the delivery timescales for the Attleborough and Thetford SUEs. In the case of the Attleborough SUE, they cannot be considered realistic and are not a reliable basis for the Local Plan's housing trajectory.

Attleborough SUE

- 2.2 The Attleborough SUE is subject to a 'live' undetermined planning application 3PL/0996/2017. The application has an agreed extension of time to 26 June 2018 although as with any planning application there is no guarantee the application will be determined by then.
- 2.3 The Housing Trajectory suggests the first completions will take place in monitoring year 2019/2020. Assuming the application secures a resolution to grant planning permission in June 2018, it will be necessary to:
- Finalise the S106 agreement; for a site of this scale this will be complex and will include multiple land interests and bodies such as Highways England and Network Rail; furthermore it will need to be negotiated having regard

to deliverability, developer's cash flow, and 'trigger points' for the provision of supporting infrastructure;

- Issue the outline planning permission;
- Conduct any necessary land marketing and transactions; it is noted that Ptarmigan Land is a strategic land promoter and does not develop sites itself; furthermore the Attleborough SUE is in multiple ownership which could add complexity to the process
- The eventual developer to secure Reserved Matters approval, discharge all pre-commencement conditions, and undertake any relevant S106 planning obligations;
- Commence development on site and complete the first units and associated infrastructure.

2.4 This is an extensive programme of work, each aspect of which is likely to take several months to conclude, and each of which is susceptible to delay. The Thetford SUE illustrates the risks of this; the application for the SUE was submitted in July 2011; the S106 was signed in November 2015, four years later. It is now March 2018 and development has still not commenced at the Thetford site, and the Trajectory indicates that 25 completions will occur in 2019/20. It is fair to say that, in light of the experience of Thetford, first completions at Attleborough are much more likely beyond the immediate five year period. This would result in a shortfall in delivery during the first five years of the Plan period which would need to be made up on other sites. Indeed, given the experience at the Thetford SUE, and that site's treatment within the Housing Trajectory, it appears there is a glaring inconsistency in the approach to the Attleborough SUE.

2.5 Furthermore, future stages of development will be affected by the need to finance and secure significant infrastructure improvements in a timely fashion. At Attleborough, the SUE requires the provision of a link road and a bridge over the Breckland Line railway. Should this not be secured at the appropriate trigger point, then future housing delivery will be delayed until the situation is addressed.

2.6 There are other examples elsewhere of where large-scale housing developments have taken a long time to come forward. For example, Northstowe in South Cambridgeshire was first envisaged as delivering completions in 2008. In practice, the first completions took place in early 2017, nine years after they were expected

to. The implications of this delay have been significant; South Cambridgeshire District Council has been unable to demonstrate a five-year housing land supply since 2014 and this has resulted in numerous speculative applications and a 'planning by appeal' scenario where many schemes have proceeded to public inquiries and hearings. The amassed housing shortfall in South Cambridgeshire at the end of the Plan period in 2016 was 7,324 units – 37% of the original planned requirement of 20,000.

- 2.7 A delay of the extent observed at Thetford, or Northstowe, will seriously undermine the five year supply and the contribution the Attleborough SUE can make towards the Plan requirement over the full course of the plan period. Each year of delay will push completions back beyond the Plan period; a delay of the scale seen at the Thetford SUE could result in non-delivery of circa 800 units across the plan period.

Thetford SUE

- 2.8 The Thetford SUE is timetabled to commence delivery in the monitoring year 2019/20. Given that the Thetford site is significantly more advanced than the Attleborough SUE (with the first named housebuilder having been signed up in 2017), this appears to be a more realistic timetable and simply highlights how over-optimistic the planned timescales for the Attleborough SUE are.
- 2.9 Nonetheless, it remains the case that the SUE's development will be complex and future stages could be susceptible to delay (for example, in respect of trigger points for delivery of infrastructure). As such, further flexibility in the planned supply is desirable.

4.8: Should the Housing Trajectory include a 20% buffer, within the figures?

- 2.10 Yes. The Annual Monitoring Report 2015/16 reveals that, against Breckland's adopted Core Strategy target to 2001, it has underdelivered in 13 of the past 15 monitoring years, and has amassed a cumulative shortfall of 3,130 units by 2015/16. This clearly represents persistent under delivery and a 20% buffer is appropriate.

4.12: Is addressing the shortfall via the Liverpool method justified?

- 2.11 No. The Planning Practice Guidance makes clear that past shortfall should be addressed within the first five years wherever possible; this approach is most consistent with the national policy imperative to 'boost significantly' the supply of housing.
- 2.12 Each situation must of course be considered on its own merits, having regard to the specific characteristics of the Plan area, the presence of any constraints (e.g. Green Belt) and the opportunities to secure sustainable development.
- 2.13 Breckland has a number of reasonably sized settlements with good access to transport and services; these include Thetford, Attleborough, Watton and Dereham. There is potential at each of these settlements to make a strong contribution towards the District's housing supply – however these do not need to exclusively take the form of SUEs. It is our view that a wider range of sites can be allocated at these sustainable settlements, providing choice and flexibility in the land supply. It will also allow for the wider involvement of a larger range of housebuilders and developers (including smaller developers). This will allow more flexibility in the planned supply, especially at an earlier stage of the Plan period. As such, there is a far stronger chance that shortfall can be addressed within a five year period.

3. MATTER 5 - HOUSING: THE SETTLEMENT HIERARCHY AND SPATIAL DISTRIBUTION OF NEW HOUSING

5.3 Is the reliance on two large Strategic Urban Extensions to deliver 50% of the housing over the Plan period justified?

- 3.1 No. As set out in our response to Q4.8, Breckland has fallen well short of its housing targets over a prolonged period. Whilst Strategic Urban Extensions are a valid approach to meeting housing need, they carry significant risk of delay. If delivery at the SUEs is delayed, the shortfall in housing will simply be perpetuated. Should a shortfall in the five year housing land supply emerge, or future Housing Delivery Test targets be missed, policies for the supply and distribution of housing will be rendered out-of-date and one can expect development to be directed towards less sustainable locations under speculative planning applications.

- 3.2 The delivery of housing plays an essential role in achieving sustainable development, particularly in the social strand. A shortfall in housing provision can result in worsening housing affordability and availability, fewer affordable and shared ownership homes. This can affect the decisions of households and families in respect of where they can afford to live, and whether they can continue to afford living in their existing communities. It can also have implications for commuting patterns. By contrast, if housing provision is secured in the most sustainable locations, residents will be able to enjoy good access to services and employment.
- 3.3 It is of vital importance that the Council allocates more, smaller sites which can come forward quickly with a lesser infrastructure burden and less complex planning procedures. In the context of the Spatial Strategy, the Plan's reliance on one site at Attleborough could prevent sustainable development from coming forward in this top-tier settlement. With no other allocated sites in the town, it will not be possible to deliver meaningful amounts of housing in Attleborough. This will increase pressure on the local housing market, with potential implications for affordability and future housing requirements under the proposed standardised methodology. If a shortfall in the five year supply emerges, housing will come forward on a speculative basis in other locations in Breckland with comparatively fewer local services, employment opportunities or access to public transport. Meanwhile opportunities to deliver development in the sustainable location of Attleborough will simply be unable to be realised.

4. MATTER 14 - STRATEGIC URBAN EXTENSIONS, HOUSING SITE ALLOCATIONS AND SETTLEMENT BOUNDARIES

14.1 Is the projected site delivery trajectory (commencement 2019/20) realistic?

- 4.1 No – refer to our response to Q4.3

14.3 Is the Attleborough SUE based on a robust assessment of reasonable alternatives? Is it the most sustainable option?

- 4.2 In terms of the assessment of reasonable alternatives, insufficient consideration has been given to alternative routes for the link road. There is the potential to deliver a link road which takes an alternative alignment around the east of

Attleborough. This would link the B1077 to the A11 at the limited access junction to the east of Attleborough which is grade-separated and free-flowing (as opposed to the at-grade roundabout junction to the south of Attleborough). This alternative route could be routed through an adjoining site north and south of the railway, previously promoted by Taylor Wimpey; it is noted that Taylor Wimpey carried out some initial feasibility work on the route of this during earlier stages of the Local Plan process. As part of an eastern link road, the A11 junction can be upgraded to an 'all-movements' junction and the Hans House Group of Companies has been in preliminary discussions with Highways England as the operator of the A11 to explore how this may be achieved.

- 4.3 Moreover, as discussed in our response to Q5.3, the Attleborough SUE is not the most sustainable option for development in the town. Attleborough is eminently one of the most sustainable locations in Breckland with a good range of local services including retail, education, healthcare provision, as well as regular rail services. Reliance on a single site to deliver all the allocated housing in Attleborough means that, should that site be delayed, development may not come forward in this sustainable location for a lengthy period of time. It is important that other, smaller allocations are made in Attleborough to make the most of the town's potential to achieve sustainable development.
- 4.4 Furthermore we note that previous iterations of the Local Plan (such as the Preferred Directions version) have proposed a total of 4,000 units to be allocated at Attenborough. This has reduced to 2,650 in the submission version, which appears to be a 'retrofitting' of the capacity of the SUE during the plan period, to the overall settlement target. It is not a reflection of the strong sustainability credentials of Attleborough. As such, there is 'headroom' to allocate more smaller sites in the town.
- 4.5 Drawing the above together, the strategy for Attleborough – and indeed the wider Local Plan – requires revision to allocate additional smaller sites. Land at White House Lane, Attleborough is of a meaningful size to deliver a decenis a sustainable location for development well-related to the settlement and with potential to contribute to the local Linear Park aspiration set out in Attleborough's Neighbourhood Plan.
- 4.6 In terms of the site's suitability for development, the Council accepts in general terms that it is suitable for development, in the 2014 SHLAA. The 2014 SHLAA discounted the site (SHLAA reference A08) principally due to impact on the railway

crossing, but otherwise notes that the site is suitable for development in all other respects. We consider that the reason for discounting the site is unfounded; the LPA evidently accepts there is capacity at the B1077 railway and within the local highway network crossing to accommodate 1,200 dwellings; that being the amount of development envisaged at the SUE under policy GEN4 before delivery of the link road is required. The figure of 1,200 is not reflective of the maximum capacity of the road network; the Transport Assessment supporting the planning application for the SUE (document reference 1409-42/TA/01, paragraph 4.27) models the impact of 1,650 dwellings prior to delivery of the link road and confirms there is adequate capacity within the local road network to accommodate that higher level of growth. Finally we note the SHLAA noted that the railway crossing would require automation; this has now been carried out by Network Rail as part of the modernisation and resignalling of the Breckland Line. As such, there is no substantiated or compelling reason why land at White House Lane could not come forward for development.

- 4.7 As such, the site represents an option for allocation and can contribute towards the achievement of a more flexible development strategy for Attleborough, thereby playing a role in overcoming our soundness concerns in respect of the Plan.