

## Supporting the delivery of new housing

Questions on which we should like your views

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	Yes	Some reservations (please give details)	No
Q1. Will the proposed change improve the delivery of new housing in your area?			The change is unlikely to improve housing delivery in this area, as most allocated employment sites are either needed for that purpose (demonstrated by an employment land study) or in locations that are unsustainable for housing. Paradoxically, the change could frustrate housing delivery on sites allocated for residential development (by undermining the 'planned' approach to land release and thereby increasing uncertainty about land availability and the appropriate order of land releases against the tests in PPG3).
Q1 comment:			
Q2. The proposed new paragraph 42a sets out a series of considerations for local planning authorities in their determination of planning applications for proposals described in the paragraph. Do you agree that local planning authorities in determining such planning applications should consider whether:			

<p>Q2a. The proposal fails to reflect the policies in PPG3, particularly those relating to a site's suitability for development and the presumption that previously developed sites (or buildings for re-use or conversion) should be developed before greenfield sites?</p>	<p>Yes</p>		
<p>Q2b. The housing development would undermine the planning for housing strategy set out in RPG or the development plan where this is up-to-date, in particular if it would lead to over-provision of new housing where this will exacerbate, or lead to, low demand?</p>	<p>Yes</p>	<p>The words 'in particular' (relating to low demand areas) are unhelpful, as there are many other planning strategy considerations that may militate against housing on allocated employment sites; use of 'in particular' could lessen the importance attached to these other matters. Suggest using 'including' instead.</p>	
<p>Q2c. There is a realistic prospect of the allocation being taken up for its stated use in the plan period or that its development for housing would undermine regional and local strategies for economic development and regeneration?</p>	<p>Yes</p>		
<p>Q2 comment:</p>			
<p>Q3. Is the proposed change likely to be advantageous to small businesses?</p>			<p>No; these are no obvious benefits for this sector. Contrary to the expectations of the partial regulatory impact assessment, the change is unlikely to bring forward significant amounts of land for mixed-use development including premises for small businesses; in high demand areas such as this, it is more likely that sites will be used purely for housing.</p>

Q3 comment:			
<p>Q4. Local authorities will need to carry out and keep up-to-date assessments of the need for land to be allocated for employment uses (and for particular types) over the plan period and a review of the suitability of particular sites. They are already expected to do this. The Partial RIA sets out circumstances where additional costs may be incurred. Are these circumstances likely to arise frequently?</p>	<p>Yes. We already undertake such reviews, but pressures to release land at the development control stage may create demands or needs for more frequent updates so that those pressures can be faced. This will inevitably place additional burdens on local authorities at a time when budgets and labour are already severely over-stretched.</p>		
Q4 comment:			
Other comment:			