

Housing Delivery Test Action Plan 2019

Huntingdonshire District Council | Housing Delivery Test Action Plan 2019

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1 Executive Summary

- 1.1** The Housing Delivery Test (HDT) results were published on 19 February 2019. The result for Huntingdonshire District Council was **92%**. This falls only slightly short of the 95% threshold, therefore only an action plan is required to be produced.
- 1.2** An important milestone since the publication of the HDT results includes the adoption of the Huntingdonshire Local Plan to 2036. This was adopted at Full Council on 15 May 2019 and is a significant step towards boosting housing delivery in the District.
- 1.3** This action plan identifies the key issues of under delivery in the District and the key actions that can help resolve these. It identifies what Huntingdonshire can still do to boost housing supply, as well as recognising and building upon the actions that the Council is already proactively pursuing to meet its housing target.

2 Introduction

2 Introduction

- 2.1** The Housing Delivery Test was introduced in the revised [National Planning Policy Framework \(NPPF\)](#) in July 2018. It provides a new additional indicator for net housing delivery over the previous 3 years against the housing requirement for the area.
- 2.2** It is the Government's aim that Local Planning Authorities (LPAs) should aim to achieve a housing delivery rate of at least 95%. This is measured by a 3 year requirement which is based on either household projections or the latest adopted housing requirement, whichever is lower. The annual requirement of either of these over 3 years is totalled to give an overall 3 year requirement. To assess if an LPA has passed or not, the net completions recorded for those 3 years are divided by the requirement to give a delivery percentage. Details are on pages 9 to 11 of the Ministry of Housing, Communities and Local Government's (MHCLG's) [Measurement Technical Note](#), published on 19 February 2019.
- 2.3** As per paragraph 75 of the [NPPF](#), to pass the test without any further actions, a delivery rate of at least 95% over the past 3 years' worth of net completions against the requirement must be achieved. If the identified housing requirement is not delivered, the following consequences are applied in an attempt to boost housing supply ⁽¹⁾:
- the publication of an action plan if housing delivery falls below 95%;
 - a 20% buffer on the LPAs 5-year housing land supply if housing delivery falls below 85%;
 - the presumption in favour of sustainable development if housing delivery falls below 75%, once transitional arrangements have ended.
- 2.4** Huntingdonshire achieved 92%, this means that an action plan is required to be prepared in order to identify ways for Council's to proactively boost housing supply. The action plan is required to be published within 6 months of the publication of the HDT results (by 19 August 2019) to meet the requirements of the Planning Practice Guidance (PPG) ⁽²⁾.
- 2.5** This will remain in place until the subsequent results are published or a new requirement is adopted.
- 2.6** As per paragraph 215 of the [NPPF](#), the presumption in favour of sustainable development applies when the delivery of housing was substantially lower than the housing requirement over the previous 3 years. The threshold for applying this is:
- November 2018 - delivery below 25% of housing required;
 - November 2019 - delivery below 45% of housing required;
 - November 2020 - delivery below 75% of housing required.
- 2.7** This is Huntingdonshire's first action plan and identifies ways of ensuring the Council's housing requirement is met so that the HDT can be passed when the next results are published.

1 [Paragraph 062 \(reference ID: 3-062-20180913\)](#) of the Planning Practice Guidance (PPG)

2 [Paragraph 073 \(reference ID: 3-073-20180913\)](#)

3 Huntingdonshire Policy Context

- 3.1** Since the publication of the Housing Delivery Test results, the [Huntingdonshire Local Plan to 2036](#) was adopted and superseded all previous development plans and saved policies (apart from made neighbourhood plans).
- 3.2** However, at the time the Housing Delivery Test was published, the planning policy context for Huntingdonshire was as follows:

Huntingdonshire Local Plan (1995) and Alteration (2002)

- 3.3** The Huntingdonshire Local Plan was adopted in December 1995, and was superseded in part by the Local Plan Alteration, adopted December 2002, which relates to housing.
- 3.4** The [Planning and Compulsory Purchase Act 2004](#) provided for the saving of policies in adopted or approved local plans for a period of 3 years from its commencement, which was September 2004. In order to ensure continuity in the plan-led system and a stable local planning framework, the Secretary of State issued a Direction (Schedule 1) in September 2007, listing all policies from the Huntingdonshire Local Plan 1995 and Local Plan Alteration 2002 which were to be saved beyond 28 September 2007 until such time as they are replaced by policies in Development Plan Documents (DPDs). The [schedule](#) can be viewed on the District Council's website. Those policies not saved in the schedule expired.

Core Strategy (2009)

- 3.5** The Core Strategy DPD was adopted in September 2009. The document sets the strategic spatial planning framework for how Huntingdonshire will develop up to 2026. It contains policies to manage growth and guide new development in the District. The Core Strategy provides the local context for considering the long-term social, economic, environmental and resource impacts of development.

Huntingdonshire West Area Action Plan (2011)

- 3.6** The Huntingdonshire West Area Action Plan was adopted in February 2011. The area action plan covers approximately 300 hectares of land west of Huntingdon Town Centre with the aim of delivering growth and regeneration to this part of Huntingdon. The remaining undeveloped sites included in this action plan have been carried forward as site allocations in the proposed Huntingdonshire Local Plan to 2036.

Huntingdonshire Local Plan to 2036

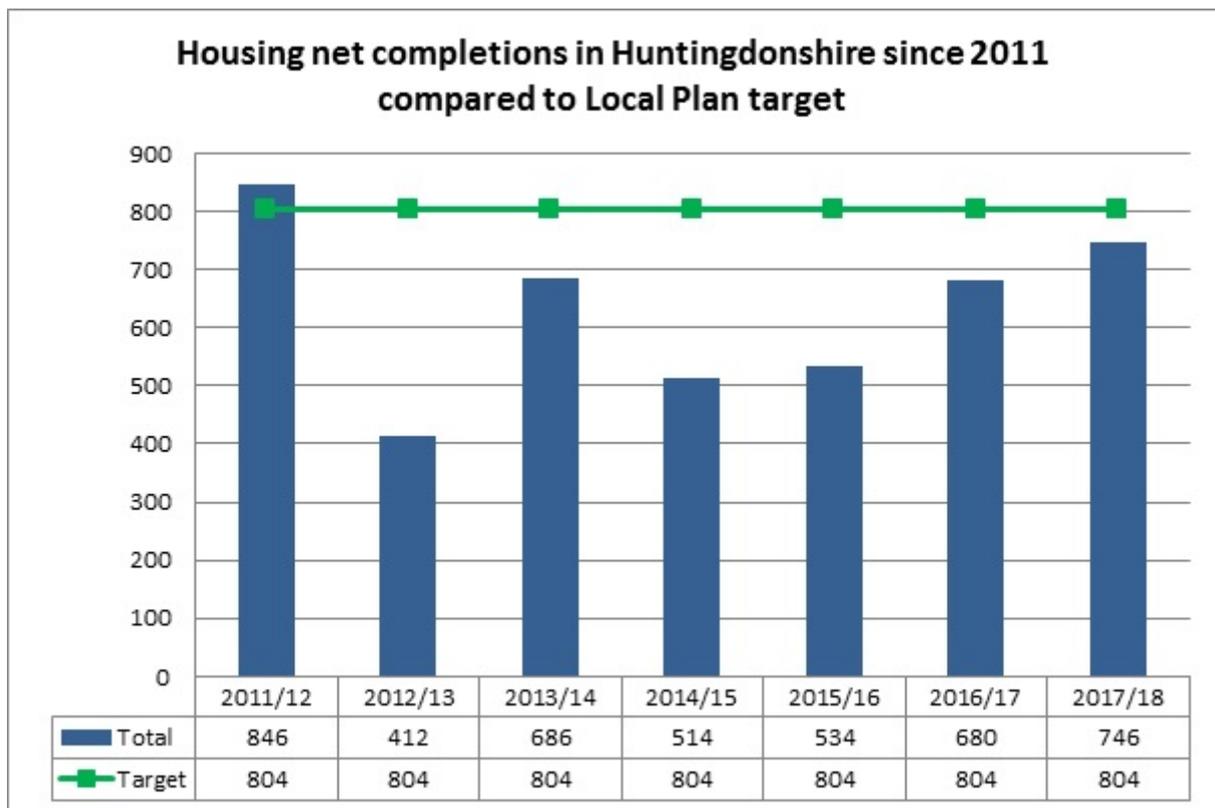
- 3.7** Changes in the national planning policy position, as well as changes in local circumstances, accelerated the need for the Council to pro-actively reconsider its local planning policy position.
- 3.8** At the time of the publication of the HDT results in February 2019, the Huntingdonshire Local Plan was still an emerging plan which incorporated both new local planning policies and identifying development allocations. It was submitted on 29 March 2018 for examination and completed several hearing sessions throughout July and September 2018. The Inspector declared that the Council complied with its duty to co-operate and that the Plan could be made sound through main modifications, consultation was completed in January 2019.
- 3.9** In February 2019, the Council were awaiting the Inspector's final report. In the time since the HDT results were published, the Huntingdonshire Local Plan to 2036 was adopted at Full Council on 15 May 2019 and supersedes the Local Plan 1995, the Local Plan Alteration 2002, the Core Strategy 2009 and the Huntingdon West Area Action Plan 2011.

4 Housing Delivery in Huntingdonshire

4 Housing Delivery in Huntingdonshire

- 4.1 Huntingdonshire has a strong vision for future development by creating sustainable environments in which people want to live, work, play and visit.
- 4.2 The [Huntingdonshire Local Plan](#) Plan period is 2011 to 2036. The Local Plan identifies sites to meet its housing and employment needs in full by allocating sites best suited to meeting overarching sustainability objectives and offering suitable diversity and opportunity for its residents.
- 4.3 While Huntingdonshire has allocated enough land to meet its future need, there has been historic under delivery in the District which the proposed Local Plan seeks to address. The identified annual housing requirement figure is 804 net dwellings a year, over the plan period, this equates to 20,100 new homes.
- 4.4 Figure 4.1 sets out the delivery of new C3 homes (dwelling houses) against the Local Plan annual requirement figure since the start of the Plan period.

Figure 4.1 C3 Housing net completions in Huntingdonshire compared to Local Plan target



HDT Result for Huntingdonshire

4.5 At the time of publication in February 2019, the Housing Delivery Test confirmed that Huntingdonshire achieved 92% of its housing requirement over the past 3 years. This meant that an action plan was required as it falls just short of the 95% threshold. Table 1 sets out Huntingdonshire's result.

Table 1 HDT result for Huntingdonshire from February 2019

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2018 measurement	Housing Delivery Test: 2018 consequence
2015-16	2016-17	2017-18		2015-16	2016-17	2017-18			
722	707	784	2,213	574	719	746	2,039	92%	Action Plan

4.6 The Government used a standard method to set housing targets. They used the 2012 household projections for year 1 (2015/16) and the 2014 household projections for years 2 and 3 (2016/17 and 2017/18). They also applied an element of student and communal accommodation (C2) by applying a multiplier to the housing completions, this explains why there are slightly differing completions figures between Table 1 and Figure 4.1. The idea of including C2 into these delivery figures is that they can release C3 dwelling houses when people make the move from their own home to a care facility for example thus reducing the need for new build market houses.

4.7 As part of the transitional arrangements, the affordability ratio was not included in this year's results as stated in footnote 18 of [MHCLG's Housing Delivery Test Measurement Rule Book \(July 2018\)](#). The affordability ratio is calculated by dividing house prices by gross annual workplace-based earnings (based on the median and lower quartiles of house prices and earnings). For Huntingdonshire, the affordability ratio would increase the required number of homes to be delivered. The Rule book clarifies that the affordability ratio will be introduced gradually year by year for future requirements so by 2021, household projections will cease to form any part of the Housing Delivery Test.

4.8 As Huntingdonshire's Local Plan had not yet been adopted at the time the results were published and the Core Strategy target was over 5 years old, the methodology on pages 3 and 4 of the [Technical Note](#) required that the completions were compared against household projections. Huntingdonshire adopted the Local Plan, which included an annual housing delivery target of 804. As this target is higher than the household projections, there is no change to the HDT result of 92% as explained in paragraph 12 of the [Measurement Rule Book](#). After the adoption of a Local Plan, LPAs do have an option to re-calculate their HDT result, however using the methodology set out in the HDT Rulebook, the result would be the same due to the transitional arrangements of using the lower of either the household projections or the local plan target.

4 Housing Delivery in Huntingdonshire

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Monitoring 2018/2019

- 4.9** Research including site visits have been undertaken to determine how many housing completions and starts have taken place over the last year. Initial results indicate that completions will be higher than the 804 target and nearer to 1,000. This will be confirmed in August once final data checking has been carried out between Cambridgeshire County Council's Business Intelligence Research Group and HDC. With this in mind, subject to no government changes in how the HDT results are calculated next time, HDC is likely to pass next year's HDT and will not be required to produce an action plan no matter which target is used (housing projections or local plan target).
- 4.10** This supports the trajectory that was produced as part of the [Annual Monitoring Report \(AMR\)](#) (published in December 2018). This anticipates above annual average target rates of completions, particularly over the next 5 years following Local Plan adoption, see Table 2 (for the full table see Appendix 1). This includes a capped trajectory based on the comments made by the Local Plan Inspector about concerns over market absorption and build out rates surrounding two main clusters of sites where the Council's two strategic sites are located:
- one being a cap of 300 completions a year from SEL1.1 and SEL1.2 (Alconbury Weald) and HU1 in the Alconbury Weald and north-western Huntingdon area;
 - the second being a cap of 200 completions a year from SEL2 (St Neots East including Wintringham Park).
- 4.11** Therefore, it can be concluded that housing under delivery is a short term issue for the district and that housing delivery is increasing.

Table 2 Post examination capped trajectory for the next 5 years against Local Plan requirements as published in the AMR 2018 (page 63)

	2011/ 12	2012/ 13	2013/ 14	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018/ 19	2019/ 20	2020/ 21	2021/ 22	2022/ 23
Dwellings Completed	846	412	686	514	534	680	746					
Identified for completion								1,034	1,496	1,428	1,290	1,218
Cumulative Completions	846	1,258	1,944	2,458	2,992	3,672	4,418	5,452	6,948	8,376	9,666	10,884
Target	804	804	804	804	804	804	804	804	804	804	804	804
Cumulative Target	804	1,608	2,412	3,216	4,020	4,824	5,628	6,432	7,236	8,040	8,844	9,648
Monitor - No. dwellings above or below cumulative development plan target	42	-350	-468	-758	-1,028	-1,152	-1,210	-980	-288	336	822	1,236

- 4.12** It should be noted the cap is only to calculate the housing trajectory and 5 year housing land supply figure. There is no actual cap on delivery on any of these sites and the developers/housebuilders involved anticipate housing completions in excess of the capped figures.

5 Key Issues Affecting Delivery

- 5.1** Huntingdonshire has identified a number of key issues that have affected the past delivery of new housing. These have been grouped into 4 key categories:
- Site constraints;
 - Supply issues;
 - Planning process; and
 - Infrastructure and services.
- 5.2** The trajectory questionnaires sent out as part of the 2018 AMR to developers/agents/landowners of permitted or allocated sites have helped to identify these issues. Developers/agents/landowners were asked to identify any issues that were impacting their sites coming forward sooner and affecting delivery rates. The survey also asked what actions could be undertaken by the Council to help reduce these issues. The responses received have helped to inform the key actions and the Council's responses to these stated later in this action plan.
- 5.3** In addition, discussions with planning officers and members of the wider Development team have given insight into other issues which have impacted delivery and identified actions that are already in the process of being implemented or are planned.
- 5.4** The Local Plan examination has helped identify some issues. The hearing sessions held in July and September 2018 allowed the Council and developers/agents to discuss delivery rates and the issues that are preventing proposed allocations in coming forward sooner. This process identified site specific issues but also wider strategic issues. While identifying these, it also allowed for a discussion on the projects that are already underway or are planned which will positively increase housing delivery.

Issue 1

Site Constraints

- Land values and viability
- Land contamination issues
- Flooding
- Heritage

Issue 2

Supply issues

- Lack of skills and labour availability
- Availability of materials
- Availability of house builders and Registered Social Landlords
- Market absorption
- Uncertainty over Brexit

5 Key Issues Affecting Delivery

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Issue 3

Planning process

- Time to determine planning applications, respond to pre-application enquiries and discharge conditions
- Time to agree planning obligations and S106 agreements
- Status of the Development Plan

Issue 4

Infrastructure and services

- Timelines of wider transport projects such as the A14
- Existing transport network and service provision

- 5.5** As a result of recognising these key issues, HDC have identified a number of actions to help resolve or mitigate these issues. Some of these actions are already being undertaken and will be carried forward, other actions are those that will be started going forward to address the shortfall of housing delivery and boost housing supply.
- 5.6** It must be recognised that some of the issues identified cannot be resolved in the short term and some are outside of HDC's direct control. However, a number of these issues can be addressed by HDC working with its delivery partners.

6 Key Actions and Responses

- 6.1 Following the identification of the key issues that have affected housing delivery, a number of actions and responses have been identified for each of these, several of which closely relate to the strategic priorities and actions in the Council's [Corporate Plan \(2018-2022\)](#).
- 6.2 Some of these actions are new; other actions are already in progress and are being implemented by either Huntingdonshire District Council or its working partners; and some actions have already been implemented, the results of which need time to be assessed, such as the newly adopted Local Plan and implications its policies are having.
- 6.3 By recognising all of these actions, Huntingdonshire is demonstrably being proactive in the delivery of housing.

Issue 1 - Actions and Responses

Site constraints

- **Land values and viability** - Huntingdonshire District Council in their newly adopted Local Plan to 2036 have policies which allow for viability assessments to be taken into account when relevant to reduce the impact of this constraint and not affect housing delivery.
- **Land contamination issues** - continue working relations with Environmental Health in assessing risk and potential mitigation so that land contamination does not affect housing delivery. Making the relevant information and documentation available to Environment Health and any other relevant bodies is key to assisting with this.
- **Flooding** - an SFRA was produced as part of the Local Plan evidence base to inform the selection of site allocations and also support the determination of planning applications. This document and the continuation of our working relationship with the Environment Agency will be important actions to sustain when assessing schemes for new housing in areas of flood risk. In addition, the use of the sequential test in the planning process has enabled housing delivery to be maximised in areas of low flood risk.
- **Heritage** - Local Plan policies require schemes to be well designed so that they do not have a detrimental impact on heritage assets; this is considered to be reasonable given the level of protection afforded to heritage assets in law.

Issue 2 - Actions and Responses

Supply issues

- **Skills and labour availability** - the housing and mixed-use allocations in the new Local Plan promotes growth up to 2036, thus facilitating an increase in the working age population in the District. Huntingdonshire's Economic Development team are working closely with Alconbury Weald and the designated Enterprise Zone including their IMET training facility as well as working to rejuvenate market towns and key service centres to bring about economic growth and greater opportunities for employment. These were identified as key areas for attention in the [Huntingdonshire Economic Growth Plan 2013-2023](#) which can continue the delivery of this vision now the Huntingdonshire Local Plan has been adopted.
- **Materials** - HDC have no control over this issue.

6 Key Actions and Responses

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- **Availability of house builders and Registered Social Landlords** - HDC have no control over this issue.
- **Market absorption** - Huntingdonshire's Local Plan supports a broad mix of tenures and dwellings sizes to avoid over supply of certain dwelling sizes and tenures in the housing market. In addition, HDC has been cautious in its approach to market absorption in the AMR. The 2018 AMR housing trajectory reflects comments made by the Planning Inspector during the Local Plan examination in regard to market absorption and build out rates of two main clusters of sites. A cap of 300 dwellings a year has been recorded for sites SEL1.1, SEL1.2 and HU1 in the Alconbury Weald and north-western area of Huntingdon and a cap of 200 dwellings a year from site SEL2 in St Neots. It should be noted the cap is only to calculate the housing trajectory and 5 year housing land supply figure. There is no actual cap on delivery on any of these sites and the developers/housebuilders involved anticipate housing completions in excess of the capped figures. Further reviews of this position will be undertaken in subsequent AMRs.

The Local Plans Team work with Neighbourhood Planning Groups including those who wish to undertake a housing needs assessment. The housing needs assessment allows for more detailed housing mix policies specifically targeted at the housing mix and housing need of the existing Neighbourhood Plan Area. This allows for greater diversity of housing supply to enhance market absorption.

In addition, Huntingdonshire is keen to promote Self and Custom Build housing as demonstrated in Local Plan policy LP25. Huntingdonshire has a Self and Custom Build Register open whereby people can register their interest for a plot. Monitoring of the Self and Custom Build Register shows that there is growing demand for this type of housing, so to help meet this growing need in the District, work between Planning/Housing teams and Parish Councils to promote suitable sites is underway.

- **Uncertainty over Brexit** - HDC have no control over this issue.

Issue 3 - Actions and Responses

Planning process

- **Time to determine planning applications, respond to pre-application enquiries and discharge conditions** - multiple actions are being undertaken across the Development Service. Firstly, a LEAN review is underway across the planning teams with the overall aim to maximise efficiency. This review has seen various actions completed including: a publication of a new [Planning Guide](#) for applicants and agents; revised validation checklists to minimise the time applications are invalid and to ensure consistency; agent forums; and training for staff, members and Parish Councils on the planning process and requirements. Secondly, a revision to the scheme of delegation has been put in place whereby applications for single dwellings no longer need to go to Development Management Committee. Thirdly, a review of conditions is underway making them more flexible in terms of triggers.

An update of the [Landscape and Townscape Supplementary Planning Document \(2007\)](#) will start in Summer 2019. This will allow for applicants and agents to have up to date guidance on landscape issues. This has the potential to help speed up the planning process by reducing the need for amended proposals, saving officer and planning agents' time.

Finally, agreements are in place on our two strategic site allocations (Alconbury Weald and Wintringham Park) whereby dedicated officers are assigned to these sites to ensure that officer knowledge of the site is retained and that good working relationships are sustained throughout the life of both of these long-term developments. In addition, to identify any delivery problems rapidly, quarterly monitoring statistics are expected from both strategic sites.

- **Time to agree planning obligations and S106 Agreements** - monitoring of the timescales taken in the preparation and conclusion of S106 Agreements will continue.
- **Status of the Development Plan** - before the adoption of the current Local Plan, the development plan for Huntingdonshire was complex with a number of saved policies and plans in place (see 3 'Huntingdonshire Policy Context'), this resulted in a period of complex decision making. Also, the creation of the [National Planning Policy Framework](#) in 2012 saw the introduction of the tilted balance. Huntingdonshire had the tilted balance engaged as a result of persistent under delivery, in part as a result of not allocating land for housing since 2002 and for not having an up to date development plan.

Issue 4 - Actions and Responses

Infrastructure and services

- **Timelines of wider transport projects such as the A14** - works by Highways England on the improved [A14](#) are expected to be completed and open to the public in 2020. These works have removed the need for schemes to provide a nil detrimental impact on the A14 and have created additional capacity for future housing allocations to be delivered.
- **Existing transport network and service provision** - work with Highways England on the A428 and East-West Rail projects to remove future constraints to the southern part of the District will continue. In addition, Huntingdonshire continues to work in partnership with the Combined Authority on their [10 key projects](#) to further minimise the lack of appropriate transport infrastructure as a constraint to housing delivery and boost the connectivity of the Cambridgeshire and Peterborough area.

What are we doing to implement the Huntingdonshire Local Plan to 2036?

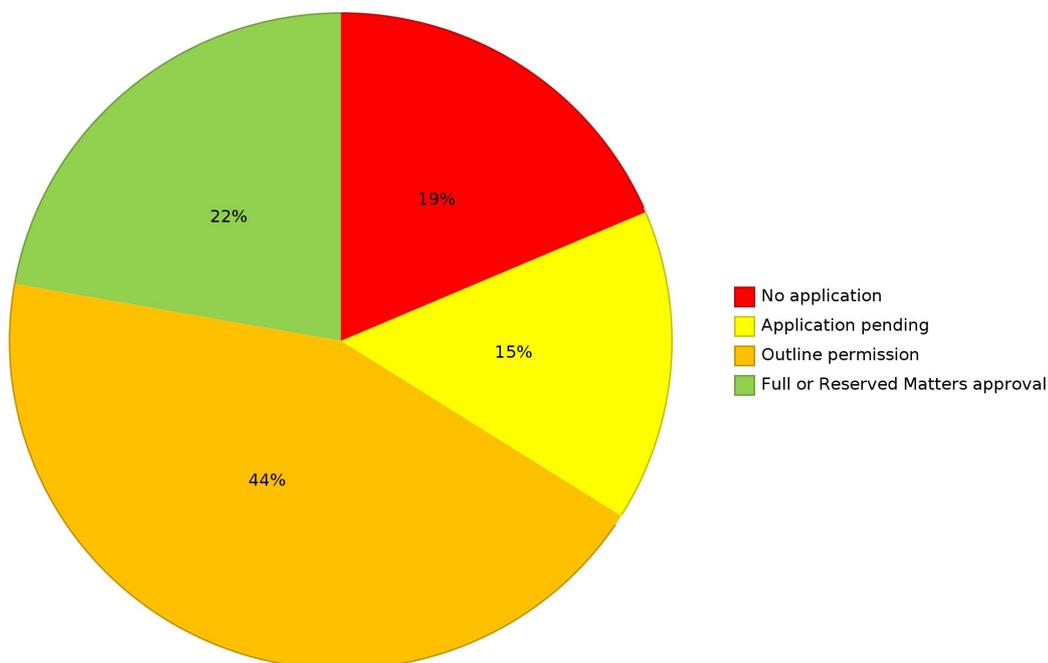
- 6.4 The Council's [Housing Strategy \(2017-2020\)](#) and [Corporate Plan \(2018-2022\)](#) detailed several actions for the Council, including the adoption of the Local Plan. This was achieved on 15 May 2019 and underpins many of the above actions. Post adoption, it is important to monitor the implications each policy is having, this will be done as with previous development plans, in the Council's AMR.
- 6.5 The Local Plan allocates 50 sites for new housing on a range of locations within the District of varying sizes, tenure, associated infrastructure and complementary uses. Monitoring the progress of site allocations in terms of planning permissions and housing completions will also continue in collaboration with Cambridgeshire County Council's Business Intelligence Research Group. Discussions with developers will continue when compiling the housing trajectory in the AMR so that a revised 5 year housing land supply position can be produced and stalled sites can be identified.
- 6.6 Research into housing delivery and the time taken from pre-application discussions through to planning approval and then to the first dwelling being completed on the site has been started and will be an ongoing task as new sites are permitted. The data collected will be used to further inform rates of delivery and the

6 Key Actions and Responses

time it takes for sites of varying sizes and complexities to come forward and build out. This will be used to help inform the housing trajectory each year in the AMR alongside the trajectory responses received from developers/agents so that realistic rates of completions can be recorded for each site.

- 6.7** At the time of publication, 35 of the 50 housing allocations (equating to 70%) either have an application on the site pending consideration, have outline permission and/or reserved matters approval or full planning permission. The following chart illustrates the proportion of dwellings this equates to:

Figure 6.1 Progress of Local Plan Sites (% in terms of dwelling numbers) June 2019



- 6.8** As part of the Local Plan evidence base, a [Housing and Economic Land Availability Assessment \(HELAA\)](#) was published in December 2017. This identified land that was suitable and unsuitable for development across the District. By using this and working with the Strategic Housing Team, potential Rural Exception sites can be identified to bring forward much needed affordable housing to support policy LP28 of the new Local Plan to 2036. To support this further, the Local Plans team will continue to work with Neighbourhood Planning groups and support those who wish to allocate small pieces of land for housing, particularly rural exception and self/custom build housing in their Plans.

- 6.9** Also, the Local Plans team and Implementation team are working towards a review of the Developer Contributions Supplementary Planning Document and Community Infrastructure Levy (CIL) charging schedule. These will take account of up to date viability information and inputs from the development industry to ensure that these do not place undue constraints on the future delivery of development.

7 Monitoring

- 7.1** The key actions identified in this action plan will be monitored in the Council's AMR. The AMR monitors policy objectives, adopted policies, housing, business and renewable commitments and completions. It also provides a housing trajectory that details the 5 year housing land supply and expected completions throughout the Local Plan period.
- 7.2** The AMR is published by 31 December each year. For 2019, it was decided that the housing element of the AMR and the housing trajectory detailing the 5 year housing supply, will be published by the end of September 2019 rather than 31 December. This is 3 months earlier than in previous years so to provide a more up to date picture in relation to the 31 March baseline that is required in the AMR.
- 7.3** The remaining elements of the AMR (policy monitoring, business and renewable data, CIL and neighbourhood plans) will be published in a separate element by 31 December to meet legislative deadlines. In the 2019 edition, the AMR will also include a section monitoring the progress of the key actions detailed in this action plan as well as future Housing Delivery Test results. This will be included in the second half of the AMR published in December to tie in with the publication of the HDT results in November by MHCLG.

8 Appendix 1 - Anticipated housing delivery throughout the Plan period

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8 Appendix 1 - Anticipated housing delivery throughout the Plan period

Table 3 Post examination capped trajectory for the Plan period against Local Plan requirements as published in the AMR 2018 (page 63)

	2014/12	2013/13	2014/14	2015/15	2016/16	2017/17	2018/18	2019/19	2020/20	2021/21	2022/22	2023/23	2024/24	2025/25	2026/26	2027/27	2028/28	2029/29	2030/30	2031/31	2032/32	2033/33	2034/34	2035/35	2036/36
Dwellings Completed	846	412	686	514	680	746																			
Identified for completion								1,034	1,465	1,629	1,218	1,330	1,432	1,193	805	704	635	635	635	650	650	635	635	635	635
Cumulative Completions	846	1,258	1,944	2,458	2,932	3,672	4,418	5,452	6,948	8,376	9,666	10,884	12,214	13,646	14,839	15,644	16,348	16,983	17,618	18,253	18,903	19,553	20,188	20,823	21,458
Target	804	804	804	804	804	804	804	804	804	804	804	804	804	804	804	804	804	804	804	804	804	804	804	804	804
Cumulative Target	804	1,608	2,412	3,216	4,020	4,824	5,628	6,432	7,236	8,040	8,844	9,648	10,452	11,256	12,060	12,864	13,668	14,472	15,276	16,080	16,884	17,688	18,492	19,296	20,100
Monitor - No. dwellings above or below cumulative development plan target	42	-350	-468	-758	-408	-1,152	-420	-960	-288	336	822	1,236	1,762	2,390	2,779	2,760	2,680	2,511	2,342	2,173	2,019	1,865	1,696	1,527	1,358