



Strategic Planning & Research Unit

For and on behalf of
Bedfordia Developments Ltd

Huntingdonshire Local Plan 2018
Response to Inspectors Questions

MATTER 3 – DEVELOPMENT STRATEGY

Prepared by
**Strategic Planning Research Unit
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June 2018



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Date: June 2018

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Huntingdonshire Local Plan Examination
Response to Matter 3
On behalf of Bedfordia Developments Ltd

0.0 INTRODUCTION

- 0.1 This representation has been prepared by the Strategic Planning and Research Unit (SPRU) of DLP Planning Ltd (DLP) on behalf of Bedfordia Developments Ltd in response to the Inspector's Matters Issues and Questions. Our client has interests at Land East of Eaton Socon, West of River Ouse, St Neots.

3.0 MATTER 3– DEVELOPMENT STRATEGY

Issue: Whether the Development Strategy is justified, effective and consistent with national policy.

Overall

1) What is the basis for the overall strategy for development and the broad distribution of growth set out in Policy LP2? What options were considered and why was this chosen? Is it justified?

3.1 There is no explanation as to why 3 quarters of the housing growth should be located within the 4 spatial planning areas.

3.2 The actual distribution within the locations identified has substantial variation (see response to question 4 table 1 below).

3.3 The SA does not provide a sufficiently clear analysis as to justify the choice of this option. A detailed justification is required as the Huntingdon Area contains a wide range of different settlements within it, compared to the other areas which are much more focused on a single settlement. The SA provides an insight into the comparative levels of allocation within the different areas that add up to the 3 quarters mentioned in the policy are the most appropriate for each of the areas.

2) Are the Spatial Planning Areas appropriately defined, what is the basis for them?

3.4 Bedfordia Developments Ltd supports the identification of St Neots as one of four Spatial Planning Areas. The town of St Neots demonstrates a high level of sustainability, with a number of schools, shops and other community services that are readily accessible. It also demonstrates good transport links, including a mainline railway station, and strategic road connections which will be enhanced following the planned improvements to the A1, A428 and A14.

3.5 Policy LP 7 as drafted is also supported in general terms, but there should be greater policy support for residential development proposals that fall within the four Spatial Planning Areas, as these are characterised as being the most sustainable locations for growth. A minor amendment to the policy is therefore proposed below:

POLICY LP 7 SPATIAL PLANNING AREAS

Each Spatial Planning Area to which this policy applies is defined above.

Development Proposals on Unallocated Sites

A proposal for development on a site which is additional to those allocated in this plan will be supported where it fulfils the following requirements and is in accordance with other policies:

Residential Development

A proposal for housing development (class 'C3') or for a residential institution use (class 'C2') will be supported and encouraged where it is appropriately located within a built-up area of an identified Spatial Planning Area settlement.

Relationship of settlements within a Spatial Planning Area

A proposal will be supported where it will not undermine the role of the primary settlement within the Spatial Planning Area or adversely affect the relationship between the settlements of the Spatial Planning Area whether this is through its scale or other impacts.

- 3.6 Despite identifying the St Neots Spatial Planning Area as a key location to deliver the growth envisaged by the plan, the LP only proposes five residential allocations in St Neots, providing a total of just 194 dwellings. These are:
- a. SN1 - St Mary's Urban Village (40 dwellings)
 - b. SN2 - Loves Farm Reserved Site (40 dwellings)
 - c. SN3 - Cornwell Road North (80 dwellings)
 - d. SN4 - Cornwell Road Car Park (20 dwellings)
 - e. SN5 – Former Youth Centre, Priory Road (14 dwellings)
- 3.7 SN1, SN2, and SN5 have extant planning permissions for residential development. This leaves just 100 dwellings being allocated for future development within the urban area of St Neots for the remainder of the plan period.
- 3.8 As this is one of the most sustainable locations in the District for growth it is considered that there are suitable, available and deliverable sites which could be brought forward in the short to medium term to achieve the minimum of 979 dpa in the early years of the plan.
- 3.9 It is unclear why the SA did not identify these reasonable alternatives and assess the impacts of an increase in the delivery expected within this settlement.
- 3.10 The present level of allocations to St Neots is not justified and the plan should allocate a greater number of sites within St Neots to help deliver the housing requirement of 979 dwellings per annum.

3) Is the approach to the scale and type of development set out in Policies LP2 and LP7 Justified?

- 3.11 This site was initially submitted to the Council for consideration via the 'call for sites' process in August 2017 which accompanied a consultation on the draft Local Plan. The site was then included in the HELAA update assessment issued for public consultation in October 2017. Representations were made on the Council's assessment of the site, but these appear to have been overlooked.
- 3.12 This site extends to approximately 14.1ha. It is situated between Brook Road and the River Great Ouse. The site is well contained. It is bound to the east by the river, to the north by the St Neots bowling club and to the west by existing residential development at Brook Road. It forms part of the urban fabric of St Neots and is not part of the open countryside. The land demonstrates excellent sustainability, enabling easy access to a range of local facilities in Eaton Socon (circa 5 minute walk) and district centre services, employment opportunities and facilities in St Neots (circa 15 minute walk), primary vehicular access to the site would be taken off River Road. This land is in private ownership and currently used as pastureland for grazing purposes and is underused. The site is capable of delivering approximately 120 sensitively designed residential units which integrate well into this setting. The north and east boundary of the proposed scheme will consist of an extensive green buffer which extend the Riverside Park and link to the allotments to the east. A Local Equipped Area of Play is

located to the south of the site. Additionally, there are three attenuation basins. The existing pond and woodland are retained to the south of the site. Cycle paths and pedestrian routes provide excellent connectivity between the green open space; this proposed residential scheme and the existing settlement boundary.

i. Key Relevant Planning History

- 3.13 A planning application was refused on appeal in April 2000 for a “countryside park and residential development” totalling 14.16ha on this site. At the time this application was refused, a public inquiry was underway to consider objections to the Council’s Local Plan alterations (March 2000). The site was designated as open space in the previously adopted Local Plan 1995. A public inquiry was held over 2000/2001 into objections to the Deposit Draft of the Huntingdonshire Local Plan Alteration, Housing Land and Planning Obligations. As a result of this inquiry, the Inspector identified a need for allocation of land for a further 1479 dwellings and therefore proposed this site to be allocated in the Local Plan to take a portion of this identified need.
- 3.14 The Council did not support the Inspector’s recommendation regarding this site, claiming that the Inspector had given insufficient weight to the visual harm that would result from the loss of countryside in this location. In rejecting the Inspector’s proposal, the Planning Officer acknowledged the relevance and material consideration that the site’s *“relative accessibility by non-car modes outweigh the harm to the countryside that would result from the development”*.
- 3.15 In disagreeing with the Inspector, the Council took the decision not to allocate the land in the Local Plan Alteration. In January 2003, Bedfordia issued a claim against Huntingdonshire Council seeking to quash the Local Plan Alteration. This claim was then dismissed in the High Court in November 2003. In summary, historically the site has been deemed suitable for development and recommended for allocation by an Inspector albeit this was historically rejected by the Council.
- 3.16 In reaching this conclusion a number of important points were conceded about the proposed development, not least that the harm to the countryside is outweighed by the site’s accessibility by non-car modes. The Environment Agency also stated that they were “satisfied that the development would not result in increased flood risk” and that “adequate highway capacity is considered available”. Whilst it is acknowledged that this planning history is now some 15 years old, the conditions of this site have not changed since the site was seen as suitable for allocation by an independent planning Inspector. On the contrary, as evident in Paragraph 47 of the Framework, there is an increasing emphasis on the effective delivery of housing in suitable locations.

4) What is the scale of development actually planned (including commitments) in and is this in line with the distribution set out in Policy LP2?

- 3.17 The scale of development planned in each area is not clear set out however reviewing the plan is as follows:

a. Huntingdon (10,314 dwellings)

- i. SEL1 Alconbury 5,000
- ii. SEL 1,2 Alconbury 1,680
- iii. HU 1 Ermine STt 1,440
- iv. HU 2 Former Forensic Science Laboratory 105
- v. HU 3 Former Police HQ 75

- vi. HU 6 George Street, Huntingdon approximately 300
- vii. HU 7 Gas Depot, Mill Common 11
- viii. HU 8 California Road 55
- ix. HU 9 Main Street 30
- x. HU 12 Dorling Way, Brampton 150
- xi. HU 13 Brampton Park 600
- xii. HU 14 Brampton Park Golf Club Practice Ground 65
- xiii. HU 17 RGE Engineering, Godmanchester 90
- xiv. HU 18 Wigmore Farm Buildings, Godmanchester 13
- xv. HU 19 Bearscroft Farm, Godmanchester 750

b. St Neots Spatial Planning Area (4,049 dwellings)

- i. SEL2 St Neots East 3,820
- ii. SN1 - St Mary's Urban Village 40
- iii. SN2 - Loves Farm Reserved Site 40
- iv. SN3 - Cornwell Road North 80
- v. SN4 - Cornwell Road Car Park 20
- vi. SN5 – Former Youth Centre, Priory Road 14
- vii. SN6 - North of St James Road, Little Paxton 35

c. St Ives Spatial Planning Area (480 dwellings)

- i. SI 1 St Ives West 400
- ii. SI 2 St Ives Football Club 30
- iii. SI 4 Former Car Showroom, London Road, 50

d. Ramsey Spatial Planning Area (895 dwellings)

- i. RA 1 Ramsey Gateway (High Lode) 110
- ii. RA 2 Ramsey Gateway 50
- iii. RA 3 West Station Yard and Northern Mill 30
- iv. RA 4 Field Road, Ramsey 90
- v. RA 5 Whytefield Road, Ramsey 40
- vi. RA 6 94 Great Whyte, Ramsey 35
- vii. RA 7 East of Valiant Square, Ramsey 90
- viii. RA 8 Former RAF Upwood and Upwood Hill House, Ramsey 450

3.18 The variance between the four Spatial Areas is substantial with the lowest level of allocations at St Ives at 490 dwellings is only a little above the 435 allocated in the key Service centre of Buckden.

- 3.19 The table below attempts to compare the levels of growth proposed in terms of existing household spaces within each urban area. This demonstrates that the Huntingdon area is going to be subject to a much higher rate of growth than the other areas, this might have implications for both delivery rates as well as infrastructure delivery.
- 3.20 The difference in terms of both the overall level of allocations as well as the level of growth between the 4 areas suggests that the policy grouping as presently proposed is not particularly meaningful.

Table 1 Resident population and household spaces compared to planned allocations

Urban Area	Usual resident	Household spaces	Proposed allocations	Increase in household spaces from proposed allocation
Alconbury and the Stukleys (ward)	3,709	1,416		
Brampton	4,862	2,128		
Godmanchester	6,506	2,813		
Huntingdon	39,014	13,339	10,314	77%
St Neots	30,252	13,065	4,049	31%
St Ives	16,384	7,177	480	7%
Ramsey	7,829	3,462	895	26%
Buckden	3,293	1,427	435	30%

Source NOMIS

- 5) **Are the strategic expansion locations at Alconbury Weald and St Neots East justified in principle? What alternative strategies for accommodating development were considered and why was this approach preferred? (detailed issues concerning these site allocations are dealt with under Matters 6 and 7)**
- 3.21 Alconbury and St Neots are identified in all 3 initial growth options in table 4.3 of the SA and as such there does not appear to have been any consideration of alternatives.
- 3.22 In the SA which considered the distribution of growth page 152 paragraph 4.25 both locations were included but the density of development varied.
- 3.23 There appears to have been no option for development that considered alternatives to these locations.
- 3.24 In our Regulation 19 submission we identified that we had concerns regarding the lead in times and rate of delivery of these allocations this is dealt with in our submissions on Matter 4.

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