



# HUNTINGDONSHIRE LOCAL PLAN EXAMINATION

## HEARING STATEMENT

MATTER 3 - DEVELOPMENT STRATEGY

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CADDICK LAND

# **HEARING STATEMENT**

**On behalf of: Caddick Land**

**In respect of: Huntingdonshire Local Plan Examination – Matter 3**

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## 1.0 Introduction

- 1.1 This hearing statement is submitted on behalf of Caddick Land in order to assist the Inspector in their examination of the Huntingdonshire Local Plan ('the New Local Plan').
- 1.2 Caddick Land have previously made representation in respect of the following documents: -
  - The Huntingdonshire Local Plan to 2036 Consultation Draft (August 2017);
  - A proposal for a housing allocation on Land to the east of North Street, Stilton through the Call for Sites process (August 2017);
  - A submission to the Huntingdonshire Council Housing and Economic Land Availability Assessment (October 2017); and
  - A further submission to the Huntingdonshire Local Plan to 2036: Proposed Submission Draft (February 2018).
- 1.3 This statement draws upon the concerns set out within these previous representations in order to provide a response to a number of questions listed under **Matter 3: Development Strategy** ('the DS') published on 16<sup>th</sup> May 2018.

## 2.0 Overall

### Question 1

- 2.1 The Huntingdonshire Core Strategy was adopted in 2009 and sets out a housing requirement of at least 14,000 homes in Huntingdonshire in the period from 2001 to 2026. Policy CS2 of the Core Strategy highlights that of this requirement, the majority of development is to be directed to the four Spatial Planning Areas; Huntingdon, St Neots, St Ives and Ramsey and Bury. Outside the Spatial Planning Areas, the Core Strategy directs some limited development to the Key Service Centres of Fenstanton, Sawtry and Yaxley. This housing strategy, put forward in the Core Strategy is modest, and reflects a policy of housing restraint.
- 2.2 In addition to this modest allocation of land, the Core Strategy indicates that other housing will come forward on 'windfall' sites within the built-up areas of the towns and villages, in line with the scale of development set out in the Settlement Hierarchy and suggests that this will be in excess of the 5,500 homes planned for through the strategic development opportunities.
- 2.3 Since the Core strategy was adopted the National Planning Policy Framework ('NPPF') has been published and this requires local planning authorities to boost significantly the supply of housing. To do this the NPPF requires local planning authorities to plan positively and to meet the full objectively assessed need ('OAN') for market and affordable housing and to provide an additional buffer of between 5% and 20% to ensure choice and competition for land.
- 2.4 The current objectively assessed need is provided within the Huntingdonshire Objectively Assessed Housing Need (2017) prepared by Cambridgeshire County Council. This document suggests that the objectively assessed need for Huntingdonshire is 20,100 dwellings between 2011 and 2036. This equates to an annual housing requirement of 804 dwellings.
- 2.5 The annual housing requirement in Huntingdonshire is therefore increasing by 43.6%. This is a significant increase in the housing requirement for the District.
- 2.6 In September 2017, the Government published a document entitled 'Planning for the right homes in the right places'. This document sets out proposals to increase the supply of new homes within local authorities. Proposals within the consultation paper would see the starting point for housing requirements reflect the DCLG household projections for that authority adjusted on the basis of evidence of acute affordability. In the case of Huntingdonshire, the Standardised Methodology shows the future housing needs of the authority as amounting to 1010 dwellings per year (based on current evidence) a total of 25,250 dwellings across a 25-year plan period. This change in national planning policy suggests a need for a further 25.6% increase in the amount of housing development required in the Huntingdonshire District; an increase of 80.4% from that set out in the Core Strategy.

<b>Housing Requirement (per annum)</b>		
<b>Core Strategy</b>	<b>New Local Plan to 2036</b>	<b>Indicative assessment of housing need</b>
560	804	1010

- 2.7 Despite the significant increase in the housing requirement and the Governments pro-growth agenda, the strategy to meet this need within the New Local Plan remains essentially unchanged from that contained in the Core Strategy.
- 2.8 We have looked back at the initial issues and options stage of the New Local Plan, produced in 2012. At this stage the New Local Plan considered high, medium and low growth options for the District wherein the housing requirement varied but the initial issues and options stage did not consider different spatial strategies. The spatial strategy remains unchanged from that adopted in the Core Strategy i.e. focusing growth on the four Spatial Planning Areas.
- 2.9 The housing need of the whole District needs to be met in the New Local Plan. However, when we look at the distribution of housing development across all settlements we see that over 85% of development is allocated in Spatial Planning Areas, with just 9.6% of development allocated to Key Service Centres and 1.7% in Local Service Centres. There are no housing allocations in the Smaller Settlements. See table attached at **Appendix 1**.
- 2.10 Directing such a large proportion of the District growth to the four Spatial Planning Areas means that there is limited development in the Key Service Centres, Local Service Centres and Small Settlements and it is therefore difficult to see how the housing needs of these settlements will be met.
- 2.11 Also, focusing development on four Spatial Planning Areas means that within these areas there is the potential for market saturation and this will not boost significantly housing development. To boost significantly the supply of housing a wide range of sites need to be allocated in a wide range of settlements.
- 2.12 The spatial strategy is important as it is the vehicle to deliver the Government growth agenda. The volume house builders re-entered the market quickly after the end of the recession but most of the small and medium sized house builders did not. It is therefore important that a range of site sizes are identified in order to encourage a full spectrum of house builder activity.
- 2.13 In this regard we note that the New Local Plan allocates 17,788 units on 58 sites. However, 11,940 units are to be delivered from just 4 sites (SEL 1.1; SEL 1.2; SEL 2 and HU1). See the table contained in **Appendix 1**. Apart from the deliverability issues associated with the development of such large sites, it is plain that the current strategy favours large volume house builders as they are the only developers that have the resources, both financial and technical, to deliver these large allocations.

- 2.14 Given the size of most of the allocations, small and medium sized house builders will largely be excluded from the market.
- 2.15 To provide for small and medium sized house builders Policy LP2 indicates that approximately a quarter of the objectively assessed need for housing, together with a limited amount of employment growth, will be permitted on sites dispersed across the Key Service Centres, Local Service Centres and Small Settlements.
- 2.16 We have seen no evidence or assessment to demonstrate that windfall will be capable of delivering this volume of development in the plan period.
- 2.17 For small and medium sized house builders the New Local Plan is reliant on these companies identifying suitable opportunities in settlements and bringing this land forward as windfall development. As there are no development limits proposed there is considerable planning uncertainties for these companies and this does nothing to ensure the deliverability of housing.
- 2.18 The strategy identified in the New Local Plan is therefore excluding a proportion of the development industry and this will lead to delivery issues.
- 2.19 Further, and in addition to the above, despite a period of sustained growth in house building and pressure to deliver more housing, it is clear from the table contained in **Appendix 2** that the Council has not achieved its housing target for 4 out of the last 5 years. This strongly suggests that the spatial strategy is flawed, particularly in its reliance on windfall sites.
- 2.20 It appears that the New Local Plan has not considered any alternative ways of meeting the housing need. Rather, it has simply rolled forward the distribution strategy contained within the Core Strategy. Rolling forward the Core Strategy housing policies does not reflect the Governments pro-growth agenda set out in the NPPF and as such we do not consider this strategy to be justified.

## 3.0 Key Service Centres

### Question 6

- 3.1 In order to be considered a Key Service Centre in the New Local Plan a settlement must be considered sustainable and offer a range of services and facilities to meet the daily needs of their residents.
- 3.2 The New Local Plan equates sustainability to the number of existing services and facilities within each settlement. This is a good starting point but on its own it is a crude way to determine the most appropriate development strategy. Services and facilities identified in the plan are considered to be indicators of sustainability but these indicators should have been weighted in order to get a true understanding of whether or not a settlement is sustainable.
- 3.3 Transportation links are often a key consideration in determining sustainability of a settlement and in our experience, the better the transportation links, the fewer services and facilities. This is because residents are easily able to access services and facilities elsewhere.
- 3.4 The perversity of complying with a simply presence/absence test, without having regard to a weighting factor or other suitable tool, is clearly shown by reference to examples. Residents of a settlement do not use public halls or visit doctors or public houses on a daily basis. Many people do not even shop on a daily basis. However, the vast majority of adult's work. Whilst it is convenient to have places of employment where you live most people travel to work. It is more sustainable if a settlement is located close to and has good access to major employment areas particularly by using public transport. We note that proximity and accessibility to places of employment is not a factor in defining Key Services Centres. This is a serious omission. A settlement which lies close to a major place of employment, with access to good public transport, can be more sustainable than an isolated settlement which benefits from a wide range of local services and facilities.
- 3.5 Further, the size of a settlement is also material. The larger a settlement is, the greater the need to sustain the community by providing further growth to support existing services and facilities (See table at **Appendix 3**) and provide new ones. This is not reflected in the current allocation of Key Service Centres.
- 3.6 Taking Stilton, allocated as a Small Settlement, as an example, we see that it is similar in population size to many of the other settlements in this section of the hierarchy.

Area	Population (2011 Census)
Buckden	2,805
Fenstanton	2,868
Kimbolton	1,477
Sawtry	6,536
Somersham	3,802
Warboys	3,994
Yaxley	9,174
Stilton	2,455

- 3.7 The only reason that Stilton is not identified as a Key Service Centre within Policy LP2 and LP8 is that it does not contain a doctor's surgery. The obvious reason for why Stilton does not have a doctor's surgery is the proximity of doctor's surgery's in Yaxley, Sawtry and Peterborough and the excellent transportation links between Stilton and these nearby settlements. Yaxley surgery currently provide a volunteer drivers service, as well as being accessible via the number 46 bus service which runs hourly between Stilton and Yaxley, Monday to Friday. Stilton does therefore have good access to a doctors' surgery – that surgery being in a nearby settlement.
- 3.8 Access to medical facilities however, are shortly to be improved in Stilton. The Chemist currently located in the Nisa Store on Church Street is relocating to 39a High Street and will run as a standalone chemist. Although not a doctor's surgery, the Chemist will reduce the importance of a doctor's surgery as residents will be able to obtain prescriptions locally, as well as providing treatment for minor ailments.
- 3.9 We consider that the methodology to determine a Key Service Centre is not effective and does not appropriately allocate settlements within the Settlement Hierarchy.

## Question 7

- 3.10 Please refer to question 1.

## 4.0 Local Service Centres

### Question 9

- 4.1 We consider that Stilton should be a Key Service Centre. This is plain when you drive down the A1(M) as Stilton is signed from the motorway (see image attached at **Appendix 4**). It is not the normal practice of the DoT to sign Local Service Centres or Small Settlement from a motorway.
- 4.2 The only reason that Stilton is not identified as a Local Service Centre within Policy LP2 and LP9 is that it does not contain a doctor's surgery. The New Local Plan indicates that Local Service Centres contain a lower level of service provision than the Key Service Centres but all offer at least:
- *Primary school*
  - *Public Hall*
  - *Doctors surgery*
  - *Convenience shop*
  - *Public House*

- 4.3 We have explained in relation to Policy LP2 and LP8 why Stilton does not have a doctor's surgery and the perversity that the simply presence/absence test. This is even more apparent in the context of the Local Service Centre tier in the settlement hierarchy. This is illustrated by reference to the population size. Stilton is larger than all other settlements in this section of the hierarchy.

<b>Area</b>	<b>Population (2011 Census)</b>
Alconbury	1,569
Bluntisham	2,003
Great Staughton	896
Stilton	2,455

- 4.4 The presence/absence test also does not have regard to the level of services and facilities which actually exist in Stilton. See table attached at **Appendix 3**. If it had it would be clear that Stilton is a highly sustainable settlement which can accommodate additional growth.
- 4.5 It is clear that the methodology to determine a Local Service Centre is not effective and does not appropriately allocate settlements within the Settlement Hierarchy.

### Question 10

- 4.6 Please refer to Question 1.

## 5.0 Small Settlements

### Question 12

- 5.1 Policy LP2 defines Small Settlements as "*all settlements with a single built up area of 30 dwellings or more.*"
- 5.2 Policy LP10 confirms that "*many settlements across Huntingdonshire have very limited or no services or facilities available. Such settlements are identified as Small Settlements.*"
- 5.3 We object to the identification of Stilton as a Small Settlement. The first reason for this is the normal usage of the word small. Small means less than normal or usual or insignificant and unimportant. Stilton has a larger population than some of the identified Key Service Centres and has a larger population than all of the identified Local Service Centres and therefore it is plainly not small. See population size table attached at **Appendix 5**.
- 5.4 Further, Stilton is plainly not a Small Settlement as it has shops, multiple places of employment, services and facilities, community meeting facilities and a modern sports centre, a primary school, a church and an excellent bus service. See table attached at **Appendix 3**. It does not have '*very limited or no services or facilities*'. It therefore does not fit the New Local Plan description of a Small Settlement.
- 5.5 We consider therefore that Small Settlements are not appropriately defined within the New Local Plan, and that the identification of Stilton as a Small Settlement is factually incorrect.

### Question 13

- 5.6 Paragraph 4.20 states that "*whilst limited allocations are made for growth at the key service centre and local service centre level, no site-specific allocations are made for small settlements*". The majority of growth within the Small Settlements will therefore come from rural exception and windfall sites. This is clearly inappropriate in the context of Stilton which can accommodate growth without harm.
- 5.7 However, the New Local Plan does not provide any analysis of windfall completions overtime or any evidence that those windfall completions will actually come forward. Even if historical analysis shows that windfall schemes have come forward in the past, this is not guaranteed, and there appears to be no capacity assessment of the Small Settlements to determine if there are sufficient opportunities to deliver the growth which the New Local Plan recognises to be needed.
- 5.8 Paragraph 17 of the NPPF confirms that the planning system should "*be genuinely plan led*" and "*provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency*".

- 5.9 Even if there was some evidence of potential future delivery from windfall sites it cannot be said that the reliance on the bringing forward such a large amount of windfall units represents a planned system.
- 5.10 In any event if settlements such as Stilton are judged to be properly regarded as a Small Settlements, it is clear that Stilton can accommodate growth without harm and therefore allocations should be made.
- 5.11 The policy is not justified.

## 6.0 Built Up Areas

### Question 16

- 6.1 The New Local Plan does not define development limits. Rather it defines a built-up area.
- 6.2 To allow interpretation of this, the New Local Plan uses a criterion based definition. The New Local Plan indicates that a criterion based definition "*avoids the perception that any form of development on any land within a drawn boundary would be acceptable, and the pressure for every piece of land within the boundary to be developed*".
- 6.3 We welcome the category which suggests that in principle individual plots and minor scale development opportunities which would provide infill and rounding off opportunities on land which is physically, functionally and visually related to existing buildings will accord with the definition. In the box which provides guidance on the interpretation of this principle it indicates small parcels of land can offer opportunities for organic growth of settlements. However, we consider that this criterion should not include an indication of the size of site which might be found to be acceptable as land within built-up areas, which would be appropriate for development, can plainly be large or small. Further the criterion should not seek to limit the scale of development as even small sites can provide a large number of dwellings.
- 6.4 The definition of a built-up area applies to all settlement typologies. It includes large settlements such as Huntingdon and small villages. The range of land and its physical size and the number of dwellings that may be appropriate on such land can therefore vary considerably.
- 6.5 It is considered therefore that the built-up area definition is not justified, due to use of the words 'minor scale' and 'small', and will not be effective as it departs from the most appropriate strategy.

# Appendix 1

## Huntingdonshire New Local Plan Proposed Allocations

Allocations	No of Units
Total Allocations:	<b>17,788</b>
<b>Strategic Expansion Locations</b>	
SEL 1.1	5,000
SEL 1.2	1,680
SEL 2	3,820
Total:	<b>10,500</b>
Percentage of Total Allocations:	<b>59.0%</b>
<b>Huntingdon Spatial Planning Area</b>	
HU1	1,440
HU2	105
HU3	75
HU6	300
HU7	11
HU8	55
HU9	30
HU12	150
HU13	600
HU14	65
HU17	90
HU18	13
HU19	750
Total:	<b>3,684</b>
<b>St Neots Spatial Planning Area</b>	
SN1	40
SN2	40
SN3	80
SN4	20
SN6	35
Total:	<b>215</b>

Allocations	No of Units
<b>St Ives Spatial Planning Area</b>	
SI1	400
SI2	30
SI3	50
<b>Total:</b>	<b>480</b>
<b>Ramsey Spatial Planning Area</b>	
RA1	110
RA2	50
RA3	30
RA4	90
RA5	40
RA6	35
RA7	90
RA8	450
<b>Total:</b>	<b>895</b>
<b>Total Spatial Planning Areas (incl. Strategic Expansions):</b> 15,774	
<b>Percentage of Total Allocations:</b> 88.7%	
<b>Key Service Centres</b>	
BU1	270
BU2	165
FS1	90
FS2	85
FS3	35
KB1	20
KB2	65
SY1	80
SY2	295
SM1	55
SM2	45
SM3	15
SM4	45
SM5	50

<b>Allocations</b>	<b>No of Units</b>
SM6	120
WB1	45
WB2	10
WB3	50
WB4	75
WB5	80
YX1	10
<b>Total:</b>	<b>1,705</b>
<b>Percentage of Total Allocations:</b>	<b>9.6%</b>
<b>Local Service Centres</b>	
A1	95
BL1	150
BL2	30
GS1	20
GS2	14
<b>Total:</b>	<b>309</b>
<b>Percentage of Total Allocations:</b>	<b>1.7%</b>

## Appendix 2

### Completed Development Table

Year	Local Plan Requirement	Net Completions per year	No dwellings above/below requirement
2011/12	804	847	+43
2012/13	804	412	-392
2013/14	804	686	-118
2014/15	804	514	-290
2015/16	804	534	-270
2016/17	804	682	-122

## Appendix 3

### Services and Facilities in Stilton

Amenity	Distance from Site (m)
The Stilton Cheese Inn	520
Stilton Lodge Hotel	560
The Talbot Inn	600
Nisa Convenience Store	650
The Stilton Tunnels Public House	690
Post Office and Convenience	700
The Bell Inn Hotel	700
Chemist (Currently within Nisa, relocating as a standalone chemist)	650/700
Village Bar and Bistro	700
Angel Spice	710
Children's Play Area	710
Hi Lite Hairdressers	725
Ten Hairdressing	750
St Marys Magdalene Church	920
Stilton C of E Primary School	980
Stilton Oaks Golf Course and Stilton New Sports Pavilion	1km

Bus Service Stilton				
Service No.	Route	Frequency (Approx.)		
		Mon-Fri	Sat	Sun
46	Peterborough – Yaxley – Stilton – Sawtry	Hourly (7am-7pm)	Hourly (8am-7pm)	N/A
46A	Stilton – Sawtry – The Alconburys - Huntingdon	3 a day	3 a day	N/A

## Appendix 4

### A1M Stilton



## Appendix 5

### Small Settlements Population Table

Settlement	Population (2011 Census)
Abbotsley	446
Brington and Molesworth	342
Catworth	347
Covington	120
Ellington	585
Glatton	308
Great Paxton	1,007
Hamerton	112
Holme	165
Kings Ripton	222
Needingworth	2,132
Old Weston	250
Ramsey Forty Foot	596
Southoe	408
Upwood and the Raveleys	1,287
Winwick	202
Wyton on the Hill	964
Abbots Ripton	305
Broughton	237
Chesterton	317
Diddington	139
Elton	679
Grafham	630
Hemingford Abbots	635
Holywell	385
Leighton Bromswold	210

Settlement	Population (2011 Census)
Offord Cluny	502
Perry	1,796
Spaldwick	631
Stow Longa	144
Wistow	522
Yelling	300
Alconbury Weston	800
Buckworth	181
Colne	865
Earith	1,606
Farcet	1,800
Great Gidding	363
Great Stukeley	1,340
Hemingford Grey	2,524
Houghton and Wyton	2,559
Little Stukeley	1,340
Offord D'Arcy	747
Pidley	388
Ramsey Mereside	697
Stibbington	473
Tilbrook	370
Waresley	231
Woodhurst	379
Alwalton	317
Bythorn and Keyston	316
Conington	209
Easton	169
Folksworth and Washingley	881
Great Gransden	1,023
Hail Weston	610

Settlement	Population (2011 Census)
Hilton	1,052
Oldhurst	256
Ramsey St Mary's	882
Stilton	2,455
Water Newton	88
Woodwalton	243