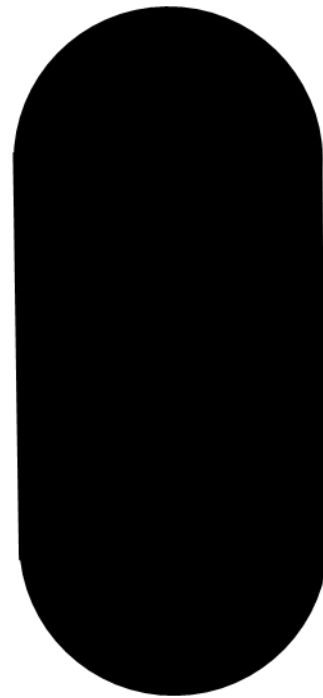
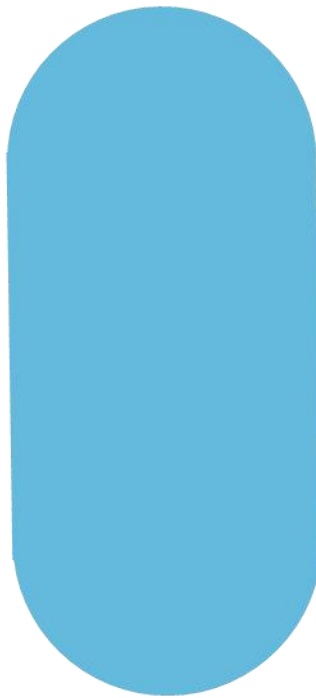


**WRITTEN STATEMENT IN RESPECT OF THE
HUNTINGDONSHIRE LOCAL PLAN TO 2036 FINAL DOCUMENT
FOR SUBMISSION MARCH 2018**

**MATTER 9 – PROPOSED SITE ALLOCATIONS – RAMSEY
SPATIAL PLANNING AREA**

On Behalf of Larkfleet Homes
HLP2036-PS:688/690/674/689



1. INTRODUCTION

- 1.1 This Written Statement is made on behalf of our client, Larkfleet Homes, in respect of its interests at Upwood Road, Bury as part of the forthcoming examination (EIP) of the Huntingdonshire District Submission Local Plan (March 2018).

2. MATTER 9: PROPOSED SITE ALLOCATIONS – RAMSEY SPATIAL PLANNING AREA

- 2.1 The specific representations made below follow the form of the specific questions raised in the Inspector's Matters and Issues paper for the Examination. It is not considered necessary to answer every single question and therefore responses have been provided only where relevant.

Question 1:

What is the background to the site allocation? How was it identified and which options were considered?

- 2.2 Rather than repeating comments, a comprehensive answer in relation to all sites is provided below.
- 2.3 The site allocations on the whole have emerged through a process of site submission and analysis. It is understood from the submitted Sustainability Appraisal that each site was initially analysed in the Environmental Capacity Study 2012 (and updated 2013) and then assessed again through the Housing and Economic Land Availability Assessment process in 2016 and 2017 (HELAA). However, it appears that the initial document (Environmental Capacity Study 2012 (ECS)) has not been submitted as part of the examination process. This should be rectified given its importance to the site selection process.
- 2.4 Once this full document is reviewed, it is clear that there are contradictions made between the Sustainability Appraisal (SA), the

HELAA and the ECS.

- 2.5 In addition, it appears that the Council has undertaken a detailed appraisal of all potential sites, which is contained within the Housing and Economic Land Availability Assessment (HELAA) December 2017, using a Sustainability Appraisal scoring framework (for example +++ is given to likely positive impacts and --- is given to likely negative impacts, etc). However, it is not clear how the Council has then compared these scores in arriving at its selected preferred site allocations.
- 2.6 The NPPF at paragraph 182 sets out that the plans will need to be prepared in accordance with the duty to cooperate, legal and procedural requirements and that they must be 'sound'. There are four tests of 'soundness', one of which is that the plan must be 'Justified' i.e. the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Whilst it is clear that the Council has assessed the impacts of the various site options, it is not clear how they have then selected what it considers to be the most appropriate sites for development. This makes it very difficult to draw direct comparisons between sites in order to determine which site options are the most sustainable and/or deliverable.
- 2.7 It is also noted that a number of the proposed site allocations are on areas of grade 1 agricultural land (RA1, RA2, and RA3). Their allocation may be perceived as inconsistent with emerging policy LP11 of the Local Plan which seeks to use land of a lower agricultural value and seeks to avoid developing on Grade 1 agricultural land unless there are 'exceptional circumstances' where the benefits of any proposal significantly outweigh the loss of land. It is not considered that the Council have demonstrated exceptional circumstances in this respect for all these sites.
- 2.8 In addition, as noted in the submission made on Matter 3, it is clear that the Council have no strict strategy and methodology for deciphering which settlements should get more or less of the development than others and there are clear discrepancies between sustainability

credentials/population statistics and number of dwellings proposed for each settlement.

[RA1 – Ramsey Gateway \(High Node\)](#)

Questions 4, 10 and 11:

What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction? Is the site realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- 2.9 The site has a convoluted and protracted planning history. It was originally approved planning permission in November 2008 (reference 0501658OUT) for residential development and a foodstore (the now built out Tesco store) and this permission was then renewed in 2011 (reference 1101019REP) in order to ensure it didn't expire.
- 2.10 Reserved matters was then approved in March 2015 (1101894REM). It is noted that a technical start has been made to this development on 1 February 2017 to prevent the permission from expiring and an application to discharge the S106 is currently pending consideration by the Council (reference 17/01538/S106).
- 2.11 Given the planning history noted above, it is questionable whether the residential element of this development will ever be fully developed out. The Agent has indicated that the site will commence within 5 years but has indicated in correspondence via email dated November 2017 that, due to viability reasons, the site is unlikely to deliver before at least 2019/20. The Council suggests in their Annual Monitoring Report (December 2017) (AMR) that this projected completion rate is protracted and they consider that the site could be delivered sooner with higher annual completion rates. This is overly optimistic especially considering the comments made by the agent.
- 2.12 It is also understood that there are ongoing ownership issues in respect of the relocation of the existing scrap yard on the site. If the owner of the

scrap yard is indeed not prepared to include it as part of a comprehensive redevelopment scheme, attenuation measures will be required as suggested, having an impact on the delivery of the scheme. The investigation of ground contamination at the scrap yard and remediation works are likely to be required.

- 2.13 Consequently, it is submitted that, the Council should take a cautious approach as to whether this site may ever come forward given commentary noted above and whether it should realistically continue to come forward as an allocation.

Questions 6, 7 and 8:

What are the potential adverse impacts of developing the site? How could they be mitigated? How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied? What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 2.14 As noted above, there are reservations as to whether the scrapyards portion of the site will come forward for development, and therefore an investigation of ground contamination and remediation works are likely to be required which could prove costly and could deem the site unviable. Further information in this respect should be sought by the Council from the agent. High and medium pressure gas pipelines run within the site, therefore the design of any development proposal and its landscaping scheme should demonstrate how it will provide an appropriate separation from these pipelines, in accordance with National Grid requirements which may deem portions of the site undevelopable. A consideration of this should be made by the Council in allocating the site.

- 2.15 Perhaps slightly academic now considering the site has planning permission but there are discrepancies here between the HELAA and the EDS and SA document as submitted. The SA and EDS identify that the site falls within Flood Zones 1 and 2, however, the HELAA identifies the

site as falling within Flood Risk Zone 3a and this is also supported by a check on the Environment Agency's flood risk mapping website. If nothing else, this questions the consistency and accuracy of the overall site assessment process undertaken by the Council.

Question 12:

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 2.16 As noted above, there is a clear reservation as to whether the scrapyards portion of the site will ever come forward for development. Therefore, it is submitted that the Council should probably consider revising the boundary to the site to exclude this portion of land.

RA2 – Ramsey Gateway

Questions 4, 10 and 11:

What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction? Is the site realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- 2.17 A planning application was submitted in February 2016 (16/00311/FUL) which is currently under consideration by the Council. It is unknown what is holding up the planning application and clarity on this should be sought given it has been pending consideration for over 2 years.

- 2.18 There are also a number of significant constraints to development particularly relating to drainage and conservation issues. There is also presence of a dense tree belt on site, which will require mitigation measures in relation to biodiversity and ecology. High and medium pressure gas pipelines run through the site. The design of any development proposal and its landscaping scheme should demonstrate how it will provide an appropriate separation from these pipelines in accordance with National Grid requirements.

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- 2.19 As such, these constraints may mean that it is unlikely that the site will deliver any housing within the next 5 years as suggested in the Councils AMR. Clarity should be sought as to why the Council have estimated delivery in the next 5 years.

[RA3 - West Station Yard and Northern Mill](#)

Questions 8 & 10:

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed? Is the site realistically viable and deliverable?

- 2.20 This site relies solely on the provision of a new access point through the adjoining 'Ramsey Gateway site' to the roundabout on St Mary's Road which provides a ransom situation. As discussed previously, there are significant constraints relating to the development of site RA2, many of which apply to RA3 too. It is therefore unclear whether the site will come forward for development at all since it appears wholly dependent on the delivery of an unrelated site first and similarly has many constraints to development in any event. The Council should provide evidence and comfort that the site will be achievable before seeking to allocate it.

[RA5 - Whytefield Road](#)

Questions 10 & 11:

Is the site realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- 2.21 The Councils AMR identifies the site as an allocation carried forward from the Local Plan Alteration 2002. Given the time passed since 2002 and the fact that the site has not come forward for development to date, it is questionable whether the site ever will come forward for development. The AMR identifies that the site is in multiple ownership which could be the issue behind why the site has not come forward for development to date. Despite there now being an agent on board, it is considered that to

re allocate the site moving forward could be overly optimistic but to identify that the site will deliver housing within the 5 year period without any strong evidence of delivery is absurd.

[RA7 - East of Valiant Square](#)

Questions 10 & 11:

Is the site realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

- 2.22 The Councils AMR identifies that the site may be delivered between years 3 – 5 of the plan period. Given a planning application is yet to be submitted, this may be premature. Whilst the site may be achievable, its delivery should be pushed out of the five year period until the point that the Council is confident it will be delivered in that timeframe.

[Land at Upwood Road, Bury](#)

- 2.23 As per previous representations made by Larkfleet Homes, the site at Upwood Road, Bury would be wholly suitable and available for development within five years. Public consultation has been undertaken and a full planning application for 100 dwellings has been prepared and will be submitted imminently. Significant research into technical considerations has been undertaken with no overriding constraints to development identified. The site also does not fall within the identified Conservation Area nor an area at risk of flooding. Larkfleet Homes are promoting the site and they have a strong track record for quickly delivering residential development in the East of England and Midlands regions. The site should thus be considered deliverable in the context of footnote 11 to paragraph 49 of the NPPF.

- 2.24 In addition, whilst not a saved policy, the Council did deem this land as suitable for development as per the previous Local Plan 1995 which allocates this site for residential development as part of the wider housing allocation. This is clearly identified on the Proposals Map for the 1995 Local Plan. This Local Plan also sought to build over 1,500 dwellings in

Ramsey with Bury, yet the allocations proposed to date equate to 895 dwellings which could be viewed as a little backwards considering the current national and localised chronic housing shortage.