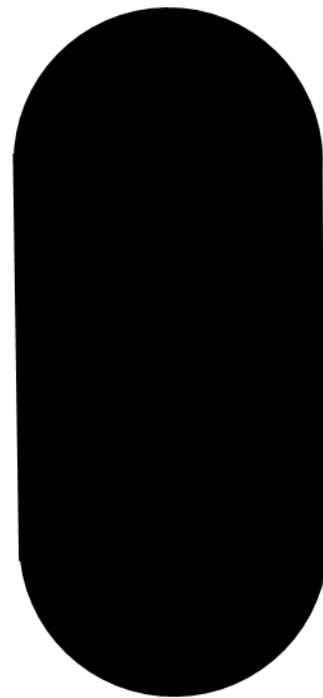
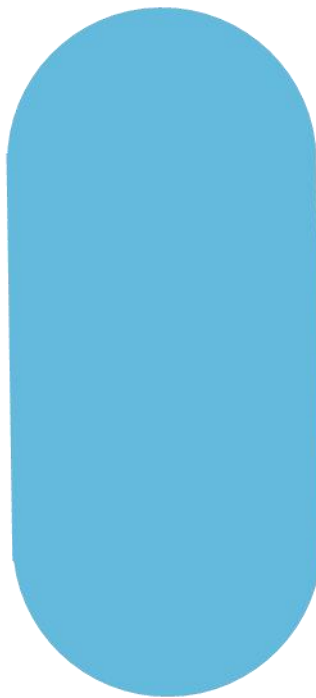
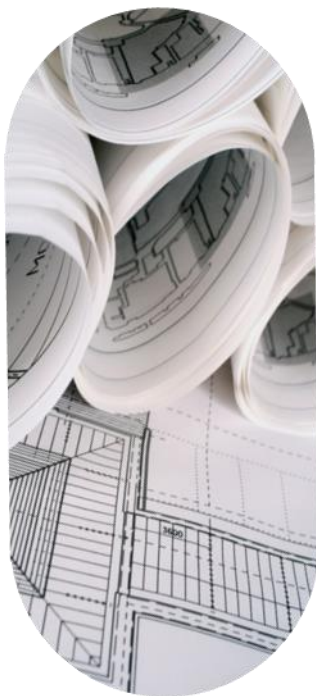


**WRITTEN STATEMENT IN RESPECT OF THE  
HUNTINGDONSHIRE LOCAL PLAN TO 2036 FINAL DOCUMENT  
FOR SUBMISSION MARCH 2018**

**MATTER 3 – DEVELOPMENT STRATEGY**

On Behalf of Larkfleet Homes



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## 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 and Glatton Road, Sawtry as part of the forthcoming examination (EIP) of the Huntingdonshire District Submission Local Plan (March 2018).

## 2. MATTER 3: DEVELOPMENT STRATEGY

- 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.

### Overall

#### *Question 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?*

- 2.2 It is submitted that the overall strategy for development is flawed and thus unjustified. As explored in further detail below, the plan places too much of a focus on the currently proposed Strategic Expansion Locations (SELs) to deliver the Districts housing requirement which in turn will ultimately lead to a shortfall in housing delivery soon after adoption (such circumstances have arisen very recently in Charnwood, Blaby and Rushcliffe – all authorities developed a 5 year housing land supply shortfall very soon after adopting their Plans).

- 2.3 It is clear from the Buckden appeal decision (reference APP/H0520/W/16/3159161) that the current adopted development plan is failing. The Inspector in this case clearly identifies that the current development plan is acting as a constraint to development in the District. It is therefore identified that the emerging Local Plan strategy and policy framework, which, as currently proposed, is not dissimilar to that of the

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adopted plan, should go further in addressing this issue in order to ensure it does not suffer the same inflexibility and constraints to development.

2.4 In addition, it is clear that the Council have disregarded the Districts close proximity and good connections with Peterborough to the north by the apparent lack of significant allocations in the northern half of the District. It is maintained (as noted below) that the most southerly allocations such as the St Neots East SEL may not be the most appropriate locations for development and rather there should be a shift in focus to allocating land in the more northern settlements such as Sawtry and Ramsey with Bury which will benefit from the close connection with Peterborough.

2.5 Indeed, in light of an existing severe shortfall in housing supply, the plan should be allocating significantly more land for development and should be distributing the requirement more widely across more sites in the District, especially in the northern half of the District. An overdependence on the delivery of the SELs and an uncertain policy approach to further development will ultimately lead to a failure of the plan.

### [Spatial Planning Areas](#)

#### *Question 3:*

#### *Is the approach to the scale and type of development set out in Policies LP2 and LP7 justified?*

2.6 Concerning policy LP2, we have already set out previously that the Development Strategy greatly depends on the rather optimistic high delivery rates of SELs at Alconbury Weald and St Neots East (as noted in paragraphs 3.6 – 3.7 of our representations in respect of the Huntingdonshire Local Plan 2036 Proposed Submission 2017 dated February 2018). In respect of those comments made, it is noted that the Council have responded in their Statement of Representations March 2018 (examination document reference CORE/04) (SR) and have provided some justification as to why they believe the higher delivery

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rates can be achieved at Alconbury Weald. Whilst we maintain that it is wholly unrealistic to expect the same or higher delivery rates throughout the lifetime of those projects and no contingency scenario is being set out, it is also noted that the Council did not provide any justification as to why they expect similarly high rates of delivery from the St Neots East SEL.

2.7 It is consequently upheld that the Council should be adopting a more flexible approach to development and this should be reflected in policy LP2. They should be providing for further development elsewhere in the District and especially (as noted above) in the north of the District. At the very least, the plan should identify a contingency figure for additional housing numbers and/or possible 'reserve' site allocations in the eventuality that the proposed SEL's do not deliver as expected and a 5 year housing land supply shortfall emerges during the early part of the plan period.

2.8 It is also noted that the council have acknowledged in their SR that some of the sites proposed during previous rounds of Local Plan consultation could be deemed acceptable through accordance with development strategy policies LP7 – LP10 relating to unallocated development. It is submitted that some of the proposed sites are larger than that which would usually come forward through a windfall policies such as these and thus should be allocated for comprehensive development now to provide additional flexibility in the plan and reduce reliance solely on delivery from the SELs. To only allow for flexibility based windfall development such as that which would come forward under the jurisdiction of these policies is unsound and is inconsistent with the NPPF, especially in the Spatial Planning Areas which are currently expected to deliver 75% of the overall housing target in any event. As proposed, the emerging plan is too heavily reliant on windfall sites and should allocate further development to provide certainty. To provide for a contingency plan is much more realistic and achievable. Further commentary in this respect is provided in our full representations as referenced above.

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- 2.9 Specifically in relation to policy LP7, the principle of this policy is reasonable insofar as it would assist the delivery of smaller windfall sites. However to rely on all further development being delivered under the mechanism of this policy is not consistent with national policy and, as noted above, does not seek to significantly boost the supply of housing by providing a high level of flexibility.
- 2.10 It is also submitted that to solely restrict development to “within the built up area” as per policy LP7 is not sound and is not consistent with the approach taken by many Inspectors to date with regards to slavishly adhering to overly restrictive boundaries to development. Rather policy LP7 needs to be worded as “within or at the edges of the built up area” in order to provide sufficient flexibility in this respect.
- 2.11 In addition, the overall definition of the built up area is ambiguous and creates uncertainty. This in turn is not going to provide landowners and developers with the confidence to bring sites forward for development, and likewise, it will not provide the Council with the confidence to be able to sufficiently defend against any speculative development. Put simply, a much more effective and positively prepared approach would be to ensure the policy is unambiguous parallel with allocating further sites within the Spatial Planning Areas that will support growth and boost the housing supply so that the Council are sufficiently protected from speculative unplanned development.

*Question 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?*

- 2.12 As previously highlighted in our full representations, the Council have not set out any real justification for including the site allocations at section 12 of the emerging plan. The Council have no clear methodology with reference to population size or sustainability criteria to demonstrate how the current site allocations and indeed numbers of houses for each

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settlement is derived. There should be a clear delineation of what numbers would be acceptable in each settlement with reference to the words “at least” so that there is still the required flexibility in the allocations. The plan should provide an indication of the expected levels of growth for each of the Spatial Planning Areas with reference to a justified methodology setting out why the proposed levels of growth are deemed appropriate by the Council.

2.13 Further information and justification in respect of the Ramsey Spatial Planning Area (RSPA) in particular is provided in our full representations as previously submitted to the council. In summary, the council have had no regard to the population and sustainability credentials of the RSPA and if this process was undertaken it would become apparent that the RSPA is highly sustainable but has a relatively smaller population than other spatial planning areas and therefore could accommodate a higher level of growth. It is also clear that in preparing the plan, the council have not had regard to constraints such as the Conservation Area and flood risk, as there are certainly other areas of the RSPA (western edge) that would be more suitable for development in this respect than some of the allocations currently proposed.

2.14 In addition, it is clear from our representations, and possibly others, that there are other sites that would be suitable for allocation. In this respect, the site being promoted by Larkfleet Homes at Upwood Road, Bury would be a suitable, available and wholly deliverable but modest additional allocation moving forward in the plan. A planning application is being prepared for this site (for submission imminently). Much of the technical work has already been undertaken which has not identified any technical constraints to preclude the site coming forward for development. Importantly, it is being promoted by Larkfleet Homes who has a strong track record for quickly delivering residential development in the East of England and Midlands regions; and the site should thus be considered deliverable in the context of footnote 11 to paragraph 49 of the NPPF. However, the council have not assessed such submitted sites and have not justified with evidence why they believe such sites should

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not be considered for allocation.

- 2.15 Consequently, it is submitted that the plan is unsound for the reasons noted above as it is not based on a clear and justified evidence base and in some respects does not comply with the NPPF.

*Question 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)?*

- 2.16 Many of the key points in respect of the SELs are noted in commentary made above and our accompanying representations and thus are not repeated. However, it is maintained that a more appropriate strategy to allocating the majority of development in the two proposed SELs would be to allocate further development at other settlements such as Ramsey and Sawtry. No real consideration, and only a brief acknowledgement in the SR, has been made by the Council in relation to other potential site allocations. The Council also have not clearly assessed the sites submitted and have not provided any reasoning as to why they have discounted the proposed additional sites. Again as noted above, it is submitted that the plan is unsound for this reason as it is not based on a clear and justified evidence base.

*Key Service Centres*

*Question 6:*

*Are the Key Service Centres appropriately defined, what is the basis for them?*

- 2.17 As per comments made in our full representations, it is submitted that if the council fail to provide the reasoned justification for the Key Service Centres proposed and in particular the hierarchy of the centres and which

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villages could accommodate more or less development than others.

- 2.18 As per commentary made in our full representations to the Council, it is asserted that the 25% development as currently proposed should be split depending on the sustainability credentials of the various Key Service Centres. More development should be allocated to the likes of Sawtry and Yaxley which are considerably more sustainable than other centres in this bracket of the settlement hierarchy. Particularly, in the case of Sawtry, it has a smaller population than Yaxley and is therefore considered to have the potential to support a bigger population than it currently does. Sawtry (and Yaxley) is also suitably located in the north of the District and relate well to comments made above.
- 2.19 It is noted that if the council fail to distinguish levels of growth between the Key Service Centres and provide the reasoned justification for the levels of development proposed this could lead to a failure of the plan. It is suggested that the Council should possibly introduce a further tier to the settlement hierarchy (if it is justified with evidence to do so) which could identify the likes of Sawtry and Yaxley as Primary Key Service Centres and the remaining service centres as Secondary Key Service Centres. Therefore, the Council could then allocate more development to these highly sustainable locations without jeopardising the strategies for smaller service centres which may be suitable as currently proposed.
- 2.20 It is submitted that Sawtry should be acknowledged for its high levels of sustainability and relatively small population and should therefore be set above other Key Service Centres as a higher order centre in the settlement hierarchy. Sawtry should then be allocated more development where it can be demonstrated that it has the capacity to do so.

*Question 7:*

*Is the approach to the scale and type of development set out in Policies LP2 and LP8 justified?*

- 2.21 In respect of policy LP2, and to avoid repetition, commentary as noted



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above at paragraphs 2.6 – 2.8 is also relevant to this question.

2.22 A similar stance to commentary made about policy LP7 at paragraphs 2.9 – 2.11 is also relevant to the acceptability of policy LP8. However, whilst it is appreciated that policy LP8 does provide for development “well related to the built up area”, its wording is ambiguous and also creates uncertainty. It refers to proposals needing to be in accordance with other policies of the plan including Countryside policy LP11 which is overly restrictive and appears to be aimed at very small scale development, not the type of development that may come forward through a strategic allocation. In order to give the plan more certainty, and to ensure that enough windfall development comes forward to maintain a five years supply of housing, policy LP8 needs to be revisited.

2.23 A much more effective and positively prepared approach would be to revise the policy in tandem with allocating further sites within the Key Service Centres that will support growth and boost the housing supply so that the Council are sufficiently protected from speculative unplanned development.

*Question 8:*

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

2.24 As stated above in respect of the Spatial Planning Areas, the Council have also not set out any real justification for selecting the site allocations at section 13 of the emerging plan. The Council have no clear methodology with reference to population size or sustainability criteria to demonstrate how the current site allocations and indeed numbers of houses for each settlement is derived. There should be a clear delineation of what numbers would be acceptable in each settlement with reference to the words “at least” so that there is still the required flexibility in the allocations. The plan should provide an indication of the expected levels of growth for each of the Key Service Centres with reference to a

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justified methodology setting out why the proposed levels of growth are deemed appropriate by the Council.

2.25 Further information and justification in respect of Sawtry in particular is provided in our full representations as previously submitted to the council. In summary, the council have had no regard to the population and sustainability credentials of Sawtry relative to other Key Service Centres and if this process was undertaken it would become apparent that Sawtry is more sustainable than all of the other Key Service Centres and has a relatively small population and therefore could accommodate a higher level of growth than other centres. However, the plan currently proposes that other less sustainable and less suitably located service centres are to receive more development than Sawtry which is clearly flawed as a development strategy.

2.26 In addition, it is clear from our representations, and possibly others, that there are other sites that would be suitable for allocation. In this respect, the site being promoted by Larkfleet Homes west of Glatton Road, Sawtry would be a suitable, available and wholly deliverable additional allocation moving forward in the plan. A planning application is being prepared for this site (for submission imminently). Much of the technical work has already been undertaken which has not identified any technical constraints to preclude the site coming forward for development. Importantly, it is being promoted by Larkfleet Homes who has a strong track record for quickly delivering residential development in the East of England and Midlands regions; and the site should thus be considered deliverable in the context of footnote 11 to paragraph 49 of the NPPF. The council have had no real regard to sites submitted during consultation and have provided no justification as to why these sites such as this one have been discounted as allocations moving forward.

2.27 Consequently, it is submitted that the plan is unsound for the reasons given above as it is not based on a clear and justified evidence base.

[Countryside and Definition of the Built Up Areas](#)

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*Question 16:*

*Is the definition of built up areas appropriate and justified?*

- 2.28 With reference to points made above, the overall definition of the “built up area” is ambiguous and creates uncertainty. This in turn is not going to provide landowners and developers with the confidence to bring sites forward for development, and likewise, will not provide the Council with the confidence to be able to sufficiently defend against any speculative development.