

# HUNTINGDONSHIRE LOCAL PLAN EXAMINATION IN PUBLIC

## HEARING STATEMENT

### MATTER 3 DEVELOPMENT STRATEGY

ON BEHALF OF LINDEN HOMES STRATEGIC LAND

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004

## Pegasus Group

Suite 4 | Pioneer House | Vision Park | Histon | Cambridgeshire | CB24 9NL

**T** 01223 202100 | **W** [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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## 1. Introduction

1.1 This Hearing Statement is prepared by Pegasus Group on behalf of Linden Homes Strategic Land, which is promoting land at Lodge Farm, Huntingdon, for development.

## 2. Q1: 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?

2.1 Linden Homes Strategic Land is concerned that the original identification of this spatial strategy and the alternatives (as subject to consultation (**PREP/06** and **PREP/08**) and Sustainability Appraisal (**CORE/07**) was based upon pre-determined definitions of the Spatial Planning Areas which are identified as the focal points for development. It appears that each of the SPAs and their constituent settlements have been ‘taken as read’; the evidence base does not suggest the Council has taken the opportunity to fully re-assess or consult on the physical extent of the SPAs after they were originally identified in the Core Strategy 2009, as expanded upon in our response to Q2. In this sense, the Local Plan is **not justified**. For the reasons set out in our response to Q2, Linden Homes Strategic Land considers that the Huntingdon SPA in particular has been incorrectly defined, therefore affecting the spatial strategy and distribution of development.

2.2 Correspondingly, the spatial distribution of development is inconsistent with the objectives of the Development Strategy set out in policy LP2 and the functions of the primary settlements within policy SP7. This is particularly evident for the Huntingdon SPA where the highly-sustainable primary settlement of Huntingdon receives very limited growth compared to the nearby new settlement of Alconbury which is in the same SPA. Such an approach will limit the ability of Huntingdon to grow and prosper, which could undermine the efforts already made to regenerate the town and in particular, its leisure and retail offer in the town centre.

**3. Q2: Are the Spatial Planning Areas appropriately defined, what is the basis for them?**

3.1 In a very broad sense, the Spatial Planning Areas should reflect the status of their respective core settlements as the most sustainable locations in the District, as is highlighted in policy LP7. However, the definition of these Spatial Planning Areas and the inclusion of their constituent settlements – particularly Huntingdon – is **not justified**.

3.2 The concept of the Spatial Planning Areas has been carried through from the Core Strategy 2009. At that time, the Huntingdon SPA encompassed Huntingdon itself and the closely-neighbouring settlements of Brampton and Godmanchester. The SPA was to have accommodated 1,800 dwellings, although this was in the context of a pre-Framework housing requirement that is lower than is currently contemplated through the Local Plan.

3.3 The Local Plan departs from the established Core Strategy position as it also includes the Alconbury Weald Strategic Expansion Location (SEL) within the Huntingdon SPA. Alconbury was first proposed for inclusion in the Strategic Options and Policies consultation in 2012 (**PREP/06**) and the growth options within that document and the preceding Initial Issues and Options (**PREP/08**) indicated that Alconbury would take a significantly greater amount of development than Huntingdon – 3,610 - 7,020 additional dwellings at Alconbury compared to just 0 - 370 additional dwellings at Huntingdon (equivalent to 5% of the growth directed to Alconbury).

3.4 However there appears to have been no assessment or meaningful justification of the implications for the Alconbury SEL's inclusion within the Huntingdon SPA in the Evidence Base. The section 'Huntingdon Spatial Planning Area' within PREP/06 states that *"It [the SPA] also now incorporates the former Alconbury airfield where Alconbury Enterprise Zone was designated in 2011 on 150ha along with land southeast together promoted as 'Alconbury Weald"* but the evidence base does not clearly explain why that decision was taken; for example there are no studies or topic papers in the evidence base, and the Sustainability Appraisal does not appear to have considered this, or assessed the wider implications of such a strategy.

3.5 Linden Homes Strategic Land contend that this approach is problematic. Development at Alconbury is not closely related to Huntingdon, the primary

settlement of the SPA. It will, in due course, form its own distinct settlement and community with the critical mass needed to support substantial local service and employment provision. However, it will take time to achieve this and residents may be reliant on services in Huntingdon and elsewhere until the full complement of services is delivered. Public transport to Alconbury is currently limited and there is no guarantee that the proposed railway station will be delivered as this is dependent upon Network Rail agreement and their timescales. There is therefore the risk of increased car-borne traffic and unsustainable patterns of travel arising.

- 3.6 By contrast, Huntingdon is already a well-established settlement being the second-largest town in the District and the historic county town. It has a wide range of facilities which serve a hinterland of surrounding towns and villages; these include the retail, leisure and cultural offer of the town centre and Tower Fields development; major employment to the west of the town; the headquarters of Huntingdonshire District Council; the Hinchingbrooke Hospital (with A&E department); and the Huntingdonshire branch of Cambridge Regional College. It is also served by major infrastructure routes including the A14, A1 and A1(M) trunk roads (the A14 being subject to a major reconstruction programme opening in 2021), the Cambridgeshire Guided Busway routes, and Thameslink and Great Northern railway services to Peterborough, London, Gatwick Airport and Horsham.
- 3.7 The settlements of Brampton and Godmanchester are also included within the SPA; this is considered reasonable as both settlements are much closer to Huntingdon with only a short physical separation between each. Whilst both settlements have their own service provision (such as primary schools and convenience retail stores) they also have a strong functional relationship with Huntingdon for employment, secondary education, leisure and retail. In the case of Godmanchester this also includes frequent local bus services into Huntingdon.
- 3.8 The inclusion of Alconbury in the SPA therefore ‘masks’ the fact that Huntingdon itself will receive only limited growth through the Local Plan despite its impressive sustainability credentials. Ostensibly, the Huntingdon Spatial Planning Area will accommodate 10,353 dwellings, but 6,680 of these units (or 65%) will be delivered at Alconbury Weald and RAF Alconbury within the self-contained new community, leaving the remaining 3,673 units (35%) to be delivered elsewhere in the SPA. If development at Brampton and Godmanchester is also excluded, the town of Huntingdon will accommodate just 2,005 dwellings (or 19%), 1,440 of

which are at an extant allocation carried from the 2002 Local Plan. When considering the Plan as a whole, Huntingdon will accommodate just 10% of total planned growth in the District.

- 3.9 This naturally raises the question as to why Huntingdon itself receives such a low apportionment of growth, since it undermines Huntingdon's status as the primary settlement within the SPA (as set out at Page 53 of the Local Plan) and a location for significant development of the types envisaged within policy LP7. It also conflicts with the policy objective of LP2 to "*concentrate development in locations which provide, or have the potential to provide, the most comprehensive range of services and facilities*". Huntingdon is an eminently sustainable location for development and should be a focal point for growth and regeneration. Furthermore, for reasons which will be set out in other Hearing Statements, there is a need to identify additional sites for development through the Local Plan.
- 3.10 Huntingdon may be perceived as having limited opportunities for future growth by virtue of recognised physical constraints however, it should also be noted at this point that there is support from Huntingdon Town Council for additional development at Huntingdon itself. The Town Council has made submissions to the Call for Sites undertaken in 2017 highlighting the development potential of Lodge Farm.
- 3.11 Huntingdon can accommodate additional growth in a sustainable way and there are suitable sites, such as Lodge Farm, where this can be achieved. Indeed, development at these sites can deliver not only infrastructure to meet their residents' needs but also to serve Huntingdon itself. In the case of Lodge Farm, this could include a landscaped countryside park, new sporting facilities, a travel interchange, and the rerouting of the A141. This is consistent with the policy aims of LP7 in directing a range of uses and services to the SPAs. As a result, and in light of the development opportunities in Huntingdon, the town itself should be given due prominence within the spatial strategy.

#### Proposed remedy

- 3.12 In order that the Local Plan correctly reflects the sustainability of its settlements, Alconbury Weald and RAF Alconbury should be excluded from the Huntingdon Spatial Planning Area and should instead be allocated their own Spatial Planning Area, given their scale and their physical separation of Huntingdon. This will

mean that the potential of Huntingdon to accommodate sustainable development can be more clearly understood and articulated.

**4. Q3: Is the approach to the scale and type of development set out in Policies LP2 and LP7 justified?**

4.1 Yes, in that the Plan directs a wide range of development types and services to the Spatial Planning Areas which are best-placed to accommodate such uses. In particular, the recognition of the importance of retail and town centre investment in Huntingdon is welcomed. These will support the regeneration of the town centre which is already well underway, reinforcing Huntingdon's status as the primary settlement in the Huntingdon SPA and in serving a District-wide role, as well as its ability to accommodate sustainable development. Furthermore, it should be noted that development sites such as land at Lodge Farm can themselves play a role in delivering the types of development and community services and facilities envisaged in policy LP7.

**5. Q4: What is the scale of development actually planned (including commitments) and is this in line with the distribution set out in Policy LP2?**

5.1 For the reasons set out in our response to Q2, the limited scale of planned development in Huntingdon does not accord with the Strategy for Development within policy LP2, which seeks to *"concentrate development in locations which provide, or have the potential to provide, the most comprehensive range of services and facilities"* and to *"provide opportunities for communities to achieve local development aspirations for housing, employment, commercial or community related schemes"*. The limited scale of growth planned for Huntingdon could undermine the ability of the town to grow and regenerate, and for new services to be provided for new and existing residents. This is a factor noted by Huntingdon Town Council through their Neighbourhood Development Plan and their intention to identify land at Lodge Farm as a 'broad location' for growth.

**6. Q5: 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?**

6.1 In *general* terms, the strategic expansion locations are reasonable. The Alconbury site has benefitted from planning permission since 2014 having been based upon a policy position dating back to the Regional Spatial Strategy. The St Neots expansion is also reasonable having regard to the comparative sustainability of St Neots (albeit with slightly fewer services than Huntingdon). Linden Homes Strategic Land's concerns in respect of these sites relate chiefly to deliverability, which will be explored in a future Hearing Statement in due course. This points towards a need to identify additional sites for development to ensure the Local Plan fully meets its housing requirement but also to ensure there is flexibility in the plan to adapt to changing economic circumstances as envisaged by the Framework.

6.2 Furthermore, it is considered that these large allocations serve to highlight the relatively limited scale growth directed to Huntingdon town, as set out in our responses to Q1 and Q2. It is apparent that alternative strategies for accommodating development – particularly in terms of the apportionment of growth to Huntingdon and the opportunities to deliver sustainable development at sites such as land at Lodge Farm – have not been fully considered.

**7. Q20: What are the implications / requirements for transport infrastructure and how have these been taken into account? How will improvements be delivered and funded?**

7.1 Clearly, the Local Plan will have significant implications in terms of highways capacity in understanding which sites are capable of coming forward. However, the supporting evidence base has not provided a full and proper assessment of potential highways impacts for potential development locations. Credible options for development - including those which have a bearing on the spatial strategy - have been dismissed without full and proper consideration. As such, the Local Plan is **not justified** in this regard.

7.2 The Huntingdonshire Strategic Transport Study (HSTS; **INF/09-INF/11**) provides the evidence base in respect of highways for the Local Plan. However, the modelled scenarios within the HSTS are limited in scope and do not allow the



impact of individual development proposes to be established. For example, land at Lodge Farm has only been assessed as part of ‘Scenario 4’ which assumes the highest level of growth out of all the modelled scenarios (indeed, significantly higher than the identified housing requirement for the District), and is inevitably the most challenging to mitigate. The impact of development at Lodge Farm has not been isolated from that from other sites assessed in that scenario. As such, the impact that any development at Lodge Farm would have (or other sites) is unknown.

- 7.3 It is noted that the Housing and Economic Land Availability Assessment (HELAA) (**HOUS/02**, p144-147) states that highways matters (and the need to provide and fund improvements) are the sole reason for concluding that Land at Lodge Farm is not suitable or achievable. However, that is based upon a flawed understanding of the impacts arising from the proposals and the required mitigation. Linden Homes Strategic Land has previously raised concerns with the Council about the HELAA (see **Appendix**).
- 7.4 Linden Homes’ highways consultant, Glanville, has sought to access the Cambridge Sub Regional Model (CSRM2) which underpins the HSTS, through a direct request to Cambridgeshire County Council which operates the model. This is to assess the impact of phased development at Lodge Farm on a stand-alone basis to establish the mitigation measures that would be required. However, this request has been declined and it is understood the model will not be available to developers until at least 2019.
- 7.5 Glanville has therefore not been able to undertake its own assessment of the potential impacts of Lodge Farm on a standalone basis, and other developers elsewhere in the District will have been in a similar position. It is Glanville’s view that the location of Lodge Farm (with good access to services and potential integration into public transport projects such as the Guided Busway and the proposed Huntingdon northern travel hub) and the likely distribution of traffic means that the site is less likely to require significant infrastructure (such as the proposed Third River Crossing). However, the assessment of Lodge Farm within the wider ‘Scenario 4’ within the HSTS has not allowed this to be fully considered, and Glanville has not been able to access the model to verify this position itself.
- 7.6 At present, it is therefore clear that the highways infrastructure constraints have not been fully assessed, resulting in sites potentially being discounted from

consideration which could otherwise accommodate sustainable development. In the case of sites around Huntingdon such as Lodge Farm, this does have a bearing on the spatial strategy and the limited scale of growth directed towards Huntingdon (with consequential effects for achieving sustainable development). Consequently, the Local Plan is **not justified** in this respect.

## **Appendix**

### **Representations to the Housing and Economic Land Availability Assessment**

# **REPRESENTATIONS TO THE HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT (HELAA)**

## **LAND AT LODGE FARM, HUNTINGDON**

### **ON BEHALF OF LINDEN HOMES STRATEGIC LAND**

## **Pegasus Group**

Suite 4 | Pioneer House | Vision Park | Histon | Cambridgeshire | CB24 9NL

**T** 01223 202100 | **W** [www.pegasuspg.co.uk](http://www.pegasuspg.co.uk)

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## 1. INTRODUCTION

- 1.1 These representations to the draft Housing and Economic Land Availability Assessment (HELAA) are made on behalf of Linden Homes Strategic Land which has interests in land at Lodge Farm, Huntingdon. These representations are made pursuant to earlier representations in 2017 to the Call for Sites and the Draft Local Plan, which were accompanied by a package of technical work to inform the consideration of the site.
- 1.2 We are concerned that the assessment of the Lodge Farm site, as set out in the HELAA, contains inaccuracies and inconsistencies of approach, when compared with other strategic sites which are found to be suitable for development. The development potential of land at Lodge Farm is at risk of being overlooked, at a time when the Council must identify significant amounts of land to meet its emerging housing requirement. Land at Lodge Farm represents a suitable, available and achievable site for development and as such, its potential should be recognised through the HELAA and ultimately allocation within the emerging Local Plan.
- 1.3 These representations set out our comments on the key issue of highways impact. It then turns to other matters raised through the Sustainability Appraisal carried out for the site

## 2. HIGHWAYS MATTERS


- 2.1 Page 53 of the HELAA set out an assessment of the suitability and achievability of development at Lodge Farm. It is apparent that the Council consider that the main constraint for this site is that of highways; for this reason, the site is considered unsuitable and unachievable in light of the likely cost of significant highways upgrades. As a result, the site scores a - in the Sustainability Appraisal.
- 2.2 It is noted that there is no other stated reason as to why the site may not be suitable or achievable; we consider this an accurate reflection of the site and the lack of applicable constraints which affect it.
- 2.3 As set out in our representations to the Draft Local Plan, we note that the Council's assessment of highways impact for Lodge Farm is derived from scenario

testing in the Huntingdonshire Strategic Transport Study. Lodge Farm was only considered in Scenario 4; that scenario was based upon an assessment of cumulative impacts including Lodge Farm and other strategic sites in the area, assuming the highest level of growth out of all the modelled scenarios and inevitably the most challenging to mitigate. The impacts of Lodge Farm **in isolation** have not been properly or adequately assessed. Nor has the potential for the phased release of the site been assessed; whilst the site may have capacity for up to 4,000 dwellings in total, it is possible that smaller parcels can come forward as a means of securing early delivery at the site. Finally it should be noted that the comprehensive nature of the proposed development (including a range of local services) will ensure that many journeys are effectively internalised without impacting upon the wider local network or on primary routes.

- 2.4 Land at Lodge Farm can also deliver a Transport Hub providing ready access to sustainable modes of transport including regular bus routes and services on the Cambridgeshire Guided Busway. This project has been identified in Cambridgeshire County Council's Long Term Transport Strategy. This facility could serve as a 'park and ride' for Huntingdon, facilitating journeys by public transport which may otherwise be made by the private car, and intercepting car journeys into Huntingdon. The highways evidence base work has not considered the potential positive impact of this.
- 2.5 As such it is not possible with the existing evidence base to accurately identify the highways impacts associated with the site as a standalone proposal and in the absence of this, it is considered inappropriate to discount the site on highways grounds as is suggested. It is necessary to fully assess the highways impacts arising from the site and the requisite mitigation, before any robust judgement can be made as to whether highways represents a constraint to development at this site.

### 3. SUSTAINABILITY APPRAISAL TOPICS

#### Public Open Space

- 3.1 Land at Lodge Farm scores a  for access to accessible natural green space. However, the site presents the opportunity to deliver a substantial amount of public open space across a range of typologies, including the potential of a countryside park and areas of open space within the built-up area of the site,

which will represent a significant public benefit. As such, it is considered that the site should be scored **+** in light of its potential to deliver this open space which will serve not only residents of the proposed development but also could have wider benefits to existing residents of Huntingdon.

- 3.2 In addition to accessible natural green space, land at Lodge Farm offers the potential to deliver an enhanced sporting facility for the use of new residents and the existing community, in the form of a 'sports hub', as shown on the Concept Masterplan submitted previously to the draft Local Plan.

### Landscape

- 3.3 We are concerned there is a glaring inconsistency of approach in assessing the impacts of the sites assessed in the HELAA. Land at Lodge Farm receives a score of **-** for landscape impact based on the statement that "*the scale and open nature of the site means that development will have a significant impact on the landscape*". Other strategic sites receive higher scores than this and it is unclear why land at Lodge Farm is marked lower in this respect given the site is in an area which is not subject to any particular landscape designations or protections.
- 3.4 For example, the RAF Molesworth site receives a neutral score of **~**, yet the HELAA states that the site lies at a significantly raised point within the local landscape. Logically, one might expect a site lying on a raised plateau to be more prominent in the local landscape and therefore more likely to give rise to potential landscape effects.
- 3.5 Similar conclusions are reached for Abbotsley Golf Course, which also receives a score of **~**. The Abbotsley Golf Course site lies towards the top of a slope and has Public Rights of Way passing through. However, the HELAA notes the presence of landscaping and considers this to be capable of mitigating landscape effects.
- 3.6 The Landscape and Visual Appraisal report submitted with our previous Draft Local Plan representations explains how existing landscaping features within the site can be retained, and how significant amounts of open space and new planting could be accommodated in the scheme design in order to contain development in views from the wider countryside. The LVA concludes that the site is capable of accommodating the proposed development "*without resulting in material harm to the surrounding countryside's landscape and visual character*". The LVA has in



turn informed the Constraints and Opportunities Plan and the Concept Masterplan for the site.

- 3.7 As such, we consider that the scoring for land at Lodge Farm should be increased to at least **~**.

#### Light, noise and visual pollution

- 3.8 The SA framework explains that a **+** will be given for locations where development is “*unlikely to cause widespread light, noise or other forms of pollution*”, and a **-** where this is not the case. For Lodge Farm, the HELAA gives a score of **-**. We disagree with this conclusion.
- 3.9 In terms of light and visual pollution it is noted that development at the Lodge Farm site would be viewed in the context of the existing built up areas around the north of Huntingdon which include illuminated residential streets and houses, illuminated junctions along the A141, an illuminated petrol filling station and signage, and a floodlit sports pitch at Jubilee Park. Development of land at Lodge Farm would therefore not alter this existing character significantly. By contrast, development in more rural parts of Huntingdonshire may result in the introduction of light pollution in areas which were previously unaffected.
- 3.10 In terms of noise pollution, it is considered that the development of land at Lodge Farm could result in a more beneficial effect; routing the A141 through the site rather than on the edge of the existing built-up area could reduce noise impacts in the wider vicinity and surrounding countryside.
- 3.11 With the above in mind we consider the Lodge Farm site is unlikely to result in widespread light, noise or other pollution and should be scored **+** for this category accordingly.

#### Distance to food shop

- 3.12 It is noted that the site is within 400m of a food shop; the BP filling station to the south eastern corner of the site was recently upgraded to include a new Hursts retail shop. This includes a ‘corner shop’ selection of goods, Paypoint and parcel delivery services. The HELAA assessment in this category should therefore be amended from **~** to **+**.








#### Distance to Primary School

- 3.13 The HELAA gives a neutral score for this criterion for Lodge Farm. SA Objective 20 explains that either a **+** or a **~** will be given where there is potential for school provision on site. For some strategic sites, for example, Sibson Aerodrome, a **+** is given.
- 3.14 It is not clear what the distinction is that results in one strategic site being scored **+** whilst another is scored **~**.
- 3.15 In the case of Lodge Farm, it is noted that the scheme will be able to provide new education facilities including new primary schools, as appropriate. However, the site is also in reasonable proximity (around 750m-1,000m) to existing schools at Thongsley Fields Primary School; Hartford Junior School and Hartford Infants School; and St Johns Primary School. Appropriate pedestrian connections could be provided through careful design and a suitable crossing of the A141 route. It is noted that CIHT guidance suggests that distances of up to 1,000m for school journeys are acceptable (with 2,000m being a maximum acceptable distance) so it should be possible to provide pedestrian connections to local schools in line with this threshold.
- 3.16 As such, given the proximity of Lodge Farm to existing primary schools, and the potential to provide new primary schools on-site, it is considered that the site merits a score of **+** in the HELAA.

#### Updated SA Table

- 3.17 We set out at **Appendix 1** a table setting out the updated scoring against the Sustainability Appraisal framework for Lodge Farm.

#### 4. CONCLUSION

- 4.1 After reviewing the Sustainability Appraisal assessment undertaken for Lodge Farm, we consider that there are inaccuracies and inconsistencies which, if left uncorrected, mean the development potential of the site risks being overlooked. At present, Lodge Farm scores four , thirteen  and fifteen . If corrected, this will result in Lodge Farm scoring two , eleven  and nineteen . The only two outstanding  scores relate to agricultural land classification (to be considered in the context of a District where much of the agricultural land is classed as Best and Most Versatile) and highways, which for the reasons set out in these representations require proper assessment and consideration of potential mitigation.
- 4.2 We would welcome the opportunity to discuss the development potential of Land at Lodge Farm further with Huntingdonshire District Council and to explore how matters such as highways impacts can be appropriately assessed and planned for.

## APPENDIX 1

### Updated Sustainability Appraisal Table

Sustainability Assessment Objective	Decision aiding question	Impact (HELAA)	Impact (amended)
1. Minimise development on greenfield land, maximise development on previously developed land or land with the lowest agricultural value	Is more than half the site Previously Developed Land (PDL)?	-	-
	Is more than half the site located on grade 3 agricultural land or lower (including urban and non-agricultural)?	~	~
	Is the site in an area where higher density development is appropriate?	~	~
2. Protect water resources (both quality and quantity)	What impact will development have on water resources?	~	~
3. Manage and minimise all forms of flood risk (taking into account climate change)	Is more than half the site located in flood zone 1, flood zone 2, flood zone 3a, or functional floodplain (flood zone 3b)?	+	+
	Is any part of the site located in a flood risk climate change allowance zone (central, higher central or upper end)?	+	+
	Can the site incorporate SuDS?	~	~
4. Improve the quantity and quality of publicly accessible open and natural green space and promote the strategic green infrastructure network and links to it	Is the site within 300m of an area of accessible natural green space over 2ha?	~	+
	Does the site present opportunities to link into and/or form part of the Green Infrastructure Network?	+	+
5. Protect, maintain and enhance biodiversity and habitats	Is the site a designated nature site, immediately adjacent to a designated nature site or within 2km of a Ramsar, SAC or SPA, 1km of a SSSI or NNR or 200m of a CWS?	~	~
	Are protected species known to exist on the site or is there potential for protected species to exist on the site?	~	~
6. Protect, maintain and enhance landscape and townscape character and the sense of place of our settlements	Will development have a significant impact on the surrounding townscape or landscape?	-	~
7. Protect, maintain and enhance heritage assets, whether they are designated or not	Will development impact on heritage assets or their settings?	~	~
8. Reduce emissions of greenhouse gases and improve energy efficiency	Can development take advantage of existing or planned opportunities for decentralised low carbon energy sources or networks?	~	~
9. Improve air quality	Is the site outside or adjacent to an air quality management area?	+	+

Sustainability Assessment Objective	Decision aiding question	Impact (HELAA)	Impact (amended)
10. Avoid unnecessary light, noise and visual pollution	Is the site located in such a position that development is unlikely to cause widespread light, noise or other forms of pollution?	-	+
11. Reduce waste production and increase reuse, recycling and composting	Is the site outside areas of search for waste purposes designated in the Cambridgeshire and Peterborough Minerals and Waste LDF?	+	+
	Will development reduce waste production and increase reuse, recycling and composting?	~	~
12. Promote built environments that encourage and support physical activity, including extending and improving access to facilities	Is the site within 500m of an existing area of open space?	+	+
	Is the site within 800m of an outdoor sports facility?	+	+
13. Promote accessibility of cultural and social activities	Is the site within 800m of a facility where cultural or social activities can be accessed?	+	+
14. Ensure all groups in society have access to decent, appropriate and affordable accommodation	Will the site provide an increase in residential accommodation?	+	+
15. Redress inequalities	Will development address a particular housing equality issue?	+	+
16. Reduce and prevent crime, anti-social behaviour and the fear of crime	Will development help to make the area safer?	~	~
17. Improve the quality, range and accessibility of social and community services and facilities including promotion of multi-purpose design and use and efficient use of these resources	Is the site within 400m of a food shop?	~	+
	Is the site within 1km of a GP surgery/ health centre?	+	+
18. Improve access to satisfying work, appropriate to skills, potential and place of residence	Is the site within 2km of a major concentration of employment opportunities and/or potential employees?	+	+
19. Positively and pro-actively encourage sustainable economic growth by improving the efficiency, competitiveness, vitality and viability of the local economy	Will the site provide opportunities for investment to create additional jobs?	+	+
20. Ensure that the educational needs of the growing population are served locally while improving uptake of learning and training opportunities	Is the site within 600m of a primary school?	~	+
21. Reduce the need to travel and promote necessary infrastructure improvements and sustainable modes of transport (walking, cycling, and public transport)	Is the site within 400m of a bus stop?	+	+
	Is the site free of known major transport infrastructure constraints?	-	- <b>Requires full assessment</b>
	Will the site support a mix of uses such as housing, employment, retail and/or community facilities?	+	+