

RAPLEYS

Hearing Statement for
RGE Group Ltd (ID No: 1153087)

**HUNTINGDONSHIRE LOCAL
PLAN 2036
EXAMINATION MATTERS &
ISSUES
MATTER 6 - PROPOSED SITE
ALLOCATIONS (POLICY HU17)**

4 July 2018

Our Ref: CB/526/315/2

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Appendices

Appendix 1 Site Location Plan (Ref: 526/315/2_SLP02)

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2008.

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Signature:	<i>Wakako Hirose</i> <small>Wakako Hirose (Jul 4, 2018)</small>

2 INTRODUCTION

- 2.1 This Hearing Statement has been prepared on behalf of RGE Group Ltd ('RGE') in response to the Examination Matters and Issues - Matter 6 (Proposed Site Allocations) Policy HU17.
- 2.2 RGE is the freeholder of 'Land at Bridge Works, The Avenue, Godmanchester, Huntingdon PE29 2AF'. The allocated site, including the RGE site and Huntingdonshire District Council owned car park extends to circa 2.6 ha. A Site Location Plan (ref: 526/315/2_SLP02), indicating the extent of the two sites is attached at **Appendix 1**.
- 2.3 As stated in our representations to the Proposed Submission consultation in February 2018, RGE wish to confirm they remain committed to promoting the site for residential-led mixed use development. In this context, our client seeks appropriate planning policy support for the site's future redevelopment.
- 2.4 This Hearing Statement responds to the Inspector's Matters in relation to the Proposed Site Allocations, in particular Policy HU17 and Issues 2, 3, 5, 6, 10 and 13.

3 ISSUES 2 AND 3 - WHAT IS THE SCALE AND TYPE/MIX OF USES PROPOSED / WHAT IS THE BASIS FOR THIS AND IS IT JUSTIFIED?

- 3.1 Policy HU17 allocates the site for "*approximately 90 homes*" and the "*re-provision of part of the site as public car park*". Whilst our client supports the proposed residential element of the allocation, we provide the following comments below in order to ensure that the policy remains flexible and does not place constraints on the design process.
- 3.2 The capacity of approximately 90 units has been informed by the Council's Urban Design Strategic team's site capacity study which suggested a capacity of 90-95 units on the allocated site. Given that the number of residential units that can be supported on the site is subject to detailed design and will be considered and assessed through the planning application process, we consider that the policy should ensure that the housing development is not restricted to 90 units and can be designed and delivered by following the principle of efficient and effective use of previously developed land.
- 3.3 Accordingly, **Criterion 1** should be amended to include the following:
"approximately 90 homes, with site capacity to be fully assessed and determined through the planning application process".
- 3.4 With regard to public car park, Huntingdonshire District Council as the owner and operator of the public car park has advised that it is their intention to make suitable alternative parking provision. A decision on the necessary re-provision is due to be made during the examination process. Therefore, at this stage, we request that **Criterion 2** should be amended to ensure that the requirement is not specific to on-site re-provision. The requested amendment is as follows - "*re- provision of ~~part of the site as~~ public car park.*"
- 3.5 As set out in our previous representations (dated 5th February 2018), **Criterion d** and **supporting paragraph 9.134** are not consistent with the NPPF as the tests of preservation and enhancement are not in line with the NPPF relative to determining planning applications. They are therefore unsound and not justified and should be amended as follows:
*"provision of high quality development to reflect the site's sensitive location and relationship with several listed buildings and the Huntingdon and Godmanchester conservation areas, ensuring that heritage assets and their settings are ~~preserved~~ conserved and where ~~appropriate and possible~~ **and** enhanced."*

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- 3.6 **Criterion e** advises that the provision of a cycle/foot bridge across Cook's Stream to the dismantled railway line to link with the wider pedestrian/cycle network should be investigated, and if possible, provided. Having reviewed the Council's evidence base, we remain strongly concerned that there is no evidence demonstrating that these infrastructure provisions are required solely in relation to the redevelopment of the site. In this regard, we refer to our previous representations (dated 5th February 2018) which detailed our objection that these requirements are unjustified when reviewed against paragraph 173 of the NPPF, and **should therefore be deleted in its entirety, together with the last two sentences of supporting paragraph 9.134.**

4 ISSUE 5 - WHAT ARE THE BENEFITS THAT THE PROPOSED DEVELOPMENT WOULD BRING?

- 4.1 Our client's site is surplus to their requirements and therefore available immediately for development. In addition, whilst the Council's public car park is currently in use, the Council has confirmed its intention to make suitable alternative parking provision to facilitate the redevelopment of the site.
- 4.2 Subject to amendments being made to Policy HU17, the site's future development potential would therefore be maximised and deliverable in the short term (i.e. within 5 years), contributing to the District's housing stock (including affordable housing), implementing environmental and visual enhancements to the benefit of the site and its immediate surroundings on the urban/rural fringe of Godmanchester, and supporting the local economy throughout the development process.

5 ISSUE 6 - WHAT ARE THE POTENTIAL ADVERSE IMPACTS OF DEVELOPING THE SITE? HOW COULD THEY BE MITIGATED?

- 5.1 We strongly urge the detailed requirements of the policy allocation under Policy HU17 are amended in line with our objections above at paragraphs 3.1 to 3.6 as these matters have potential adverse impacts on the future redevelopment of the site in terms of the ability to bring forward a viable scheme.
- 5.2 In terms of mitigation, any planning application will continue to be subject to the policy allocation which covers inter alia, design, flood risk and air quality, as well as other development management policies of the Development Plan.

6 ISSUE 10 - IS THE SITE REALISTICALLY VIABLE AND DELIVERABLE?

- 6.1 As stated in our previous representations and above, whilst we support the proposed allocation of the site for mixed use development under Policy HU17, in order to realistically secure the delivery of a viable development, a number of detailed requirements of the policy allocation still require amending.
- 6.2 Brownfield industrial sites in urban areas, such as our client's site, impose a number of physical constraints including dealing with contamination, in the delivery of a viable development scheme. In this regard, paragraph 173 of the NPPF advises that sites identified in the plan should not be subject to a scale of obligations and policy burdens that their ability to develop viably is threatened.

7 ISSUE 11 - WHAT IS THE EXPECTED TIMESCALE AND RATE OF DEVELOPMENT AND IS THIS REALISTIC?

7.1 As aforementioned, both our client's site and the Council's public car park which form the site allocation under Policy HU17 are available now for redevelopment. It is therefore realistic to expect that the whole site allocation can be delivered in the short term (i.e. within the next 5 years), subject to detailed requirements of the policy allocation being amended as set out above.

8 ISSUE 13 - ARE THE DETAILED POLICY REQUIREMENTS EFFECTIVE, JUSTIFIED AND CONSISTENT WITH NATIONAL POLICY?

8.1 We refer to our previous representations dated 5th February 2018 and paragraphs 3.1 to 3.6 above in response to Matter 6 - Proposed Site Allocation (Policy HU17), Issue 13.

9 CONCLUSION

9.1 Since 2012, RGE has engaged with Officers and submitted policy representations in order to establish the principle of residential use on the site.

9.2 As stated in our previous representations and above, whilst RGE remain supportive in principle of Policy HU17, we strongly remain of the view that to ensure the timely delivery of a viable scheme, some of the policy's detailed requirements need amending because they are not effective, justified nor consistent with national policy. In particular, we are seriously concerned about the lack of robust evidence for infrastructure requirements associated with Policy HU17, and this is contrary to national policy and guidance on plan-making.

9.3 The land in RGE's ownership is surplus to their requirements and therefore available for development, in addition to the Council owned public car park for which there will be suitable alternative provision. Subject to amendments being made to Policy HU17, the whole allocation has the realistic potential of being delivered in the short term (i.e. within 5 years) to contribute to the District's housing supply (including affordable housing), environmental and visual enhancements to the urban/rural fringe of Godmanchester, and support towards the local economy.

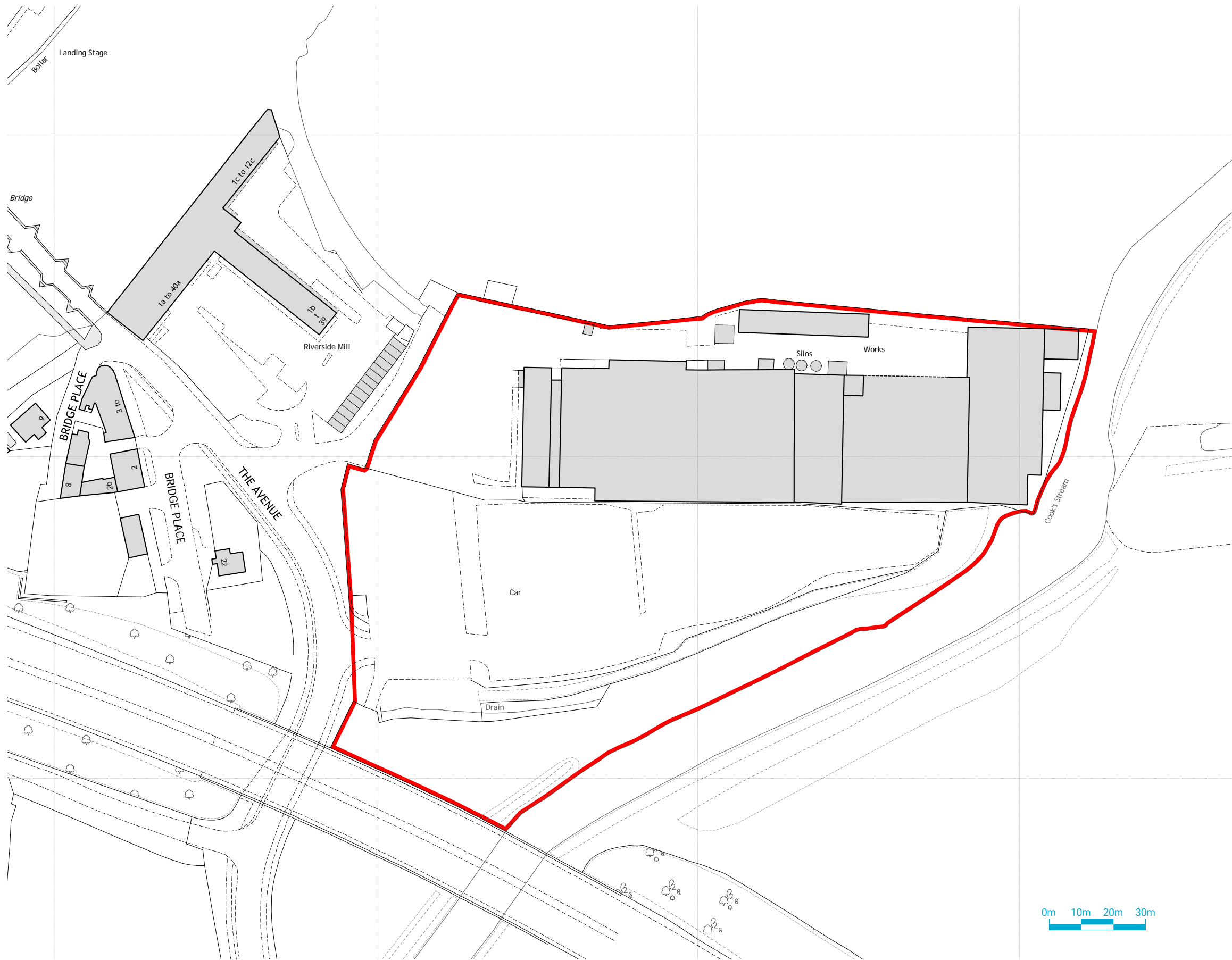
9.4 We wish to reserve our client's right to participate at the Hearing session in order to explore these issues in more detail and look forward to receiving written confirmation that this Hearing Statement has been received, and duly made.

9.5 Please kindly send all correspondence marked for the attention of Wakako Hirose, who can be contacted on 07876 030418 or wakako.hirose@rapleys.com.

Appendix 1

SITE LOCATION PLAN

Ref: 526/315/2_SLP02



SITE LOCATION PLAN
 The Avenue
 GODMANCHESTER PE29 2AF



Scale @ A3 : 1:1250
 Plan No. : 526/315/2_SLP02

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