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# Huntingdonshire Local Plan (Proposed Submission)

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Local Plan Examination  
Hearing Statement – Matter 6

On behalf of  
The Master, Fellows and Scholars of the College of  
St John's the Evangelist in the University of  
Cambridge (991822)



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## 1. Introduction

- 1.1. This Hearing Statement has been prepared by Savills (UK) Limited on behalf of The Masters, Fellows and Scholars of the College of St John the Evangelist in the University of Cambridge ('St John's College').
- 1.2. St Johns College are the freehold landowners of land allocated under Policy LU1 of the Submission version of the Huntingdonshire Local Plan.
- 1.3. Savills (UK) Limited on behalf of the College have made the necessary and relevant representations at all consultation stages of the emerging Plan. This includes representations made to the Regulation 19 version of the Plan.

## 2. Matter 6: Proposed Site Allocations

*Issue: Whether the proposed site allocations for the Huntingdon Spatial Planning Area are justified, effective and consistent with national policy.*

### HU1 – Ermine Street

**Question 1: What is the background to the site allocation? How was it identified and which options were considered?**

- 2.1. The land to the east of Ermine Street is in the ownership of our client, St John's College and the identification of College land for residential development as part of a larger mixed use development is supported.
- 2.2. The Council previously granted an outline employment permission on the site for a mix of commercial uses, which at the time was consistent with the Council's adopted Core Strategy in 2009. Consent was granted on Friday 13 November 2015 under planning reference 1300730OUT. A copy of the illustrative master plan for the site that was submitted as part of this employment application is enclosed at **Appendix 1**. The granting of this permission in our view confirms the acceptance of built form on this part of the allocated site.
- 2.3. Following the publication of the Regulation 18 draft, the Council identified the site for a mix of housing, employment and strategic open space under Policy HU 1 'Proposed Allocation (Mixed Use) – North of Ermine Street Huntingdon'.
- 2.4. In light of the representations received during this 2013 Draft Local Plan consultation, the Council then published its Targeted Consultation in January 2015 document at the beginning of 2015. Within the 2015 Targeted Consultation document, the Council for the first time proposed to combine the College land with that land on the western side of Ermine Street, known as the "Northbridge" site. Policy HU1 'Ermine Street' of the 2015 Plan identified a single large strategic mixed use allocation to the north-west of Huntingdon comprising:
  - Approximately 1,450 homes
  - A realignment route for the A141
  - Approximately 1,000m<sup>2</sup> of shop floorspace (class 'A1') with a maximum of 400 m<sup>2</sup> in one store and other stores with a maximum of 200m<sup>2</sup> each
  - Food and drink retail (class 'A3 to 'A5')
  - A primary school and other social and community facilities to meet the needs arising from the development
  - Strategic Green Infrastructure

- 2.5. The current Proposed Submission Draft 2017 document now retains this as a single large urban expansion allocation, which has been outlined in Policy HU 1 together with supporting paragraphs 9.35 to 9.44 on pages 150 - 151.

### **Question 2: What is the scale and type/mix of uses proposed?**

- 2.6. Policy HU 1 of the Proposed Submission Draft 2017 allocates 85 hectares of land at Ermine Street, Huntingdon for a mixed use development.
- 2.7. In terms of land uses, Policy HU1 states that the 85 hectare allocation at Ermine Street, Huntingdon will comprise the following:
- Approximately 1,440 homes
  - A potential realignment route for the A141
  - Approximately 1,000m<sup>2</sup> of shop floorspace (class 'A1')
  - Food and drink retail (class 'A3' to 'A5')
  - A primary school and other social and community facilities to meet needs arising from the development
  - Strategic Green Infrastructure.
- 2.8. The nature and scale of the land uses listed above in our view presents broadly a logical policy requirement for a scheme of this size in this location. However in our submitted representation to the Submission version (Regulation 19) (ref HLP2036 – PS:269) we submitted comments on behalf of the College in respect of the figure of 1440 homes referred to in the Policy HU1 that could come forward across the whole of the site. This matter is addressed in Question 3 below.

### **Question 3: What is the basis for this and is it justified?**

- 2.9. Given the outline employment planning permission granted on Friday 13 November 2015, the principle of built form on this land has been accepted and in the context of a review of its planning policy documents, it is entirely appropriate for the Council to consider alternative uses other than employment on this site.
- 2.10. Paragraph 50 of the National Planning Policy Framework (NPPF) provides that local planning authorities must “*deliver a wide choice of high quality homes... [and] a mix of housing based on current and future demographics trends, market trends and the needs of different groups in the community*”. Paragraph 52 of the NPPF goes on to explain the “*supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns*”.
- 2.11. At the same time as acknowledging the importance of delivery new housing in the Local Plan on sustainable sites, there is a recognition implicit within the plan that there is no harm to plan policies or proposals in the event that the planning permission for employment is not implemented. The Local Plan has a wide range of Established Employment Areas that contribute to the local economy and provide on-going employment opportunities and Policy LP19 of the Submission Version of the plan (page 82) provides positive wording to continue employment uses on those sites listed under paragraph 6.17. The substitution

of a new mixed allocation on the College's land will now override the employment planning permission on land east of Ermine Street on College land which in any case expires on Tuesday 13 November 2018.

- 2.12. The 85 hectare site allocated in Policy HU1 comprises two distinct land ownership parcels either side of Ermine Street. The land to the west is known as the “Northbridge” and has been a committed housing site for many years. The site is similar to the St Johns College land insofar as it is located adjacent to the built up area and is thus a logical extension to the urban fabric. The nature of the allocation is one where a comprehensive approach is needed to secure the component elements of the site. Working alongside the landowners of the Northbridge site on the west side of Ermine Street, the College is committed to delivering their site and accommodating the relevant elements of the policy with the landholding.
- 2.13. Representations that the College have made to the Policy HU 1 are generally supportive in nature. However the College considers that having regard to masterplanning work undertaken to date on behalf of both landowners, the reference to “approximately 1440 homes” is misleading. Work to date suggests that the capacity may be more in the region of 1600 homes and consequently we consider the text should be amended to reflect this situation.
- 2.14. The allocation of sustainable sites for residential development is necessary to meet the objectively assessed need (OAN) for housing development within the housing market area (HMA). This allocation is sustainable in terms of its supporting infrastructure and self-sufficiency, developable and deliverable in terms of its strategic location and immediate availability.
- 2.15. In this respect, it is our view that this policy is sound and we support Policy HU1 in the Huntingdonshire Local Plan – Proposed Submission subject to the above suggested change to site capacity in terms of overall scale and type of development proposed and the broad location for growth.

**Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?**

- 2.16. The College as a landowner has instructed all the necessary consultants to form part of a project team to prepare for the submission of an outline planning application. Meetings have been held with the developers and their agents in respect of the Northbridge site in order to assess how the elements comprising the scheme (as listed under Policy HU1) will be distributed across the whole allocation. The apportionment of costs of survey work has been discussed. We are also aware that the Northbridge site has been the subject of scoping for Environmental Impact Assessment and that a number of formal pre-application meetings have been held with the Council. The College is currently preparing an application and it is anticipated that this will be submitted after the Northbridge application and before the end of the year.

**Question 5: What are the benefits that the proposed development would bring?**

- 2.17. Primarily, the benefit of the development is the overall contribution of this allocation to the housing market area and the Council's objectively assessed need. The site has the lowest risk of flooding, few nature conservation constraints and relates well to existing employment and services in close proximity i.e. Alconbury Weald and Ermine Business Park.

- 2.18. Not only does the site offer the opportunity to better integrate key points of interest in the surrounding area, it would also be largely self-sustaining upon completion of the proposed community facilities and social infrastructure which will be delivered alongside the additional dwellings and which are a requirement of the Policy.
- 2.19. This policy states that the site will also safeguard a strategic buffer for the realignment of the A141, which will address the additional traffic generation as well as address wider traffic issues. The Cambridgeshire Local Transport Plan 2011 – 2031: Long Term Strategy (2014) provides that “This route would separate the strategic and local functions of the current route, and provide capacity for further growth both locally and further north-east along the A141”. The College has raised reservations about the need for this route and thus the requirement in Policy HU 1 for a “potential realignment route for the A141”. It is noted that modification to the submission vehicular of the plan have addressed the represent actions made by the College to ensure that the potential realignment of the A141 is also suitably applicable to the land immediately north of the Washingley Farm site at Alconbury Weald.

**Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?**

- 2.20. It is acknowledged that the development of the allocation in the manner suggested by the Policy, will clearly generate a substantial visual change in the landscape. New uses will result in the loss of grade 2 and grade 3a agricultural land but in the context where planning permissions have already been granted in the past, then clearly there is no issue to such a loss as a matter of principle. New built form in terms of new dwellings, new retail and community facilities including a new primary school will create a significant new urban extension. Consequently it is imperative that sound urban design principles will need to be applied to any new development coming forward. The role of structural landscaping as well as detailed planting proposals will be key matters to address. The importance of such issues have been acknowledged given the reference within Policy HU1 to “strategic green infrastructure” and the need to provide a substantial buffer between the development and Green End and to limit with existing and planned green infrastructure.
- 2.21. Paragraph 9.40 of the Local Plan Proposed Submission makes reference to the need to protect the setting of Green End and Great Stukeley. It is entirely appropriate for the Council to require the positive planning of this allocation in the interest of preserving local identity and the landscape gap between these two distinct areas. It is understood that this is an important element within the landscape and in this context and a Landscape Appraisal will be undertaken to inform a landscape design which recognises vistas, long distance views, boundaries and the green infrastructure network.
- 2.22. Other impacts that will need to be addressed will be the effect of increased movement of new residents and visitors and the impact this will have on the local highway network. As paragraph 9.36 of the Plan acknowledges, a transport assessment and Travel Plan will be required as part of any planning application and this will assess the impact and necessarily introduce mitigation measures as appropriate. As previously mentioned the need for a safeguarding route is referred to in the policy and we await further clarity from the Council in respect of the justification for such a measure.

- 2.23. Whilst it is likely for a development of this scale to give rise to noise and light pollution, these matters can be addressed within the design to ensure that the impacts are kept to a minimum. In terms of the impact of the development on the surrounding area, the issues considered by the Council within the Housing and Economic Land Availability Assessment (HELAA) of June 2017 are capable of being addressed through mitigation or are those services or facilities which would be provided on the wider allocated site as set out within the proposed Policy HU1.

**Question 7: 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?**

- 2.24. The Environment Agency Flood Map indicates that the site for development is entirely within Flood Zone 1, which is classified as 'very low' risk of flooding. Much of the land lies above the 40m contour thus forming a relatively elevated plateau and it is also relatively flat.
- 2.25. Nevertheless, it is understood that any Flood Risk Assessment and Drainage Strategy must assess the impact of the proposed new uses. The use of any future soakaways or infiltration devices must also be agreed with the relevant bodies to ensure an appropriate strategy can be implemented in due course.

**Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?**

- 2.26. Whilst the site has limited access to some local services, the amount of new residential development and the facilities envisaged within the policy will ensure that a sustainable community comes forward as a result of this allocation. There are no constraints to development that cannot be addressed through the planning process, requiring appropriate mitigation and the use of conducive and legal agreements.

**Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?**

- 2.27. There is capacity within the existing Huntingdon WWTW and we will maintain an ongoing dialogue with the Environmental Agency and Anglian Water Services to ensure that waste water flows from the site can be accommodated.

**Question 10: Is the site realistically viable and deliverable?**

- 2.28. We would confirm that the College supports the identification of land for Policy HU1 and can confirm that as far as the College land is concerned to the east of Ermine Street, this land is immediately available and can be viably developed within the plan period.

**Question 11: What is the expected timetable and rate of development and is this realistic?**

- 2.29. The College can confirm the site's delivery at an early stage of the Local Plan period to 2036, following the submission of a full planning application by the end 2018.



**Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?**

- 2.30. St John's College consider the proposed boundary of allocation HU1 appropriate.

**Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?**

- 2.31. As stated above under Question 3, as part of the initial analysis of the capacity of the site to accommodate development on the scale envisaged, initial work has shown that the figure of 1,440 homes is a very conservative approach to the capacity for dwellings on site. In our view, the site could accommodate a higher capacity for dwellings and the current figure of 1,440 homes outlined in the policy is therefore not justified.
- 2.32. We suggest increasing this to a more realistic base figure of "approximately 1,600 homes" to provide the Council with the element of flexibility considered beneficial to the plan and consistent with national policy.