

**RPS**

**Proposed Submission  
Local Plan Examination  
Hearing Statement –  
Matter 8**

In respect of

Huntingdonshire District Council  
Proposed Submission Local Plan  
Examination

On behalf of

Abbey Properties Cambridgeshire  
Limited and De Bene Esse Ltd

RPS Ref: JCG19995

6 July 2018

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# QUALITY MANAGEMENT

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Prepared by:	<b>Robert Mackenzie-Grieve</b>
Authorised by:	<b>Mark Buxton</b>
Date:	<b>July 2018</b>
Project Number/Document Reference:	<b>19995</b>

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# 1 INTRODUCTION

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- 1.1 We are instructed by our clients, Abbey Properties Cambridgeshire Limited and De Bene Esse Ltd to submit Hearing Statements and appear at the Huntingdonshire Local Plan Examination on their behalf in relation the Huntingdonshire Proposed Submission Local Plan and associated evidence base.
- 1.2 RPS previously submitted representations on behalf of our clients to the Huntingdonshire Local Plan to 2036: Proposed Submission (PREP/01), November 2017 Call for Sites, Local Plan to 2036 Consultation Draft 2017 (PREP/02), and the 2016 Housing and Employment Land Availability Assessment: Additional Consultation 2016.
- 1.3 The representations to the Local Plan Consultation Draft 2017 (PREP/02) and to the Proposed Submission Plan (PREP/01) are enclosed (**Appendix A and Appendix B**) with this Statement for ease of reference.
- 1.4 This Statement details our client's responses to Matter 8 of the Matters and Issues identified by the Inspector. Hearing Statements have also been prepared in respect of Matters 6, 9, 11, 12 and 13, as well as Matters 3 and 4 (already submitted)

## 2 RESPONSE TO THE MATTERS AND ISSUES IDENTIFIED BY THE INSPECTOR

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- 2.1 The Inspector has posed a number of questions in respect of the 15 Examination Matters. This Hearing Statement seeks to respond to questions of relevance to our clients' interests in respect of Matter 8.

### **Matter 8 – Proposed Site Allocations – St Ives Spatial Planning Area**

*Whether the proposed site allocations for the St Ives Spatial Planning Area are justified, effective and consistent with national policy*

- 2.2 This Hearing Statement considers all the draft residential allocations within the St Ives Spatial Planning Area only. Allocation SI 3 Giffords Farm, St Ives has not been considered as it relates to employment development.
- 2.3 **Appendix C** provides our analysis of the proposed residential allocations for the St Ives Spatial Planning Area. The Appendix sets out the current planning status for each site, the main constraints, suitability of the sites for development, deliverability, viability and delivery. This addresses what we consider to be the key issues for each site and provides responses to the majority of the Inspector's questions.
- 2.4 Following this review we consider that SI14 Former Car Showroom, London Road is not appropriate for residential development and should not be allocated within the draft Local Plan. The entire site is located within the rapid inundation zone and additionally is located within Flood Zones 2 and 3a and therefore should not pass either the Sequential or Exception Tests.
- 2.5 We consider that the site's allocation within the rapid inundation zone should result in its immediate exclusion from being allocated for housing development. Rapid Inundations Zones are areas behind flood defences which, should the flood defences be breached or overtopped, means that the flood water has the potential to cause structural damage, injury or death at the site. We do not consider that the Council has provided any justification why the development of a site within the rapid inundation zone is necessary particularly as our client has promoted a number of sites located outside this zone and within lower Flood Risk Zones.
- 2.6 Furthermore Paragraph 101 of the NPPF states:
- “The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding....”*
- 2.7 The Council's allocation of this site essentially means that the Sequential Test does not need to be applied within the district as the Council has already concluded that there is insufficient land within Flood Zone 1 to be developed for housing purposes.

- 2.8 We disagree with the Council's apparent conclusion that there is insufficient land within Flood Zone 1 to be developed for housing purposes. As detailed in our previous representations to the Huntingdonshire Local Plan to 2036: Proposed Submission (**Appendix B**) our client has promoted a number of sites located within Flood Zone 1 which we consider provide the opportunity for sustainable residential development.
- 2.9 As set out within our representations to the Huntingdonshire Local Plan to 2036: Proposed Submission (**Appendix B**), the Old Ramsey Road site is located within Flood Zone 1 and is available and suitable for development. We consider that the site could provide a total 131 dwellings including 52 units affordable units.
- 2.10 The allocation of S12 St Ives Football Club is premature with the site not currently available for development. The site requires the relocation of the Football Club prior to it becoming available. In May 2018 an ES Scoping Opinion was submitted which included proposals to relocate the Football Club. However, to date no planning application has been submitted. Currently HDC consider that units will be completed on site before 2021/22. Should the relocation of the Football Club remain part of the planning application which follows the ES Scoping Opinion we consider it is unlikely that the site will become available until towards the end of the plan period.
- 2.11 In relation to proposed allocation S11 – St Ives West, we consider that there are issues in relation to the suitability of part of the proposed allocation. Outline Planning Permission 1301056OUT was submitted in 2013 for 224 dwellings and is yet to be determined due to a conflict with the adopted Development Plan policies. We therefore consider that the proposed allocation should be reassessed to provide a reduced allocation to reflect the total number of dwellings currently permitted (213) rather than the 400 dwellings proposed to be allocated. This would result in a reduction in the proposed allocation by 187 dwellings units which would need to be located elsewhere within the District.

### 3 CONCLUSION

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- 3.1 On behalf of our clients, we have a number of concerns in relation to the approach taken by the Council towards the Proposed Site Allocations – St Ives Spatial Planning Area.
- 3.2 We consider that the draft Local Plan is not justified, effective or consistent with national policy for allocation SI4 Former Car Showroom, London Road. Furthermore the draft Local Plan is optimistic in relation to the timescales for delivery of SI2 St Ives Football Club and the number of units which can be delivered at SI1 – St Ives West. We contend that the following amendments are required in order for the Plan to be considered sound:
- The removal of site SI4 Former Car Showroom, London Road from the draft Local Plan;
  - The allocation of sequentially preferable site(s) within Flood Zone 1 to replace the allocation which do not comply with the Sequential Test including Old Ramsey Road, St Ives;
  - Revisions to delivery timeframe for SI2 St Ives Football Club;
  - The revision to the number of units which can be delivered by SI1 – St Ives West to reflect the existing permissions and reallocation of units removed elsewhere within the District.

**APPENDIX A – REPRESENTATIONS LETTER TO  
CONSULTATION DRAFT DATED AUGUST 2017**

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**Our Ref: 19995/RMG/MB**  
**Your Ref:**

**E-mail: [mark.buxton@cgms.co.uk](mailto:mark.buxton@cgms.co.uk)**  
**Date: August 2017**

Local Plans Team  
Pathfinder House  
St Mary's Street  
Huntingdon  
PE29 3TN

Dear Sir/Madam,

**REPRESENTATIONS TO THE HUNTINGDONSHIRE LOCAL PLAN TO 2036:  
CONSULTATION DRAFT 2017**

RPS CgMs are instructed to submit representations on behalf of our client, Abbey Properties Cambridge Limited ('Abbey Properties'), to the Huntingdonshire Consultation Draft Local Plan.

This letter sets out our objections to, and where relevant, support for, the Consultation Draft Local Plan.

**Objectively Assessed Needs (OAN)**

Paragraph 4.8 identifies that the emerging Local Plan will support the overall provision of at least 21,000 new homes. Paragraph 4.34 states the emerging draft Local Plan identifies that 20,100 homes are required to meet the forecast population growth between 2011 and 2036 according to the Objectively Assessed Need for Huntingdonshire (2017). This equates to 804 dwellings per annum.

To be positively prepared the Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. While we welcome Huntingdonshire District Council's intention to target an overall provision of new homes above their assessed OAN, the Plan only contains a single sentence (at paragraph 4.1) setting out that the Council has taken this approach. We consider further justification for this approach should be contained within the Plan to accord with the tests of soundness reflected in NPPF paragraph 182.

We also highlight that if the Council seeks to provide at least 21,000 new homes during the plan period they will need to provide in excess of 804 dwellings per annum. We therefore consider that the Council should make it clear how many dwellings are required per annum to achieve the provision of at least 21,000 new homes over the course of the plan period in order for the Plan to be considered sound.

Furthermore, we consider that the Council has underestimated its Objectively Assessed Need for housing in the district. Abbey Properties has commissioned its own assessment of OAN for Huntingdonshire which it considers to be an appropriate Housing Target for the District. This figure has been created using PopGroup Modelling software in order to determine the objective assessed housing need. The software incorporates a wide range of socio-economic data which is sensitive to local circumstances and satisfies the requirements of the NPPF. The

assessment has been submitted to the Council on a number of occasions in support of Outline Planning Applications: 16/01530/OUT, 17/01161/OUT and 17/00931/OUT. A further update has also been commissioned.

This work assessed a variety of different scenarios and concluded that taking account of the Demographic, Economic, Affordability and Market Signals for Huntingdonshire there is clear evidence of a housing need of between 23,809 and 27,068 to be met between 2011 and 2036.

Therefore, we consider that a housing need of 23,809 dwellings is a robust and sound figure based on the sensitivity testing and should be the minimum level of housing need countenanced by Huntingdonshire District Council.

### **Policy LP 1 - Strategy For Development**

The policy concentrates development in locations which provide the greatest access to services and facilities and directs substantial development to two strategic expansion locations: Alconbury Weald and St Neots East. We consider this strategy inhibits growth and does not provide a sufficiently flexible approach to bring further sites forward. The Policy also fails to comply with the NPPF which requires Local Planning Authorities *“to boost significantly the supply of housing”* (Paragraph 47).

The policy does not proactively address the key reasons behind the persistent under delivery of houses within the District during the previous plan period. The Local Plan again places over reliance on the delivery of a small number of large strategic sites which take a long time to bring forward, have substantial infrastructure requirements, and are more likely to be delayed.

We therefore consider that the Distribution of Growth should be planned more positively across the District with greater allowance made for additional small and windfall sites to support the larger strategic sites. The Housing White Paper ‘Fixing our Broken Housing Market’ advocates such an approach.

### **Policy LP 5 - Spatial Planning Areas**

We disagree with the Council’s position on developments on unallocated sites. We consider that this policy is too restrictive and fails to recognise that the built-up areas of identified Spatial Planning Area are unable to accommodate viable and sustainable further growth. We therefore consider this policy is unsound.

The built-up area act as a proxy for the settlement boundaries. These have not been positively planned or adequately reviewed in this Local Plan and therefore do not allow for future growth. This results in limiting and restricting much needed housing growth. Moreover the built-up areas are based on outdated policy, the 2002 Local Plan Alterations, and are no longer relevant nor are they supported by the evidence base.

The supporting text *states “allocations for new development reflect existing known opportunities within each spatial planning area”*. These areas are planned to cater for 70% of future housing growth. However the boundaries reflected in LP5 limit the opportunities to provide the future housing need of Huntingdonshire, as well-located and strategically placed housing settlements are not identified. These settlement boundaries should be reviewed as the areas defined are out of date.

We advise, with consideration to paragraph 151 of the NPPF, that to contribute to sustainable development less constrained boundaries are necessary. We consider there to be further sites suitable for residential development which are appropriately located with excellent access to services and public transport.

### **Policy LP 6 – Key Service Centres**

The Council identifies in its objectives that there should be a good supply of suitable land for growth and the promotion of high quality, well designed and locally distinctive sites. We support this objective but consider that certain policies fail to support this and are therefore unsound.

Policy LP 6 states that a “*proposal for development on a site in addition to those allocated in this plan will be supported where it is located within a built-up area of a Key Service Centre*”. However, we consider the Policy and emerging Plan has failed to support this aim by effectively retaining the existing settlement boundaries originally defined with the 1995 Local Plan and 2002 Local Plan Alterations through the Built-up Areas definition. Any sites suitable and viable for development would have already been identified and developed during the preceding years. We consider evidence of this can be seen through the Council’s failure to meet its annual housing target in 4 of the last 5 years. Therefore, we considered that this policy is unreasonable and fails to plan positively for the District.

As a result the emerging Local Plan relies too heavily upon a small number of large strategic sites which take a long time to bring forward, affecting housing delivery in the district. Notably the Council has failed to meet its identified need over the last 4 years; a position the Inspector at the recent Lucks Lane Inquiry (Appeal Ref: APP/H0520/W/16/3159161) concluded constituted ‘*persistent under delivery*’. Furthermore we disagree with the ‘built up area’ definition. Excluding sites which are not ‘Previously Developed Land’ or ‘relate to surrounding countryside rather than buildings’ limits the number of sustainable sites which could deliver sustainable development.

Paragraph 157 of the NPPF requires Local Plans to plan positively for the development and infrastructure required in the area. This means indicating broad locations for strategic development. We consider there are other suitable sites which can positively meet housing need in the District. Therefore, we submit that the Council should identify further locations where development will be supported when it is well-related to the built-up area. This is over and above the policy support espoused in Community Planning Proposals and Rural Exceptions Housing policies.

### **Policy LP8 - Countryside**

This policy states all development in the countryside must “*avoid the irreversible loss of the best and most versatile agricultural land (grade 1 to 3a) where possible.*”

While we recognise that this policy is supported by the NPPF, we consider this policy fails to recognise that there are suitable sites for development particularly in agricultural grade 3a. Selective planned development of these sites will not harm the countryside nor materially affect the amount of the best and most versatile agricultural land within the District and would furthermore provide opportunities for the Council to meet its housing need. We therefore argue that limiting development in the countryside is too restrictive and does not plan positively.

Moreover, the policy position appears to be a direct contradiction to the majority of the Council's Strategic Allocations and the 2017 HELAA. A number of sites being promoted and allocated by the Council are former agricultural land comprising of either Grade 2 to 3a.

We consider that the policy should be reworded to more accurately reflect the Council's Strategic Allocations and positively plan for the District.

### **Policy LP9 - Flood risk**

This policy determines the locations suitable for development and states proposals will only be supported where the flood risk has been addressed. This requires that *"all reasonable opportunities to reduce overall flood risk have been taken"*.

We support this policy but consider there is an inconsistency with this policy and a number of Strategic Allocations. We consider that the Council needs to address this inconsistency and ensure that it correctly implements the Sequential and Exception Tests as set out in the NPPF.

### **Policy LP23 – Affordable Housing Provision**

The policy sets out the provision of affordable housing to delivered on site. It targets the delivery of 40% affordable housing on sites where 11 homes or 1,001sqm residential floorspace or more is proposed except where it can be demonstrated that the target is not viable.

We support the principle of this policy, however, we consider that the range of affordable housing types, sizes and tenures should be clearly set out within the main policy text rather than a referring back to the Housing Register, the Cambridge sub-region Strategic Housing Market Assessment and other local sources. The Policy currently fails to provide certainty for developers seeking to establish the tenure mix and associated costs. The policy is also likely to create uncertainty during periods when evidence is being updated or in situations when the evidence documents contradict each other. We therefore consider that the Council should state the percentage of affordable housing types, sizes and tenures sought within the Local Plan.

Furthermore we have concerns in relation to bullet point c. This requires affordable housing to be dispersed across the development in *'small clusters of about 15 dwellings'*. This can only reasonably apply to the largest strategic allocations in the District. Furthermore, it exceeds the 11 unit threshold. For example, it would be impossible for a 12 unit scheme to meet this policy requirement.

We consider that 15 dwellings constitutes more than what would typically be considered a *'small cluster'* on the majority of sites. We consider this will result in the majority of the affordable units being located in one area of the site. We are also unaware of any evidence which supports this figure. We therefore consider this element of the policy to be unsound and not supported by evidence. We would wish to see this element of the policy amended with a reduced figure which can be reasonably considered to be a *'small cluster'* in the context of the proposed development. Amending the draft policy to refer to clusters of up to 15 units and removing the reference to a *'small cluster'* maybe an acceptable solution. We consider that this would also provide flexibility for smaller sites where the number of units proposed means a cluster of 15 dwellings is not possible or suitable.

We consider that the policy should also recognise that a site's location within the District and its local housing market characteristics could be a material consideration affecting the percentage

and mix of affordable housing which can be provided on site. The District Council should recognise that the different settlements within the District have different markets for affordable housing with some areas more attractive to affordable housing providers than others. The policy wording or supporting text should reflect that, where it is supported by viability evidence, the location of sites will be a material consideration to justify a reduction in the amount of affordable housing proposed on site.

### **Policy LP28 - Rural Exceptions Housing**

Policy LP28 offers flexibility to proposals outside the built-up area and provides a positive opportunity to meet housing need as a rural exception. The policy requires providing “*affordable housing for people with a local connection*” with the aim of increasing diversity in housing tenures and to meet Huntingdonshire’s housing need.

We support this policy in so far that it recognises that development might be necessary outside of the built-up area. The policy could enable the Council to support sites outside the built-up area of settlement to come forward to help meet the District’s housing need. The policy also recognises the need to provide both affordable and market housing on site to ensure such sites are viable. This could help offset the restrictions of LP1 Strategy for development and LP5 ‘Spatial Planning Areas’.

We are concerned however over the lack of clarity in this policy. The policy states the scale and location of the proposal must demonstrate the availability of services and infrastructure and the effect on the character of the immediate locality. This does not provide sufficient clarity to the development industry over issues such as the location of these exception sites or what scale will be acceptable.

### **Allocations**

We object that a number of sites which we consider to be sustainable and suitable for development have not been included within the emerging plan allocations. We therefore consider the allocations in the Plan to be unsound.

Separate representations on the HELAA and ‘Call for Sites’ forms have been submitted for each of these sites. We consider it is necessary for the HELAA and proposed allocations to be reviewed and additional sites included for the emerging plan to be considered sound.

A brief description and analysis of the additional sites we consider should be allocated is provided below:

#### *Biggin Lane, Ramsey*

Biggin Lane is located to the west of Ramsey and we consider could be developed for at least 141 dwellings. The site is assessed within the HELAA and was found to be suitable for only low density development before being considered as ‘not suitable’ within the summary table for Ramsey. We consider this is inconsistent and the HELAA has failed to consider a realistic capacity for the site.

We note that the majority of Biggin Lane comprises grade 3b agricultural land and is exclusively located within Flood Zone 1. We also consider the site has been incorrectly assessed within the Council’s Sustainability Appraisal for the reasons set out in our separate representation letter. *Old Ramsey Road, St Ives*

Old Ramsey Road is located to the north west of St Ives and despite representations being submitted to the 2016 HELAA Additional Sites Consultation, the site has been omitted from the HELAA 2017.

The site is approximately 10.81 hectares and we consider is suitable for 131 dwellings. The site is located entirely with Flood Zone 1 and could provide at least 40% affordable units. The site has been fully assessed through a number of technical reports submitted in support of Outline Planning 17/00931/OUT which demonstrate that the site is sustainable.

*Thrapston Road, Brampton*

The site is located to the north of Brampton and has in part been included with the HELAA, but limited to the frontage site only and therefore considered to have a capacity of just 8 dwellings. The site was not therefore considered for allocation as it fell below the capacity threshold of 10 dwellings. The full site was not assessed due to concerns relating to flood risk.

However, we consider that the HELAA has failed to reflect the Council's updated Strategic Flood Risk Assessment which identifies the site almost entirely within Flood Zone 1. The site performs well in the Sustainability Appraisal and we consider should only result in 6 negative impacts of the 32 criteria tested.

We therefore consider that the Thrapston Road site should be reassessed within the HELAA and allocated for 63 dwellings.

**Conclusion**

Overall we disagree with elements of the Council's Draft Local Plan. We believe the Plan to unduly limit potential future development sites. In addition we advise further consideration into its settlement boundaries is needed to deliver sites to meet, and potentially exceed, the OAN for housing and to provide sustainable and inclusive communities for the future.

RPS CgMs reserves the right to appear and speak at the Examination should the emerging Local Plan continue to fail to satisfactorily address our concerns over issues of soundness.

Please do not hesitate to contact either myself or my colleague Robert Mackenzie-Grieve if you require any information on, or wish to further discuss, this representation.

Yours Sincerely



Mark Buxton  
Director

**APPENDIX B – REPRESENTATIONS LETTER TO PROPOSED  
SUBMISSION PLAN DATED 5/2/18**

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140 London Wall, London EC2Y 5DN  
T +44 (0)20 7280 3300 F +44 (0)20 7583 2231 W [rpsgroup.com](http://rpsgroup.com)

**Our Ref: 19995/RMG/MB**  
**Your Ref:**

**E-mail: [mark.buxton@rpsgroup.com](mailto:mark.buxton@rpsgroup.com)**  
**Date: 5<sup>th</sup> February 2018**

Local Plans Team  
Pathfinder House  
St Mary's Street  
Huntingdon  
PE29 3TN

***By email only***

Dear Sir/Madam,

**REPRESENTATIONS TO THE HUNTINGDONSHIRE LOCAL PLAN TO 2036: PROPOSED SUBMISSION**

RPS are instructed to submit representations on behalf of our client, Abbey Properties Cambridge Limited ('Abbey Properties'), to the Huntingdonshire Local Plan Proposed Submission.

This letter sets out our representations to the Proposed Submission version of the Local Plan and should be read alongside the representations made to the July 2017 Consultation Draft. Previous representations were submitted under the name of RPS CgMs.

We set out at the end of each representation whether we consider the policy/allocation meets the tests of soundness and the reasons why.

**LP1 – Amount of Development: OBJECT**

Policy LP 1 sets out the amount of development which is required in Huntingdonshire.

According to the Policy at least 20,100 new homes (both market and affordable) are required within the District. We consider that this policy fails to meet the Objectively Assessed Housing Need for the District for the reasons set out in the 'Huntingdonshire Housing Requirement and OAN' report by Regeneris Consulting attached to this letter.

According to the Regeneris Report the Council's OAN evidence contains the following shortcomings:

- A lack of consistency between the figures and aspects of the method in the 2013 SHMA and 2017 CRG study;
- The absence of any substantive consideration of the implications of Huntingdonshire's stand-alone OAN study for housing need figures in the wider Housing Market Area;
- The lack of a thorough assessment of past trends in household formation rates;
- Flaws in the Council's approach to economic growth adjustments in the OAN; and
- An adjustment for market signals which falls far short of an increase in the future housing supply relative to assessed demand which might reasonably be expected to result in an easing of affordability problems.



Regeneris consider that a minimum OAN of 23,750 (950 dpa) should be planned for the district and we support and endorse their conclusions.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	No	No evidence of joint working on strategic priorities
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

**LP2 – Strategy for Development: OBJECT**

This policy seeks to protect the intrinsic character and beauty of the countryside surrounding settlements and therefore seeks to apply a blanket protection to the whole of the countryside. This is inconsistent with the NPPF which is clear that account should be taken of the different roles and character of different areas. The NPPF only uses the term ‘protect’ in reference to valued landscape and designated areas. We therefore consider that this addition to Policy LP2 from previous draft versions of the Local Plan is inconsistent with National Guidance.

The policy further concentrates development in locations which provide the greatest access to services and facilities and directs substantial development to two strategic expansion locations: Alconbury Weald and St Neots East. This means that approximately 75% of housing growth is proposed to be located within the four spatial planning areas.

We consider this strategy potentially inhibits growth and does not provide a sufficiently flexible approach to encourage other sites to come forward. The Policy therefore arguably fails to comply with the NPPF which requires Local Planning Authorities “to boost significantly the supply of housing” (Paragraph 47).

The policy does not proactively address the key reasons behind the persistent under delivery of houses within the District earlier in the plan period. The Local Plan again places over reliance on the delivery of two large strategic sites which take a long time to bring forward, have substantial infrastructure requirements, and are more likely to be delayed.

We therefore consider that the distribution of growth should be planned more positively across the District with greater allowance made for additional small and windfall sites to support the larger strategic sites. The Housing White Paper ‘Fixing our Broken Housing Market’ advocates such an approach.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	N/A	
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

**LP7 – Spatial Planning Areas: OBJECT**

We disagree with the Council’s position on developments on unallocated sites. We consider that this policy is still too restrictive and fails to recognise that the built-up areas identified as Spatial Planning Area settlement are unable to accommodate sufficient viable and sustainable further growth to meet the Objectively Assessed Need. We therefore consider this policy is unsound.

The built-up area effectively acts as a proxy for the settlement boundaries. These have not been positively planned or adequately reviewed within the Local Plan and therefore do not allow for future growth. This results in limiting and restricting much needed housing growth. Moreover the built-up areas appear to be based on outdated policy, the 2002 Local Plan Alterations, and are no longer relevant nor are they supported by the evidence base.

The supporting text states *“allocations for new development reflect existing known opportunities within each spatial planning area”*. These areas are proposed to cater for 75% of future housing growth according to Policy LP2. However, supporting paragraph 4.8 states that to allow for the level of growth currently proposed the use of some greenfield land will be required to deliver the necessary scale of development. The policy wording of LP7 does not reflect this need and limits the opportunities to deliver the future housing need of Huntingdonshire, as well-located and strategically placed housing settlements are not identified. These settlement boundaries should be reviewed as the areas defined are out of date.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	No	No evidence of joint working on strategic priorities
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

**LP11 – The Countryside: OBJECT**

This policy requires that all development in the countryside must *“avoid the irreversible loss of the best and most versatile agricultural land (grade 1 to 3a) where possible.”*

While we recognise that this policy is supported by the NPPF through directing development to poorer quality land, we consider this policy fails to recognise that there are suitable sites for development particularly in agricultural land grade 3a. Selective planned development of these sites will not harm the countryside nor should it materially affect the amount of the best and most versatile agricultural land within the District. It would furthermore provide opportunities for the Council to meet its identified housing need. We therefore contend that the countryside policy is too restrictive and fails to plan positively.

Moreover, the policy position appears to be a direct contradiction to the majority of the Council’s Strategic Allocations and the 2017 HELAA. A number of sites being promoted and allocated by the Council are best and most versatile agricultural land comprising Grade 2 to 3a.

Furthermore we object to the policy seeking to protect the intrinsic character and beauty of the countryside. As stated above this is inconsistent with the NPPF which is clear that account should be taken of the different roles and character of different areas.

We consider that the policy should be reworded to more accurately reflect the Council's Strategic Allocations and positively plan for the District.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	N/A	
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

**LP25 – Affordable Housing Provision: OBJECT**

This policy sets out the provision of affordable housing to be delivered on site. It targets the delivery of 40% affordable housing on sites where 11 homes or 1,001sqm residential floorspace or more are proposed except where it can be demonstrated that the target is not viable.

We do not support this policy and consider, amongst other things, that the range of affordable housing types, sizes and tenures should be clearly set out within the main policy text rather than referring back to the Housing Register, the Cambridge sub-region Strategic Housing Market Assessment and other local sources. The Policy currently fails to provide certainty for developers seeking to establish the tenure mix and associated costs. The policy is also likely to create uncertainty during periods when evidence is being updated or in situations when the evidence base documents contradict each other. We therefore consider that the Council should state the percentage of affordable housing types, sizes and tenures sought within the Local Plan.

We support the removal of the reference in bullet point c to small clusters referring to ‘about 15 dwellings’. However, we still consider the reference to ‘small clusters of dwellings’ is unclear, inconsistent with the supporting text, and difficult to achieve on smaller sites.

Supporting paragraph 7.10 states that affordable housing should be ‘pepper-potted’ around a development and ‘may be provided in small clusters, proportionate to the scale of development’. However, the proposed wording of Policy LP25 is less clear and does not provide sufficient guidance regarding what is considered to be a ‘small cluster’. Furthermore, supporting paragraph 7.14 still refers to small clusters consisting of about 15 dwellings. While paragraph 7.14 acknowledges that clusters of 15 affordable dwellings could be too large on smaller sites we consider this reference currently provides the only indication of what the Council considers to be a ‘small cluster’.

We wish to see this element of the policy amended to provide further clarity on what is considered to be a ‘small cluster’ in the context of the proposed development or to remove the reference altogether. We consider that this would provide a greater degree of flexibility for smaller sites.

We consider that the policy should also recognise that a site's location within the District and its local housing market characteristics could be a material consideration affecting the percentage and mix of affordable housing which can be provided on site. The District Council should recognise that the different settlements within the District have different markets for affordable housing with some areas more attractive to affordable housing providers than others. The policy wording or supporting text should reflect that, where it is supported by viability evidence, the location of sites will be a material consideration to justify a reduction in the amount of affordable housing proposed on site.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	N/A	
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

**LP30 – Rural Exceptions Housing: OBJECT**

Policy LP30 offers some flexibility to proposals outside the built-up area and provides a positive opportunity to meet housing need as a rural exception. The policy seeks to provide “*affordable housing for people with a local connection*” with the aim of increasing diversity in housing tenures and to meet Huntingdonshire’s housing need.

We support this policy in so far as it recognises that development might be necessary outside of the built-up area. The policy could enable the Council to support sites outside the built-up area of settlements to come forward to help meet the District’s housing need. The policy also recognises the need to provide both affordable and market housing on site to ensure developments are viable. This provides a counter-balance to the restrictions on development of LP2 ‘Strategy for Development’ and LP7 ‘Spatial Planning Areas’.

We are concerned however over the lack of clarity in this policy. The policy states the scale and location of the proposal must demonstrate the availability of services and infrastructure and the effect on the character of the immediate locality. This does not provide sufficient clarity to the development industry over issues such as the location of these exception sites or what scale will be acceptable.

We are also concerned that the policy may not assist with the need to provide additional affordable housing within the District due to the overly restrictive criteria for eligibility. We consider that the need for affordable houses across the District, as set out in LP25, should result in the Council allocating more new housing developments in order to achieve 40% affordable housing provision from those sites. This would address an urgent need within the District and provide access to affordable dwellings to all.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	N/A	
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

**Allocations: OBJECT**

We consider that the following allocations should have been included within Huntingdonshire Proposed Submission Local Plan:

*Land off and to the North of 66-100 Thrapston Road, Brampton*

An application for 63 dwellings was dismissed at Appeal in December 2017 (APP/H0520/W/17/3172571) as the site was considered to have a harmful impact on the local landscape and townscape.

However, we do not agree with the Inspector's findings (and we have lodged a judicial review of the decision) on this point and note the Council did not consider this site to comprise part of a valued landscape in its determination of the original planning application. We therefore consider the site is still suitable for 63 dwellings and lies within a sustainable location which would not harm the landscape or setting of Brampton.

With regard to landscape impact the site is undesignated in landscape terms, contains no features of particular value and is enclosed to the public.

The site is approximately 3.25 hectares and is located to the north of Brampton. It is currently a vacant greenfield site with residential properties to the south. To the north, east and west of the site is open land including Hinchingsbrooke Country Park and Alconbury Brook Pond. Existing agricultural and commercial uses are located to the north and north east of the site including Poplars Farm.

The majority of the site comprises semi-improved grassland, tall ruderals and scrub with the site boundaries comprising individual trees, hedgerows and scrub. Development of the site should not have a negative impact on either Hinchingsbrooke Gravel Pits or Portholme SAC. Great Crested Newts have been identified within the pond on site and appropriate mitigation would therefore be required. No reptiles have been recorded on site.

No Tree Preservation Orders are in place on site and one group of trees would require partial removal to create the vehicle entrance. A number of trees are recommended for removal for reasons of good arboricultural practice.

There are no designated heritage assets within the site and a single listed building is located 100m to the south. The closest Scheduled Monument is located 500m west of the site. Development of the site will not affect the setting of these assets due to their distance from the site and the existing screening. There is no suggestion that the site contains archaeological remains that would prohibit development.

The site lies within the Huntingdon Spatial Planning Area (SPA) and presents a sustainable location for residential development in terms of access to local facilities and amenities as well as a good level of public transport provision. The site is well located to access local schools on foot/cycle as well as local shops and larger superstores. The site is also located in close proximity to the cycling routes. The nearest bus stops are located within 250m of the site's frontage to Thrapston Road. Development of the site would not have a detrimental impact on the local highway or sustainable transport networks.

The site is located within Flood Zone 1 and all built development can be proposed outside of the modelled 1 in 1000 year flood extent. SuDs such as permeable paving and detention basins can be incorporated into any scheme to ensure that runoff rates do not exceed greenfield rates.

According to Natural England Agricultural Land Classification the site comprises Grade 3 Agricultural Land; two grades below the best quality agricultural land. The site is also suitable for affordable housing.

For the reasons above we consider that Land off and to the North of 66-100 Thrapston Road is suitable, available and achievable for the provision of new residential development within the next 5 years. Therefore the site should be included as a residential allocation within the Proposed Submission Local Plan.

#### *Thrapston Road Frontage Site*

Additionally, we consider (in the event that the site above is not allocated) that the smaller frontage site, to the east of no.66 Thrapston Road, should be considered for allocation within the Proposed Submission Local Plan.

The site is 0.49ha and capable of accommodating 14 dwellings along the frontage of Thrapston Road.

We consider that this site would address the perceived impact on the valued landscape raised in the Inspector's Appeal Decision referred to above (notwithstanding that a judicial review application has been lodged). A frontage scheme would not extend further north than the existing ribbon development, could not be described as 'in depth' and would not breach the visual boundary of Brampton.

A frontage scheme would continue the established pattern of houses and would complement the village form and settlement pattern. Additionally any impact on the character of the village edge or the landscape would be limited due to the reduced extension of development into the countryside.

The Council assessed the suitability of this site within the May 2013 Environmental Capacity Study. It was concluded at that time that only the eastern part of the site would be suitable for development owing to flood risk issues. As a result the scheme would have been below the 10 dwelling threshold for allocation within the future Local Plan so was not separately identified.

These concerns from May 2013 over flood risk have subsequently been removed owing to the more up-to-date Environment Agency flood risk maps. The Council should therefore look favourably upon new development in this location on the edge of the settlement which relates more to the built-up area than the countryside.

We consider this site should be included within Huntingdonshire Local Plan Proposed Submission.

#### *Old Ramsey Road, St Ives*

The site is approximately 10.81 hectares and is located to the north west of St Ives. It is a greenfield site currently in agricultural use with a residential property, caravan storage business



to the east (in part) and allotments to the south. To the north of the site is agricultural land and RAF Wyton a short distance further north. The site would be accessed via Old Ramsey Road.

The site lies within the St Ives SPA and is currently subject to Outline Planning application 17/00931/OUT and we consider the site is suitable for 131 dwellings.

The site mainly comprises arable land with the boundaries consisting of individual trees, scrubs, and tall ruderals. A stream runs along the northern boundary. The arable land is not in itself of ecological significance. No reptiles were found on site however the site margins do have the potential to support invertebrates, amphibians, reptiles, breeding birds, foraging and commuting bats and hedgehogs. The site also has the potential to support Barn Owls as a Barn Owl box is present on the western boundary.

It is not necessary to remove any trees to enable development but a section of hedgerow on the eastern boundary of the site will need to be removed to facilitate vehicle access. The remaining boundary landscaping can be retained and enhanced through sensitive planting.

There are no designated heritage assets within the study site or the surrounding 1km search area. Evidence provided from the Historic Environment Record demonstrates that the site is considered to have low/negligible potential for significant archaeological evidence from all periods.

Vehicular access to the site could be provided from Old Ramsey Road in the form of a priority junction designed in accordance with DMRB standards. A new footway is proposed to be provided along the western side of Old Ramsey Road. The Transport Assessment establishes that the site enjoys a sustainable location in respect of the services and facilities and in respect of available public transport. A proposed development of 131 dwellings would not be anticipated to have a material impact on the operation of the local highway network.

The site is primarily located in Flood Zone 1 and is not considered to be at a significant risk of flooding from any sources assessed. However, parts of the site adjacent to the ordinary watercourse are at 'medium' to 'high' risk of surface water flooding and therefore any proposed development should be located wholly outside of this area. Sustainable Drainage can also be incorporated into the scheme to ensure that runoff rates do not exceed greenfield rates. This can be done through permeable paving and a retention basin on site.

As the site is located within Flood Zone 1 it is sequentially preferable to a number of sites assessed within the 2017 HELAA. We calculate there are 11 sites with flood risk issues assessed within the HELAA. We consider that these sites are sequentially less preferable to Land off Old Ramsey Road and the Council has failed the sequential test set out in the NPPF by not adequately assessing this site within Flood Zone 1 before actively promoting other sites.

The allocation of some sites within Flood Zone 2 may be necessary in order to meet the Council's Objectively Assessed Need but they should be shown to meet the Sequential and Exception Tests set out in the NPPF. We object to these sites being allocated before all possible sites within Flood Zone 1 have been assessed and allocated where they are identified as being sustainable.

The majority of the site comprises Grade 2 agricultural land. Therefore, we consider the development would not involve the loss of the best quality Grade 1 agricultural land. The site is located in very close proximity to the built up area of St Ives with urban uses immediately to the south east of the site.

The site could also provide additional affordable housing. The Proposed Submission Local Plan sets a target of 40% affordable housing on residential sites. We consider that this site could provide 40% affordable housing (equating to 52 units), or potentially more, while remaining viable. This development site could therefore provide a significant number of the affordable dwellings requirement within St Ives.

A Sustainability Matrix based on the Council's HELAA criteria was prepared and submitted with application 17/00931/OUT and the previously withdrawn application 16/01884/OUT. This found that of the 23 criteria tested, there were 12 positive returns, 10 neutral and only 1 negative (relating to the site not being previously developed land). We therefore object to the fact that a number of sites have been allocated as a result of the 2017 HELAA which have a similar or higher number of negative impacts when assessed against the sustainability criteria.

For the reasons above we consider that land off Old Ramsey Road is suitable, available and achievable for the provision of new residential development within the next 5 years. Therefore the site should be included within the Huntingdonshire Local Plan to 2036: Proposed Submission.

#### *Meeting Lane, Needingworth*

The site is approximately 4.9 hectares and is located on the north west edge of Needingworth.

Needingworth is identified as a small settlement in the draft Local Plan. Draft Policy LP10 'Small Settlements' states that "*a proposal for development on land well-related to the built-up area may be supported where it accords with the specific opportunities allowed for through other policies of this plan*". We contend that land at Meeting Lane is very well related to the existing built up area.

The site is greenfield and accessible from either Meeting Lane or the High Street. The site lies primarily in Flood Zone 1 although access issues need to be satisfactorily resolved. It is located a short distance to the north of two bus stops and Needingworth Post Office. We therefore consider that the site is a sustainable location for development.

The site was assessed within the Housing & Economic Land Availability Assessment December 2017. Overall the appraisal was positive with some of the main positive features including the sites close proximity to Overcote Lane playing fields, Needingworth Village Hall, Post Office and One Stop Shop. The site is also only 700m away from the Holy Church of England Primary School and 1.9km from Needingworth Industrial Estate.

However, the Sustainability Appraisal within the 2017 HELAA concluded that the "*the site is not considered suitable for development as it contributes significantly to the character area of the local area*".

This conclusion seems to run counter to the overall assessment and is seemingly based on the fact the site would be inappropriate for higher density development.

We consider the site to be suitable for up to 50 dwellings and is also capable of providing significant public open space. At 4.9ha such a scale of development would qualify as very low density development, well below the Council's own assessment of 'low density' development of 30 dwellings per ha in the HELAA. We therefore consider this site is suitable for low density residential development.



Furthermore the site is supported locally for additional development in the village with the Parish Council expressing a positive early view of the site’s potential.

*Meadow Lane, Ramsey*

The site is approximately 2.2 hectares and is located to the east of Bury within the Ramsey Spatial Planning Area. The site is currently greenfield with an electricity sub-station adjacent to the south-eastern corner and was previously used as a practice ground by Ramsey Golf Club. The development would be accessed from Meadow Lane off Warboys Road.

The site is approximately 650m from Bury Stores and 750m away from Bury Church of England Primary School. The site is also within 2km of both the High Lode industrial Estate and the proposed employment site at Upwood Airfield.

We consider the site is suitable for 40 dwellings, open space and additional landscaping. The site is not located in an area of flood risk. It lies on the south-eastern edge of the extensive Ramsey Conservation Area adjacent to other housing which falls outside the Conservation Area.

There is scope to provide a high quality and sensitively designed housing scheme on this site which could enhance this part of the conservation area and provide an improved edge to the settlement boundary in this location. It would also help to secure the long-term future of Ramsey Golf Club.

Accordingly, we consider the site should be allocated for low-medium density residential development in the Proposed Submission Local Plan.

A site location plan for this site is attached to this covering letter (area marked by black hatching).

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	No	Plan will not deliver levels of development needed over its period
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

**Proposals Map: NOTE/OBJECT**

We consider the key to the Proposals Map is currently misleading. It contains a reference to SPA which is understood in this context to apply to ‘Special Protection Areas’ but could equally apply to ‘Spatial Planning Areas’. We consider this should be clarified and cross reference to relevant Plan policies in the key could assist in this regard.

**Conclusion**

We object to the Council’s Proposed Submission Local Plan for the reasons outlined above. We consider the Plan unduly limits potential future development sites. Further consideration of the settlement boundaries is required to deliver sites to meet, and potentially exceed, the OAN



for housing and to provide sustainable and inclusive communities for the future. We therefore consider the Local Plan, as drafted, fails the tests of soundness

RPS wish to participate at the oral examination on behalf of Abbey Properties Cambridgeshire Limited to ensure that our clients' interests are adequately addressed.

Please do not hesitate to contact either myself or my colleague Robert Mackenzie-Grieve if you require any information on, or wish to further discuss this representation letter.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Mark Buxton', written in a cursive style.

Mark Buxton  
Director

**APPENDIX C – ST IVES SPATIAL PLANNING AREA DRAFT  
ALLOCATIONS SITE APPRAISALS**

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## Proposed site allocations – St Ives Spatial Planning Area

<b>Site Allocation</b>	<b>SI1 – St Ives West</b>
<b>Unit size</b>	54ha for approximately 400 homes
<b>Current planning status</b>	<p>There are a number of planning applications associated with this allocation.</p> <ul style="list-style-type: none"> <li>• Outline Application 1302210OUT was approved in June 2016 for approximately 90 dwellings.</li> <li>• Outline Application 1301056OUT for 224 dwellings on the land between Houghton Grange and The How is currently pending consideration.</li> <li>• Two smaller applications 1201890FUL and 1201891FUL for 7 dwellings has been approved subject to the completion of the S106 Agreement.</li> <li>• The remainder of the site on the former golf course was granted permission on appeal (hybrid application 1301895OUT) in December 2015 for 166 units.</li> </ul>
<b>Constraints</b>	<p>The site is sensitively located and most of the site comprises greenfield land. The west of the site contains Houghton Grange, a grade II listed building. The central part of the site contains a water tower and two groups of derelict buildings. Additionally the southern boundary and western part of the site are located within Houghton and Wyton Conservation Area.</p> <p>Flood risk is potentially an issue with a small part of the site lying within Flood Zones 2, 3a and 3b. Additionally due to the geology of the site it is unlikely that it would be conducive to the use of soakaways or infiltration devices according to the HELAA December 2017. However, the Sustainability Appraisal within the HELAA considers that the Flood Risk is outside the area proposed for development and therefore is considered appropriate for development. Additionally as a number of applications have already been approved within the allocation we consider that any issues relating to flood risk have been satisfactorily resolved.</p> <p>The site contains a number of trees which are subject to preservation orders.</p> <p>Moreover the larger application 1301056OUT for 224 units is still pending determination. This is largely due to the conflict with development plan policies, such as Policy En15 of the Local Plan Alteration 2002 which states <i>“the maintenance of the green wedge between [the original Golf Course allocation] and Houghton Grange is vital to the separate physical identity of St Ives and Houghton”</i>.</p> <p>This complex site is therefore subject to a number of constraints and will require a sensitive approach to development.</p>
<b>Suitability</b>	<p>Sensitive site location with a number of issues that still need to be resolved including conflict with adopted Local Plan policies, issues in relation to the flood risk and drainage, and potential heritage issues.</p> <p>The length of time taken to determine planning application 1301056OUT (5 years) leads to questions over the suitability of the site to deliver housing on at least part of the allocation.</p>

	Other elements (former golf course) have been granted planning permission and are therefore considered suitable for residential development by HDC.
<b>Availability</b>	We have no reason to consider that the various sites which comprise St Ives West will not be available. Furthermore we note that development has commenced on The Spires (former Golf Course) with 18 units currently completed and a further 166 units expected to be completed within the next 5 years.
<b>Viability</b>	It is noted that the application for The Spires (1301895OUT) only provided 35% affordable housing on site. Therefore, the Council should be seeking to allocate additional housing sites to address the shortfall in the affordable housing provided on this site.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	<p>According to the Council's 2017 AMR, Land between Houghton Grange and The How can deliver 125 units with the first units being delivered in 2022/23. This is approximately 100 units less than that sought by the current application on site. Furthermore this application (1301056OUT) has taken 5 years to determine and is still awaiting a decision.</p> <p>With the considerable difference in the housing numbers proposed by the landowners and Council we consider it is unlikely housing will be delivered on site in the timeframe currently forecast by the Council.</p>
<b>Conclusion</b>	Overall the majority of the proposed allocation can be delivered. However, there are clear issues in relation to the suitability of the land between Houghton Grange and The How and whether 224 units can be provided on this site

<b>Site allocation</b>	<b>SI2 – St Ives Football Club</b>
<b>Unit size</b>	1.4ha for approximately 30 homes.
<b>Current planning status</b>	Outline planning application 16/01485/OUT was submitted in August 2016 and is still pending determination.
<b>Constraints</b>	<p>Replacement facilities for the football club must be available prior to development starting.</p> <p>Access to the site is restricted by a very narrow private road with a sharp bend.</p> <p>Substantial landscaping will be required on the western boundaries to help safeguard against disturbance from the adjoining leisure uses.</p> <p>The site is located within Flood Zone 1.</p> <p>A number of consultees have raised issues with the application. The Urban Design Officer objects to the development failing to understand the site context and constraints and the open spaces are poorly integrated within the development. A significant number of trees are proposed to be removed. Additionally the Parish Council strongly objects to the application.</p>
<b>Suitability</b>	The planning application was submitted nearly 2 years ago and is still pending determination. We therefore consider there are a number of issues which require resolution regarding the suitability of the site for development. However, based on a review of the consultees' responses we consider these

	objections relate to the design of the proposed development rather than the suitability of the site for housing.
<b>Availability</b>	The Agent says the site will become available for development from 2020 when the relocation of the football club can commence. However, we note that the ES Scoping Opinion was submitted in May 2018 for the mixed use scheme including a new sports ground (18/70112/SCOP). We therefore question where the approved relocation of the football club is going ahead in the timeframe currently suggested. Additionally there is no certainty that the football club will relocate to this site as 18/70112/SCOP proposes an urban extension to the town which is not proposed within the draft Local Plan
<b>Viability</b>	The viability appraisal for the development is still ongoing suggesting there may be issues over the viability of the site.
<b>Deliverability</b>	No comments.
<b>Delivery</b>	The site is unable to be delivered prior to the relocation of the football ground. Should the football ground not be relocated until the a decision has been reached on the likely future planning application which will follows the May 2018 Scoping Opinion (18/70112/SCOP) then it is unlikely that units will be completed on site before 2021/22
<b>Conclusion</b>	Overall we consider that the site is currently unavailable for development with the relocation of the Football Club required before the site can be developed. However we consider there is a strong possibility that the site could become available during the life time of the Local Plan.

<b>Site Allocation</b>	<b>SI4 Former Car Showroom, London Road</b>
<b>Unit size</b>	1.4ha for approximately 50 homes
<b>Current planning status</b>	No application submitted but the agent considers the site's capacity could be up to 75 dwellings.  Agent has confirmed that technical reports for flooding and heritage matters are currently underway.
<b>Constraints</b>	The whole site sits within the rapid inundation zone and the majority of the site falls within Flood Zones 2 and 3a.  Given the previous use as a car showroom there is potential for contamination.  The site is located with the St Ives Conservation Area.
<b>Suitability</b>	Brownfield site with potential contamination issues considering its previous use. The site is located within Flood Zones 2 and 3a and will therefore need to pass both the Sequential and Exceptions Tests in order to comply with the NPPF.  Our client has promoted a number of sites located within Flood Zone 1 which are sequentially preferable to the proposed allocation.
<b>Availability</b>	According to the 2017 AMR the Agent considers that the site is available and we have no reason to disagree with this assessment.
<b>Viability</b>	If contamination is found on the site it could increase the costs of bringing the development forward.
<b>Deliverability</b>	Due to the sites location within the Rapid Inundation Zone and with the

	majority of the site falling within Flood Zones 2 and 3a there are a number of constraints to its deliverability.
<b>Delivery</b>	The Agent contends that the site has capacity to deliver up to 75 dwellings which has been reduced to 50 by the Local Plan allocation with the first units expected to be completed in 2019/20.
<b>Conclusion</b>	We consider that the proposed allocation does not comply with the NPPF Sequential or Exceptions Tests which constrains the deliverability of the site.

