

Huntingdonshire Local Plan to 2036 Examination

Hearing Statement Matter 9:

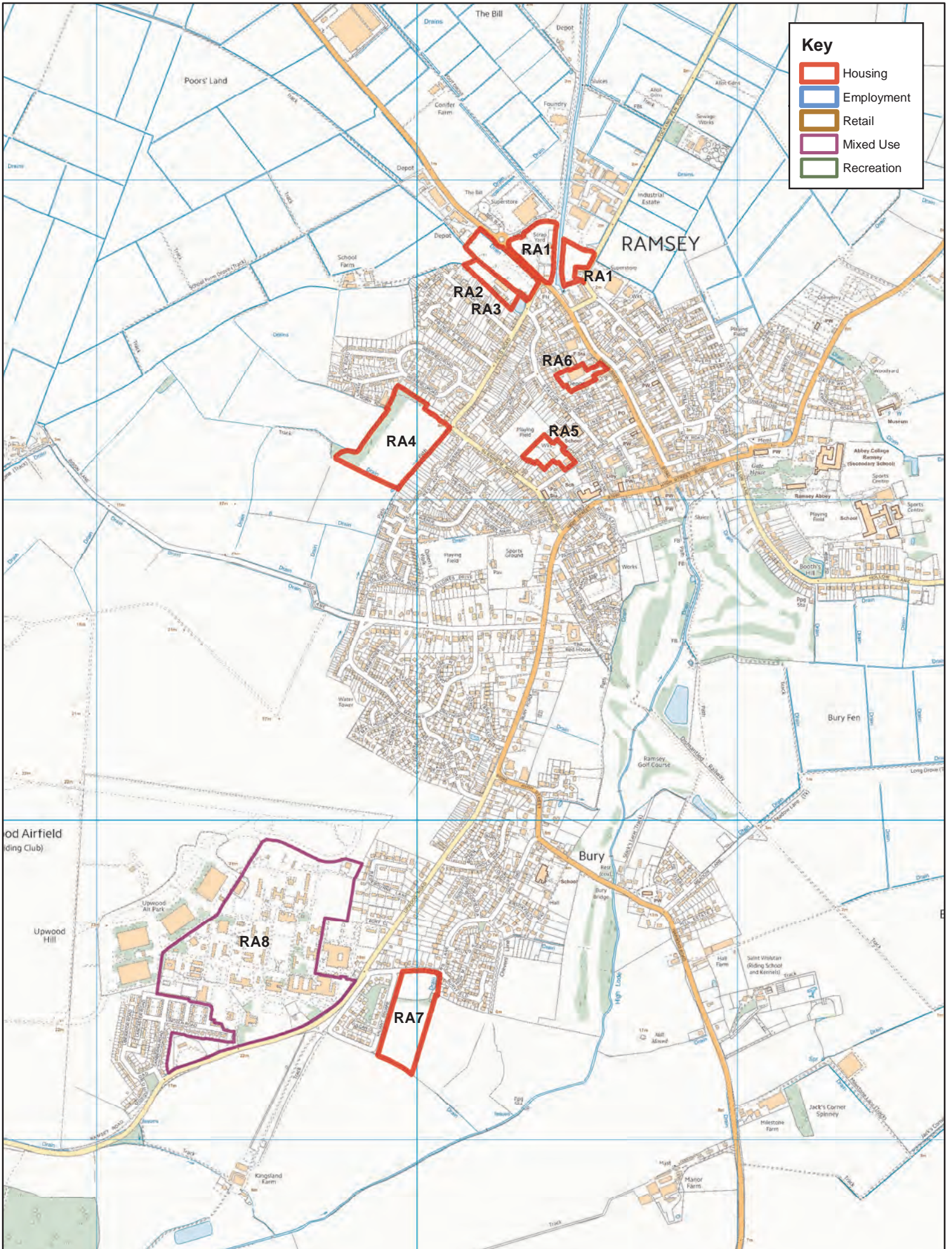
Proposed site allocations – Ramsey Spatial Planning Area

Huntingdonshire District Council

July 2018

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Issue

Whether the proposed site allocations for the Ramsey Spatial Planning Area are justified, effective and consistent with national policy.

1. Ramsey

RA1- Ramsey Gateway (High Lode)

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

- 1.1. The site was mostly unused scrub and grass on both sites and less than half of the site has previously been developed.
- 1.2. The site been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 416-419 for full assessment).
- 1.3. This site is situated on the edge of the town in close proximity to a major superstore, community centre and GP surgery. Taking flooding constraints into account, it is considered suitable for medium density residential use or a mix of dwellings and specialist older people's accommodation across a net developable area of 80% of the site resulting in an estimated capacity of 105 dwellings. Should it be developed with the western part for medium density residential use across 80% of 1.7ha this portion of the site could accommodate 68 dwellings. Correspondingly, should the eastern part be developed for specialist older people's accommodation across 75% of 0.9ha this portion of the site could accommodate 57 units (HOUS/02: Suitability, page 418).

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

- 1.4. The proposed scale and mix was determined through planning application 1101894REM and is for approximately 110 dwellings and consists of 3 no. 1 bedroom flats and apartments (3%), 70 no. 2 bedroom houses and apartments (64%), 16 no. 3 bedroom houses (14%), 16 no. 4 bedroom houses (14%) and 5 no. 5 bedroom houses (5%).
- 1.5. 29% of these homes have been allocated as affordable housing.

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

- 1.6. The Councils assessment of the site determined that subject to passing sequential and exception tests for flooding and making allowance for mitigation measures, the site is suitable for medium density residential use or mix of dwellings and specialist older people's accommodation across a net developable area of 80% of the site. This results in an estimated 105 dwellings.

- 1.7. Should it be developed with the western part for medium density residential use across 80% of 1.7ha this portion of the site could accommodate 68 dwellings. Correspondingly, should the eastern part be developed for specialist older peoples accommodation across 75% of 0.9ha this portion could accommodate 57 units.
- 1.8. The site has the benefit of full planning permission for 110 dwellings, granted in March 2015 (1101894REM). A lawful start was made upon the site in early 2017.

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

- 1.9. An Outline planning application (planning reference 0501658OUT) for a foodstore, petrol filling station, residential development, community facilities and associated highways and infrastructure works was approved in November 2008.
- 1.10. A subsequent Reserved Matters application (planning reference 1101894REM) for 110 dwellings (81 on the western parcel and 29 on the eastern parcel) was approved in March 2015 and a lawful start was made in early 2017.
- 1.11. A further application to vary the Section 106 Agreement (planning reference 17/01538/S106) is under consideration.

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

- 1.12. The site is located in close proximity to services, employment, public transport and open space and is therefore a very sustainable choice for residential development. The site is a mix of previously developed and greenfield land. The land could not technically be farmed effectively and is therefore to be classed as urban land. The development of the land would regenerate a site upon the gateway to the town.
- 1.13. The development will contribute to the Council's five-year land supply and provide residential accommodation that is highly accessible to local services and facilities.
- 1.14. The development will improve publically accessible viewpoints and will sit comfortably within the context of the wider area.

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

- 1.15. The HELAA identifies potential adverse impacts with regards to flood risk, townscape impact and impact on the conservation area, transport impact, noise pollution from neighbouring scrap yard, habitats on site and gas pipelines within the site.

- 1.16. Mitigation measures are identified in the HELAA include, the assessment of ecological impact to ascertain whether there are protected species on site, the development should ensure that any impacts upon protected species are avoided, mitigated or compensated for and that opportunities are taken to enhance biodiversity.
- 1.17. Nearly the whole site lies within Flood Zone 3a. A flood risk assessment and drainage strategy will be required to address these issues, to be produced in agreement with the relevant bodies.
- 1.18. The site is in a prominent location at the northern gateway to the town, in addition the western part of the site is within the conservation area. The design of the development proposal and its landscaping scheme should demonstrate how it will protect and enhance the character and appearance of the conservation area and townscape more generally.
- 1.19. Representation received from K R Abblitt (ID: 771112) objected to the site on the grounds of the effect of extra traffic on the existing approach roads in Ramsey. A proportionate transport assessment will be required and applicants will be required to demonstrate that safe, appropriate access can be provided via the existing roundabout on St Marys Road and that any adverse transport impacts can be adequately mitigated (through criterion a the policy).
- 1.20. The site is located within close proximity to a scrap yard that means that any development would be affected by noise pollution, if the scrap yard would continue to operate. If this is the case a noise assessment and acoustic treatments will be required, ensuring an appropriate level of amenity for users of the site.
- 1.21. High and medium pressure gas pipelines run within the site. The design of any development proposal and its landscaping scheme should demonstrate how it will provide an appropriate separation from these pipelines in accordance with National Grid requirements.
- 1.22. Mitigation measures are achievable, as demonstrated through the approval of application 1101894REM in early 2015, a lawful start to the development has been recognised which now means that the site benefits from an extant permission.

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?

- 1.23. The site was assessed in the Sequential Test for Flood Risk (FLO/01). It was identified that most of the site is in Flood zone 3a with the area around High Lode being within Flood zone 3b functional floodplain. 13% of the site is in Flood zone 1, 5% in Flood zone 2, 81% in Flood zone 3a and 1% in Flood zone 3b.

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

- 1.24. HOUS/02 sets out the main constraints for the site and existing infrastructure. In summary, the site is constrained by flood risk near to the drain area, drain access easements and by gas pipes running through the site. There is contamination from gasworks use and potential noise issues from the adjacent supermarket.
- 1.25. In terms of infrastructure, access can be gained from the nearby roundabout. The site is well served by schools, bus stops, services and employment uses. New infrastructure has been determined as part of the planning consent and there is a signed S106. The design has taken into account the constraints and mitigated these.

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

- 1.26. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely to substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 1.27. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Proposed sites in Ramsey will be served by the Ramsey Wastewater Treatment Works (referred to as a Water Recycling Centre-WRC by Anglian water). The Water Cycle Study assessed that the cumulative impact of the planned growth would exceed capacity in the plan period (FLO/11 p82-84). Reinforcement work to increase capacity will be required. Upgrade work will be needed prior to the capacity being breached. The required upgrades are identified as critical schemes in the IDP Schedule (INF/02).
- 1.28. Anglian water is responsible for building, operating and maintaining their water infrastructure which is required to provide for additional growth, whereas local upgrades and connections to

the existing sewer network required to bring forward development are typically funded by developers. This includes a connection charge, paid by the developer to the water company for the physical connection to the sewer, and also an infrastructure charge. This charge is also paid by the developer when the premises are first connected. The charge contributes to the water companies' investment in improvements to the existing sewer networks to meet increased demand for new customers. Water companies can also build the infrastructure required to connect the new development to its network by charging the developer a requisition charge, which the water company will use to provide a new public sewer and associated infrastructure to a new locality. The cost and extent of the required network improvements are determined through pre-development requirements and appraisals once a more detailed design is known. This enables capacities to be confirmed and the timescales for necessary upgrades and local enforcements.

- 1.29. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in WRC catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and off-site reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 1.30. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 1.31. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 1.32. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6).

- 1.33. The Study is not site specific, as this is not a requirement for the Local Plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas and whether greenfield or previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 1.34. The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).
- 1.35. The report concludes that the housing market in Huntingdonshire is strong with confidence of sustained market growth and that up to 40% affordable housing is viable for most typologies applicable in the District, meaning that housing delivery will not be slowed on the grounds of viability.
- 1.36. For this site, constraints, contamination, density and relatively low sales values will impact on the viability. Policy LP25 (affordable housing provisions) seeks a target of 40% on sites of 11 homes or 1,001sqm or more but where it can be demonstrated in a viability appraisal that due to specific site conditions e.g. other high cost infrastructure elements, subject to validation of the appraisal, consideration will be given to reducing the requirement to ensure viability is achievable.
- 1.37. The current signed S106 requires 29% affordable housing but the developer has requested a variation to this requirement on viability grounds. The Combined Authority has recognised the primary constraints of the site and has considered the need to maintain a good provision of affordable homes at this site. Potentially, grant funding could be awarded as a result.

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

- 1.38. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the agent for the site has confirmed its availability and says the site will be commenced within 5 years and confirmed that the site is deliverable within the early part of the plan period (MON/01, page 67).
- 1.39. The first 5 homes are expected to be completed in the year 2019/2020, the timescale for delivery is set out below:

No. units in years 1-5	19/20 Yr. 3	20/21 Yr. 4	21/22 Yr. 5	22/23	23/24	24/25	25/26	26/27	27/28	Total 17/36
20	5	5	10	10	10	15	15	20	20	110

1.40. These projections appear somewhat protracted, and the Council considers the site could be delivered quicker with higher annual completion rates. In light of ongoing viability work, the agent has moved delivery back by a year since the August 2017 update (MON/01, page 67).

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

1.41. The boundary of the site is appropriate as it represents the land submitted as available for development. No representations were received to the proposed submission Local Plan consultation suggesting that the boundary should be amended.

1.42. The defined boundary allows for comprehensive re-development of the site and as it stands it is suitable, available and achievable demonstrated by the approval of reserved matters application 1101894REM.

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

1.43. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA.

1.44. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Cambridgeshire County Council as LLFA and Archaeology, Anglian Water.

1.45. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG¹. The site is developable as defined through paragraph 47 of the NPPF, planning permission was approved in March 2015 demonstrating the development is viable and suitable, development has lawfully commenced and the site benefits from an extant permission for 110 dwellings. Recent responses to the Annual Monitoring Report Housing Trajectory identify around 20 units could be completed within five years.

¹ Housing and economic land availability assessment

RA2- Ramsey Gateway

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

- 1.46. The site comprises a former station yard which has lain vacant and has been overgrown for some years.
- 1.47. It was originally identified during the production of the Core Strategy 2009 and included in the 2010 SHLAA. It was then assessed in Stage 2 of the Local Plan to 2036 in the Environmental Capacity Study, consulted upon in summer 2013 (HOUS/02: Availability, page 444). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 442-444 for full assessment).
- 1.48. This site is situated in an area of mixed uses and has good access to services and facilities. Taking into account the flood risk constraints on site, protected species and the presence of pipeline will constrain on design options. Therefore, the site is considered suitable for low density residential development across a net developable area of 75% of the site resulting in an estimated capacity of 45 dwellings (HOUS/02: Suitability, page 444).

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

- 1.49. The proposed use is for approximately 50 dwellings.

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

- 1.50. Initial assessment through the HELAA (HOUS/02 – page 444) concluded that the land is previously developed and located in close proximity to services; employment and public transport, and is therefore a sustainable choice for residential development. The HELAA identified a site capacity of around 45 dwellings. Planning application ref. 16/00311/FUL seeks permission for 52 dwellings and following amendment to the application, Planning Officers are minded to grant permission subject to completion of an agreed S106 agreement. On this basis the scale and type of uses are justified.

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

- 1.51. A Full planning application (planning reference 16/00311/FUL) for 52 dwellings is under consideration.

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

- 1.52. Taking the Framework policies into account, and in accordance with its Section 1, the development would use previously developed land, have important economic benefits through employment in the construction of the housing (including in the supply chains of

materials, fittings and furnishings) and in the local economic contribution from future residents. There would be important social benefits from the provision of market and affordable homes for the residents, and open space in accordance with Section 6 of the Framework. In accordance with Section 4 of the Framework the site would also be sustainably located with access to employment and facilities by means other than the car including cycling facilities.

- 1.53. The redevelopment of this site at a prominent gateway to Ramsey, and affording views to a from the Northern Mill building (a local landmark of historic significance), presents the opportunity for positive enhancement to the setting of heritage assets and improvement of the conservation area as identified in Paragraph: 004 Reference ID: 18a-004-20140306 of the NPPG through criteria 'c' and 'd' of the RA2 allocation policy and para 12.12 of the Local Plan (CORE/01).

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

- 1.54. The HELAA identifies potential adverse impacts with regards to flood risk from surface water, foul water capacity, location within the conservation area, general townscape issues, transport access, potential contamination and protected species, and presence of high and medium pressure gas pipelines through the site.
- 1.55. Mitigation measures are identified in the HELAA (HOUS/02 – page 444) and allocation policy RA2 of the Local Plan (CORE/01) and include the requirement for drainage assessments and consultation with drainage bodies, that appropriate account is taken of the location of the site within the Conservation Area and gateway to Ramsey, including retention of trees along site boundaries to protect views to and from Ramsey Conservation Area, provision of views through to St Marys Road and the Northern Mill building, provision of a suitable access, the assessment of the land for contamination, along with ecological surveys, and adhering to National Grid requirements regarding gas pipelines.
- 1.56. Through consideration of the planning application (ref. 16/00311/FUL) it has been shown that the potential adverse impacts from the development can be satisfactorily mitigated. With regard to the objections from the Environment Agency (ID 1146949) on drainage consultation and KR Abblitt (ID 771112) on transport infrastructure, agreement was reached with the County Council as Highways Authority and Lead Local Flood Authority, that the flooding and highway impacts of the development of 52 dwellings can be mitigated and made acceptable.

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?

- 1.57. Most of the site falls within Flood zone 1 (90%), with a small area in the north western edge lying within Flood zones 2 (6%) and Flood zone 3a (4%).

1.58. The site was assessed in the Sequential Test for Flood Risk (FLO/01). Use of the Sequential Approach means development can be placed away from Flood Zones 2 and 3, with the area affected by flood risk left undeveloped, this leaves approximately 1.9 hectares of land available for development outside of the Flood Zones (FLO/01: page 12).

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

1.59. HOUS/02 sets out the constraints. In summary, this is a prominent site which needs to preserve views to the Northern Mill adjacent to the site. There are some areas in flood zones 2 and 3. Trees must be preserved along the boundaries and the site is in a conservation area. Property values in Ramsey are relatively low. Development can focus on areas away from the flood zones. (1.58 refers).

1.60. In terms of infrastructure, access can be gained from the nearby roundabout. Agreement has been reached with the County on an acceptable road solution for the site (1.58 refers). The site is well served by schools, bus stops, services and employment uses.

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

1.61. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely to substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

1.62. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Proposed sites in Ramsey will be served by the Ramsey Wastewater Treatment Works (referred to as a Water Recycling Centre-WRC by Anglian water). The Water Cycle Study assessed that the cumulative impact of the planned growth would exceed capacity in the plan period (FLO/11 p82-84). Reinforcement work to increase capacity will be required. Such work will be needed prior to

the capacity being breached. The required upgrades are identified as critical schemes in the IDP Schedule (INF/02).

- 1.63. Anglian water is responsible for building, operating and maintaining their water infrastructure which is required to provide for additional growth, whereas local upgrades and connections to the existing sewer network required to bring forward development are typically funded by developers. This includes a connection charge, paid by the developer to the water company for the physical connection to the sewer, and also an infrastructure charge. This charge is also paid by the developer when the premises are first connected. The charge contributes to the water companies' investment in improvements to the existing sewer networks to meet increased demand for new customers. Water companies can also build the infrastructure required to connect the new development to its network by charging the developer a requisition charge, which the water company will use to provide a new public sewer and associated infrastructure to a new locality. The cost and extent of the required network improvements are determined through pre-development requirements and appraisals once a more detailed design is known. This enables capacities to be confirmed and the timescales for necessary upgrades and local enforcements.
- 1.64. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in WRC catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and off-site reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 1.65. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 1.66. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 1.67. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to

demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6).

- 1.68. The Study is not site specific, as this is not a requirement for the Local Plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 1.69. The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).
- 1.70. The report concludes that the housing market in Huntingdonshire is strong with confidence of sustained market growth and that up to 40% affordable housing is viable for most typologies applicable in the District, meaning that housing delivery will not be slowed on the grounds of viability.
- 1.71. For this site, constraints of the adjacent Mill, density and relatively low sales values will impact on the viability. Policy LP25 (affordable housing provisions) seeks a target of 40%. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is not viable due to specific site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal. The viability work within INF/04 indicates that the typology that this site falls into will generally indicate limited viability though other Ramsey sites have been able to support policy levels of affordable housing.

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

- 1.72. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the agent confirmed that there are no constraints to the development and that the site can be delivered within 5 years (MON/01, page 87).
- 1.73. The first 20 homes are expected to be completed in the year 2020/2021, with all homes expected to be completed in years 1-5. The timescale for delivery is set out below:

No. units in years 1-5	17/18 Yr. 1	18/19 Yr. 2	19/20 Yr. 3	20/21 Yr. 4	21/22 Yr. 5	Total 17/36
52	0	0	0	20	32	52

- 1.74. This development will be developed simultaneously with 94 Great Whyte (15/02384/FUL for 32 dwellings which was granted permission on the 22nd June 2018) as the sites have interlinked public open space provision (MON/01, page 87).
- 1.75. This is deemed to be a realistic timescale as planning permission for 94 Great Whyte has now been granted.

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

- 1.76. The boundary of the site is appropriate as it represents the land submitted as available for development. No representations were received to the proposed submission Local Plan consultation suggesting that the boundary should be amended.

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

- 1.77. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA (HOUS/02) and the Huntingdonshire Local Plan Viability Study (INF/04).
- 1.78. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 33, 56, 81, 111, 213, 327, 400 and 459) and Statement of Representations (CORE/04, Pages 104-105).
- 1.79. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG². The site is deliverable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development is available now can be completed within a five year time period.

² Housing and economic land availability assessment

RA3- West Station Yard and Northern Mill

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

- 1.80. The site has previously been developed with around half of the site being covered by Northern Mill, associated sheds and hardstanding, and the rest is covered by brambles and scrub.
- 1.81. This piece of land was originally identified during the production of the Core Strategy 2009 and included in the 2010 SHLAA. It was then assessed in Stage 2 of the Local Plan to 2036 in the Environmental Capacity Study consulted upon in summer 2013. The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 445-447 for full assessment).
- 1.82. This site is situated in an area of mixed uses and has good access to services and facilities. It has some constraints due to potential townscape and heritage impacts. The site is considered suitable for conversion of the mill building of 3 storeys at five apartments per storey including adjoining land for parking and its setting and low density residential development across 50% of the site, resulting in a capacity of 30 dwellings (HOUS/02: Suitability, page 447).

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

- 1.83. The proposed use is for approximately 30 dwellings.
- 1.84. The type and mix of residential units will be determined through the application of policy LP 26 Housing Mix.

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

- 1.85. Initial assessment through the HELAA (HOUS/02 – page 447) identified a site capacity of around 30 dwellings, comprising conversion of the existing Mill building (15 apartments) and new build housing (15 units) in its grounds. The HELAA identified the site as suitable as the land comprises previously developed land located in close proximity to services; employment and public transport, and is therefore a sustainable choice for residential development.
- 1.86. Representations submitted by Mr Hayden Morris (ID: 1146361) argues that the conversion of the existing Mill building to apartments is unviable owing to the need to meet modern regulations, and therefore it will be of limited interest to housing developers, unless a grant is awarded. Mr Morris also argues that the allocation policy (criterion 'a') requiring the main access through the adjacent allocated site (RA2 Ramsey gateway) which is in separate ownership, places a further cost on the development. Mr Morris considers that greater flexibility around the Northern Mill building and access to the site is needed if this land is ever to be developed on.

- 1.87. The Council's assessment in the HELAA (HOUS/02 – page 447) is that the site lies in the Ramsey Conservation Area, and the Northern Mill is a local landmark and has local historic significance, and should therefore be retained. Historic England (ID 56252) welcomes references to the Conservation Area and the mill building, including the need to retain the mill.
- 1.88. In terms of providing access to the site through the adjacent allocated site (RA2 Ramsey Gateway) the Council's assessment in the HELAA (HOUS/02 – page 447) is that a proportionate transport assessment will be required to demonstrate that safe, appropriate access can be provided from the roundabout on St Mary's Road,
- 1.89. Policy LP 26 is justified through the application of Cambridge Sub-Region SHMA (HOUS/07) and Peterborough SHMA (HOUS/08) and local housing need and strategies (including HOUS/06). By referring to up-to-date evidence the policy ensures that the most appropriate strategy is employed in line with local demand and settlement type and location, or proximity to the most appropriate housing market area consistent with paragraph 50 of the NPPF and NPPG Housing and economic development needs assessment.
- 1.90. On this basis the scale and type of uses are justified.

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

- 1.91. No planning application has yet been submitted but it is anticipated that development is likely to take place later in the Plan period.

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

- 1.92. Taking the Framework policies into account, and in accordance with its Section 1, the development would use previously developed land, have important economic benefits through employment in the construction of the housing (including in the supply chains of materials, fittings and furnishings) and in the local economic contribution from future residents. There would be important social benefits from the provision of market and affordable homes for the residents in accordance with Section 6 of the Framework. In accordance with Section 4 of the Framework the site would also be sustainably located with access to employment and facilities by means other than the car including cycling facilities.
- 1.93. The HELAA (HOUS/02 – page 447) identifies how the site presents the opportunity for positive enhancement and improvement of the conservation area through retention of the Northern Mill building as a landmark of local historic significance, as identified in Paragraph: 004 Reference ID: 18a-004-20140306 of the NPPG through criterion 'd', of the RA3 allocation policy and para 12.19 of the Local Plan (CORE/01). This would also include suitable landscaping scheme provided to maintain its significance and setting which capitalise on the views in and out of the site to the Mill. Any development proposal should preserve or enhance the character or appearance of the conservation area.

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

- 1.94. The HELAA (HOUS/02 – page 442) identifies potential adverse impacts with regards to drainage, prominent location at a gateway to Ramsey, impacts on heritage assets (the conservation area and the significance and setting of the Northern Mill building), townscape, issues with transport access, potential contamination, ecology and high pressure gas pipelines.
- 1.95. Mitigation measures are identified in the HELAA (HOUS/02 – page 442) and allocation policy RA3 of the Local Plan (CORE/01) and include the requirement for drainage assessments and consultation with drainage bodies, that appropriate account is taken of the location of the site within the Conservation Area, including retention of trees along site boundaries to protect views to and from Northern Mill and Ramsey Conservation Area, retention of the existing Northern Mill building itself to act as a local landmark, provision of a suitable access, the assessment of the land for contamination, along with ecological surveys, and adhering to National Grid requirements regarding gas pipelines.
- 1.96. With regard to the objection from the Environment Agency (ID 1146949), it is considered that the site provides opportunities for satisfactory drainage following consultation with statutory consultee requirements.

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?

- 1.97. The site is in Flood zone 1 (FLO/01, page 10). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

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

- 1.98. The site is constrained (HOUS/02 p447 refers). In summary, the site contains an historic mill building which needs to be retained and brought back into use. The site also contains gas pipes/easements.
- 1.99. In terms of infrastructure, site access may be possible from the nearby roundabout across site RA 2 (1.85 refers). The site is close to local amenities. Open space may be required. It is expected that infrastructure will be met through developer contributions.

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

- 1.100. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure

typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely to substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 1.101. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Proposed sites in Ramsey will be served by the Ramsey Wastewater Treatment Works (referred to as a Water Recycling Centre-WRC by Anglian water). The Water Cycle Study assessed that the cumulative impact of the planned growth would exceed capacity in the plan period (FLO/11 p82-84). Reinforcement work to increase capacity will be required. Work will be needed prior to the capacity being breached. The required upgrades are identified as critical schemes in the IDP Schedule (INF/02).
- 1.102. Anglian water is responsible for building, operating and maintaining their water infrastructure which is required to provide for additional growth, whereas local upgrades and connections to the existing sewer network required to bring forward development are typically funded by developers. This includes a connection charge, paid by the developer to the water company for the physical connection to the sewer, and also an infrastructure charge. This charge is also paid by the developer when the premises are first connected. The charge contributes to the water companies' investment in improvements to the existing sewer networks to meet increased demand for new customers. Water companies can also build the infrastructure required to connect the new development to its network by charging the developer a requisition charge, which the water company will use to provide a new public sewer and associated infrastructure to a new locality. The cost and extent of the required network improvements are determined through pre-development requirements and appraisals once a more detailed design is known. This enables capacities to be confirmed and the timescales for necessary upgrades and local enforcements.
- 1.103. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in WRC catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's

emerging Local Plan to ensure that infrastructure provision aligns with growth”. The response goes on to state that “water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan”. Site specific and off-site reinforcements will be funded via Anglian Water’s zonal charges (as set out in Anglian Water’s Developer Services, Summary of Charges 2018/2019).

1.104. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 (‘AMP 7’) for public consultation. The document suggests that Anglian Water will “manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery”. This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.

1.105. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

1.106. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6).

1.107. The Study is not site specific, as this is not a requirement for the Local Plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).

1.108. The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).

1.109. The report concludes that the housing market in Huntingdonshire is strong with confidence of sustained market growth and that up to 40% affordable housing is viable for most typologies applicable in the District, meaning that housing delivery will not be slowed on the grounds of viability.

1.110. For this site, constraints of the Mill, density and relatively low sales values will impact on the viability. Policy LP25 (affordable housing provisions) seeks a target of 40% on sites of 11 homes or 1,001sqm. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is not viable due to specific

site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal. The viability work within INF/04 indicates that the typology that this site falls into will generally indicate limited viability though other Ramsey sites have been able to support policy levels of affordable housing.

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

1.111. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the site’s agent has confirmed the sites availability for development and anticipates that the development will take place later in the plan period, as the site is currently being actively marketed and no planning application has yet been submitted (MON/01, page 87).

1.112. The first 15 homes are expected to be completed in the year 2031/2032, the timescale for delivery is set out below:

No. units in years 1-5	30/31	31/32	Total 17/36
0	15	15	30

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

1.113. The boundary of the site covers the entire Northern Mill building and is appropriate as it represents the land submitted as available for development. No representations were received to the proposed submission Local Plan consultation suggesting that the boundary should be amended.

1.114. Mr Hayden Morris (ID: 1146361) has raised the requirement to access the site through the adjacent allocation (RA2 Ramsey Gateway) as a reason to object, but this does not justify combining the two allocations into a single allocation. However, it is acknowledged that allocation RA1, Ramsey Gateway, through the detailed planning application (still under consideration) allows for access to the Northern Mill site.

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

1.115. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA (HOUS/02) and the Huntingdonshire Local Plan Viability Study (INF/04).

1.116. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway

authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 81, 111, 400 and 459) and Statement of Representations (CORE/04, Pages 104-105).

1.117. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG. The site is developable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development can be completed within the plan period.

RA4- Field Road

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

1.118. The site is located north west of the town centre and is a greenfield site which was used for agricultural purposes.

1.119. The site was put forward during the Stage 2: Strategy and Policies consultation in 2012 and originally assessed during Stage 3 of the Local Plan to 2036 in the Environmental Capacity Study, consulted upon in summer 2013 (HOUS/02: Availability, page 450). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 448-450 for full assessment).

1.120. The site is situated on the edge of a residential area and has good access to services and facilities. It has limited site specific constraints and is well screened from surrounding countryside by established woodland, therefore, the site is considered suitable for low density residential development across 50% of the developable site resulting in an estimated capacity of 91 dwellings (HOUS/02: Suitability, page 450).

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

1.121. The proposed use is for approximately 90 dwellings.

1.122. As approved under 16/02379/REM, the mix of housing includes 3 no. 1 bed affordable flats, 6 no. 2 bed affordable flats, 18 no. 2 bed houses (of which 16 are affordable) 29 no. 3 bed house (of which 9 are affordable), 31 no. 4 bed houses (of which 2 are affordable) and 3 no. 5 bed houses. A total of 36 units (or 40%) will be affordable housing.

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

1.123. The Council's assessment of the site determined that a capacity of approximately 90 residential units is suitable. The HELAA and more recently planning application reference 14/01852/OUT confirmed that the site is in Flood Zone 1. Condition 9 of said permission requires details of a surface water drainage scheme.

1.124. A Representation submitted, by K R Abblitt (ID: 771112) objected to the site on the grounds that the burden of extra traffic from the proposed development would have on neighbouring streets.

1.125. The HELAA stated that a proportionate transport assessment will be required to demonstrate that safe, appropriate access can be provided from Field Road and that any adverse off-site transport impacts can be adequately mitigated including additional generated traffic on Blenheim Road and Field Road. Criterion a of the policy also requires provision for new access off Field Road. In their comments on the planning application 14/01852/OUT County Highways accepted the applicants conclusions that the development is expected to increase traffic flows at local junctions by less than 5% and that the increases in traffic of this magnitude would have no perceptible impact on the local highway network in terms of safety and capacity.

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

1.126. An Outline planning permission (planning reference 1401825OUT) for up to 90 dwellings was approved in October 2016.

1.127. The subsequent Reserved Matters application (planning reference 16/02379/REM) was approved in April 2017 and commenced on the 6th March 2018.

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

1.128. Redevelopment of the site will bring many benefits to the surrounding area. Taking the Framework policies into account, and in accordance with its Section 1, the development is in a highly sustainable location and have important economic benefits through employment in the construction of the housing (including in the supply chains of materials, fittings and furnishings) and in the local economic contribution from future residents. There would be important social benefits from the provision of market and affordable homes for the residents in accordance with Section 6 of the Framework, along formal space at Ramsey Colts and informal open space. In accordance with Section 4 of the Framework the site would also be sustainably located with access to employment and facilities by means other than the car including cycling facilities.

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

1.129. The HELAA identifies the following potential adverse impacts

- development of grade 2 agricultural land;
- that the site's location adjacent to open countryside and to residential properties means that the impact on the surrounding landscape is a constraint;
- the site location adjacent to open countryside and to residential properties means that development could give rise to noise and light pollution;

- due to the geology of the site it is unlikely that it will be conducive to the use of soakaways or infiltration devices; and
- due to the presence of suitable habitats on site, including woodland, ditches and ponds there may be protected species existing here

1.130. Representation submitted by Mr Colum Fitzsimons (ID: 1150302) state that: The site has a surface water flood route along the south-eastern edge and in order to reduce flood risk into Ramsey, the development should be required to reduce discharge rates.

1.131. Mitigation measures for the above constraints and objections are achievable, as demonstrated through the approval of application ref: 1401852OUT. No objections were raised by Anglian Water, CCC Archaeology, CCC Highways, Environment Agency, Natural England although conditions were suggested and applied. Consideration of these constraints are also addressed in criteria a to g of RA 4 Field Road, Ramsey.

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?

1.132. The site is in Flood zone 1 (FLO/01, page 9). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

1.133. Representation submitted by the Environment Agency (ID: 1146949) argues that it is not necessary or accurate that the LLFA are the statutory consultee. The Middle Level Commissioners are not. The Council disagrees with the deletion of criterion g and, although not statutory consultees, feel that input from the middle level commissioners will ensure that development is carried out appropriately.

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

1.134. HOUS/02 (page 450) sets out the constraints. In summary, a transport assessment will be needed to determine how the site can be accessed and landscaping work is required to reduce impact on open countryside. Infrastructure issues have been addressed through the approval of planning applications.

1.135. The site is reasonably well served by local amenities.

1.136. Infrastructure requirements will be met through developer contributions.

1.137. Residential values for this part of the District are relatively low.

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

- 1.138. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely to substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 1.139. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Proposed sites in Ramsey will be served by the Ramsey Wastewater Treatment Works (referred to as a Water Recycling Centre-WRC by Anglian water). The Water Cycle Study assessed that the cumulative impact of the planned growth would exceed capacity in the plan period (FLO/11 p82-84). Reinforcement work to increase capacity will be required. Work will be needed prior to the capacity being breached. The required upgrades are identified as critical schemes in the IDP Schedule (INF/02).
- 1.140. Anglian water is responsible for building, operating and maintaining their water infrastructure which is required to provide for additional growth, whereas local upgrades and connections to the existing sewer network required to bring forward development are typically funded by developers. This includes a connection charge, paid by the developer to the water company for the physical connection to the sewer, and also an infrastructure charge. This charge is also paid by the developer when the premises are first connected. The charge contributes to the water companies' investment in improvements to the existing sewer networks to meet increased demand for new customers. Water companies can also build the infrastructure required to connect the new development to its network by charging the developer a requisition charge, which the water company will use to provide a new public sewer and associated infrastructure to a new locality. The cost and extent of the required network improvements are determined through pre-development requirements and appraisals once a more detailed design is known. This enables capacities to be confirmed and the timescales for necessary upgrades and local enforcements.

1.141. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: “work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in WRC catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council’s emerging Local Plan to ensure that infrastructure provision aligns with growth”. The response goes on to state that “water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan”. Site specific and off-site reinforcements will be funded via Anglian Water’s zonal charges (as set out in Anglian Water’s Developer Services, Summary of Charges 2018/2019).

1.142. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 (‘AMP 7’) for public consultation. The document suggests that Anglian Water will “manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery”. This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.

1.143. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

1.144. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6).

1.145. The Study is not site specific, as this is not a requirement for the local plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306). The viability work within INF/04 indicates that the typology that this site falls into will generally show strong viability.

1.146. The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).

1.147. The report concludes that the housing market in Huntingdonshire is strong with confidence of sustained market growth and that up to 40% affordable housing is viable for most typologies

applicable in the District, meaning that housing delivery will not be slowed on the grounds of viability.

1.148. Policy LP25 (affordable housing provisions) seeks a target of 40% on sites of 11 homes or 1,001sqm. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is not viable due to specific site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal. The viability work within INF/04 indicates that the typology that this site falls into will generally indicate strong viability.

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

1.149. In response to the Annual Monitoring Report 2017, the site's agent has confirmed that the site could be delivered within five years. The housebuilders website states homes are 'coming soon' (MON/01, page 68).

1.150. The first 45 homes are expected to be completed in the year 2019/2020, with all homes expected to be completed within years 1-5, the timescale for delivery is set out below:

No. units in years 1-5	19/20 Yr. 3	20/21 Yr. 4	21/22 Yr. 5	Total 17/36
90	45	45	0	90

1.151. This is deemed to be realistic as the development has commenced on site following both Outline and Reserved Matters approvals.

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

1.152. The boundary of the site is appropriate as it represents the land submitted as available for development. No representations were received to the proposed submission Local Plan consultation suggesting that the boundary should be amended.

1.153. The site as it stands is suitable, available and achievable demonstrated by the grant of Outline planning permission and approval of the Reserved Matter.

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

1.154. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA.

1.155. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Cambridgeshire County Council as Highways, LLFA and Archaeology.

1.156. Responses to the questions above demonstrate that the site is suitable, available and achievable as defined in the NPPG. The site is deliverable as defined through paragraph 47 of the NPPF; planning permission was approved demonstrating the development is viable and suitable. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development is available now and can be completed within a five year time period.

RA5- Whytefield Road

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

1.157. The majority of the site is currently in use as a garage and car showroom, although around a third of the site is comprised of scrub and trees.

1.158. It was allocated for housing in the Local Plan Alteration 2002 and assessed for the Local Plan to 2036 in the Environmental Capacity Study, consulted upon in summer 2013. The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 390-392 for full assessment).

1.159. This site is situated in a primarily residential area adjacent to a primary school with good access to services and facilities. It has few constraints other than the need to respect its position within a Conservation Area and potential for contamination given its use as a garage. Therefore, the site is considered suitable for medium density residential development across a developable area of 90% of the site, resulting in an estimated capacity of 41 dwellings (HOUS/02: Suitability, page 392).

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

1.160. The proposed use is for approximately 40 dwellings.

1.161. The type and mix of residential units will be determined through the application of policy LP 26 Housing Mix.

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

1.162. Initial assessment through the HELAA (HOUS/02 – page 392) identified a site capacity of around 41 dwellings and the site being suitable for residential development as it is located in a residential area of the Town in close proximity to services, employment, open space and public transport. It is therefore a sustainable choice for residential development.

1.163. The land is previously developed, and in close proximity to services, employment, open space and public transport. It is therefore a sustainable location for residential development. The Councils assessment of the site determined that a capacity of approximately 41 residential units is suitable. The HELAA confirmed that the site is in Flood Zone 1.

1.164. Policy LP 26 is justified through the application of Cambridge Sub-Region SHMA (HOUS/07) and Peterborough SHMA (HOUS/08) and local housing need and strategies (including HOUS/06). By referring to up-to-date evidence the policy ensures that the most appropriate strategy is employed in line with local demand and settlement type and location, or proximity to the most appropriate housing market area consistent with paragraph 50 of the NPPF and NPPG Housing and economic development needs assessment.

1.165. On this basis the scale and type of uses are justified.

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

1.166. No planning application has yet been submitted.

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

1.167. Taking the Framework policies into account, and in accordance with its Section 1, the development would use previously developed land, have important economic benefits through employment in the construction of the housing (including in the supply chains of materials, fittings and furnishings) and in the local economic contribution from future residents. There would be important social benefits from the provision of market and affordable homes for the residents in accordance with Section 6 of the Framework. In accordance with Section 4 of the Framework the site would also be sustainably located with access to employment and facilities by means other than the car including cycling facilities.

1.168. The HELAA (HOUS/02 – page 392) identifies the visibility of the site in the Conservation Area. The redevelopment of this site presents the opportunity for positive enhancement to the setting of heritage assets and improvement of the conservation area as identified in Paragraph: 004 Reference ID: 18a-004-20140306 of the NPPG through criterion 'c', of the RA5 allocation policy and para 12.31 of the Local Plan (CORE/01).

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

1.169. The HELAA (HOUS/02 – page 392) identifies potential adverse impacts with regards to drainage, location within the Conservation Area, townscape, issues with transport access, potential contamination, overlooking of the adjacent school and ecology.

1.170. Mitigation measures are identified in the HELAA (HOUS/02 – page 392) and allocation policy RA5 of the Local Plan (CORE/01) and include the requirement for drainage assessments and

consultation with drainage bodies, that appropriate account is taken of the location of the site within the Conservation Area, that a suitable access is provided and the land is assessed for contamination, along with appropriate protection being secured to avoid overlooking of the school and to secured ecological enhancement.

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?

1.171. The site is in Flood zone 1 (FLO/01, page 10). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

1.172. Representation submitted by the Environment Agency (ID: 1146949) argues that it is not necessary or accurate that the LLFA are the statutory consultee. The Middle Level Commissioners are not. The Council disagrees with the deletion of criterion g and, although not statutory consultees, feel that input from the middle level commissioners will ensure that development is carried out appropriately.

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

1.173. Representations submitted by Historic England (ID: 56252): request that the policy be strengthened by specifying that development should preserve or where opportunities arise enhance the character or appearance of the Conservation Area, the garage building at the front of the site appears to have some architectural interest, and they recommended further investigation as to whether it merits retention.

1.174. HOUS/02 (page 392) sets out the site constraints. In summary, a landscape buffer is needed along the boundary with a school. It is in a Conservation Area so the design must enhance the character and appearance of the area. A transport assessment is needed to determine if safe access can be taken from Whitefield Road. Demolition of existing commercial buildings will be required as well as removal of hardstanding areas. A drainage assessment is needed. The Council feels that the criteria for site RA5 will adequately enable the mitigation and assessment of these constraints and the representation set out above.

1.175. The site is close to local amenities so there are no significant infrastructure needs identified. Provision for essential infrastructure will be met through developer contributions.

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

1.176. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure

typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely to substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 1.177. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Proposed sites in Ramsey will be served by the Ramsey Wastewater Treatment Works (referred to as a Water Recycling Centre-WRC by Anglian water). The Water Cycle Study assessed that the cumulative impact of the planned growth would exceed capacity in the plan period (FLO/11 p82-84). Reinforcement work to increase capacity will be required. Upgrade work will be needed prior to the capacity being breached. The required upgrades are identified as critical schemes in the IDP Schedule (INF/02).
- 1.178. Anglian water is responsible for building, operating and maintaining their water infrastructure which is required to provide for additional growth, whereas local upgrades and connections to the existing sewer network required to bring forward development are typically funded by developers. This includes a connection charge, paid by the developer to the water company for the physical connection to the sewer, and also an infrastructure charge. This charge is also paid by the developer when the premises are first connected. The charge contributes to the water companies' investment in improvements to the existing sewer networks to meet increased demand for new customers. Water companies can also build the infrastructure required to connect the new development to its network by charging the developer a requisition charge, which the water company will use to provide a new public sewer and associated infrastructure to a new locality. The cost and extent of the required network improvements are determined through pre-development requirements and appraisals once a more detailed design is known. This enables capacities to be confirmed and the timescales for necessary upgrades and local enforcements.
- 1.179. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in WRC catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's

emerging Local Plan to ensure that infrastructure provision aligns with growth”. The response goes on to state that “water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan”. Site specific and off-site reinforcements will be funded via Anglian Water’s zonal charges (as set out in Anglian Water’s Developer Services, Summary of Charges 2018/2019).

1.180. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 (‘AMP 7’) for public consultation. The document suggests that Anglian Water will “manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery”. This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.

1.181. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

1.182. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6).

1.183. The Study is not site specific, as this is not a requirement for the local plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).

1.184. The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).

1.185. The report concludes that the housing market in Huntingdonshire is strong with confidence of sustained market growth and that up to 40% affordable housing is viable for most typologies applicable in the District, meaning that housing delivery will not be slowed on the grounds of viability.

1.186. For this site, demolition, the setting of the conservation area, density and relatively low sales values may impact on the viability. Policy LP25 (affordable housing provisions) seeks a target of 40% on sites of 11 homes or 1,001sqm. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is

not viable due to specific site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal. The viability work within INF/04 indicates that the typology that this site falls into will generally show limited viability though other Ramsey sites have been able to support policy levels of affordable housing.

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

1.187. In response to the Council's Annual Monitoring Report housing trajectory survey 2017, the site is in multi ownership, but an agent acting for the owners of the site confirmed its availability.

1.188. The site's agent has confirmed that the site can be delivered within five years with the 40 homes expected to be completed in the year 2021/2022, with a view to submitting a planning application in the near future (MON/01, page 79).

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

1.189. The boundary of the site covers the entire garage premises and is appropriate as it represents the land submitted as available for development. No representations were received to the proposed submission Local Plan consultation suggesting that the boundary should be amended.

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

1.190. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA (HOUS/02) and the Huntingdonshire Local Plan Viability Study (INF/04).

1.191. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 33, 56, 81, 112, 215, 328, 401 and 459) and Statement of Representations (CORE/04, Pages 104-106).

1.192. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG. The site is deliverable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development is available now and can be completed within a five year time period.

RA6- 94 Great Whyte

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

- 1.193. This is a brownfield site which was most recently used for warehousing/storage, but has fallen into a semi-derelict state.
- 1.194. It was put forward for re-development in December 2014 (HOUS/02: Availability, page 389) and has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 387-389 for full assessment).
- 1.195. This site is situated in in close proximity to Ramsey town centre with good access to local services, employment, open space and public transport. It has some constraints including potential contamination and flood mitigation requirements but is considered suitable for medium density residential development across a net developable area of 90% of the site resulting in an estimated capacity of 32 dwellings (HOUS/02: Suitability, page 389).

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

- 1.196. The site is allocated for approximately 35 dwellings.
- 1.197. Under 15/02384/FUL, planning permission was granted on the 22nd June 2018, the residential mix includes flats and dwellings, with 13 units being allocated to affordable housing.

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

- 1.198. Initial assessment through the HELAA (HOUS/02 – page 389) identified a site capacity of around 32 dwellings based on the size and shape of the site. Permission was granted recently (planning permission reference 15/02384/FUL) for 32 dwellings.
- 1.199. On this basis the scale and type of uses are justified.

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

- 1.200. A Full planning application (planning reference 15/02384/FUL) for 32 dwellings was granted permission on the 22nd June 2018.

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

- 1.201. Taking the Framework policies into account, and in accordance with its Section 1, the development would use previously developed land, have important economic benefits through employment in the construction of the housing (including in the supply chains of

materials, fittings and furnishings) and in the local economic contribution from future residents. There would be important social benefits from the provision of market and affordable homes for the residents in accordance with Section 6 of the Framework. In accordance with Section 4 of the Framework the site would also be sustainably located with access to employment and facilities by means other than the car including cycling facilities.

- 1.202. The existing visual appearance of the large warehouse buildings and the gap in the Great Whyte built frontage was causing harm to the character and appearance of the Conservation Area in which it sits. The redevelopment of this site presents the opportunity for positive enhancement to the setting of heritage assets and improvement of the Conservation Area as identified in Paragraph: 004 Reference ID: 18a-004-20140306 of the NPPG through criterion 'b', of the RA6 allocation policy and para 12.37 of the Local Plan (CORE/01).

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

- 1.203. The HELAA identifies potential adverse impacts with regards to flood risk from surface water, foul water capacity, location within the conservation area and proximity to listed buildings, issues with transport access, potential contamination and protected species
- 1.204. The planning permission granted (reference. 15/02384/FUL) has shown that the potential adverse impacts from the development have been mitigated or can be satisfactorily mitigation through planning conditions, including surface water drainage which is the subject of 2 objections to allocation RA6 from the County Council as Lead Local Flood Authority (ID 1150302) and Environment Agency (ID 1146949). The planning permission was granted in accordance with the advice of the County Council.
- 1.205. The planning permission granted (reference. 15/02384/FUL) has shown that the development would enhance the Conservation Area in accordance with the policy objection and amendments suggested by Historic England (ID 56252).

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?

- 1.206. The site is in Flood zone 1 (FLO/01, page 9). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

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

- 1.207. HOUS/02 (page 387) sets out the main constraints. Due to former uses, contamination may be present. It is in the Conservation Area and landscaping is needed to protect neighbouring properties.

1.208. The site is close to local amenities and no specific infrastructure requirements have been identified. It is expected that developer contributions will meet these requirements.

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

1.209. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely to substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

1.210. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Proposed sites in Ramsey will be served by the Ramsey Wastewater Treatment Works (referred to as a Water Recycling Centre-WRC by Anglian water). The Water Cycle Study assessed that the cumulative impact of the planned growth would exceed capacity in the plan period (FLO/11 p82-84). Reinforcement work to increase capacity will be required. Such work will be needed prior to the capacity being breached. The required upgrades are identified as critical schemes in the IDP Schedule (INF/02).

1.211. Anglian water is responsible for building, operating and maintaining their water infrastructure which is required to provide for additional growth, whereas local upgrades and connections to the existing sewer network required to bring forward development are typically funded by developers. This includes a connection charge, paid by the developer to the water company for the physical connection to the sewer, and also an infrastructure charge. This charge is also paid by the developer when the premises are first connected. The charge contributes to the water companies' investment in improvements to the existing sewer networks to meet increased demand for new customers. Water companies can also build the infrastructure required to connect the new development to its network by charging the developer a requisition charge, which the water company will use to provide a new public sewer and associated infrastructure to a new locality. The cost and extent of the

required network improvements are determined through pre-development requirements and appraisals once a more detailed design is known. This enables capacities to be confirmed and the timescales for necessary upgrades and local enforcements.

- 1.212. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: “work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in WRC catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council’s emerging Local Plan to ensure that infrastructure provision aligns with growth”. The response goes on to state that “water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan”. Site specific and off-site reinforcements will be funded via Anglian Water’s zonal charges (as set out in Anglian Water’s Developer Services, Summary of Charges 2018/2019).
- 1.213. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 (‘AMP 7’) for public consultation. The document suggests that Anglian Water will “manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery”. This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 1.214. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 1.215. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6).
- 1.216. The Study is not site specific, as this is not a requirement for the local plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 1.217. The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).

- 1.218. The report concludes that the housing market in Huntingdonshire is strong with confidence of sustained market growth and that up to 40% affordable housing is viable for most typologies applicable in the District, meaning that housing delivery will not be slowed on the grounds of viability.
- 1.219. Policy LP25 (affordable housing provisions) seeks a target of 40% on sites of 11 homes or 1,001sqm. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is not viable due to specific site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal. The viability work within INF/04 indicates that the typology that this site falls into will generally show limited viability though other Ramsey sites have been able to support policy levels of affordable housing.

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

- 1.220. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the agent confirmed that the site can be delivered within 5 years and it is anticipated that development could potentially be delivered by 2021.
- 1.221. The first 16 homes are expected to be completed in the year 2019/2020, with all homes expected to be completed within years 1-5, the timescale for delivery is set out below:

No. units in years 1-5	19/20 Yr. 3	20/21 Yr. 4	Total 17/36
33	16	16	32

- 1.222. The site will be developed simultaneously with RA 2 Ramsey Gateway (Land Adjacent St Mary’s Road Industrial Estate) as the sites have interlinked public open space provision. The agent anticipates this smaller site would be completed first (MON/01, page 88). This is realistic as Full planning permission for the site has now been granted.

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

- 1.223. The boundary of the site is appropriate as it represents the land submitted as available for development and it is the curtilage of the transport depot. No representations were received to the proposed submission Local Plan consultation suggesting that the boundary should be amended.

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

- 1.224. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA (HOUS/02) and the Huntingdonshire Local Plan Viability Study (INF/04).
- 1.225. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 81, 112, 401, 460) and Statement of Representations (CORE/04, Page104 – 106.).
- 1.226. The planning permission granted (15/02384/FUL) is faithful to the detailed policy requirements and was considered consistent with national policy.
- 1.227. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG. The site is deliverable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development is available now can be completed within a five year time period.

RA7- East of Valiant Square

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

- 1.228. This is a greenfield site and partly comprises of rough grassland with significant groups of trees close to the boundaries.
- 1.229. This extended site was submitted in response to the Call for Sites in August 2017 (HOUS/02: Availability, page 431). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 428-431 for full assessment).
- 1.230. This site has reasonable access to the services and facilities of Bury and Ramsey. The northern part is well contained in the landscape but access may be a significant constraint given the narrow configuration of Tunkers Lane. The southern part is also constrained by its potential access which may require third party land from Valiant Square and the need for extensive boundary landscaping to mitigate the potential impact on the adjoining countryside. However, the site is considered suitable for low density residential development across 70% of the site resulting in an estimated capacity of 88 dwellings (HOUS/02: Suitability, page 431).

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

- 1.231. The proposed use is for approximately 90 dwellings.

- 1.232. The type and mix of residential units will be determined through the application of policy LP 26 Housing Mix.

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

- 1.233. The Council's assessment of the site determined that a capacity of approximately 90 residential units is suitable. The HELAA states the site is suitable with reasonable access to the services and facilities of Bury and Ramsey and should achieve a low density housing development which maximises existing trees and hedgerow to visually contain the surrounding countryside.
- 1.234. Issues such as access subject to a proportionate transport statement, landscaping subject to a landscape assessment, retention of trees subject to an arboricultural report and ecology based on a preliminary ecological survey can be dealt with and mitigated during the forthcoming pre application enquiries and a formal planning application.
- 1.235. Policy LP 26 is justified through the application of Cambridge Sub-Region (HOUS/07) and Peterborough Strategic Housing Market Assessments (SHMA) (HOUS/08) and local housing need and strategies (including HOUS/06). By referring to up-to-date evidence the policy ensures that the most appropriate strategy is employed in line with local demand and settlement type and location, or proximity to the most appropriate housing market area consistent with paragraph 50 of the NPPF and NPPG Housing and economic development needs assessments.

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

- 1.236. The agent anticipates a planning application will be submitted and approved by late 2018, with the development commencing early/mid 2019.

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

- 1.237. The development will contribute to the Council's five-year land supply and provide residential accommodation that is highly accessible to local services and facilities.
- 1.238. The development will improve publically accessible viewpoints and will sit comfortably within the context of the wider area.
- 1.239. To be compliant with Policy LP25 the development would provide 40% affordable housing.
- 1.240. The proposal would contribute towards economic growth, including job creation - during the construction phase and in the longer term through the additional population assisting the local economy through spending on local services/facilities. There will also be Council Tax receipts arising from the development.

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

- 1.241. The HELAA identifies access, countryside and landscaping, ecology, trees and flood risk/drainage as potential constraints to the development. There is also the potential for archaeological finds on this land.
- 1.242. Representation submitted by Mr Pete Brindley (ID: 1024523) has objected to any construction traffic using Tunkers Lane or Owls End and suggests that access to the proposed site can be made via the far side of Valiant Square.
- 1.243. Mitigation measures are identified within the HELAA have been carried through into allocation RA7 of the Huntingdonshire's Local Plan to 2036: Proposed Submission 2017 in the form of criteria a to e, this includes the requirement for provision of a suitable means of access and satisfactory resolution of additional traffic impacts on roads (criterion a).
- 1.244. The design of the proposal and landscaping assessments would be mitigated by the retention of trees and hedgerows as identified in criterion b.
- 1.245. Agreement will be sought with key drainage and flood risk stakeholders such as Middle Level Commissioners Anglian Water, the Environment Agency (criteria c to e), the Lead Local Flood Authority.
- 1.246. Any archaeology work with Cambridgeshire County Council is likely to be dealt with by condition as part of any planning consent. It is considered mitigation measures for the above constraints are achievable.

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?

- 1.247. The site is in Flood zone 1 (FLO/01, page 10). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.
- 1.248. Representation submitted by the Environment Agency (ID: 1146949) argues that it is not necessary or accurate that the LLFA are the statutory consultee. The Middle Level Commissioners are not. The Council disagrees with the deletion of criterion g and, although not statutory consultees, feel that input from the middle level commissioners will ensure that development is carried out appropriately.

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

- 1.249. HOUS/02 sets out the main constraints for the site. In summary, access is constrained due to the narrow access road.
- 1.250. The site has reasonable access to local amenities and no significant infrastructure costs are envisaged though third party land may be required to facilitate access.
- 1.251. No specific infrastructure costs have been obtained for the site and infrastructure provision is likely to be through relevant developer contributions.

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

- 1.252. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely to substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 1.253. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Proposed sites in Ramsey will be served by the Ramsey Wastewater Treatment Works (referred to as a Water Recycling Centre-WRC by Anglian water). The Water Cycle Study assessed that the cumulative impact of the planned growth would exceed capacity in the plan period (FLO/11 p82-84). Reinforcement work to increase capacity will be required. Such work will be needed prior to the capacity being breached. The required upgrades are identified as critical schemes in the IDP Schedule (INF/02).
- 1.254. Anglian water is responsible for building, operating and maintaining their water infrastructure which is required to provide for additional growth, whereas local upgrades and connections to the existing sewer network required to bring forward development are

typically funded by developers. This includes a connection charge, paid by the developer to the water company for the physical connection to the sewer, and also an infrastructure charge. This charge is also paid by the developer when the premises are first connected. The charge contributes to the water companies' investment in improvements to the existing sewer networks to meet increased demand for new customers. Water companies can also build the infrastructure required to connect the new development to its network by charging the developer a requisition charge, which the water company will use to provide a new public sewer and associated infrastructure to a new locality. The cost and extent of the required network improvements are determined through pre-development requirements and appraisals once a more detailed design is known. This enables capacities to be confirmed and the timescales for necessary upgrades and local enforcements.

- 1.255. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in WRC catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and off-site reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 1.256. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 1.257. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 1.258. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6).

- 1.259. The Study is not site specific, as this is not a requirement for the local plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 1.260. The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).
- 1.261. The report concludes that the housing market in Huntingdonshire is strong with confidence of sustained market growth and that up to 40% affordable housing is viable for most typologies applicable in the District, meaning that housing delivery will not be slowed on the grounds of viability.
- 1.262. Policy LP25 (affordable housing provisions) seeks a target of 40% on sites of 11 homes or 1,001sqm. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is not viable due to specific site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal. The viability work within INF/04 indicates that the typology that this site falls into will generally show strong levels of viability. i.e policy level of affordable.

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

- 1.263. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the site’s agent has stated that the site can be delivered immediately and anticipates a planning application will be submitted and approved by late 2018, with the development commencing early/mid 2019 (MON/01, page 88).
- 1.264. The first 20 homes are expected to be completed in the year 2019/2020, the timescale for delivery is set out below:

No. units in years 1-	17/18 Yr. 1	18/19 Yr. 2	19/20 Yr. 3	20/21 Yr. 4	21/22 Yr. 5	22/23	Total 17/36
80	0	0	20	30	30	10	90

- 1.265. This is deemed to be realistic as a planning application is expected to be submitted by late 2018.
- 1.266. This allocation is supported by the Abbey Group and the Trustees of C R East (ID: 1151576). Abbey Group have entered into an agreement with the Trust to promote the land in accordance with the draft allocation and anticipate the submission of a pre-application

enquiry to the LPA to be followed by a Full application for residential development. The specific site requirements identified in the allocation can all be dealt with during an application. They note that site is deliverable within the timetable of the Local Plan.

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

- 1.267. The boundary of the site is appropriate as it represents the land submitted as available for development. The boundary comprises soft landscaping that gives a natural boundary for this site.
- 1.268. The defined boundary allows for comprehensive re-development of previously developed land and brings benefits to the site.

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

- 1.269. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA and the Huntingdonshire Local Plan Viability Study.
- 1.270. The policy requirements are effective and have been based on future consultation with statutory consultees such as the Environment Agency, Anglian Water, Natural England, Cambridgeshire County Council as LLFA and Archaeology and Local Highway Authority, Highways England, or Historic England.
- 1.271. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG. The site is developable as defined through paragraph 47 of the NPPF, subject to a forthcoming pre application and formal planning application.

RA8- Former RAF Upwood and Upwood Hill House

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

- 1.272. The land is comprised of derelict offices and other buildings, hardstanding and green open space. The northern boundary adjoins Upwood Air Park.
- 1.273. This piece of land was originally put forward during the production of the Core Strategy 2009 and was included in the 2010 SHLAA. The site was then assessed in Stage 2 of the Local Plan to 2036 in the Environmental Capacity Study consulted upon in summer 2013 (HOUS/02: Availability, page 408). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 406-409 for full assessment).
- 1.274. This site is situated west of existing residential properties and forms the south eastern part of the former airfield with reasonable access to services and facilities. Given its size the site is

considered suitable for residential-led mixed use development across 50% of the site resulting in an estimated capacity of 462 dwellings. To promote the site's sustainability, 2ha of employment use has been set aside for employment uses (HOUS/02: Suitability, page 408).

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

- 1.275. The proposed site is allocated for a mixed use development comprising of 2ha of employment land for business uses (class 'B1'), approximately 450 homes and community facilities.
- 1.276. The final mix of residential units and employments uses was derived from site specific planning applications, as described in Q4, including the appeal pursuant to 0900342OUT.

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

- 1.277. Having the benefit of site specific planning applications in addition to the HELAA (HOUS/02), it is considered that the type/mix of uses are justified.

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

- 1.278. Planning application 0900342OUT for the demolition and clearance of redundant buildings, reclamation and remediation of land and redevelopment for mixed uses including housing (at least 650 units), employment (at least 10 ha), neighbourhood centre and open space) was subject of a non-determination Appeal. The Appeal was dismissed on the 17th August 2010.
- 1.279. An Outline planning permission 1201274OUT for "Selective demolition and clearance of existing (former defence) buildings, environmental remediation and the carrying out of employment-led mixed use development comprising about 2 hectares of employment (Use Class Order B1 uses) (including the conversion and change of use of some buildings) and residential (not more than 160 dwellings) development, together with the provision of infrastructure and the laying out of ancillary open space. (Phased Development)" was approved in June 2017 and remains extant.
- 1.280. A subsequent Reserved Matters application has not yet been submitted.

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

- 1.281. This site is in Flood zone 1 and presents an opportunity to regenerate an untidy site. Redevelopment of the site will bring many benefits to the surrounding area. Taking the Framework policies into account, and in accordance with its Section 1, the development would use previously developed land in a sustainable location and have important economic benefits through the provision of employment land, employment in the construction of the housing (including in the supply chains of materials, fittings and furnishings) and in the local economic contribution from future residents. There would be important social benefits from

the provision of market and affordable homes for the residents in accordance with Section 6 of the Framework, along with the provision of formal and informal open space. In accordance with Section 4 of the Framework the site would also ensure sustainable access to employment and facilities by means other than the car including cycling facilities and new bus routes. In accordance with paragraph 11 of the NPPF this scheme would bring about opportunities to conserve and enhance biodiversity and ecology through good design and introduction of sustainable urban drainage.

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

- 1.282. The HELAA identifies there are a number of protected trees on site. The character of the former RAF base is still evident, and the site therefore contains known potential for heritage assets. Middle Level Commissioners have advised that the use of soakaways or other infiltration devices will not be effective at this site and that the water management system downstream is sensitive to increased discharges and over-loaded during high rainfall events which have led to flooding in the area. Development of this site will generate a significant amount of additional traffic. Due to the age and dilapidated nature of buildings, as well as hedgerows, trees and large open areas on site, there may be protected species existing here. The site's location adjacent to existing residential properties, and with parts of the site being prominent within the landscape, mean that development could give rise to light pollution.
- 1.283. Allocation RA 8 clearly sets out that successful development will require a number of assessments to be submitted with the planning application. Having regard to the appeal decision and recent planning permission it is considered that the above can be mitigated through a S106 agreement and use of planning conditions.
- 1.284. Representation submitted by the Environment Agency (ID: 1146949) argues that it is not necessary or accurate that the LLFA are the statutory consultee. The Middle Level Commissioners are not. The Council disagrees with the deletion of criterion g and, although not statutory consultees, feel that input from the middle level commissioners will ensure that development is carried out appropriately.
- 1.285. Historic England (ID:56252) express welcome the form a development that will enable the character of the historic RAF use to be maintained including a master planning exercise. Consideration must be given to the separation of Ramsey and the Village of Upwood to the South, which is a conservation area, to ensure that the essential setting of this settlement is considered. The requirement for landscape design, recognising vistas and the use of green infrastructures networks will help secure this and is welcomed. It is considered that Historic England's concerns and concerns in respect of TPO'd trees can be addressed through careful design and in reading this plan as a whole, including policies LP33 – Trees, Woodland, Hedges and Hedgerows and policy LP36 – Heritage Assets and their settings.

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?

1.286. The site is in Flood zone 1 (FLO/01, page 9). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

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

1.287. HOUS/02 sets out the main constraints. In summary, a transport assessment is needed to determine how local access roads can absorb increased traffic generated. Significant demolition is needed.

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

1.288. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely to substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

1.289. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Proposed sites in Ramsey will be served by the Ramsey Wastewater Treatment Works (referred to as a Water Recycling Centre-WRC by Anglian water). The Water Cycle Study assessed that the cumulative impact of the planned growth would exceed capacity in the plan period (FLO/11 p82-84). Reinforcement work to increase capacity will be required. Such work will be needed prior to the capacity being breached. The required upgrades are identified as critical schemes in the IDP Schedule (INF/02).

- 1.290. Anglian water is responsible for building, operating and maintaining their water infrastructure which is required to provide for additional growth, whereas local upgrades and connections to the existing sewer network required to bring forward development are typically funded by developers. This includes a connection charge, paid by the developer to the water company for the physical connection to the sewer, and also an infrastructure charge. This charge is also paid by the developer when the premises are first connected. The charge contributes to the water companies' investment in improvements to the existing sewer networks to meet increased demand for new customers. Water companies can also build the infrastructure required to connect the new development to its network by charging the developer a requisition charge, which the water company will use to provide a new public sewer and associated infrastructure to a new locality. The cost and extent of the required network improvements are determined through pre-development requirements and appraisals once a more detailed design is known. This enables capacities to be confirmed and the timescales for necessary upgrades and local enforcements.
- 1.291. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in WRC catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and off-site reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 1.292. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 1.293. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 1.294. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire

to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6).

- 1.295. The Study is not site specific, as this is not a requirement for the local plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 1.296. The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).
- 1.297. The report concludes that the housing market in Huntingdonshire is strong with confidence of sustained market growth and that up to 40% affordable housing is viable for most typologies applicable in the District, meaning that housing delivery will not be slowed on the grounds of viability.
- 1.298. For this site, demolition and remediation costs will impact on the viability. Policy LP25 (affordable housing provisions) seeks a target of 40% on sites of 11 homes or 1,001sqm. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is not viable due to specific site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal. The viability work within INF/04 indicates that the typology that this site falls into will generally show limited viability though other Ramsey sites have been able to support policy levels of affordable housing.

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

- 1.299. In response to the Council’s Annual Monitoring Report (MON/01, page 69), the site's agent has confirmed that the first 20 homes are expected to be completed in the year 2020/2021, the timescale for development is set out below:

No. units in years 1-5	20/21 Yr. 4	21/22 Yr. 5	22/23	23/24	24/25	25/26	Total 17/36
90	20	70	90	90	90	90	450

- 1.300. This is deemed to be realistic, as Outline approval under 1201274OUT has been approved for the site.

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

1.301. Strawsons Property (ID: 1151353) suggest the proposed northern boundary of the allocation to be arbitrary and irrational, because it does not coincide with any defensible natural or man-made boundary. Accordingly it proposes that the northern boundary would be better set along the northern edge of the residual concrete runway, immediately to the north of the currently proposed allocation. In response, and as per the Statement of Consultation (CORE/05, Page 56), the boundary to RA8 was amended as part of Huntingdonshire Local Plan 2036: Submission March 2018.

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

1.302. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA and the Huntingdonshire Local Plan Viability Study and Strategic Flood Risk Assessment. Hallam Land Management (ID: 1118661) challenge the delivery of this allocation and objects that to the fact that more development is directed to Ramsey compared with St Ives which is a larger and more sustainable settlement. In response the Council contend that delivery rates are discussed in more detail under Matter 12 but there is extant outline permission for 160 units and the applicant contends that 90 can be delivered within the next 5 years, with the remainder during the plan period. In respect of the sustainability of the settlements, a key benefit of this scheme is the opportunity to tidy up and regenerate previously developed land.

1.303. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 112, 215, 216, 329, 401, 460) and Statement of Representations (CORE/04, Page107).

1.304. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG. The site as developable through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development can achieve 90 units within the next 5 years, with the remainder to be delivered through the plan period.