

# Huntingdonshire Local Plan to 2036 Examination

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**Hearing Statement Matter 10:**

**Proposed site allocations – Key Service Centres**

**Huntingdonshire District Council**

**July 2018**

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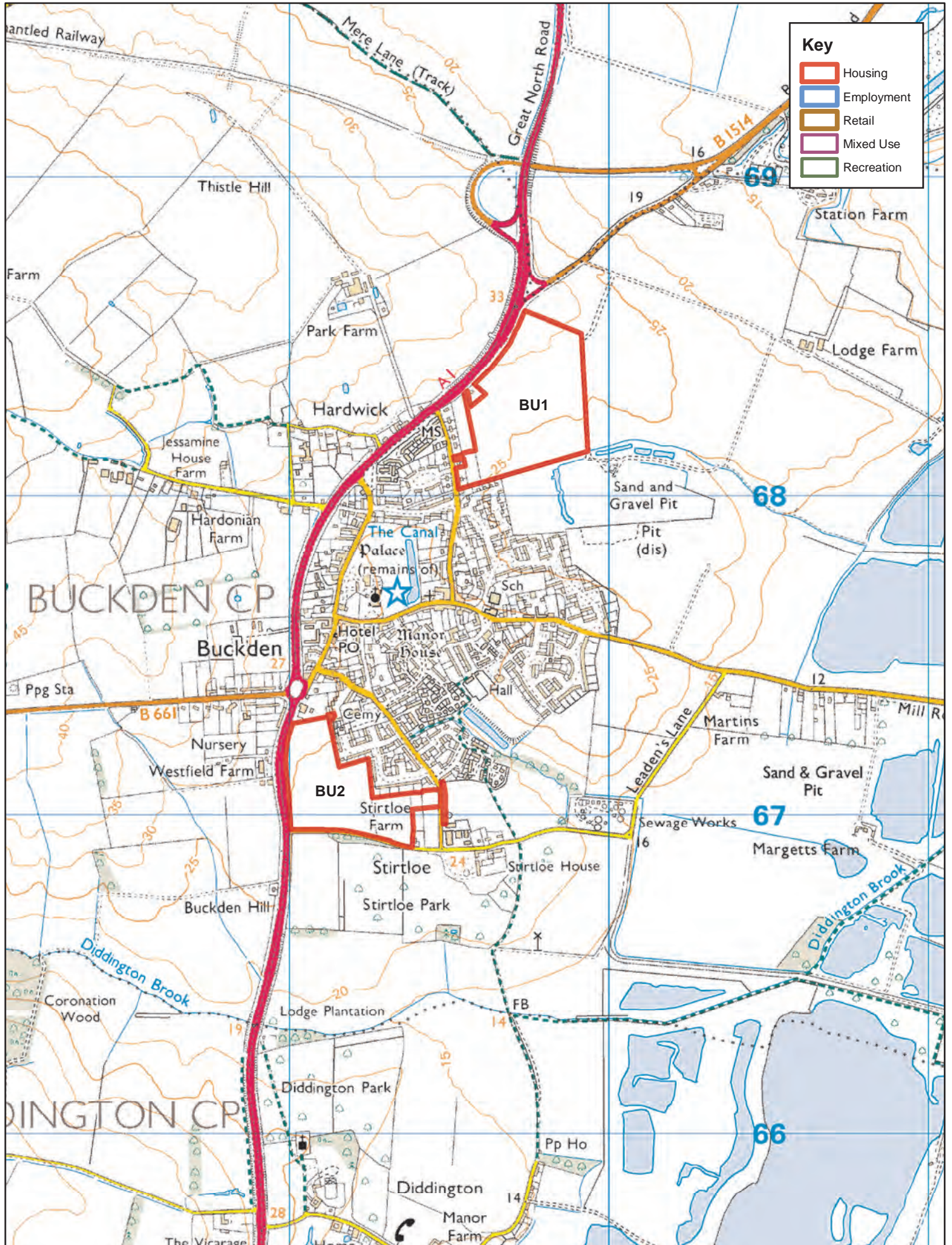
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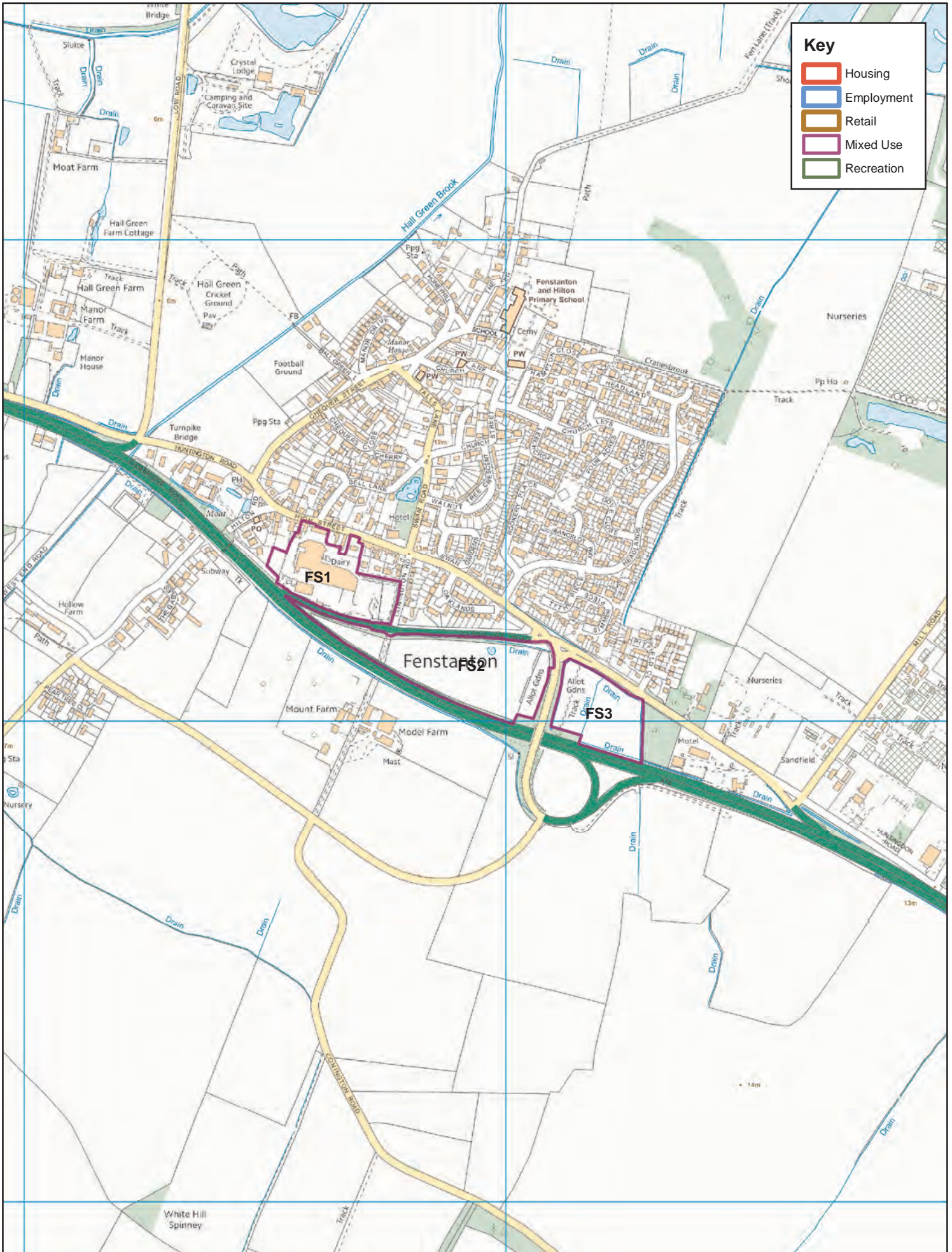
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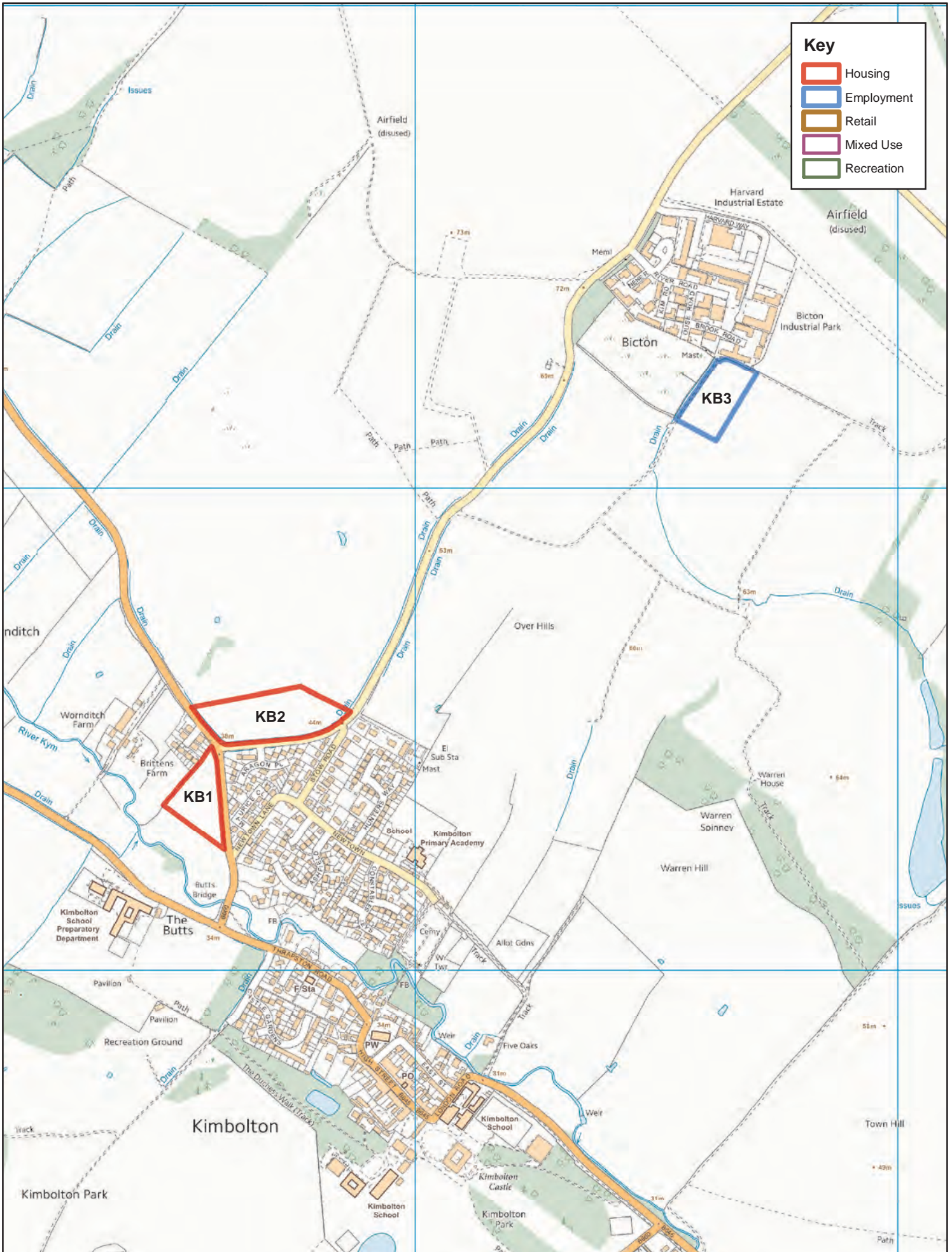
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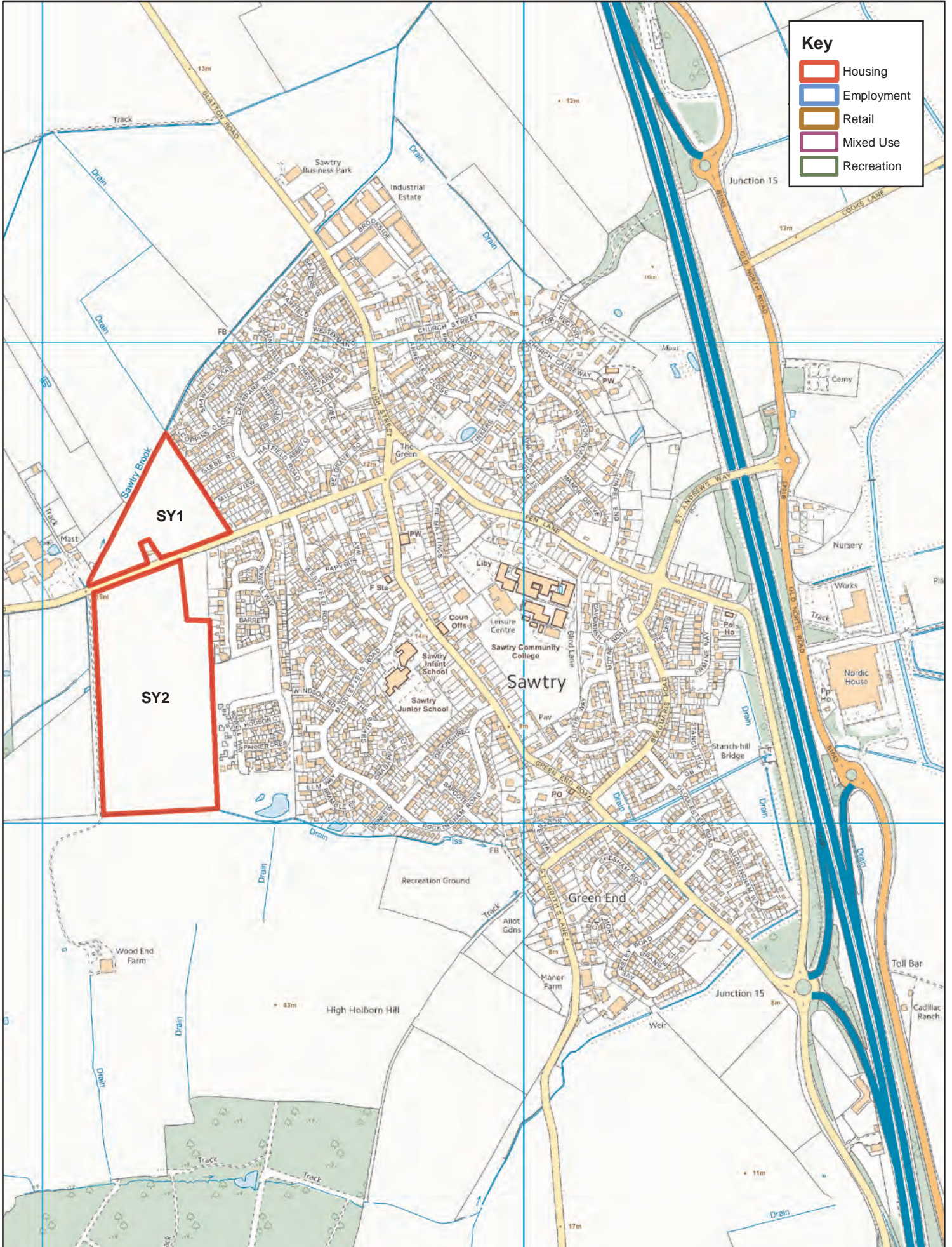
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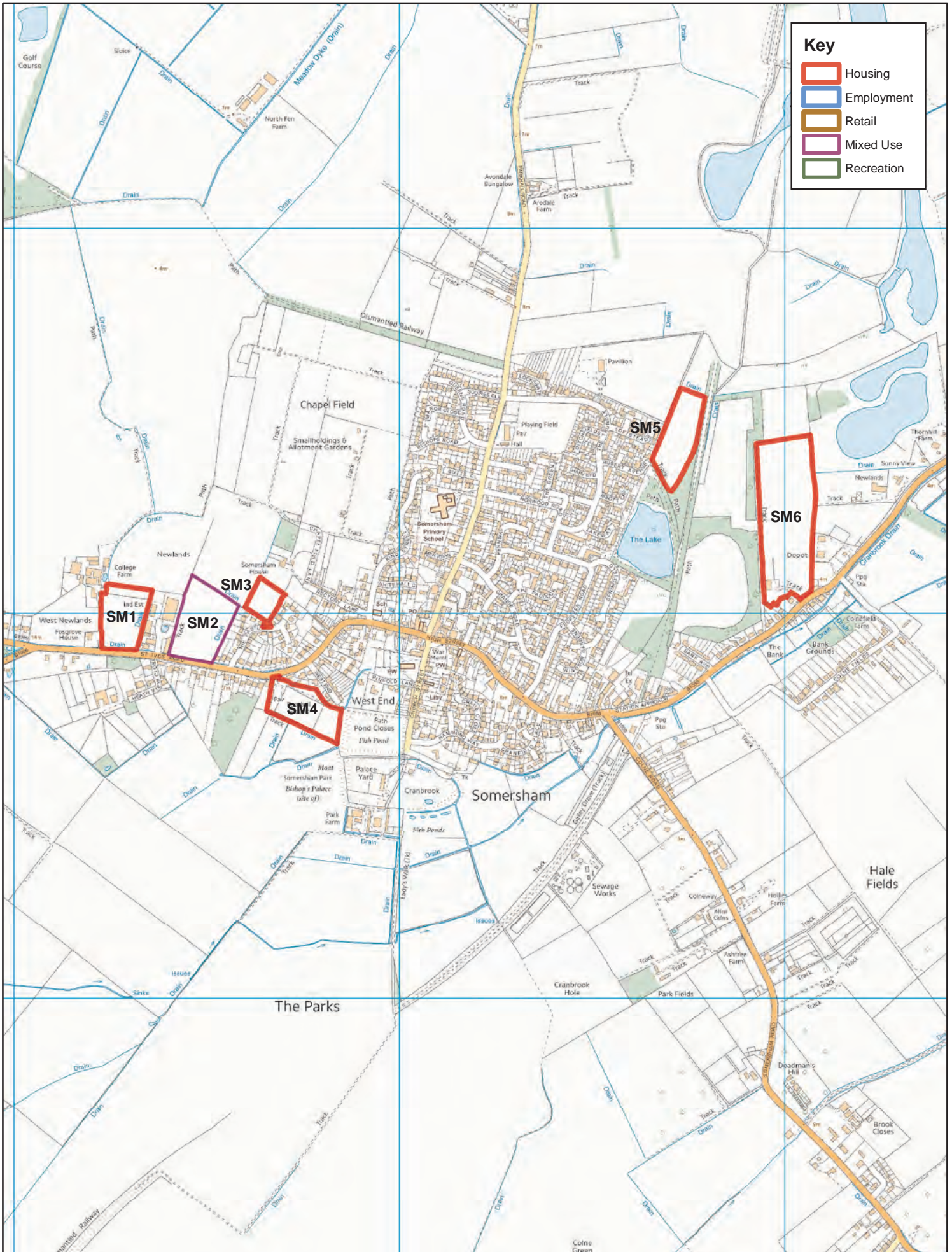




Huntingdonshire Local Plan Policies Map: Sawtry - Key Service Centre Allocated Sites

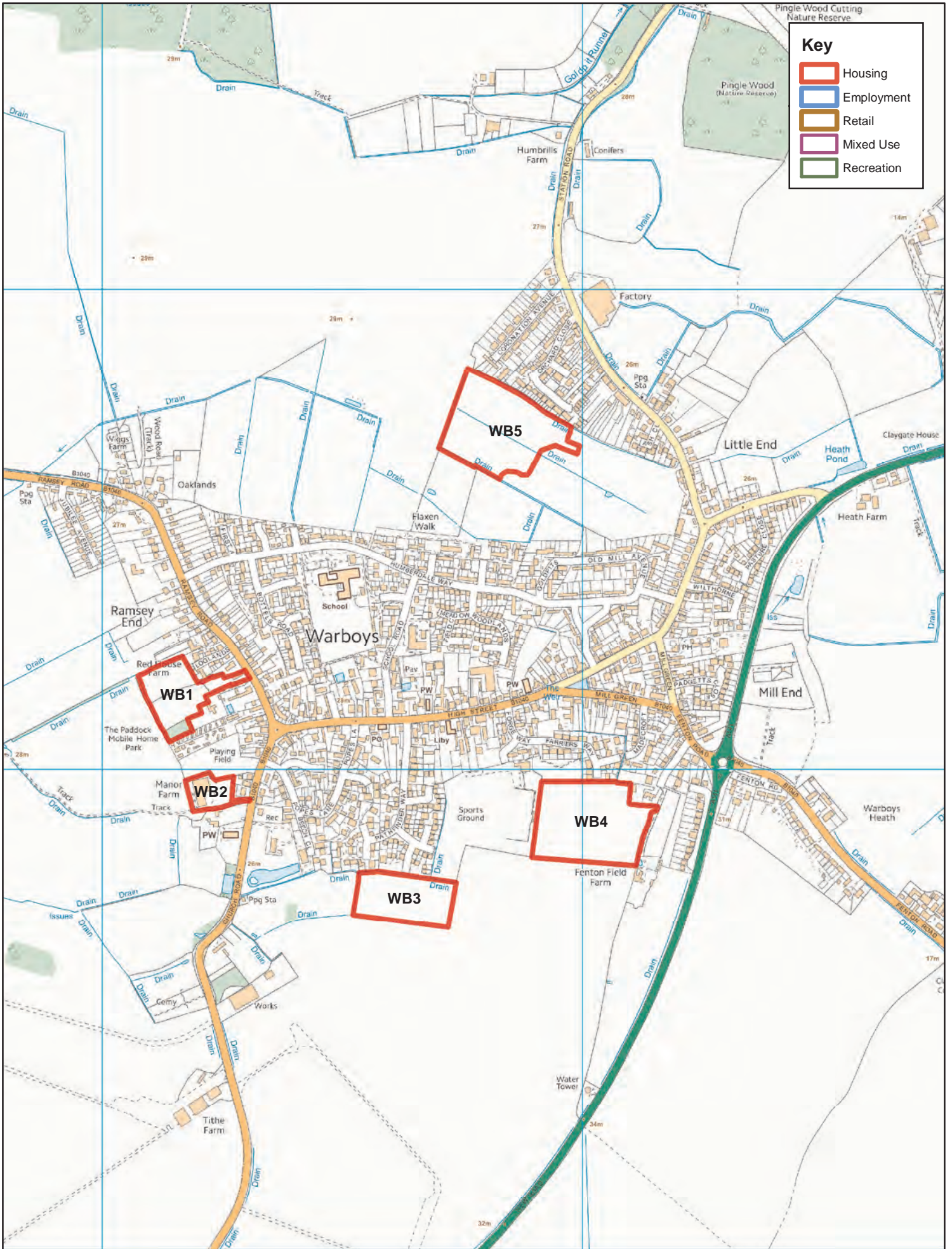


Huntingdonshire Local Plan Policies Map: Somersham - Key Service Centre Allocated Sites

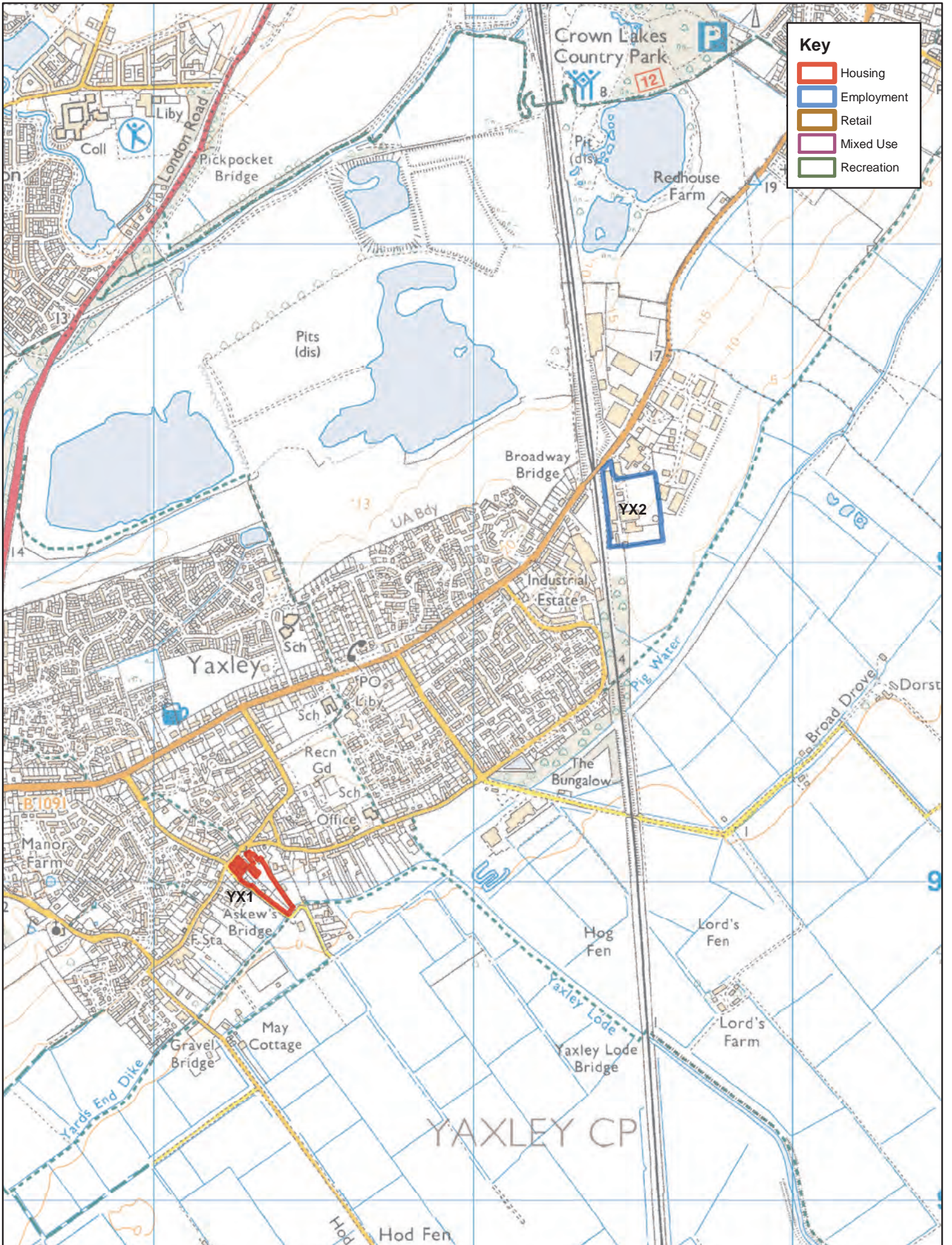


Huntingdonshire Local Plan Policies Map: Warboys - Key Service Centre Allocated Sites

Scale 1:10,000 Date: 02/07/2018







## Issue

Whether the proposed site allocations for the Key Service Centres are justified, effective and consistent with national policy.

### 1. Buckden

#### BU1- East of Silver Street and South of A1

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

- 1.1. This is a greenfield site located to the south of the A1 on the northern edge of Buckden.
- 1.2. The allocation has joined two pieces of land that were assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: pages 461-463 for full assessment). East of Silver Street was put forward during the Stage 3 consultation in 2013 and originally assessed for the Local Plan to 2036 in the Environmental Capacity Study: Additional Site Assessments document in November 2013. (HOUS/02: Availability, page 463).
- 1.3. As the site is situated amongst existing residential properties and allotment gardens on the outskirts of the village and has reasonable access to services and facilities, it is considered suitable for low density mixed use development across a net developable area of 75% of the site. This results in an estimated capacity of 0.1ha to extend the allotment gardens and 16 dwellings (14 net, as 2 already exist on the site) (HOUS/02: Suitability, page 463).
- 1.4. The second site, East of Silver Street and south of A1, Buckden (226) was submitted in response to the Call for Sites in August 2017 (HOUS/02: Availability, page 467) and has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 464-467 for full assessment).
- 1.5. East of Silver Street and south of A1, Buckden is considered suitable for low density residential development across a net developable area of 50% of the site resulting in an estimated capacity of 247 dwellings. This is due to the site extending into the open countryside; however it is well screened by trees and hedging and along with good access to the services and facilities of Buckden. The most significant constraint for development is the proximity of any potential noise and light pollution from the A1 (HOUS/02: Suitability, page 467).
- 1.6. Together, both sites give an estimated capacity of 263 dwellings.

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

- 1.7. The proposed use is for approximately 270 dwellings.

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

- 1.8. The Council's assessment of the site determined that a capacity for approximately 270 dwellings is suitable recognising that while the site extends into open countryside it is well screened by existing trees and hedging on the western and eastern boundaries, and it has good access to the services and facilities of Buckden.
- 1.9. Initial assessment through the HELAA identifies that the East of Silver Street and south of A1, Buckden site is considered suitable for low density residential development across a net developable area of 50% of the site. This results in an estimated capacity of 247 dwellings. East of Silver Street is also considered suitable for low density mixed use development across a net developable area of 75% of the site. This results in an estimated capacity of 0.1ha to extend the allotment gardens and 16 dwellings (14 net, as 2 already exist on the site). (HOUS/02 – pages 466 - 467). In total, the two sites combined amount to 263, or approximately 270 dwellings when taken into account as a comprehensive development.
- 1.10. The number of dwellings and density of the site has been determined by the sites relationship to surrounding area, substantial landscaping would be undertaken to limit the spread of development into the countryside and minimise public views of the development.

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

- 1.11. No planning application has yet been submitted.

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

- 1.12. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

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

- 1.13. The HELAA (HOUS/02 pages 466-467) identifies potential adverse impacts with regards to transport impacts and the ability of the wider road network to absorb additional traffic created by the development, air pollution, noise impacts to neighbouring properties from the

development and to the development from the A1, impact on the surrounding landscape, impact on heritage assets and the conservation area, archaeological impacts, land contamination, foul water capacity and surface water drainage impacts, ecology and potential impacts on the adjacent County Wildlife Site.

- 1.14. The Buckden Parish Council (ID 34720) objects on the grounds of adverse traffic impacts, particularly as Buckden roundabout on the A1 is over capacity and the at-grade crossing of the East Coast Mainline to the east of Buckden is problematic with regard to the flow of traffic.
- 1.15. Mitigation measures are identified in the HELAA (HOUS/02 – pages 466-467) and within BU1 in the Local Plan and include the requirement for provision of suitable access and satisfactory resolution of additional traffic impacts on local roads and the A1, pedestrian and cycle integration into the village, noise assessment, an appropriate relationship with neighbouring property, retention and substantial reinforcement of landscaping, ecological enhancement to address the impact on the County Wildlife Site (CORE/01, criteria a, b, c, d, e and f).
- 1.16. Representations submitted by WYG on behalf of the sites promoters (ID 998125) advise that a series of studies have been undertaken and these demonstrate that no potentially significant ground contamination has been identified which would significantly impact on the development of the site; there is scope through the design of the greenspace within the site to compliment the biodiversity interest of the CWS through the provision of new, purposely designed habitats which enhance the wider ecological connectivity of the local landscape; noise impacts can be mitigated; the site can be satisfactorily drained; and a Transport Feasibility Assessment identifies how the site access can be provided via a simple priority 'T' junction onto Silver Street. The optimal location for this access would require the removal or relocation of the priority traffic calming feature currently located on Silver Street.

**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?**

- 1.17. 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?**

- 1.18. Constraints are set out in HOUS/02. In summary, noise mitigation and air pollution measures will be required given its vicinity to the A1. A transport assessment will be needed to ensure traffic generated by the development is adequately addressed.
- 1.19. There are no known transport infrastructure requirements. There is a local bus stop but greenspace should be considered and a local shop provision. Specific infrastructure costs have not been costed for the site although the Infrastructure Delivery Plan Schedule (INF/02) sets

out modelled outputs on a District wide basis to ensure policy compliance as projects come forward.

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

- 1.20. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 1.21. 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. It is anticipated that sites in Buckden will be served by the Buckden Wastewater Treatment Works. The Water Cycle Study acknowledged Buckden of having capacity for growth.
- 1.22. 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 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).
- 1.23. 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.

- 1.24. 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?**

- 1.25. 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 (INF04, para 3.6). 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).
- 1.26. 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).
- 1.27. 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 typologies that this site would fall into will generally show strong viability.

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

- 1.28. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the site's owner/ agent has confirmed the availability of the site for development.
- 1.29. The first 48 homes are expected to be completed in the year 2021/2022, the timescale for delivery is set out below:

No. units in years 1-5	21/22 Yr. 5	22/23	23/24	24/25	25/26	Total 17/36
48	48	69	69	69	15	270

- 1.30. The timescale has been deferred by 2 years; this is deemed to be realistic as no planning application has yet been submitted.
- 1.31. The agent considers the site could accommodate up to 330 dwellings; however, the capacity has been kept at 270 to reflect the draft Local Plan allocation and the implementation of mitigation measures, such as noise attenuation, access and to ensure it's setting within the wider landscape (MON/01, pages 88-89).

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

- 1.32. The defined boundary allows for the scale of housing allocated along with significant additional landscaping reflecting the location of the site extending into the countryside. The two sites assessed in the HELAA (see question 1) were combined to ensure a comprehensive development across the site.

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

- 1.33. 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.
- 1.34. 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 58, 82, 112/113, 331, 403, 461, 472, 506/507) and Statement of Representations (CORE/04, Pages 108, 111/112).
- 1.35. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG<sup>1</sup>. The site is developable 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 the plan period.

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<sup>1</sup> Housing and economic land availability assessment

## BU2- Luck's Lane

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

- 1.36. The site is currently used for arable farmland.
- 1.37. The site has been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 468-470 for full assessment), where the site is referred to as East of A1. The site is deemed appropriate following a public inquiry, for residential development.
- 1.38. The site is in a relatively sustainable location well served by services, facilities and public transport within walking distance. The site also has good public transport to neighbouring towns of Huntingdon and St Neots for employment.

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

- 1.39. The proposed use is for 165 dwellings.
- 1.40. Under a successful appeal against 16/00576/OUT (approved in May 2017), 40% of units will be allocated to affordable housing.

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

- 1.41. Representations at proposed submission consultation from Gladman Developments (ID: 1118265) support the allocation and recommend the allocation policy is amended to up to 180 dwellings to accord with the planning permission.
- 1.42. The Local Plan (CORE/01 – paragraph 13.8) in having regard to the allowed appeal, allocates the land for approximately 165 dwellings to ensure the figure of 180 dwellings is not exceeded. It is necessary to control the scale of the development in recognition of the HELAA assessment (HOUS/02 – page 470) which identifies the landscape setting of this site as a significant constraint to development, because it is a sensitive site which acts as a landscape buffer between the existing built form and the A1, and forms an important landscape gap between Buckden and Stirtloe, helping to avoid the process of coalescence.

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

- 1.43. An Outline planning application (planning reference 16/00576/OUT) was refused in August 2016 but allowed on Appeal (Appeal reference APP/H0520/W/16/3159161) after a public inquiry in July 2017.
- 1.44. A subsequent Reserved Matters application is anticipated to be submitted in August 2018 with preliminary site works in April 2019 and first completions in October 2019.



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

1.45. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

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

1.46. The HELAA (HOUS/02 - page 470) identifies the impact on landscape and setting of the village as the principal adverse impact. This is a sensitive site which acts as a landscape buffer between the existing built form and the A1 and forms an important landscape gap between Buckden and Stirtloe. Other adverse impacts were identified with regard to traffic impacts, air quality, noise, light pollution, and a potential under capacity in the waste water treatment works to accommodate flows from the development.

1.47. It was established through consideration of the planning appeal that the adverse impacts of developing the site - identified in the HELAA - were either outweighed by the benefits and/or could be satisfactorily mitigated, and these mitigation measures are reflected in the allocation policy criteria (CORE/01, criteria a – j).

### **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?**

1.48. The site is in Flood zone 1 (HOUS/02, page 469). 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?**

1.49. Constraints are set out in HOUS/02. In summary, noise mitigation will be needed given proximity to the A1. A transport assessment is needed to ensure the growth in traffic is addressed.

- 1.50. Specific infrastructure costs have not been costed for the site although the IDP Schedule INF/02 sets out modelled outputs on a District wide basis to ensure policy compliance as projects come forward.
- 1.51. Constraints have been addressed through the approval of planning permission on the site and a signed S106 agreement.

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

- 1.52. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 1.53. 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. It is anticipated that sites in Buckden will be served by the Buckden Wastewater Treatment Works. The Water Cycle Study acknowledged Buckden of having capacity for growth.
- 1.54. 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 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).

- 1.55. 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.
- 1.56. 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?**

- 1.57. There is a signed S106 agreement delivering appropriate infrastructure and 40% affordable housing.

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

- 1.58. In November 2017, the agent for the site says that the site was being marketed and that a Reserved Matters application is anticipated to be submitted in August 2018 with preliminary site works in April 2019 and first completions in October 2019 (MON/01, page 71).
- 1.59. The first 18 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	Total 17/36
108	18	45	45	45	27	<b>180</b>

- 1.60. This is deemed realistic as the site already has outline approval for 180 dwellings with a Reserved Matters application expected to be submitted in August 2018.

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

- 1.61. The boundary of the site is appropriate as it represents the land submitted with planning permission for up to 180 homes, 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?**

- 1.62. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA (HOUS/02) and the planning permission allowed on appeal.
- 1.63. An objection from Historic England (ID: 56252) says that whilst there are no designated heritage assets within the site boundary, Buckden Conservation Area lies to the north of the site. The Conservation Area contains a high concentration of listed buildings, included the grade I Inner Gatehouse, part of Buckden Towers which itself is scheduled. The policy should make reference to these assets and the need to protect or enhance their settings. The development of 180 homes granted on appeal was considered by the Planning Inspector to have *“no direct relationship with Buckden Towers or the Church, both of which derive much of their historic interest from their fabric and to some extent, historical associations”* and *“The local topography and landscaping mean that the development is unlikely to feature prominently on views from the A1, or diminish glimpsed long range views towards the heritage assets to any significant extent. In addition, the development will include large areas of public accessible open space that may open up views towards heritage assets that are not currently available”*.
- 1.64. 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 and 461) and Statement of Representations (CORE/04, Page 113).
- 1.65. 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 is available now can be completed within the plan period.



## 2. Fenstanton

### FS1- Former Dairy Crest Factory

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

- 2.1. This was a brownfield site formerly a dairy factory that closed in 2013.
- 2.2. This piece of land was put forward during Draft Local Plan consultation and originally assessed for the Local Plan to 2036 in the Environmental Capacity Study consulted on in summer 2013 (HOUS/02: Availability, page 483) and has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 481-484 for full assessment).
- 2.3. The site is considered suitable for a mixed-use development with 0.2ha of land for employment and community uses and residential development across a net developable area of 75% of the site. This was deemed suitable as the site has good access to the services and facilities of Fenstanton, and constraints of air and noise pollution from the A14 are expected to be significantly reduced following the rerouting of the A14 (HOUS/02: Suitability, page 483).

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

- 2.4. The site was considered suitable for a mixed-use development with 0.2ha of land for employment and community uses and residential development across a net developable area of 75% of the site resulting in an estimated capacity of 79 dwellings through the HELAA.
- 2.5. The proposed site was allocated for a mixed use development comprising of approximately 90 dwellings, 0.5ha of employment uses (class 'B1'), a village hall and open space, following the subsequent approval of planning application 16/01206/FUL which assessed the site capacity to be viable and developable for 88 residential units.

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

- 2.1. No representations were received regarding the capacity of the site
- 2.2. The Council's assessment of the site determined that a capacity for approximately 90 residential, 0.5ha of employment use, a village hall / community facility and open space suitable recognising that part of the site is situated within the conservation area, in proximity to listed buildings and trees along the eastern boundary.
- 2.3. This approach was derived from the findings of an urban design process involving a working group including District and Parish Councillors as well as the landowners who helped inform and shape guidance for the site. This predated the allocation in the HELAA 2017; it meets the requirements of paragraph 94 and 99 of the NPPF by adopting a proactive strategy to mitigate

and adapt to climate change by taking into account flood risk and considering the longer term implications of climate change.

- 2.4. Initial assessment through the HELAA identifies that the site is suitable for high density apartments due to its proximity to the village centre and correlation with the more built-up nature of the existing area.
- 2.5. A Hybrid Planning Application for the Demolition of Existing Factory Buildings and the Development of 88 Dwellings (to include for the residential conversion of 3 units located at 17 High Street), provision of public open space and associated works (applied for in full) and provision of 660sq.m of commercial (B1) and 279 sqm of community (D1) uses (Applied for in Outline with All Matters Reserved Except Access) was approved 5<sup>th</sup> May 2017. 34 units (a mix of 1 bed maisonettes, 2 bed houses, 3 bed houses and 1 bed apartments), have been allocated to affordable housing

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

- 2.6. A Full planning application (planning reference 16/01206/FUL) for 88 homes (to include the residential conversion of 3 units located at 17 High Street), was approved in May 2017 and development commenced on the 11<sup>th</sup> September 2017.

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

- 2.7. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.
- 2.8. Redevelopment of the site will bring many benefits to the surrounding area. A large proportion of the site is currently hardstanding. Many of the vacant derelict buildings have been demolished. The redevelopment of this site presents the opportunity for positive enhancement to the setting of heritage assets and improvement of the conservation area, including the reuse of the listed building on the site as identified in Paragraph: 004 Reference ID: 18a-004-20140306 of the NPPG through criterion d and e, which asks for the development proposal to take appropriate account of the site's location within the conservation area. The listed building on the site will remain a feature of any development (para 13.17 of the Local Plan – CORE/01).

- 2.9. Redevelopment of the site would require a heritage statement to ensure redevelopment contributes to the setting in line with paragraph 128 of the NPPF.
- 2.10. The site was assessed as a highly sustainable location suitable for mixed use development; it is easily accessible to the village centre on foot and is close to accessible natural green space, open space, sports, social facilities, a food shop, a doctors' surgery and primary school.
- 2.11. The former employment use on the site has historically generated a notable number of HGVs in and out of the site via the rear vehicular entrance off the A14 spur road. When the site was at full capacity it ran 24 hours a day. A residential mixed use scheme is more compatible with neighbouring dwellings / village centre uses. The redevelopment of the site will post completion remove HGVs on the site and surrounding local road network and improve local noise quality.
- 2.12. Redevelopment of the site will enable public permeability through the site connecting into surrounding streets (currently the site severs the High Street from Connington Road and the A14 spur road to the south) (criterion c and para 13.15 of the Local Plan – CORE/01). The redevelopment of the site will positively change the character of this part of the village through introducing open space, landscaping and retaining existing site trees (where possible) (criterion g and para 13.20 of the Local Plan – CORE/01).
- 2.13. The development will provide for a much needed village hall / community facility which provide wider benefits for the local community. A designation on the site for employment use will also help to provide local employment and help to compensate for the loss of Dairy Crest which was a major local employer (para 13.17 of the Local Plan – CORE/01).
- 2.14. Through the removal of a notable amount of hard surfacing on the site and the introduction of open space and private curtilages to dwellings the site will be more permeable and the surface run off rate reduced. This meets the requirements of paragraph 94 and 99 of the NPPF by adopting a proactive strategy to mitigate and adapt to climate change by taking into account flood risk and considering the longer term implications of climate change.
- 2.15. 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.

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

- 2.16. The HELAA identifies potential adverse impacts with regards to green linkages, potential protected species, impacts upon heritage assets, community facilities, and employment.
- 2.17. Mitigation measures are identified in the HELAA and within FS1 allocation in the Local Plan. These include mitigation measures for air and noise pollution from the A14 through careful location of uses least sensitive to noise and air quality such as employment closest to the A14



and the inclusion of acoustic treatments. A noise and proportionate air quality assessment will be required.

- 2.18. Traffic considerations and how they can be catered for within the village and on the A14 via a transport assessment and ensuring that any layout integrates pedestrian access to the High Street will be required.
- 2.19. Light pollution from the development onto adjacent residential dwellings to the site should be mitigated through the design of the proposal and its landscaping.
- 2.20. The site lies within a Total Catchment (Zone 3) Source Protection Zone which may affect the use of SuDS. A flood risk assessment and drainage strategy will therefore be required to address this issue, to be produced in agreement with relevant bodies.
- 2.21. Given the location of the site next to a Roman road, appropriate archaeological investigations are required. Any proposal will need to demonstrate how it will mitigate adverse effects on nearby heritage assets, and actively enhance the conservation area.
- 2.22. Land contamination will require assessment and appropriate mitigation.
- 2.23. Trees on site can be mitigated through an arboricultural report, and ensuring that development is outside root protection zones and sited so not to be dominated or shaded by the trees.
- 2.24. Mitigation measures are achievable, as demonstrated through the approval of application 16/01206/FUL in May 2017. Concerns were raised by Fenstanton Parish Council relating to insufficient overflow parking, vehicular access onto the high Street not being acceptable, detached parking spaces from specific plots, insufficient open green space, insufficient parking for the community building. No objections however were raised from Highways England, Cambs Constabulary, Anglian Water, Historic England, Cambs Fire and Rescue, Cambridgeshire County Council as LLFA, Highways and Archaeology, or HDC Transportation, Environmental Health and Lighting; although conditions were suggested and applied.

**Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?**

- 2.25. 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?**

- 2.26. Detailed constraints are set out in HOUS/02. In summary, these are noise/pollution from the A14 and part of the site is within a conservation area, with a listed building within the site.

- 2.27. Specific infrastructure costs have not been costed for the site although the IDP Schedule INF/02 sets out modelled outputs on a District wide basis to ensure policy compliance as projects come forward. Infrastructure requirements and costs have been addressed through the approval of planning permission.

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

- 2.28. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 2.29. 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. FLO/11 identifies the site as served by the Huntingdon Wastewater Treatment Works. FLO/11 acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth in line with the Local Plan is to be enabled.
- 2.30. 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 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).

- 2.31. 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.
- 2.32. 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?**

- 2.33. Development is underway with a signed S106 agreement delivering close to policy level for affordable housing (approximately 37%)

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

- 2.34. The sites agent confirmed in response to the Councils The Annual Monitoring Report 2017 housing trajectory (MON/01, page 66) that the first 44 homes will be completed in the year 2019/2020, with all homes expected to be completed within years 1-5, the timescale for development is set out below:

No. units in years 1-5	19/20 Yr. 3	20/21 Yr. 4	Total 17/36
88	44	44	88

- 2.35. This is deemed to be a realistic timescale as Full planning permission has been granted and development as commenced on the site.

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

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

- 2.37. The defined boundary allows for comprehensive re-development of previously developed land and brings benefits such as to the site such as contamination mitigation and on-site water permeability.

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

- 2.38. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA and the Huntingdonshire Local Plan Viability Study.
- 2.39. 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, Page 219) and Statement of Representations (CORE/04, Page114).
- 2.40. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG<sup>2</sup>. 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.

## FS2- Cambridge Road West

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

- 2.41. The site was mainly comprised of arable farmland with a remnant orchard in the north west corner.
- 2.42. This piece of land was originally assessed for the Local Plan to 2036 in the Environmental Capacity Study: Additional Site Assessments document consulted on in November 2013. A planning application was approved in February 2017 for 86 dwellings on the site (16/00582/FUL). The site has since been assessed in the Hosing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 485-488 for full assessment).
- 2.43. The site is sufficiently close to the historic centre of Fenstanton for pedestrians to access existing shops and services, although social facilities are limited. Therefore, this development has the opportunity to provide a new community facility and open space as well as a residential development of approximately 80 homes (HOUS/02: page 487).

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<sup>2</sup> Housing and economic land availability assessment

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

- 2.44. The proposed site was allocated for a mixed use development comprising of approximately 85 dwellings and village hall or other community facility.
- 2.45. Planning permission 16/00582/FUL was approved in February 2017 for 86 residential units. The housing mix consists of 9 no. 1 bed affordable houses, 17 no. 2 bed houses affordable houses, 34 no. 3 bed houses (6 affordable) 22 no. 4 bed houses (2 affordable) and 4 no. 5 bed houses. This gives a total of 34 affordable homes.

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

- 2.46. Representation submitted by the Historic England (ID: 56252) states that development of the site would have potential to impact upon the setting of the Conservation Area. Further Historic England state that Cambridge Road which is a Roman Road increases the archaeological potential. Historical England argues that the policy and supporting text should make reference to this and consideration should be given to the impact of development upon potential undesignated heritage assets and archaeological remains.
- 2.47. The Councils assessment of the site determined that a capacity of approximately 85 residential units is suitable. The HELAA and planning application reference 16/00582/FUL confirmed that the land is outside of the conservation area and that there are no known heritage assets on or near land. Notwithstanding Condition 19 on the planning permission secures a written scheme of archaeological investigation.

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

- 2.48. A Full planning application (planning reference 16/00582/FUL) for 86 homes was approved in February 2017 and development commenced on the 28<sup>th</sup> November 2017.

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

- 2.49. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

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

2.50. The HELAA identifies the following potential adverse impacts

- Development will be on grade 2 agricultural land;
- development could significantly change the way in which Fenstanton is viewed from the A14;
- The site is within the Fenstanton to Hemingford Air Quality Management Area;
- Gas pipeline runs adjacent to site;
- Protected species may exist on site.

2.51. Mitigation measures are achievable, as demonstrated through the approval of application ref: 16/00582/FUL. No objections were raised by Anglian Water, CCC Archaeology, CCC Highways, Environment Agency LLFA, although conditions were suggested and applied.

## **Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?**

2.52. 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?**

2.53. The site constraints are set out in detail in HOUS/02. In summary the site is affected by traffic noise, gas pipe and drain easements and a transport assessment is needed to ensure appropriate access can be taken from the nearby slip road.

2.54. Infrastructure requirements have been agreed with the developer and are incorporated into the signed S106 agreement.

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

2.55. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 2.56. 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. FLO/11 identifies the site as served by the Huntingdon Wastewater Treatment Works. FLO/11 acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth in line with the Local Plan is to be enabled.
- 2.57. 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 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).
- 2.58. 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.
- 2.59. 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?**

- 2.60. A signed S106 will ensure delivery of a policy level of affordable housing.

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

2.61. The sites agent confirmed in response to the Councils The Annual Monitoring Report 2017 housing trajectory (MON/01, page 65) that the first 20 homes are expected to be completed in the year 2018/2019, the timescale for delivery is set out below:

No. units in years 1-5	18/19 Yr. 2	19/20 Yr. 3	20/21 Yr. 4	Total 17/36
86	20	40	26	86

2.62. This is deemed to be realistic as Full planning permission has been granted and development has since commenced.

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

2.63. 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.

2.64. The site as it stands is suitable, available and achievable demonstrated by the grant of full planning permission.

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

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

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

2.67. Responses to the questions above demonstrate that the site is suitable, available and achievable as defined in the NPPG2. The site is deliverable as defined through paragraph 47 of the NPPF, planning permission was approved and development has commenced on site 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.



## FS3- Cambridge Road East

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

- 2.68. The site consists of allotments in the eastern part of the site and a grassed paddock.
- 2.69. This piece of land was originally assessed for the Local Plan to 2036 in the Environmental Capacity Study: Additional Site Assessments document consulted on in November 2013. The site has since been assessed in the Hosing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 489-492 for full assessment).
- 2.70. The site is sufficiently close to the historic centre of Fenstanton for pedestrians to access existing shops and services, although social facilities are limited. This development has the opportunity to provide 0.2 ha of allotments as well as a residential development of 35 homes (HOUS/02: page 491).

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

- 2.71. The proposed site is allocated for a mixed use development comprising of approximately 35 dwellings and 0.2ha extension to allotment gardens.

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

- 2.72. Representation submitted by the Historic England (ID: 56252) states that development of the site would have potential to impact upon the setting of the Conservation Area. Further, Historic England states that Cambridge Road is a Roman Road which increases the archaeological potential. Historical England argues that the policy should include to the archaeology requirements and the conservation area.
- 2.73. Representation submitted by the Environment Agency (ID: 1146949) The EA are concerned that flood risk has not been highlighted as a key factor in this development policy. The EA adds that the flood map for surface water indicates that this site is at significant risk of surface water flooding that could impact on the feasibility of this development.
- 2.74. Representations submitted by Ely Diocesan Offices (ID: 1118691) support allocation - however to maximise opportunities they suggest an amendment to the allotment gardens element. Ely Diocesan acknowledges that the Parish have waiting lists for the allotments but question the need for allotment on this site.
- 2.75. The Councils assessment of the site determined that a capacity of approximately 35 residential units and 0.2 hectare extension to allotment gardens is suitable. The HELAA confirmed that the land is outside of the conservation area and that there are no known heritage assets on or near land. As FS2 a condition on the planning permission would secure a written scheme of investigation.

2.76. The site lies within a Total Catchment (Zone 3) Source Protection Zone which may affect the use of SuDs. A flood risk assessment and drainage strategy will therefore be required to address this issue, to be produced in agreement with the relevant bodies

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

2.77. No planning applications have been submitted for the site.

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

2.78. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

2.79. The development will provide extended allotment facilities for Fenstaton (a valuable local facility), with the addition of 35 residential units. Pedestrian and walking routes will be improved and noise mitigation measures addressed which will in turn improve noise impact on the surrounding area.

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

2.80. The HELAA identifies the following potential adverse impacts

- Development will be on grade 2 agricultural land;
- development could significantly change the way in which Fenstanton is viewed from the A14;
- The site is within the Fenstanton to Hemingford Air Quality Management Area;
- Gas pipeline runs adjacent to site;
- Protected species may exist on site.

2.81. Mitigation measures are achievable, as demonstrated through the approval of application ref: 16/00582/FUL on neighbouring site FS2. Specifically no objections were raised by Anglian Water, CCC Archaeology, CCC Highways, Environment Agency LLFA, although conditions were suggested and applied

**Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?**

2.82. 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?**

2.83. HOUS/02 p489 sets out the main constraints. In summary, the site is bordered by drain easements and a gas easement. Poor air quality will need to be mitigated. A transport assessment will need to demonstrate that access can be taken from the nearby slip-road.

2.84. Specific infrastructure costs have not been identified or costed for the site although the IDP Schedule INF/02 sets out modelled outputs on a District wide basis to ensure policy compliance as projects come forward. Approval of planning application 16/00582/FUL on neighbouring site FS2 demonstrates that infrastructure requirements can be addressed appropriately.

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

2.85. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

2.86. 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. FLO/11 identifies the site as served by the Huntingdon Wastewater Treatment Works. FLO/11 acknowledged

Huntingdon as reaching capacity with improvements needed by 2021/22 if growth in line with the Local Plan is to be enabled.

- 2.87. 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 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).
- 2.88. 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.
- 2.89. 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?**

- 2.90. 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 (INF04, para 3.6). 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).
- 2.91. 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).
- 2.92. 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.

2.93. The viability work within INF/04 indicates that the typologies that this site would fall into will generally show strong viability. The adjacent site achieved a policy level of affordable.

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

2.94. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the agent for the site has confirmed its availability and expects the first 17 homes to be expected to be completed in the year 2022/2023 with the timescale for delivery set out below:

No. units in years 1-5	22/23	23/24	Total 17/36
0	17	18	35

2.95. The agent for the site has stated that the site could accommodate 47 dwellings; however, the capacity has been kept at 35 to match the Local Plan allocation (MON/01, page 89).

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

2.96. 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?**

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

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

2.99. Responses to the questions above demonstrate that the site is suitable, available and achievable as defined in the NPPG2. The site is developable as defined through paragraph 47 of the NPPF. Taking into account that planning permission was approved on the adjacent site there is no reason why the development on this site will not be viable and suitable. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development is available now and can be completed within the plan period.

### **3. Kimbolton**

#### **KB1- West of Station Road**

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

- 3.1. The site comprises part of a field used for pasture. The southern part of the site is around 50m from the river Kym, and is of high landscape quality.
- 3.2. This piece of land was put forward during the Stage 2: Strategy and Policies consultation in 2012 and originally 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 Hosing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 534-536 for full assessment).
- 3.3. This site is considered suitable for low density residential development across a net developable area of 50% of the site resulting in an estimated capacity of approximately 20 dwellings. The site has reasonable access to Kimbolton village facilities but is relatively remote from higher order services (HOUS/02: Suitability, page 536).

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

- 3.4. The proposed use is for approximately 20 dwellings.

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

- 3.5. The site comprises circa 1.3ha of green field (grade 3 agricultural) land west of Station Road, Kimbolton. As Kimbolton does not benefit from the same range of services available in a market town, potential future occupants of the development would need to travel further afield for particular services/facilities and wider employment opportunities.
- 3.6. Representations from Kimbolton Parish Council (ID: 34501) [source PREP/02] indicated support for the allocation.
- 3.7. Potential landscape and heritage impacts are a development constraint. In order to achieve a sympathetic, low density design across a developable area of circa 50% of the site, an estimated capacity of 20 dwellings has been identified. This approach was derived from the findings in the HELAA 2017 (HOUS/02).

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

3.8. No planning application has been submitted.

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

3.9. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

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

3.10. Landscape and heritage impacts are a development constraint. A number of listed buildings are located in the vicinity (note Historic England (ID: 56252) representation [source PREP/01 and PREP/02]) and the proximity of the River Kym (circa 50m to the south) creates an area of high landscape quality which covers the southern section of the site. It is also noted that views across the site are achievable from a number of vantage points. Open space and screening will be required to the south and west of the site to minimise impact on the surrounding area, as will the minimisation of mature hedgerows (criteria 1 & 3).

3.11. All planning applications will have to consider their relationship with conservation areas and heritage assets as set out in policy LP36.

3.12. The proximity of the River Kym requires a site specific Flood Risk Assessment and drainage strategy to support a development, noting the overland flood route and potential downstream impacts highlighted by the Environment Agency (ID: 775665) [source PREP/01 and PREP/02] and Cambridgeshire County Council: (ID: 1150302) [source PREP/01]. Provision of an acceptable flood risk assessment will be required through criterion 4 to ensure development proposals can be safely mitigated.

3.13. Integration with the rest of Kimbolton may be challenging. As such, a transport assessment which explores cycle/pedestrian connectivity with the main body of Kimbolton is required (criterion 1).

**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?**

- 3.14. 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?**

- 3.15. Specific infrastructure costs have not been identified or costed for the site although the IDP Schedule INF/02 sets out modelled outputs on a District wide basis to ensure policy compliance as projects come forward.
- 3.16. HOUS/02 sets out the envisaged constraints. In summary an off-site water main is needed to serve the site, being near to the river, a flood risk assessment is needed and there are listed buildings 100M away. A transport assessment will determine how safe appropriate access can be achieved.
- 3.17. The constraints and identifying the essential infrastructure will be addressed through the application process.

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

- 3.18. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 3.19. 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. FLO/11 identifies the site as served by the Kimbolton Wastewater Treatment Works. FLO/11 acknowledged Kimbolton as having capacity.

- 3.20. 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 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).
- 3.21. 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.
- 3.22. 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?**

- 3.23. 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 (INF04, para 3.6). 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).
- 3.24. 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).
- 3.25. 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.

3.26. The viability work within INF/04 indicates that the typologies that this site would fall into will generally show strong viability.

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

3.27. The site is deliverable. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the agent for the site has confirmed its availability with the first 11 homes 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
23	11	12	23

3.28. This is deemed to be realistic, as the amount of development is small on the site.

3.29. The agent for the site has also stated that the site could accommodate 25 dwellings; capacity of 23 dwellings reflects recent discussions with the agent on a potential scheme, which could be developed within 5 years (MON/01, page 89).

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

3.30. The boundary to the east is defined by the established hedging and the highway. Similar hedging defines the boundary to the west. Due to the extent of the flood zone to the south of the site, coupled with the high landscape quality of this area it is considered appropriate to incorporate a buffer of circa 65m between the southern boundary of the site and the River Kym.

3.31. This arrangement is appropriate as it represents the land submitted as available for development.

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

3.32. 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) and Strategic Flood Risk Assessment (FLO/02).

- 3.33. 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 113, 221, 335, 404 and 462) and Statement of Representations (CORE/04, Page 115).
- 3.34. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG<sup>3</sup>. 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.

## KB2- North of Station Road/Stowe Road

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

- 3.35. This is a greenfield site and is currently in use as arable farmland.
- 3.36. This site was submitted in response to the Call for Sites in August 2017 (HOUS/02: Availability, page 522) and has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 519-522 for full assessment).
- 3.37. The site is adjacent to residential development, it has few physical constraints and has good access to facilities within the village, therefore the site is considered suitable for low density residential development across a net developable area across 75% of the site resulting in an estimated capacity of 66 dwellings (HOUS/02: Suitability, page 522).

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

- 3.38. The proposed use is for approximately 65 dwellings.

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

- 3.39. The Council's assessment of the site determined that a capacity for approximately 65 residential units is more suitable recognising the site constraints as set out in the HELAA. Initial assessment the HELAA identifies that the site is adjacent to the built up area of Kimbolton comprising residential dwellings and Overhills Primary School and while acknowledging the constraints of the site including the topography of the land, the site is considered suitable for low density residential development.

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<sup>3</sup> Housing and economic land availability assessment

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

3.40. No planning application has been submitted.

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

3.41. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

3.42. The site is also 1.2kms from a concentration of employment, namely Harvard Industrial estate. The site is also within 2Km of an industrial estate, namely Harley Industrial Estate. 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?**

3.43. To the south-west of the site on the opposite side of the B660 lie three grade II listed Buildings. Concerns were raised by Historic England (ID: 56252) highlighting that development should preserve these listed buildings and their settings. This requirement should be included in the policy and supporting text. Given the distance between the listed buildings and the site, along with the intervening buildings and low density of the scheme proposed it is considered that this site can be sensitively designed to ensure the setting is not compromised. It is considered that when all policies, including policy LP36 (Heritage Assets and their Settings) are considered in the planning balance the protection sought by Historic England already exists within the Plan currently being examined.

3.44. Objections have been received from the Environment Agency (ID:1146949) and Cambridgeshire County Council in their role as LLFA (ID:1150302) on the grounds that This site is close to a surface water flow route that connects to the River Kym, and could affect downstream flood risk in Kimbolton. Development should be required to reduce discharge rates. The Environment Agency also advises that this approach provides an opportunity to reduce the flood risk downstream through the safe management of the surface water flow

paths that are indicated in the SFRA. The site is in Flood zone 1 and Policy KB2 requires any development of the site to provide a surface water drainage strategy, to mitigate the impact of developing this site. Once that has been considered appropriately worded conditions can be included within any consent.

- 3.45. The HELAA identifies a number of constraints including that the site is greenfield, open countryside and not generally flat. However, through careful design and use of conditions and having regard to nearby residential dwellings and the topography of the land, a suitable, low, density scheme can be delivered on this site.

**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?**

- 3.42 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?**

- 3.46. Specific infrastructure costs have not been identified or costed for the site although the IDP Schedule INF/02 sets out modelled outputs on a District wide basis to ensure policy compliance as projects come forward.
- 3.47. HOUS/02 sets out the envisaged constraints. In summary a transport assessment will determine how safe appropriate access can be achieved and increased traffic addressed. A landscaping scheme can mitigate impact on the surrounding landscape.
- 3.48. The constraints and identifying the essential infrastructure will be addressed through the application process.

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

- 3.49. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 3.50. 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. FLO/11 identifies the site as served by the Kimbolton Wastewater Treatment Works. FLO/11 acknowledged Kimbolton as having capacity.
- 3.51. 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 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).
- 3.52. 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.
- 3.53. 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?**

- 3.54. 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 (INF04, para 3.6). 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).

- 3.55. 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 value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 3.56. 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.
- 3.57. The viability work within INF/04 indicates that the typologies that this site would fall into will generally show strong viability.

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

- 3.58. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the site’s owner/ agent has confirmed that the site can be delivered immediately with the first 25 homes expected to be completed in the year 2020/2021, the timescale for delivery is set out below:

No. units in years 1-5	20/21 Yr. 4	21/22 Yr. 5	22/23	Total 17/36
50	25	25	15	65

- 3.59. The agent's projections have been deferred by 1 year as no planning application has been submitted (MON/01, page 89).

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

- 3.60. It is considered that the boundary is appropriate taking into consideration the spatial arrangement of the existing built form including Montagu Gardens. Allocation KB2 sets out that any future scheme is expected to include a comprehensive landscaping scheme to integrate the development with nearby residential properties but also with the open countryside to the north.

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

- 3.52 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.
- 3.53 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 Representations (CORE/04, Page115).
- 3.54 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 is available now can be completed within the plan period.

## **KB3- South of Bicton Industrial Estate**

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

- 3.61. The site is currently used as arable farmland.
- 3.62. This piece of land was put forward during the Stage 2: Strategy and Policies consultation in 2012 and assessed for the Local Plan to 2036 in the Environmental Capacity Study, consulted upon in summer 2013 so is known to be available (HOUS/02: Availability, page 525). The site has also been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 523-525 for full assessment).
- 3.63. The site is immediately south of Bicton Industrial Estate so is therefore considered suitable for employment development to comprise of light industrial business uses (class 'B1c' uses) with an estimated capacity of 5,200m<sup>2</sup> of ground floor space (HOUS/02: Suitability, page 525).

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

- 3.64. The proposed use is for light industrial business uses (class 'B1c').

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

- 3.65. Representations submitted by Mr Paul Seabrook (ID: 1117143) [source: PREP/01 and PREP/02] outlined that the landowners support the proposed allocation and are currently working to bring forward a planning application.



- 3.66. Representations from Kimbolton Parish Council (ID: 34501) [source: PREP/02] indicate that the Parish Council supported the allocation, but did request consideration be given to pedestrian/cycle links. Historic England (ID: 56252) [source: PREP/02] noted no specific comment, but highlighted that integration into the surrounding landscape should be a considered.
- 3.67. The site comprises approx. 1.3ha of greenfield arable farmland adjacent to Bicton Industrial Estate, Kimbolton and is considered to be appropriate for employment use (note ECON/01 page 8), with approx. 140 employment opportunities created (based on density figures from the Alconbury Employment Zone) [source: CORE/01].

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

- 3.68. No planning application has been submitted.

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

- 3.69. The site represents an expansion of the existing Established Employment Area and could provide additional employment opportunities for both local residents and a wider labour force.

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

- 3.70. The application site is bounded to the south and east by open countryside and to the west by a County Wildlife Site. As such, both a landscaping scheme and an ecological assessment must be developed. Agreement between the developer, LPA and Anglian Water is required to ensure the water supply/foul sewerage networks have capacity to accommodate a development. This is addressed in criterion b of the policy.
- 3.71. A proportionate transport assessment is also required to demonstrate that safe and appropriate access can be provided, with any adverse impacts mitigated in line with criterion a.

**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?**

- 3.72. The site is in Flood zone 1 (FLO/01, page 29). 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?**

- 3.73. There are no significant key constraints. HOUS/02 identifies the need for landscaping to mitigate visual impact on the landscape and provision of a satisfactory access
- 3.74. Specific infrastructure costs have not been identified or costed for the site although the IDP Schedule INF/02 sets out modelled outputs on a District wide basis to ensure policy compliance as projects come forward.

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

- 3.75. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 3.76. 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. FLO/11 identifies the site as served by the Kimbolton Wastewater Treatment Works. FLO/11 acknowledged Kimbolton as having capacity.
- 3.77. 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 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).

- 3.78. 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.
- 3.79. 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?**

- 3.80. The Employment Land Study (ECON/01) page 8 identifies the site as having a high likelihood of meeting qualitative or quantitative employment need. The Study (page 91) identifies an undersupply of vacant industrial floorspace across the district. Employment use for the site will therefore contribute to creating a sustainable pattern of development as highlighted in Matter 5 Question 3.

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

- 3.81. The overall strategy for development and broad distribution for growth was derived from the Huntingdonshire Employment Land Study (2014) (ECON/01). Site KB3 is part of the Council's Development Strategy to meet overall employment need in the District (further information included in the Council's response to Matter 5, questions 1 to 3). Employment sites have been distributed across the district which allows for choice and diversity in the employment market by creating a sustainable pattern of employment development based around key services and population.
- 3.82. No planning application has been submitted for this site, although assessment of the site (see above) demonstrates that the site is suitable for employment development and is in a prominent area where there is an undersupply of the identified B uses (ECON/01, page 71).

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

- 3.83. The boundary of the site is appropriate as it represents the land submitted as available for development. The site represents an expansion of the existing Established Employment Area and could provide additional employment opportunities for both local residents and a wider labour force. 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?**

- 3.84. 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).
- 3.85. 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, Highways England, or Historic England. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 113, 221, 335, 405 and 462) and Statement of Representations (CORE/04, Page 115).
- 3.86. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG<sup>4</sup>. The site is considered developable within the plan period.

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<sup>4</sup> Housing and economic land availability assessment



## 4. Sawtry

### SY1- East of Glebe Farm

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

- 4.1. The site was used for arable farmland.
- 4.2. This site was put forward during production of the Core Strategy 2009 and was originally assessed during Stage 2 of the Local Plan to 2036 in the Environmental Capacity Study in summer 2013 (HOUS/02: Availability, page 570). The site has also been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 568-570 for full assessment).
- 4.3. The site is situated on the edge of the village adjacent to existing residential properties and has reasonable access to services and facilities. Along with limited constraints, the site is considered suitable for low to medium density development across a net developable area of 60% resulting in an estimated capacity of 82 dwellings (HOUS/02: Suitability, page 570).

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

- 4.4. The proposed use is for approximately 80 dwellings.
- 4.5. As of October 2016, 40% (32 units) will be allocated for affordable housing under 16/01109/REM.

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

- 4.6. Representation submitted, by Sawtry Parish Council (ID: 1117516) supports the allocation notes that they are pleased to see the plan move forward in its current format.
- 4.7. Representation submitted by Mr Colum Fitzsimons (ID: 1150302) states that: The site is on the Sawtry Brook, and could affect flood risk in Sawtry. Mr Fitzsimons adds that development should be required to reduce discharge rates into the Sawtry Brook. Parts of the site are at surface water risk, and the site therefore requires a flood risk assessment covering flooding from all sources.
- 4.8. Representation submitted by the Environment Agency (ID: 1146949) argues that SY1 is on the Sawtry Brook and could affect flood risk in Sawtry. The Environment Agency state that development should be required to reduce discharge rates into the Sawtry Brook. The current policy wording indicates that restricting run off rates to the greenfield conditions would provide betterment. The EA disagree, they state that this is an undeveloped site and would not provide betterment.

- 4.9. The Councils assessment of the site determined that a capacity of approximately 80 residential units is suitable. The HELAA and more recently planning application reference 1401659OUT confirmed that the site is in Flood Zone 1. Condition 9 of said permission requires details of a surface water drainage scheme.

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

- 4.10. An Outline application (planning reference 1401659OUT) for up to 80 dwellings was approved in May 2016.
- 4.11. A subsequent Reserved Matters application (planning reference 16/01109/REM) was refused but allowed on Appeal in April 2017 following (APPEAL reference APP/H0520/W/16/3164983). The development commenced on the 18<sup>th</sup> December 2017.
- 4.12. A further Reserved Matters application (planning reference 18/00633/REM) to alter house types is under consideration.

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

- 4.13. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.
- 4.14. The site is supported by Sawtry Parish Council

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

- 4.15. The HELAA identifies the following potential adverse impacts:
- 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. Additionally there have been flooding issues associated with Sawtry Brook

- due to the presence of suitable habitats on site, including woodland, ditches and ponds there may be protected species existing here.

4.16. Mitigation measures are achievable, as demonstrated through the approval of application ref: 1401659OUT. No objections were raised by Anglian Water, CCC Archaeology, CCC Highways, Environment Agency, Natural England although conditions were suggested and applied

**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?**

4.17. 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?**

4.18. HOUS/02 identifies few constraints. Improvements/extension to the existing water main supply will be needed to service the site.

4.19. Infrastructure requirements and costs have been addressed through the approval of planning permission.

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

4.20. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

4.21. 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. FLO/11 identifies the site as served by the Sawtry Wastewater Treatment Works. FLO/11 acknowledged Sawtry as having sufficient capacity.

- 4.22. 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 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).
- 4.23. 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.
- 4.24. 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?**

- 4.25. There is an existing S106 with provision for a policy level of affordable housing
- 4.26. The viability work within INF/04 indicate that the typologies that this site would fall into will generally show strong viability.

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

- 4.27. The Annual Monitoring Report 2017 (MON/01, page 68) considers the site is deliverable within five years following planning permissions 1401659OUT and 16/01109/REM, with the first 40 homes expected to be completed in the year 2019/2020 and 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	19/20 Yr. 3	20/21 Yr. 4	Total 17/36
80	40	40	<b>80</b>

4.28. This is expected to be a realistic timescale as development has already commenced on the site and with a Reserved Matters application (18/00633/REM) to alter the house types under consideration.

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

4.29. The boundary of the site is appropriate as it represents the land submitted as available for development and is reflected in the approved planning application. No representations were received to the proposed submission local plan consultation suggesting that the boundary should be amended.

4.30. 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?**

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

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

4.33. Responses to the questions above demonstrate that the site is suitable, available and achievable as defined in the NPPG2. The site is deliverable as defined through paragraph 47 of the NPPF, planning permission was approved in April 2016 and reserved matters approved March 2017 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.

**SY2- South of Gidding Road**

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

4.34. The site is currently being used for agricultural purposes.

- 4.35. This piece of land was originally put forward in the 2010 SHLAA and was assessed during Stage 3 of the Local Plan to 2036 in the Environmental Capacity Study: Key Service Centres document consulted upon between May 2013 and July 2013 (HOUS/02: Availability, page 567). The site has also been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 565-567 for full assessment).
- 4.36. As the site is in reasonable proximity to some services, small-scale employment and open space, the site was considered to be suitable for potential mixed density residential development at 40 dwellings per hectare on 65% net developable area. This results in an estimated capacity of 289 dwellings. (HOUS/02: Page 567).

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

- 4.37. The proposed use is for approximately 295 dwellings.
- 4.38. Under 17/00077/OUT (approved May 2017), 40% (118 units) have been allocated to affordable housing.

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

- 4.39. No representations were received regarding the capacity of the site.
- 4.40. The Council's assessment of the site determined that a capacity for approximately 289 dwellings could be accommodated, recognising that parts of the site are prominent and visually sensitive, especially from High Holborn Hill to south and countryside to the west and the need to retain the established trees and hedgerows surrounding the site to mitigate and minimise against light and visual pollution.
- 4.41. Initial assessment through the HELAA identifies that the site was suitable for mixed density residential development.
- 4.42. The site was allocated for 295 dwellings to reflect the approved planning permission 17/00077/OUT.

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

- 4.43. An Outline application (17/00077/OUT) for up to 295 dwellings was granted permission on the 1<sup>st</sup> May 2018. Pre-applications discussions on the future reserved matters application are ongoing.

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

- 4.44. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

- 4.45. The development will improve publically accessible viewpoints and will sit comfortably within the context of the wider area.
- 4.46. The HELAA assessment identifies the site as being in a sustainable location being within walking and cycling distance of most services and facilities (within 500m of open space at St Judith's Lane Recreation and 800m of Leisure Centre Sports Pitches, within 800m of village pubs, halls, youth centre, community college etc. within 600m of a primary school).
- 4.47. The approved outline application 17/00077/OUT included an area of green buffer located at the north-west corner of the site to relate to the area of Great Crested Newt habitat proposed on the site opposite (16/01109/REM) approved at appeal in April 2017. A large area of open space was proposed in the south of the site, which could link to the area of open space and newt habitat on the adjacent Bellway/Permission site, to the east, as well as the Prow which runs along the southern boundary. An area of open space has been indicated centrally adjacent to the eastern boundary which would assist with connectivity and permeability to the services and facilities within Sawtry. A further link to the existing Public Rights of Way at the north west of the site would also provide connectivity to the open countryside and could encourage walking and cycling. Condition 13 of 17/0077/OUT requires these links to be provided as part of the reserved matters application for layout.

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

- 4.48. The HELAA (page 567) identifies there are potential adverse impacts with regards to transport and access, visibility of the site from the countryside to the south and west and potential for archaeological remains. The geology of the site means it would unlikely be conducive to the use of soakaways or infiltration devices.
- 4.49. Mitigation measures are identified in the HELAA and within SY 2 in the Local Plan (CORE/01, pages 249-250) and include the requirement for a detailed transport assessment and travel plan, archaeological evaluation, surface water drainage strategy. SY 2 also requires for open space to be incorporated in the southern part of the site and a landscaping scheme to ensure retention and enhancement of the boundary planting to reduce the impact on the surrounding countryside.
- 4.50. The site is greenfield with boundary hedging so may provide some habitats for wildlife. The adjoining land to the east contains Great Crested Newt habitats. To mitigate potential impacts

a biodiversity and ecological survey will be required to assess avoidance, mitigation or compensation strategies.

**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?**

4.51. 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?**

4.52. HOUS/02 sets out the constraints. In summary, the impact on open countryside needs mitigating, there may be protected wildlife species and a transport assessment is needed for a safe appropriate access point.

4.53. Specific infrastructure costs have not been identified or costed for the site although the IDP Schedule INF/02 sets out modelled outputs on a District wide basis to ensure policy compliance as projects come forward. Infrastructure requirements and costs are been addressed through the planning permission.

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

4.54. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

4.55. 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. FLO/11 identifies the site as served by the Sawtry Wastewater Treatment Works. FLO/11 acknowledged Sawtry as having sufficient capacity.

- 4.56. 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 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).
- 4.57. 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.
- 4.58. 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?**

- 4.59. A S106 agreement was signed in May 2018 delivering appropriate infrastructure and a policy level of affordable housing.
- 4.60. The viability work within INF/04 would indicate the typologies that this site would fall into will generally show strong viability.

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

- 4.61. The Annual Monitoring Report 2017 (MON/01, page 89) expects the first 75 homes to be completed in the year 2020/2021, the timescale for delivery is set out below:

No. units in years 1-5	20/21 Yr. 4	21/22 Yr. 5	22/23	23/24	Total 17/36
150	75	75	75	70	295

- 4.62. This is deemed to be realistic as Outline planning permission has been approved and pre-application discussions are ongoing for the submission of a Reserved Matters application for the site.

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

- 4.63. 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.
- 4.64. The defined boundary allows for comprehensive development of the site, with natural boundaries formed by existing development to the east, and by Gidding Road to the north and existing hedge planting to the west. The alignment of the northern site boundary would reflect the line of the built form to the east and is therefore appropriate.

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

- 4.65. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA, the Huntingdonshire Local Plan Viability Study and the Strategic Flood Risk Assessment.
- 4.66. The policy requirements are effective and have been based on consultation with statutory consultees, Mid Level Commissioners and Cambridgeshire County Council. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, page 223-224) and Statement of Representations (CORE/04, page 116).
- 4.67. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG. The site is considered to be deliverable as defined through paragraph 47 of the NPPF.

## 5. Somersham

### SM1- College Farm, West of Newlands Industrial Estate

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

- 5.1. This site is on greenfield land and was submitted in response to the Call for Sites in August 2017 (HOUS/02: Availability, page 600), it has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 597-600 for full assessment).
- 5.2. The site has reasonable access to the services and facilities of the village and has few physical constraints and is therefore is considered suitable for low density residential development across a net developable area of 90% of the site resulting in an estimated capacity of 57 dwellings (HOUS/02: Suitability, page 600).

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

- 5.3. The proposed use is for approximately 55 dwellings.

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

- 5.4. The site is situated at the edge of Somersham, adjacent to an existing Industrial Estate, a farm holding and existing residential development. The site has reasonable access to services and facilities being close to open space, sports and social facilities and a doctor's surgery (HOUS/02, page 599). It is therefore considered that residential development of the site is an appropriate use; forming an extension to Somersham Key Service Centre.
- 5.5. Initial assessment through the HELAA identified that the site is suitable for low density residential development across a net developable area of 90% of the site, with an estimated capacity of 57 dwellings.

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

- 5.6. A planning application has not yet been received.

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

- 5.7. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

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

- 5.8. Mitigation measures are identified in the HELAA and within SM 1 in the Local Plan and include the requirement for appropriate noise mitigation, retention of trees along parts of the site boundaries, provision of a surface water drainage strategy, the design of the development to reflect the transition to the countryside, provision of a footway to link the site with the existing footway network and any necessary highways improvements determined through production of a Transport Assessment. It is also noted that discussions with Anglian Water and the Environment Agency would be required to obtain confirmation that waste water flows could be accommodated and that the Water Framework Directive would not be comprised. Potential contamination would also be addressed by an environmental assessment, alongside identification of any appropriate mitigation (CORE/01, criteria 1-8, page 252 and HOUS/02, page 599).
- 5.9. Representations at proposed submission consultation stage from Tracy Bradshaw (1151411) raised objection due to concerns in relation to many of the potential adverse impacts identified within the HELAA. Within the representation, concerns are also raised with regards to potential increases in traffic volumes as a result of development of the site and outline that development should be matched with investment in the village infrastructure, to support the influx of people and their needs. These matters would be addressed through the mitigation measures identified in the HELAA and within SM 1 in the Local Plan, through the Community Infrastructure Levy and as part of the planning process for any subsequent application for planning permission.
- 5.10. Representations at proposed submission consultation stage from Kyle Christie (ID: 1151306) raised objection due to the lack of headroom at Somersham WWTW. This matter would be addressed through the mitigation measures identified in the HELAA and within SM 1 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 6 Waste Water Management.
- 5.11. Representations at proposed submission consultation stage from R Woolway (ID: 1151522), on behalf of the land owners, make reference to the mitigation measures that would be necessary and confirm that the site is suitable and deliverable.

**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?**

5.12. The site is in Flood zone 1 (FLO/01, page 11). 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?**

5.13. The main constraints are identified in the HELAA (HOUS/02). This identifies potential adverse impacts with regards to surface water flooding, the potential for protected species within the site, the archaeological interest of the site, landscape impact due to countryside extending to the north and west of the site, contamination given the use of the site, provision of a suitable access point and pressure upon the water supply network and lack of capacity for the foul sewage network (Question 9 refers).

5.14. Specific infrastructure costs have not been identified or costed for the site although the IDP Schedule INF/02 sets out modelled outputs on a District wide basis to ensure policy compliance as projects come forward.

5.15. Infrastructure provision will be agreed through a S106 agreement when an application is submitted.

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

5.16. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 5.17. 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. FLO/11 identifies the site as served by the Somersham Wastewater Treatment Works. FLO/11 acknowledged Somersham as having insufficient capacity for the growth outlined in the Plan period.
- 5.18. 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 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).
- 5.19. In the case of Somersham, it is acknowledged that capacity is limited. As future developments come forward, there will be an increasing need for agreement with Anglian Water and the Environment Agency if further capacity can be provided or if interim solutions can be implemented while longer term solutions are designed and implemented.
- 5.20. 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.
- 5.21. 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?**

- 5.22. 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 (INF04, para 3.6). 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).

- 5.23. 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.
- 5.24. The viability work within INF/04 indicate the typologies that this site falls into generally show a reasonable level i.e. 25-30% of viability.

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

- 5.25. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the site’s owner/ agent have stated that the site can be delivered immediately and the site is currently available for development and could be delivered within 5 years (MON/01, page 91).
- 5.26. The first 30 homes are expected to be completed in the year 2020/2021, 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	20/21 Yr. 4	21/22 Yr. 5	Total 17/36
55	30	25	55

- 5.27. This is considered realistic as there are no major constraints to restrict development.

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

- 5.28. No representations were received in relation to the Local Plan consultation suggesting that the boundary should be amended.
- 5.29. The defined boundary allows for comprehensive development of the site, with natural boundaries formed by existing development to the east and west, and by St Ives Road to the south. The alignment of the northern site boundary would reflect the line of the built form to the east and is therefore appropriate.

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

- 5.30. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA, the Huntingdonshire Local Plan Viability Study and the Strategic Flood Risk Assessment.

- 5.31. 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, Page 513) and Statement of Representations (CORE/04, Page 116 - 121).
- 5.32. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG. The site is considered to be deliverable as defined through paragraph 47 of the NPPF.

## SM2- Newlands St Ives Road

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

- 5.33. The land is currently used for arable farmland.
- 5.34. This piece of land was put forward during production of the Core Strategy 2009 and originally assessed in Stage 2 of the Local Plan to 2036 in the Environmental Capacity Study: Somersham document consulted upon between August 2012 and November 2012 (HOUS/02: Availability, page 603). The site has also been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 601-604 for full assessment).
- 5.35. The site is situated between residential properties and an industrial estate in reasonable proximity to services and facilities; therefore the site is in a sustainable location for a mix of low density residential development and care home facilities providing job opportunities. This would be across net developable area of 75% of the site resulting in an estimated capacity of approximately 0.8ha for a care home or other specialist elderly persons housing and 45 dwellings (HOUS/02: Suitability, page 603).

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

- 5.36. The proposed site has been allocated for a mixed use development comprising of approximately 45 dwellings and 0.8ha for supported housing (a care home with approximately 60 beds).
- 5.37. Under 15/00917/OUT, 18 units will be allocated for affordable housing.

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

- 5.38. The Council's assessment of the site determined that a capacity of approximately 45 residential units and a 60 bed care home are suitable and take into account existing footways, access and appropriate density in keeping with the neighbouring area.

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

- 5.39. An Outline planning application (planning reference 15/00917/OUT) for 45 dwellings and a care home for between 40 and 50 residents was approved in November 2017 and is currently awaiting the subsequent Reserved Matters application to be submitted.

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

- 5.40. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.
- 5.41. The site will deliver a bed care home to meet the needs of the older local population. Additional employment opportunities will become available through the operation of the care home.

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

- 5.42. Representation submitted, by Kyle Christie (ID: 1151306) raised Concerns over the supporting Waste Water Treatment Works which is documented as having no headroom to support such development – Note that the Environment Agency have concerns over the feasibility of such upgrades and concerns over proposed interim solutions.
- 5.43. Representation submitted by Mr Colum Fitzsimons (ID: 1150302) states that: There is surface water flood risk areas across this site. This is recognised in the supporting text but there is no policy requirement relating to flooding. There should be a requirement for a flood risk assessment. Further development on the site should be required to reduce surface water runoff and improve water management on site to address the flood risk issue to St Ives Road.
- 5.44. Representation submitted by the Environment Agency (ID: 1146949) argues that: There is surface water flood risk areas across this site. This is recognised in the supporting text but there is no policy requirement relating to flooding. There should be a requirement for a flood risk assessment. Further development on the site should be required to reduce surface water runoff and improve water management on site to address the flood risk issue to St Ives Road

- 5.45. Representation submitted by the Historic England (ID: 56252) states that they welcome the reference to conservation area and its setting in the policy
- 5.46. The HELAA and more recently planning application reference 15/00917/OUT confirmed that the site is in Flood Zone 1. Conditions 6 and 7 of said permission requires details of a surface water and foul water drainage schemes
- 5.47. Mitigation measures are achievable, as demonstrated through the approval of application ref: 15/00917/OUT. No objections were raised by CCC Archaeology, CCC Highways, Environment Agency, although conditions were suggested and applied

**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?**

- 5.48. 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?**

- 5.49. The site constraints and infrastructure requirements have been considered for the site and appropriate mitigation measures have been agreed as part of the planning application.

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

- 5.50. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 5.51. 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. FLO/11 identifies the site as served by the Somersham Wastewater Treatment Works. FLO/11 acknowledged Somersham as having insufficient capacity for the growth outlined in the Plan period.
- 5.52. 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 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).
- 5.53. In the case of Somersham, it is acknowledged that capacity is limited. As future developments come forward, there will be an increasing need for agreement with Anglian Water and the Environment Agency if further capacity can be provided or if interim solutions can be implemented while longer term solutions are designed and implemented.
- 5.54. 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.
- 5.55. 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?**

- 5.56. A signed S106 delivering policy levels of affordable housing is in place.

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

- 5.57. The agent has confirmed in response to the Council’s Annual Monitoring Report 2017 (MON/01, page 71) that the first 20 homes are expected to be completed in the year



2020/2021, with all homes to be completed within years 1-5, the timescale for delivery is set out below:

No. units in years 1-5	20/21 Yr. 4	21/22 Yr. 5	Total 17/36
45	20	25	45

5.58. This is deemed to be realistic as Outline approval for 45 dwellings has been granted for the site.

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

5.59. The boundary of the site is appropriate as it represents the land submitted as available for development and through the planning application. No representations were received to the proposed submission local plan consultation suggesting that the boundary should be amended.

5.60. 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?**

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

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

5.63. Responses to the questions above demonstrate that the site is suitable, available and achievable as defined in the NPPG2. The site is deliverable as defined through paragraph 47 of the NPPF, planning permission was approved in April 2016 and reserved matters approved March 2017 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.

## SM3- The Pasture

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

- 5.64. The site is currently greenfield open space.
- 5.65. This piece of land was put forward during the production of the Core Strategy 2009 and was consulted on at Stage 2 and Stage 3 and originally assessed for the Local Plan to 2036 in the Environmental Capacity Study: Somersham document consulted upon between August 2012 and November 2012 when it was known as 'Rectory Lane' (HOUS/02: Availability, page 607). The site has also been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 605-607 for full assessment).

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

- 5.66. The proposed use is for approximately 15 dwellings.
- 5.67. Due to the sensitive nature of the surroundings of the Rectory Lane section of this site and the constrained access via the lane, only the western section of the site off The Pasture is considered suitable for development. The section of this site at The Pasture is considered suitable for residential development for approximately 15 dwellings based on a low density development on a developable area of 60% (HOUS/02: Suitability, page 607).

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

- 5.68. The site is situated at the edge of Somersham, with existing residential development to the north, south and east. The site has good accessibility to a number of key services including a food shop, primary school and doctor's surgery (HOUS/02, page 607). It is therefore considered that residential development of the site is an appropriate use; forming an extension to Somersham Key Service Centre.
- 5.69. The HELAA assessed a larger site, with land to the north-east of the site also included (HOUS/02, page 605). However, through assessment within the HELAA, it was identified that due to the sensitive nature of the surroundings of the Rectory Lane section of the site and the constrained access via Rectory Lane, only the western section of the site (off The Pasture) is suitable for development. The site boundary identified within the Local Plan is considered suitable for residential development for approximately 15 dwellings based on a low density development on a developable area of 60% (CORE/01, page 256 and HOUS/02, page 607).

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

5.70. No planning application has yet been submitted.

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

5.71. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

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

5.72. The HELAA identifies potential adverse impacts with regards to the proximity of the site to designated heritage assets, landscape impact due to countryside extending to the west of the site and pressure upon the water supply network and the foul sewage network. It is specifically noted that Somersham WWTW currently has no consented headroom.

5.73. Mitigation measures are identified in the HELAA and within SM 3 in the Local Plan and include the requirement for retention of hedging along the western site boundary, the provision of high quality sensitive development given the proximity to heritage assets, provision of an appropriate point of access. It is also noted that discussions with Anglian Water and the Environment Agency would be required to obtain confirmation that waste water flows could be accommodated and that the Water Framework Directive would not be comprised (CORE/01, criteria a-d, page 256 and HOUS/02, page 607).

5.74. Representations at proposed submission consultation stage from Kyle Christie (ID: 1151306) raised objection due to the lack of headroom at Somersham WWTW. This matter would be addressed through the mitigation measures identified in the HELAA and within SM 1 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 6 Waste Water Management.

5.75. Representations from Historic England (ID: 56252) at proposed submission stage raise objection, noting that the policy should refer to the setting of Somersham Conservation Area and Grade II Listed Somersham House. Whilst this point is noted, all policies, including policy LP36 (Heritage Assets and their Settings) are considered in the planning balance and therefore

the protection sought by Historic England already exists within the Plan currently being examined.

**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?**

5.76. 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?**

5.77. Through assessment within the HELAA, (HOUS/02) it was identified that due to the sensitive nature of the surroundings of the Rectory Lane section of the site and the constrained access via Rectory Lane, only the western section of the site (off The Pasture) is suitable for development. The site boundary identified within the Local Plan is considered suitable for residential development for approximately 15 dwellings based on a low density development on a developable area of 60% (CORE/01, page 256 and HOUS/02, page 607).

5.78. Mitigation measures are identified in the HELAA and within SM 3 in the Local Plan (criterion b) and include the requirement for retention of hedging along the western site boundary, the provision of high quality sensitive development given the proximity to heritage assets, provision of an appropriate point of access.

5.79. There is an identified lack of capacity at the Somersham Waste Water Works which will serve this site. Appropriate mitigation will be required in the form of short term capacity improvements or longer term improvements (Q9 refers).

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

5.80. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 5.81. 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 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).
- 5.82. The 2014 URS Detailed Water Cycle Study FLO/11 for Huntingdonshire acknowledged that there might be capacity issues for wastewater treatment at Huntingdon, Oldhurst, Ramsey, Somersham and St. Neots, if engineering solutions to increase capacity are not undertaken...future development proposals connecting to the sewer network will only be supported based on certain criteria and highlighting the fact that process upgrades and increased discharge consents are likely to be required at these five WWTWs”.
- 5.83. In the case of Somersham, it is acknowledged that capacity is limited. As future developments come forward, there will be an increasing need for agreement with Anglian Water and the Environment Agency if further capacity can be provided or if interim solutions can be implemented while longer term solutions are designed and implemented.
- 5.84. 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.
- 5.85. 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?**

- 5.86. 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 (INF04, para 3.6). 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).

- 5.87. 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).
- 5.88. 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.
- 5.89. The viability work within INF/04 indicates that the typologies that this site falls into will generally show reasonable viability i.e. 25-30% being attainable.

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

- 5.90. In response to the Council's Annual Monitoring Report 2017, the agent has confirmed that the 15 homes are expected to be completed in the year 2021/2022.
- 5.91. The agent considers the site could accommodate 20 dwellings; however, the capacity has been kept at 15 to reflect the draft Local Plan allocation and has been deferred as no planning application has yet been submitted (MON/01, page 90).
- 5.92. This is deemed to be realistic due to the small nature of the development.

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

- 5.93. The boundary within the Local Plan (CORE/01, page 256) was been reduced from that identified within the HELAA (HOUS/02, page 605), due to the likely detrimental impact upon heritage assets that would have resulted from development of additional land to the east and due to the constrained nature of the access via Rectory.
- 5.94. No representations were received in relation to the Local Plan consultation suggesting that the boundary should be amended.
- 5.95. The defined boundary allows for comprehensive development of the site whilst responding to the constraints of the site.

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

- 5.96. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA, the Huntingdonshire Local Plan Viability Study and the Strategic Flood Risk Assessment.
- 5.97. 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, Highways England, or Historic England. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 82, 114, 228, 340, 406 and 464) and Statement of Representations (CORE/04, Page 116 - 121).
- 5.98. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG.

## **SM4- Somersham Town Football Ground**

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

- 5.99. The site is currently used for recreational use by Somersham Town Football Club.
- 5.100. This piece of land was originally assessed during the Stage 3 consultation for the Local Plan in the Environmental Capacity Study: Somersham Spatial Planning Area document consulted upon between August 2012 and November 2012. The site has also been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 590-592 for full assessment).

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

- 5.101. The site was considered suitable for low density residential development across a net developable area of 75% of the site resulting in an estimated capacity of 47 dwellings as it is adjacent to existing residential properties with good access to services and facilities, however, this relies on the relocation of the current football ground (HOUS/02: Suitability, page 592).
- 5.102. The proposed use is for approximately 45 dwellings.

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

- 5.103. Ensuring the site is developed on 75% of the site allows for the development to protect the setting of the scheduled monument and be designed in a way that is sensitive to the conservation area and adjoining land.

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

- 5.104. No planning application has been submitted.

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

- 5.105. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

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

- 5.106. Representations at proposed submission consultation stage from Kyle Christie (ID: 1151306) raised objection due to the lack of headroom at Somersham WWTW. This matter would be addressed through the mitigation measures identified in the HELAA and within SM 1 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 6 Waste Water Management. The Environment Agency have concerns over the feasibility of such upgrades and concerns over proposed interim solutions. This is addressed in question 9.
- 5.107. Representation submitted by the Historic England (ID: 56252) states that the site located adjacent to an extensive scheduled monument: the medieval earthwork and buried archaeological remains of the Bishop of Ely's Palace the site also falls within the Somersham Conservation Area. All planning applications will have to consider their relationship with conservation areas and heritage assets as set out in policy LP36. Sensitive design is also required through criterion e of the policy.
- 5.108. Representation from Mrs Michelle Wormald (ID: 148305) notes that the addition of 45 more houses will put huge pressure on the existing traffic network. Mitigation measures are



identified within SM4 is addressed through criterion d in the Local Plan and include improved access to the B1086. A Transport Assessment would also need to be submitted with any application and if necessary mitigation could be sought through conditions/s106.

- 5.109. The Council's assessment of the site determined that a capacity of approximately 45 residential. The HELAA confirmed that the site is in Flood Zone 1. Notwithstanding a flood risk assessment would be needed. Conditions could be used to require full details of a surface water foul water drainage schemes

**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?**

- 5.110. 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?**

- 5.111. HOUS/02 sets out the site constraints. The key constraint is the requirement to relocate the football ground facility. Additionally, the setting of a scheduled ancient monument building must be considered alongside the conservation area requiring sensitive design of a development. A transport assessment will be required to determine safe access to the site and mitigate extra traffic generated.
- 5.112. The site is close to local amenities and no significant infrastructure requirements have been identified. Appropriate infrastructure will be determined through consideration of a planning application and use of a S106 agreement.

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

- 5.113. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 5.114. 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 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).
- 5.115. The 2014 URS Detailed Water Cycle Study FLO/11 for Huntingdonshire acknowledged that there might be capacity issues for wastewater treatment at Huntingdon, Oldhurst, Ramsey, Somersham and St. Neots, if engineering solutions to increase capacity are not undertaken Future development proposals connecting to the sewer network will only be supported based on certain criteria and highlighting the fact that process upgrades and increased discharge consents are likely to be required at these five WWTWs”.
- 5.116. In the case of Somersham, it is acknowledged that capacity is limited. As future developments come forward, there will be an increasing need for agreement with Anglian Water and the Environment Agency if further capacity can be provided or if interim solutions can be implemented while longer term solutions are designed and implemented.
- 5.117. 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.
- 5.118. 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?**

- 5.119. 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 (INF04, para 3.6). 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).

5.120. 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).

5.121. 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. For this site, the cost of relocation of the football ground will represent a significant cost, reducing the level of viability.

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

5.122. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the site’s agent confirmed the site’s availability for re-development with the first 25 homes expected to be completed in the year 2021/2022, the timescale for delivery is set out below:

No. units in years 1-5	21/22 Yr. 5	22/23	Total 17/36
25	25	20	45

5.123. The site’s agent has stated that there are no constraints on delivery and the site can be delivered within five years, however, a cautious approach has been taken and only 25 dwellings are expected to be completed in the first 5 years as no planning application has yet been submitted (MON/01, page 90).

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

5.124. The boundary of the site is appropriate as it represents the land submitted as available for development. Notwithstanding agree with Historic England that if the current extent of the football pitch is to be used as marker for the limit of development then a clear map showing the outline of the pitch itself should be included in the plan to ensure that the policy can be realistically implemented.

5.125.No other representations were received to the proposed submission local plan consultation suggesting that the boundary should be amended.

5.126.The site as it stands is suitable, available and achievable.

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

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

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

5.129.Responses to the questions above demonstrate that the site is suitable, available and achievable as defined in the NPPG2. The site is developable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that the site is available now and can be completed within the plan period.

## **SM5- East of Robert Avenue**

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

5.130.The site is currently greenfield land.

5.131. This site was submitted in response to the Call for Sites in August 2017 (HOUS/02: Availability, page 596) and has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 593-596 for full assessment).

5.132.As the site is close to open space, sports and social facilities, a doctor's surgery, a food shop and primary school and residential development abuts a section of the western site boundary. There is a Country Wildlife Site to the east of the site; however it is well screened by existing trees and hedges. 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 74 dwellings (HOUS/02: Suitability, page 596).

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

5.133.The proposed use is for approximately 50 dwellings.

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

- 5.134. The Council's assessment of the site determined that a capacity for approximately 74 dwellings (HOUS/02 – page 596) is suitable recognising that while the site extends into open countryside it is well screened by existing trees and hedging on the eastern and southern boundaries, and it has good access to the services and facilities of Somersham.
- 5.135. Initial assessment through the HELAA identifies that the site is considered suitable for low density residential development across a net developable area of 75% of the site. This results in an estimated capacity of 74 dwellings (HOUS/02 – pages 593 - 596).
- 5.136. Representations on behalf of the landowner (by Anna Leadbetter (ID: 1105085), William Gosney Ltd) advise that the land is available for development being within the control of a single owner and is being actively marketed to development partners at the present time, with discussions underway.

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

- 5.137. No planning application has been submitted.

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

- 5.138. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

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

- 5.139. The HELAA identifies potential adverse impacts with regards to transport impacts, proximity to a County Wildlife Site and Local Nature Reserve, impact upon trees and hedges, impact upon ecology, the potential for noise and light pollution, impact upon archaeological assets, landscape impact due to countryside extending to the north of the site and pressure upon the water supply network and the foul sewage network. It is specifically noted that Somersham WWTW currently has no consented headroom.

- 5.140. Mitigation measures are identified in the HELAA and within SM 5 in the Local Plan and include the requirement for retention of the existing trees and hedges within the site along the southern and eastern boundaries, as well as new planting along the northern boundary. Further mitigation measures identified include the requirement for an ecological assessment and enhancements scheme and an assessment of contamination and remediation if necessary. It is also noted that discussions with Anglian Water and the Environment Agency would be required to obtain confirmation that waste water flows could be accommodated and that the Water Framework Directive would not be comprised (CORE/01, criteria a-f, page 259 and HOUS/02, page 593-596).
- 5.141. Representations from Colum Fitzsimons (ID: 1150302) , Cambridgeshire County Council raise objection due to the omission of reference to the proximity the adjacent Local Nature Reserve (LNR) and a County Wildlife Site (CWS). Whilst it is acknowledged that the LNR is not specifically referenced within SM 5, it is noted that SM 5 makes specific reference to the requirement for an ecological assessment and enhancement scheme for the site that also addresses the county wildlife site. Notwithstanding this, it is considered that this matter would be addressed through the mitigation measures identified in the HELAA and within SM 5 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 32 of the Plan being examined.
- 5.142. Representations from Paul Grace (ID: 1147551) raise objection due to development of the site impinging upon the open countryside. Whilst it is acknowledged that the site currently forms part of the countryside, it is considered the mitigation measures identified within the HELAA and SM5 in the Local Plan would ensure that the visual impact upon the landscape would be minimised.
- 5.143. Representations at proposed submission consultation stage from Kyle Christie (ID: 1151306) and Yvonne Gauci (ID: 1151864) raised objection due to the lack of headroom at Somersham WWTW. This matter would be addressed through the mitigation measures identified in the HELAA and within SM 5 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 6 of the Plan being examined.
- 5.144. Representations from Andrea Thomas (ID: 1148434), Derek Millar (ID: 1148517), R D Riordan (ID: 1149848), Yvonne Gauci (ID: 1151864), Miranda Kenny (ID: 1151524) and Mrs Michelle Wormald (ID: 1148305) raise objection, noting that the associated run off of water cannot be efficiently absorbed as the area is vulnerable to flooding already and there is no capacity to deal with the waste water flows, with temporary flooding having previously been experienced along Robert Avenue. Whilst this point is noted, the mitigation measures identified within the HELAA and SM5 in the Local Plan would ensure these concerns are addressed. The concerns raised would already be addressed through the requirements of Policy LP5 and LP 6 within the Plan currently being examined.

- 5.145. Representations from Derek Millar (ID: 1148517) at proposed submission consultation stage raise objection due to contamination studies not having been undertaken; with the risk therefore being unknown. This matter would be addressed through the mitigation measures identified in the HELAA and within SM 5 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 39 of the Plan being examined.
- 5.146. Representations from Kyle Christie (ID: 1151306), Michelle Wormald (ID: 1148305), Paul Grace (ID: 1147551), Sarah Watson (ID: 1148526), Lesley Dench (ID: 1150705), Andrea Thomas (ID: 1148434), Miranda Kenny (ID: 1151524), Yvonne Gauci (ID: 1151864), Chris Whitfield (ID: 1150710) and Penny Bryant (ID: 34953), Somersham Parish Council at proposed submission consultation stage raise objection due to concerns regarding the requirement for additional community facilities, services and infrastructure including local road infrastructure, employment, education, doctors and public transport to be provided as part of any development proposals, as currently these resources are stretched within the community. These matters would be addressed as part of the planning process for any subsequent application for planning permission; including through the Community Infrastructure Levy.
- 5.147. Representations at proposed submission consultation stage from Kyle Christie (ID: 1151306), Andrea Thomas (ID: 1148434), Michelle Wormald (ID: 1148305), Lisa Crawford (ID: 1150517), Robin Riordan (ID: 1150020), Peter Scarisbrick (ID: 1150466), R D Riordan (ID: 1149848), Chris Whitfield (ID: 1150710), Paul Grace (ID: 1147551), Yvonne Gauci (ID: 1151864), Jodie Nixon (ID: 1148873), Kirsten Toye (ID: 1150287), Penny Bryant (ID: 34953) Somersham Parish Council and Philip Clark (ID: 1148642) Friends of Somersham Nature Reserve raise objection due to the potential impact on the local environment including to existing wildlife and plants, particularly given the proximity to a County Wildlife Site and Local Nature Reserve. Derek Millar (ID: 1148517) raises similar concerns given the lack of surveys undertaken in relation to protected species whilst Philip Clark (ID: 1148642) Friends of Somersham Nature Reserve notes that surveys in relation to protected species are required. Philip Clark (ID: 1148642) Friends of Somersham Nature Reserve also notes that the access route would result in the loss of part of the designated County Wildlife Site and Local Nature Reserve, whilst development would lead to increase pressure upon County Wildlife Site and Local Nature Reserve. These matters would be addressed through the mitigation measures identified in the HELAA and within SM 5 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 32 and LP 33 of the Plan being examined.
- 5.148. Representations from Robin Riordan (ID: 1150020), R D Riordan (ID: 1149848) and Kyle Christie (ID: 1151306) raise objection due to the potential impact upon trees, primarily as a result of creating a means of access. It is highlighted that the provisions of SM 5, namely the requirement for “retention of existing planting along the southern and eastern site boundaries” could not be met, as trees would need to be removed to form an access point. These matters would be addressed through the mitigation measures identified in the HELAA and within SM 5 in the Local Plan and as part of the planning process for any subsequent

application for planning permission; particularly in light of the provisions of Policy LP 33 of the Plan being examined.

5.149. With regards to access arrangements, representations from Jennifer Mansfield (ID: 1148672) and Derek Millar (ID: 1148517) also raise concerns with regards to the impact upon trees and plants, but also outline that access to the site would not be adequate. Representation from Robin Riordan (ID: 1150020), R D Riordan (ID: 1149848) and Chris Whitfield (ID: 1150710) raise objection as it is highlighted that the only point of access would be across land which is under separate ownership and therefore is not feasible. This matter would be addressed through the mitigation measures identified in the HELAA and within SM 5 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 17 and LP 33 of the Plan being examined.

5.150. Representations received from Anthony Reay (ID: 1151523), Dawn McConville (ID: 1151518), Richard Holland (ID: 1148280), Richard Riordan (ID: 1150020), Peter Scarisbrick (ID: 1150466), Lisa Crawford (ID: 1150517), Emma Roberts (ID: 1150456), Kirsten Toye (ID: 1150287), Andrea Thomas (ID: 1148434), Lesley Dench (ID: 1150705), Jennifer Mansfield (ID: 1148672), Derek Millar (ID: 1148517), Michelle Wormald (ID: 1148305), Andrea Thomas (ID: 1148434), Sarah Watson (ID: 1148526), Paul Grace (ID: 1147551), R D Riordan (ID: 1149848), Miranda Kenny (ID: 1151524) and Chris Whitfield (ID: 1150710) raise objection not only due to the access arrangements and the impact upon Robert Avenue, but also the wider local highway network within Somersham and the highway safety implications. Concerns are also expressed with regards to the safety of pedestrians and other highways users. These matters would be addressed through the mitigation measures identified in the HELAA and within SM 5 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 17 of the Plan being examined.

**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?**

5.151. 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?**

5.152. HOUS/02 sets out the constraints. A traffic impact assessment is needed to determine safe access and traffic mitigation measures needed. A contamination survey may be required. A suitable landscaping scheme is needed to minimise impact on the landscape.

5.153. No significant transport infrastructure has been identified or costed. Infrastructure will be identified through a planning application.



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

- 5.154. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 5.155. 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 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).
- 5.156. The 2014 URS Detailed Water Cycle Study FLO/11 for Huntingdonshire acknowledged that there might be capacity issues for wastewater treatment at Huntingdon, Oldhurst, Ramsey, Somersham and St. Neots, if engineering solutions to increase capacity are not undertaken. Future development proposals connecting to the sewer network will only be supported based on certain criteria and highlighting the fact that process upgrades and increased discharge consents are likely to be required at these five WWTWs".
- 5.157. In the case of Somersham, it is acknowledged that capacity is limited. As future developments come forward, there will be an increasing need for agreement with Anglian Water and the Environment Agency if further capacity can be provided or if interim solutions can be implemented while longer term solutions are designed and implemented.
- 5.158. 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.

5.159. 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?**

5.160. 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). 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).

5.161. 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).

5.162. 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.

5.163. The viability work within INF/04 indicates that the typologies that this site falls into will generally show reasonable viability i.e. 25-30% being attainable.

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

5.164. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the site’s owner/ agent have stated that the site can be delivered immediately as the site is available and can be realistically be developed within 5 years.

5.165. The first 20 homes are expected to be completed in the year 2021/2022, the timescale for delivery is set out below:

No. units in years 1-5	20/21 Yr. 4	21/22 Yr. 5	Total 17/36
50	20	30	50

5.166. However, the agent's projections have been deferred by 2 years and spread over 2 years rather than one as no planning application has yet been submitted (MON/01, pages 90-91).

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

5.167. The boundary within the Local Plan (CORE/01, page 259) has been reduced from that identified within the HELAA (HOUS/02, page 593), due to landscape impact on the open countryside to the north.

5.168. No representations were received in relation to the Local Plan consultation suggesting that the boundary should be amended.

5.169. The defined boundary allows for comprehensive development of the site whilst responding to the constraints of the site.

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

5.170. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA, the Huntingdonshire Local Plan Viability Study and the Strategic Flood Risk Assessment.

5.171. 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 473, 513 and 514) and Statement of Representations (CORE/04, Pages 7, 74, 108, 116 - 121).

5.172. Representations on behalf of the landowner (by Anna Leadbetter (ID: 1105085), William Gosney Ltd) advise that the land is available for development being within the control of a single owner and that it is being actively marketed to development partners at the present time and discussions are underway.

5.173. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG.

## SM6- North of the Bank

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

5.174. The site is an old agricultural/ horticultural holding that ceased to operate around 2000. Arable fields continue to the north in the same ownership.

5.175. This piece of land was put forward during production of the Core Strategy 2009 and originally assessed for the Local Plan to 2036 in the Environmental Capacity Study: Somersham Spatial Planning Area document consulted upon between August 2012 and November 2012 (HOUS/02: Availability, page 622). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 620-622 for full assessment).

5.176. As the site is situated adjacent to a local nature reserve but also has reasonable access to services and facilities, 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 120 dwellings (HOUS/02: Suitability, page 622).

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

5.177. The proposed use is for approximately 120 dwellings.

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

5.178. The Council's assessment of the site determined that a capacity for approximately 120 dwellings (HOUS/02 – page 622) is suitable recognising that while the site extends into open countryside, development of the site could respond to this constrain and the site has reasonable access to the services and facilities in Somersham.

5.179. Initial assessment through the HELAA identifies that the site is considered suitable for low density residential development across a net developable area of 75% of the site. This results in an estimated capacity of 120 dwellings (HOUS/02 – page 622).

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

5.180. No planning application has been submitted.

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

5.181. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

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

- 5.182. The HELAA identifies potential adverse impacts with regards to landscape impact due to the location of the site at the edge of Somersham, transport impacts, proximity to a County Wildlife Site and Local Nature Reserve and the potential for noise and light pollution and air quality impacts, impact upon ecology, impact upon archaeological assets and pressure upon the water supply network and the foul sewage network. It is specifically noted that Somersham WWTW currently has no consented headroom.
- 5.183. Mitigation measures are identified in the HELAA and within SM 6 in the Local Plan and include the requirement for ecological assessment and enhancements scheme, air quality and noise assessments, an assessment in relation to light pollution, a comprehensive package of community benefits including enhancements to the local rights of way network, access to the Local Nature Reserve to the north-west and cycleway improvements, retention of existing trees on the west and north boundaries and the potential requirement for further screening along the site boundaries and the setting back of development from the site boundaries. It is also noted that discussions with Anglian Water and the Environment Agency would be required to obtain confirmation that waste water flows could be accommodated and that the Water Framework Directive would not be comprised (CORE/01, criteria a-g, page 261 and HOUS/02, page 620-623).
- 5.184. Representations at proposed submission consultation stage from Debbie Mack (ID: 56252) Historic England raise objection, as whilst Historic England advise that they have no specific comment to make in relation to the site (and there are no known designated assets which would be affected), they outline that consideration should be given to how development of this site would integrate into the surrounding landscape. It is considered that this matter would be addressed through the mitigation measures identified in the HELAA and within SM 6 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 12 and LP 13 of the Plan being examined.
- 5.185. Representations at proposed submission consultation stage from Ian Johnson (ID: 1150487) raise objection due to the distance between the site and facilities and services within Somersham. It is also highlighted that fewer services and facilities are available within Somersham than referenced within the HELAA (HOUS/02). It is considered that this matter

would be addressed through the mitigation measures identified in the HELAA and within SM 6 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 17 of the Plan being examined.

- 5.186. Representations at proposed submission consultation stage from Kyle Christie (ID: 1151306) raise objection due to the lack of headroom at Somersham WWTW. This matter would be addressed through the mitigation measures identified in the HELAA and within SM 5 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 6 of the Plan being examined.
- 5.187. Representations at proposed submission consultation stage from Ian Johnson (ID: 1150487) and Kyle Christie (ID: 1151306) raise objection due to the potential impact on the local environment including to existing wildlife and plants, particularly given the proximity a Local Nature Reserve, County Wildlife Site, Community Orchard and Open Space where people walk dogs. Representations at proposed submission consultation stage from Peter Scarisbrick (ID: 1150466) also raise objection due to the cumulative impact upon the Nature Reserve, due to loss of habitat bordering the reserve and the impact upon the amenity of visitors to the reserve, which would result from development of this site and allocation SM 5. Representations from Gary Jones (ID: 1149444) raise objection due to impact upon biodiversity within the application site. These matters would be addressed through the mitigation measures identified in the HELAA and within SM 6 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 32 and LP 33 of the Plan being examined.
- 5.188. Representations at proposed submission consultation stage from Ian Johnson (ID: 1150487), Gary Jones (ID: 1149444) and Geoffrey Massey (ID: 1151074) raise objection due to the location of the access, highway safety concerns and with regards to the impact upon the local highways network as a result of increases in traffic volumes. Concerns are also expressed within representations from Gary Jones (ID: 1149444) with regards to the safety of pedestrians and other highways users. These matters would be addressed through the mitigation measures identified in the HELAA and within SM 6 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 17 of the Plan being examined.
- 5.189. With regards to access arrangements to the Local Nature Reserve, representations from Geoffrey Massey (ID: 1151074) raises objection due to concerns regarding the loss of woodland that would be required to facilitate access. This matter would be addressed as part of the planning process for any subsequent application for planning permission; particularly in light of the provisions of Policy LP 33 of the Plan being examined.

**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?**

5.190. 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?**

5.191. HOUS/02 identifies the site constraints which and include the requirement for ecological assessment and enhancements scheme, air quality and noise assessments, an assessment in relation to light pollution, a comprehensive package of community benefits including enhancements to the local rights of way network, access to the Local Nature Reserve to the north-west and cycleway improvements, retention of existing trees on the west and north boundaries and the potential requirement for further screening along the site boundaries and the setting back of development from the site boundaries. Two trees central within the site should be incorporated into the landscape design. A transport assessment will determine a safe access that will mitigate traffic generated.

5.192. No significant infrastructure has been identified or costed. Infrastructure required will be determined when a planning application is submitted.

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

5.193. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

5.194. 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 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).

5.195. The 2014 URS Detailed Water Cycle Study FLO/11 for Huntingdonshire acknowledged that there might be capacity issues for wastewater treatment at Huntingdon, Oldhurst, Ramsey, Somersham and St. Neots, if engineering solutions to increase capacity are not undertaken. Future development proposals connecting to the sewer network will only be supported based on certain criteria and highlighting the fact that process upgrades and increased discharge consents are likely to be required at these five WWTWs".

5.196. As future developments come forward, there will be an increasing need for agreement with Anglian Water and the Environment Agency if further capacity can be provided or if interim solutions can be implemented while longer term solutions are designed and implemented.

5.197. 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.

5.198. 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?**

5.199. 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 (INF04, para 3.6). 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).



5.200. 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 on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).

5.201. 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.

5.202. The viability work within INF/04 indicates that the typology that this site falls into will generally show strong viability i.e. 30-40% affordable housing being attainable.

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

5.203. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the site's owner says the development could realistically be delivered within 5 years with the first 60 homes 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	Total 17/36
120	60	60	0	120

5.204. However, their projections have been deferred by 1 year as they do appear optimistic given that no planning application has yet been submitted (MON/01, page 90).

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

5.205. No representations were received in relation to the Local Plan consultation suggesting that the boundary should be amended.

5.206. The defined boundary allows for comprehensive development of the site whilst responding to the constraints of the site.

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

5.207. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA, the Huntingdonshire Local Plan Viability Study and the Strategic Flood Risk Assessment.

5.208. 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, Highways England, or Historic England. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 82, 115, 229, 342, 407 and 464) and Statement of Representations (CORE/04, Pages 109, 116 - 121).

5.209. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG.

## 6. Warboys

### WB1- West of Ramsey Road

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

- 6.1. The site is split into two small fields, with the land covered in rough grass.
- 6.2. This piece of land was put forward during Stage 2 consultation and originally assessed for the Local Plan to 2036 in the Stage 3 Huntingdonshire Environmental Capacity Study: Key Service Centres document consulted upon between May 2013 and July 2013. The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 682-684 for full assessment).
- 6.3. This land is located in close proximity to the centre of Warboys and is close to a range of services, including public transport. There is open space and a play area nearby. The site is greenfield land but is well screened from the wider countryside by established trees and hedges. There are unlikely to be significant impacts on nature or conservation from development. 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: page 684).

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

- 6.4. The proposed use is for approximately 45 dwellings.

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

- 6.5. The site adjoins existing residential development and forms two fields with a larger agricultural field to the west, to the south is a single storey Mobile Home Park. The site area for the allocation reflects these surrounding land uses and the edge of settlement location requires a low density of development and an adequate landscape buffer. As such it is considered that approximately 45 dwellings is justified in terms of use and scale.
- 6.6. Representations from the Parish Council (ID: 711718) support the allocation.

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

- 6.7. No planning application has been submitted.

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

- 6.8. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.
- 6.9. Enhancements to the planting on the northern and western boundaries would be required as part of a landscaping scheme, this would provide a better buffer from the settlement to the surrounding countryside.

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

- 6.10. The HELAA identifies potential adverse impacts with regards to landscape and trees, setting of adjacent heritage assets (Conservation Area and listed buildings), provision of suitable site access including pedestrian links, the potential for protected species, and surface water flooding. It is specifically noted that Oldhurst WWTW currently has no consented headroom.
- 6.11. Mitigation measures are identified in the HELAA and within WB 1 in the Local Plan and include the requirement for retention and enhancement of trees along parts of the site boundaries, a high quality development that is complimentary to the adjacent Conservation Area, provision of a footway link to Ramsey Road if access is taken from Longlands Close. It is also noted that discussions with Anglian Water and the Environment Agency would be required to obtain confirmation that waste water flows could be accommodated and that the Water Framework Directive would not be comprised (CORE/01, criteria a-g, page 264 and HOUS/02, page 684).
- 6.12. It is considered that the impacts upon the setting of heritage assets can be addressed through appropriate design and landscaping. Representations from Historic England (ID: 56252) welcomes the requirement to have consideration to the adjacent Conservation Area but considers the wording could be "tightened" and the policy should refer to the listed buildings and the need to have regard to their settings, along with long views over the open landscape into the Conservation Area. It is considered that when all policies, including policy LP36 (Heritage Assets and their Settings) are considered in the planning balance, the protection sought by Historic England already exists within the Plan currently being examined.
- 6.13. Access could be taken from Longlands Close and/or directly from Ramsey Road. Policy WB 1 sets out that if vehicular access is only to be provided from Longlands Close then additional pedestrian access should be provided directly to Ramsey Road. In representations from J L

Daniels Discretionary Trust (ID: 1118260) concerns are raised over the suitability of this link alongside the retention of the property, it is however detailed that a suitable vehicular access can be provided directly onto Ramsey Road following demolition of No. 21 (which would be viable for a vehicular access but not pedestrian link) and therefore this will not be necessary. Representations from Gould Construction (ID: 34531) confirm that they constructed Longlands to form suitable access to the site and that this is available, along with adequate drainage.

- 6.14. There is a sewer pipe which crosses the site, to mitigate this the detailed layout will need to consider the pipe location and protected easement, or consider the possibility of diversion.

**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?**

- 6.15. 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?**

- 6.16. HOUS/02 lists the site constraints. The main requirements are around landscape design, given there are nearby listed buildings. The site access is already formed and well screened and if a pedestrian link is added, there is improved access to the main village amenities
- 6.17. There are no significant infrastructure costs anticipated. Although no infrastructure has been assessed or costed for this specific site, the IDP (INF/01) identifies the District wide needs for infrastructure to support growth.

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

- 6.18. 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

substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 6.19. 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 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).
- 6.20. The 2014 URS Detailed Water Cycle Study FLO/11 for Huntingdonshire acknowledged that there might be capacity issues for wastewater treatment at Huntingdon, Oldhurst, Ramsey, Somersham and St. Neots, if engineering solutions to increase capacity are not undertaken. Future development proposals connecting to the sewer network will only be supported based on certain criteria and highlighting the fact that process upgrades and increased discharge consents are likely to be required at these five WWTWs”.
- 6.21. This site is served by Oldhurst. There will need to be agreement with Anglian Water and the Environment Agency if further capacity can be provided or if interim solutions can be implemented while longer term solutions are designed and implemented.
- 6.22. 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.
- 6.23. 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?**

- 6.24. 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 (INF04, para 3.6). 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).

- 6.25. 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).
- 6.26. 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.
- 6.27. The viability work within INF/04 indicates that the typology that this site falls into will generally show limited viability.

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

- 6.28. The site is in dual ownership; the agent for one part of the site confirmed its availability in response to the Council’s Annual Monitoring Report 2017 (MON/01). Both agents have stated slightly different timeframes for delivery. In light of this, and that no planning application has yet been received, the projections have been deferred by 2 years as they do appear optimistic, although it is understood that appraisal work is being carried out on part of the site (MON/01, page 91).
- 6.29. The first 10 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	Total 17/36
45	10	20	15	45

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

- 6.30. The boundary of the site is appropriate as it represents the land submitted as available for development. No representations were received to the Local Plan proposed submission suggesting the boundary should be amended.
- 6.31. The defined boundary allows for comprehensive redevelopment of the site with access links and natural boundaries to the countryside to the north and west, and the Mobile Home Park the south.

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

- 6.32. 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.
- 6.33. 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 35, 59, 83, 115, 230, 343, 408, and 465) and Statement of Representations (CORE/04, Pages 121, 122 and 157).
- 6.34. 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 the site is in dual ownership and site appraisal work is being undertaken in advance of submitting a planning application. It is considered that this scale of development can be completed within a five year time period.

## **WB2- Manor Farm Buildings**

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

- 6.35. The land is currently used for agricultural sheds.
- 6.36. This piece of land was put forward during production of the Core Strategy 2009 and assessed in the 2010 SHLAA. It was then further assessed in the Local Plan to 2036 in the Environmental Capacity Study: Additional document consulted upon in November 2013 (HOUS/02: Availability, page 635). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 633-636 for full assessment).
- 6.37. The site is situated between residential properties and a playground with open space with good access to services and facilities. The site is considered suitable for low density residential development across a net developable area of 50% of the site to allow adequate screening and to minimise the impact on the adjacent listed buildings and offers a good opportunity to improve the current situation of removing the agricultural sheds. This results in an estimated capacity of 11 dwellings (HOUS/02: Suitability, page 635).



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

6.38. The proposed use is for approximately 10 dwellings.

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

6.39. The site is located on the edge of the settlement and near to designated heritage assets which include Grade I, II and II\* listed buildings and adjacent the Conservation Area (except for the site access which within the Conservation Area), there are also trees on the site and access to the site has restricted visibility. There are residential properties in the vicinity.

6.40. It is considered that a high quality, low density residential development is an appropriate form of development in this location and approximately 10 dwellings could be achieved.

6.41. Representations from Warboys Parish Council support the allocation.

6.42. The policy is considered justified in terms of its residential nature and scale.

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

6.43. No planning application has been submitted.

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

6.44. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

6.45. The replacement of the large agricultural buildings with a high quality, sensitively designed development is an opportunity to enhance the environment and the settings of the nearby heritage assets. It could also be an improvement to residential amenity for adjacent properties.

6.46. Planting on the western boundaries would be required as part of a landscaping scheme, this would provide a better buffer from the settlement to the surrounding countryside.

- 6.47. The development would contribute to the Council's housing land supply and provide residential accommodation in an area which had good access to local services and facilities.
- 6.48. Enhancement and provision of additional landscaping on the site would also have benefits for the environment and biodiversity.

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

- 6.49. The HELAA identifies potential adverse impacts with regards to issues with heritage assets, (Conservation Area and listed buildings), landscape, surface water drainage, the potential for protected species, and provision of suitable site access including pedestrian links. It is specifically noted that Oldhurst WWTW currently has no consented headroom.
- 6.50. Mitigation measures are identified in the HELAA and within WB 2 in the Local Plan and include the requirement for retention and enhancement of trees along the site boundaries and ideally those inside the site, and a high quality development that is complimentary to the setting of the Conservation Area and listed buildings. It is also noted that discussions with Anglian Water and the Environment Agency would be required to obtain confirmation that waste water flows could be accommodated and that the Water Framework Directive would not be comprised (CORE/01, page 266 and HOUS/02, page 635).
- 6.51. It is considered that the impacts upon the setting of heritage assets can be addressed through appropriate design and landscaping. Representations from Historic England (ID: 56252) raise concerns with the allocation as they have requested a specific proportionate Heritage Impact Assessment be produced in advance of the allocation to understand the potential impact of new development on heritage assets and inform whether the allocation is acceptable in principle, what the capacity of the site is, and any potential mitigation measures required. Criterion b and e of Policy WB 2 acknowledged these heritage assets and para. 13.99 sets out the requirement for a Heritage Statement (CORE/01, page 266). The allocation allows for approximately 10 dwellings which represents low density development of around 50% of the site; it is considered that the allocation detail, and when all policies, including policy LP36 (Heritage Assets and their Settings) are considered in the planning balance, the protection sought by Historic England already exists within the Plan currently being examined.
- 6.52. Access to the site is acknowledged within the Development Guidance for Policy WB1 (CORE/01, para. 13.100, page 266) as being very constrained given the need for adequate visibility and the retention of the boundary wall and mature trees on the southern boundary to protect the setting of the adjacent listed buildings. It is advised that proposals for an access should be accompanied by a speed survey to demonstrate the necessary visibility required for traffic speeds in this area.

6.53. The adjacent Recreational Ground means that appropriate separation distances and screening will be required to minimise the impacts of the development. This potential impact can be mitigated through careful design and landscaping.

**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?**

6.54. 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?**

6.55. Constraints are highlighted in HOUS/02. Design and landscaping will need to mitigate the effect of development on nearby listed buildings and conservation area. A transport assessment will be needed to devise a safe access and mitigate traffic generation

6.56. There are no significant infrastructure costs anticipated. Although no infrastructure has been assessed or costed for this specific site, the IDP (INF/01) identifies the District wide needs for infrastructure to support growth.

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

6.57. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

6.58. 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

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).

- 6.59. The 2014 URS Detailed Water Cycle Study FLO/11 for Huntingdonshire acknowledged that there might be capacity issues for wastewater treatment at Huntingdon, Oldhurst, Ramsey, Somersham and St. Neots, if engineering solutions to increase capacity are not undertaken. Future development proposals connecting to the sewer network will only be supported based on certain criteria and highlighting the fact that process upgrades and increased discharge consents are likely to be required at these five WWTWs".
- 6.60. This site is served by Oldhurst. There will need to be agreement with Anglian Water and the Environment Agency if further capacity can be provided or if interim solutions can be implemented while longer term solutions are designed and implemented.
- 6.61. 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.
- 6.62. 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?**

- 6.63. 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 (INF04, para 3.6). 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).
- 6.64. 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).

- 6.65. 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.
- 6.66. The viability work within INF/04 indicates that the typology that this site falls into will generally show limited viability.

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

- 6.67. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the site’s agent confirmed that it is likely to become available for re-development within 5 years once the existing farmyard is suitably relocated; the agent confirms that the owner is actively doing so. Lead-in time could be reduced if a temporary location is found (MON/01, page 91).
- 6.68. The first 5 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
10	5	5	<b>10</b>

- 6.69. This is deemed to be realistic as the proposed development is of a small nature, in addition to the relocation of the farmyard being currently actively sort.

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

- 6.70. The boundary of the site is appropriate as it represents the land submitted as available for development. No representations were received to the Local Plan proposed submission suggesting the boundary should be amended.
- 6.71. The defined boundary allows for comprehensive redevelopment of the site with access links, and natural boundaries with the countryside to the west, recreational ground to the north and the access track.

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

- 6.32. 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.
- 6.33. 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, Highways England, and Historic England. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 35, 59, 83, 115, 231, 345, 408, 465 and 466) and Statement of Representations (CORE/04, Pages 121, 122 and 157).
- 6.34. The site is deliverable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that the site owner is actively seeking to relocate the current farmyard to allow redevelopment. It is considered that the relocation of the farmyard and this scale of development can be completed within a five year time period.

## **WB3- South of Stirling Close**

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

- 6.72. The site is part of a very large arable field adjacent to the southern edge of Warboys.
- 6.73. This site was submitted in response to the Call for Sites in August 2017 (HOUS/02: Availability, page 681) and has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 678-681 for full assessment).
- 6.74. The site is considered suitable for residential development across 35% of the site, this takes into account the careful consideration needed in regards to landscaping the southern boundary to avoid any intrusion on the countryside. The site does have very good access to services and facilities (HOUS/02: Suitability, page 681).

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

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

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

- 6.76. The site is situated at the edge of Warboys, with existing residential development to the north. The site has good accessibility to a number of services including a food shop, primary

school, open space, social facilities and doctor's surgery (HOUS/02, page 680). It is therefore considered that residential development of the site is an appropriate use; forming an extension to Warboys Key Service Centre.

- 6.77. The HELAA assessed a larger site, with land to the south of the site also included (HOUS/02, page 678). However, through assessment within the HELAA, it was identified that development of the entire site would form a visual intrusion into areas of open countryside and when considered as a whole, the site does not relate well to the existing built form. Therefore, only the north-western part of the site was identified as suitable for development. The site boundary identified within the Local Plan is considered suitable for residential development for approximately 50 dwellings based on a low density development on a developable area of 35% of the site identified within the HELAA (CORE/01, page 268 and HOUS/02, page 681).

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

- 6.78. No planning application has been submitted.

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

- 6.79. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

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

- 6.80. The HELAA identifies potential adverse impacts with regards to the proximity of the site to designated heritage assets, landscape impact due to countryside extending to the east and south of the site and pressure upon the water supply network and the foul sewage network. It is specifically noted that Oldhurst WWTW currently has no consented headroom.
- 6.81. Mitigation measures are identified in the HELAA and within WB 3 in the Local Plan and include the requirement for retention of trees along the northern and western boundaries, an ecological assessment and enhancement scheme, provision of landscaping on the southern and eastern boundaries, provision of open space in the north of the site, a design that

preserves and enhances the character and appearance of the Conservation Area and takes account of any key views towards Mary Magdalene Church.

- 6.82. It is also noted that discussions with Anglian Water and the Environment Agency would be required to obtain confirmation that waste water flows could be accommodated and that the Water Framework Directive would not be comprised. Agreement with the Middle Level Commissioners with regards to flood risk matters would also be required (CORE/01, criteria a-j, page 268 and HOUS/02, page 680-681).
- 6.83. Representations at proposed submission consultation stage from Debbie Mack (ID: 56252) , Historic England object as whilst reference to the conservation area and views of the church in bullet point d. and e. of WB 3 is welcomed, Historic England consider that reference should also made to the setting of the conservation area. When all policies, including policy LP36 (Heritage Assets and their Settings) are considered in the planning balance, the protection sought by HE already exists within the Plan currently being examined.
- 6.84. 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.
- 6.85. Representations from Roy Reeves (ID: 711718) , Warboys Parish Council raise objection due to development of the site impinging upon the open countryside and due to the landscape impacts of the proposal. Whilst it is acknowledged that the site currently forms part of the countryside, it is considered the mitigation measures identified within the HELAA and WB 3 in the Local Plan would ensure that the visual impact upon the landscape would be minimised.
- 6.86. Representations from Roy Reeves (ID: 711718) , Warboys Parish Council at proposed submission consultation stage raised objection due to concerns regarding the lack of infrastructure to support development of the scale proposed. This matter would be addressed as part of the planning process for any subsequent application for planning permission; including through the Community Infrastructure Levy.

**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?**

- 6.87. The site is in Flood zone 1 (FLO/01, page 11). 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?**

- 6.88. HOUS/02 identifies potential adverse impacts with regards to the proximity of the site to designated heritage assets and landscape impact due to countryside extending to the east and south of the site.
- 6.89. Mitigation measures are identified in HOUS/02 and within WB 3 in the Local Plan and include the requirement for retention of trees along the northern and western boundaries, an ecological assessment and enhancement scheme, provision of landscaping on the southern and eastern boundaries, provision of open space in the north of the site. A design should preserve and enhance the character and appearance of the Conservation Area and takes account of any key views towards Mary Magdalene Church.
- 6.90. There are no significant infrastructure costs anticipated. Although no infrastructure has been assessed or costed for this specific site, the IDP (INF/01) identifies the District wide needs for infrastructure to support growth.

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

- 6.91. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 6.92. 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 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).

- 6.93. The 2014 URS Detailed Water Cycle Study FLO/11 for Huntingdonshire acknowledged that there might be capacity issues for wastewater treatment at Huntingdon, Oldhurst, Ramsey, Somersham and St. Neots, if engineering solutions to increase capacity are not undertaken. Future development proposals connecting to the sewer network will only be supported based on certain criteria and highlighting the fact that process upgrades and increased discharge consents are likely to be required at these five WWTWs".
- 6.94. This site is served by Oldhurst. There will need to be agreement with Anglian Water and the Environment Agency if further capacity can be provided or if interim solutions can be implemented while longer term solutions are designed and implemented.
- 6.95. 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.
- 6.96. 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?**

- 6.97. 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 (INF04, para 3.6). 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).
- 6.98. 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 on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 6.99. 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.

6.100. The viability work within INF/04 indicates that the typology that this site falls into will generally show strong viability, within a range of 30-40%.

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

6.101. In response to the Council's Annual Monitoring Report housing trajectory survey 2017, the site's owner/ agent have stated that the site can be delivered immediately with the first 15 homes 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	Total 17/36
40	15	25	10	50

6.102. The agent's projections have been deferred by 1 year as no planning application has been submitted (MON/01, page 92).

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

6.103. The boundary within the Local Plan (CORE/01, page 268) has been reduced from that identified within the HELAA (HOUS/02, page 681), due to concerns that development of the entire site would form a visual intrusion into areas of open countryside and when considered as a whole, the site would not relate well to the existing built form. Following a reduction to the site, the site boundary within the Local Plan is considered appropriate (CORE/01, page 268).

6.104. No representations were received in relation to the Local Plan consultation suggesting that the boundary should be amended.

6.105. The defined boundary allows for comprehensive development of the site whilst responding to the constraints of the site.

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

6.106. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA, the Huntingdonshire Local Plan Viability Study and the Strategic Flood Risk Assessment.

- 6.107. 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 120, 474, 516) and Statement of Representations (CORE/04, Pages 121 and 123).
- 6.108. Representations received from Richard Stokes (ID: 1114254) on behalf of the landowner outline that there are no technical constraints, ownership or legal complications and the land is not subject to any heritage or ecological designations that will prevent the site coming forward for development in the plan period, and the landowners are working to bring forward an early planning application.
- 6.109. 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.

## WB4- South of Farrier's Way

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

- 6.110. The majority of the land is currently used for arable farming.
- 6.111. This area of land was put forward during production of the Core Strategy 2009 and originally assessed for the Local Plan to 2036 in the Environmental Capacity Study: Warboys Spatial Planning Area document consulted upon between August 2012 and November 2012 (HOUS/02: Availability, page 654). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 652-655 for full assessment).
- 6.112. The site is in close proximity to the centre of Warboys with a range of services, open space and employment opportunities with access to the wider area as it is close to a bus stop; therefore it is in a sustainable location. This makes the site suitable for low density residential development across a net developable area of 65% of the site to allow adequate screening. This results in an estimated capacity of 75 dwellings (HOUS/02: Suitability, page 654).

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

- 6.113. The proposed is for approximately 75 dwellings.
- 6.114. Under 1401887OUT, 40% (30 units) have been allocated for affordable housing.

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

6.115. The Council's assessment of the site in the HELAA (HOUS/02 – page 654) had regard to the extant planning permission ref. 1401887OUT, and determined the site is suitable for low density residential development across a net developable area of 65% of the site to allow adequate screening. This results in an estimated capacity of 75 dwellings.

6.116. The HELAA identifies that the site is suitable as it is located in close proximity to the centre of Warboys. It is close to a range of services, including employment opportunities and also has good access to the wider area as it is near to a bus stop. There is open space nearby and it is next to a sports field.

6.117. Warboys Parish Council (ID: 711718) supports the allocation.

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

6.118. An Outline planning application (planning reference 1401887OUT) for 74 dwellings was approved in December 2016.

6.119. A Full planning application (planning reference 18/00195/FUL) for vehicular access from Farriers Way was approved in March 2018.

6.120. A subsequent Reserved Matters application (planning reference 18/00531/REM) is under consideration.

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

6.121. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

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

6.122. The HELAA identifies potential adverse impacts with regards to landscape effects as the site is on the edge of the village with views to the countryside to the south, trees impacts as there

are trees growing on or close to the site boundaries, potential impacts on protected species existing on the site, agreement with the Environment Agency and Anglian Water Services that they are satisfied that waste water flows from the proposal can be accommodated, potential for archaeology and transport impacts and accessibility.

6.123. The outline planning permission for 74 dwellings demonstrates that the adverse impacts of developing the site can be satisfactorily mitigated. The site allocation policy builds upon this and it sets the criteria for successful development of the site and provides guidance for developing the site to mitigate against the potential adverse impacts.

**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?**

6.124. 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?**

6.125. The HELAA (HOUS/02) identifies potential adverse impacts with regards to landscape effects as the site is on the edge of the village with views to the countryside to the south, trees impacts as there are trees growing on or close to the site boundaries, potential impacts on protected species existing on the site, agreement with the Environment Agency and Anglian Water Services that they are satisfied that waste water flows from the proposal can be accommodated, potential for archaeology and transport impacts and accessibility.

6.126. Required infrastructure has been agreed through the completion of a S106 agreement.

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

6.127. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

6.128. 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 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).

6.129. The 2014 URS Detailed Water Cycle Study FLO/11 for Huntingdonshire acknowledged that there might be capacity issues for wastewater treatment at Huntingdon, Oldhurst, Ramsey, Somersham and St. Neots, if engineering solutions to increase capacity are not undertaken. Future development proposals connecting to the sewer network will only be supported based on certain criteria and highlighting the fact that process upgrades and increased discharge consents are likely to be required at these five WWTWs”.

6.130. This site is served by Oldhurst. There will need to be agreement with Anglian Water and the Environment Agency if further capacity can be provided or if interim solutions can be implemented while longer term solutions are designed and implemented.

6.131. 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.

6.132. 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?**

6.133. A S106 agreement has been signed with a policy level of affordable housing.

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

6.134.The Annual Monitoring Report 2017 (MON/01, page 70) has spread the site over 2 years rather than one as suggested by agent since a Reserved Matters application has only recently been submitted in March 2018. Therefore, the first 24 homes are expected to be completed in the year 2018/2019 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	18/19 Yr. 2	19/20 Yr. 3	Total 17/36
74	24	50	74

6.135.This is realistic since an application for vehicular access (18/00195/FUL) From Farriers Way was approved in March 2018 and the subsequent Reserved Matters has since been submitted and is pending consideration.

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

6.136.No representations were received to the proposed submission Local Plan consultation suggesting that the boundary of the site amended, although it could be inferred that the objection from Mr B E A Augstein (ID: 897722) considers that the allocation boundary should be amended to include his land, which was deleted from an earlier version of the Local Plan because its deliverability cannot be demonstrated (CORE/05, page 467). The boundary of the allocation site is appropriate as it represents the land submitted as available for development and which has outline planning permission.

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

6.137.Historic England (ID: 56252) objects to the policy because the supporting text should reference the need to protect or where opportunities arise enhance the conservation area and its setting. The Council feels that this allocation (through criterion d) in combination with Policy LP 36 would address these issues

6.138.Mr B E A Augstein (ID: 897722) objects to the allocation on the basis that his adjacent land at Fenton Field Farm is no longer allocated for housing development and that the allocation policy should be revised to require an access through the allocation site to his land to facilitate development of Fenton Field Farm. This is not an objection to the principle of this allocation, rather it relates to the fact that the allocation policy criteria does not make provision for an access through to connect Fenton Field Farm, to Farrier's Way to facilitate development of housing on Fenton Field Farm. The HELAA (HOUS/02 – page 654) says that a future road



connection point to link the site with the Fenton Field Farm site to the east is required, but the Council considers this is no longer required as there are no proposals in the draft Local Plan to allocate the adjacent land at Fenton Field Farm for housing. It was deleted because its delivery could not be demonstrated (see page 467 of CORE/05).

6.139. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA and the Huntingdonshire Local Plan Viability Study, and the extant planning permission.

6.140. 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, Highways England, and Historic England. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 230, 408-409 and 467) and Statement of Representations (CORE/04, Pages 121, 123,).

6.141. 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.

## **WB5- Extension to West of Station Road**

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

6.142. The land is currently used for arable farming.

6.143. The site has been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 637-639 for full assessment).

6.144. The site has few constraints and is reasonably well connected to existing services. Due to its visibility in long distance views to the west, the site may be suitable for medium density residential development across a net developable area of 65% of the site resulting in an estimated capacity of 82 dwellings (HOUS/02: Availability, page 639).

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

6.145. The proposed use is for approximately 80 dwellings.

6.146. Under 16/02519/OUT, 40% (32 units) will be allocated for affordable housing.

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

- 6.147. Representation received from Mr Roy Reeves of Warboys Parish Council (ID: 711718) support the inclusion of the following site for housing development.
- 6.148. Representation received from Gladman Developments (ID: 1118265) support the allocation as they believe that the Key Service Centre has the ability to accommodate a further scale of growth than proposed and that the Council should be allocating additional sustainable sites in these locations
- 6.149. Representation received from David Wright (ID: 1151603) objects to the allocation in relation to the scale of development already permitted under 15/01817/REM to the west of Station Road and the access via a narrow roadway.
- 6.150. The Council's assessment of the site determined that a capacity of approximately 80 residential units is suitable. Moreover this was confirmed by outline planning permission which was granted on this site for up to 80 dwellings in October 2017 (ref 16/02519/OUT) including access via the existing site west of Station Road, Warboys. A Reserved Matters application (ref 18/00776/REM) has been submitted and is yet to be determined.

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

- 6.151. An Outline planning application (planning reference 16/02519/OUT) for up to 80 dwellings was approved in October 2017.
- 6.152. A subsequent Reserved Matters application (planning reference 18/00776/REM) is under consideration.

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

- 6.153. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

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

6.154. Representation received from David Wright (ID: 1151603) objects to the allocation and notes that in the event that a reserved matters application, that the following should be added to this site allocation:

- preserve the existing public rights of way through the site;
- substantial financial contributions to local services, including the Moat House Surgery and the Warboys Community primary school;
- that building heights are limited to the heights found in the current immediately adjacent streets;
- substantial landscaping
- development should provide cycle storage facilities to promote sustainable alternatives to car usage.

6.155. The Council notes these concerns. Comprehensive development of the site will not only be shaped by criteria a to h set out under allocation WB5, but will be supplemented by Policies in the Plan such as LP 12 Design Context, LP 13 Design Implementation, LP 17 sustainable travel and LP 18 Parking Provision and Vehicle Movement.

6.156. Both Policy WB 5 and the HELAA state that landscaping is an important issue with the land forming an important wedge of open countryside contributing to the rural character of Warboys and the lack of significant landscaping enhances the sites prominence particularly with long distance views from the west. A significant landscaping strategy would therefore be required.

6.157. The scale of the development would give rise to light and noise pollution. Good urban design and landscaping should demonstrate how these impacts will be mitigated and prevent adverse impacts on neighbour amenity. Agreement with the Environment Agency and Anglian Water is necessary to make sure proposed waste water flows can be accommodated. Conditions 7 and 8 of Outline planning consent (ref 16/02519/OUT) conditioned further drainage information. Great Crested Newts also exist on the site West of Station Road, condition 11 of the above consent conditioned further ecological information. The ponds/habitats of the Great Crested Newts are not within the red line of the reserved matters application ref 18/00775/REM. The access to the site was dealt with as part of the above outline planning permission.

6.158. It is considered mitigation measures for the above constraints are achievable during the application stage.

**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?**

6.159. The site is in Flood zone 1 (HOUS/02 page 638). 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?**

6.160. The site constraints are detailed in HOUS/02. In summary, attention is required to produce a landscape strategy, given the site's location facing open countryside. An ecology survey is needed to identify any protected species e.g. crested newts.

6.161. There are no significant infrastructure costs anticipated and provision has been agreed through provision of a S106 agreement

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

6.162. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

6.163. 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 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).

6.164. The 2014 URS Detailed Water Cycle Study FLO/11 for Huntingdonshire acknowledged that there might be capacity issues for wastewater treatment at Huntingdon, Oldhurst, Ramsey, Somersham and St. Neots, if engineering solutions to increase capacity are not undertaken. Future development proposals connecting to the sewer network will only be supported based on certain criteria and highlighting the fact that process upgrades and increased discharge consents are likely to be required at these five WWTWs”.

6.165. This site is served by Oldhurst. There will need to be agreement with Anglian Water and the Environment Agency if further capacity can be provided or if interim solutions can be implemented while longer term solutions are designed and implemented.

6.166. 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.

6.167. 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?**

6.168. A signed S106 agreement will require policy level of affordable housing.

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

6.169. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the agent says there no constraints on delivery and anticipates that the site could be delivered within 5 years (MON/01, page 71).

6.170. The first 20 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
80	20	30	30	80

6.171. This is deemed to be realistic as Outline permission has been granted for the site and the subsequent Reserved Matters application is currently pending consideration.

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

6.172. 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.

6.173. The site as it stands is suitable, available and achievable demonstrated by the grant of outline planning permission and the pending determination of the reserved matters.

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

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

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

6.176. 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 in October 2017 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.

## 7. Yaxley

### YX1- Askew's Lane

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

- 7.1. Approximately half the site has been previously developed, operating as a coal yard, and is covered with hardstanding, around a fifth of the site comprises a paddock and three dwellings and their gardens make up the rest of the existing land on the northern part of the site.
- 7.2. This piece of land was put forward during production of the Core Strategy 2009 and originally assessed for the Local Plan to 2036 in the Draft Environmental Capacity Study: Yaxley document consulted upon between August 2012 and November 2012. The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 709-711 for full assessment).
- 7.3. The site is situated amongst a mixture of residential and commercial properties with reasonable access to local services, facilities, employment opportunities and public transport and although is constrained by access, it is considered suitable for low density residential development across a net developable area of 35% of the site resulting in an estimated capacity of 12 dwellings (HOUS/02: Suitability, page 711).

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

- 7.4. The proposed use is for approximately 10 dwellings.

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

- 7.5. Whilst there is limited development along Askew's Lane, this site is partly previously developed and offers the opportunity to redevelop the coal yard and to link with residential development to the north. As such residential use is considered to be appropriate.
- 7.6. Representations from Providence Land Ltd (ID: 1118714) support the allocation.
- 7.7. The HELAA identifies that the site has an estimated capacity for 12 dwellings. Concerns were raised during application 1401547OUT which sought 'up to 12 dwellings' as it was not demonstrated that the quantum of development sought could be accommodated along with green space required by the Developer Contributions SPD for site over 10 units so the outline consent was amended to refer to 'residential development'.
- 7.8. A Reserved Matters application has been submitted which seeks nine units with a mix of 2 x 2 bed units, 2 x 3 bed units and 5 x 4 bed units.

7.9. It is considered that the allocation for 10 is justified.

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

7.10. An Outline application (planning reference 1401547OUT) was approved in June 2015.

7.11. A subsequent Reserved Matters application (planning reference 18/01341/REM) was submitted in June 2018 and is currently pending consideration.

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

7.12. Taking the Framework policies into account, and in accordance with its Section 1, the development would 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 and in the creation of public recreational land on the open space in accordance with Section 8. The open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located close to open space, sports and social facilities, a doctor's surgery and primary school.

7.13. Redevelopment of the coal yard provides an opportunity to improve the townscape in this location and also to enhance the setting of the Conservation Area, which includes the properties and rear gardens on Main Street. Historic England (ID: 56252) welcome the references within the policy and supporting text to the Conservation Area but request that the wording be "tightened up"; it is considered that when all policies, including policy LP36 (Heritage Assets and their Settings) are considered in the planning balance, the protection sought by Historic England already exists within the Plan currently being examined.

7.14. Askew's Lane is narrow in width and residential use of this site would result in movements of smaller vehicles than those associated with a fully functioning coal yard business. The inclusion of the 3 properties on Main Street provides opportunities for alternative access points, particularly for walking and cycling links to limit the use of Askew's Lane for pedestrians and cyclists, which is also more convenient given the likely route from the site to the north for facilities such as the school and recreational ground.

7.15. The residential use of the site will mean that site investigations and land remediation will be required which will be a wider environmental benefit. Potential contamination will be addressed by an environmental assessment alongside any appropriate mitigation (CORE/01, para 13.120, page 275).



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

- 7.16. The HELAA identifies potential adverse impacts with regards to land contamination, surface water drainage protected species, access and flooding.
- 7.17. Yards End Dyke is along the south eastern boundary and forms part of the Middle Level Commissioners (MLC) drainage system and requires long-term access for maintenance and detailed agreement will be required between the MLC and Anglian Water regarding the water discharge. The site currently comprises a large amount of hardstanding so development of the site offers opportunities to decrease run-off rates but consultation will also be required with the Lead Local Flood Authority to ensure an appropriate surface water drainage strategy is achieved. The detailed site layout can provide the 20m maintenance strip required for the MLC (CORE/01, criteria d and para 13.124, page 275).
- 7.18. A small part of the south eastern corner is designated a Flood Zones 2 and 3, there is however sufficient space on site within Flood Zone 1 to accommodate the allocation and ensure that no dwelling is situated on the land liable to flood. A site-specific Flood Risk Assessment will be required.
- 7.19. There is a sewer pipe which crosses the site, to mitigate this, the detailed layout will need to consider the pipe location and protected easement, or consider the possibility of diversion.
- 7.20. Due to features found on site and nearby the HELAA and allocation YX 1 note that protected species may be a constraint to development. To mitigate this risk an ecological survey will be required to assess avoidance, mitigation or compensation strategies.

### **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?**

- 7.21. 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?**

- 7.22. The HELAA (HOUS/02) identifies potential adverse impacts with regards to land contamination from previous coal yard use, surface water drainage, protected species, access and flooding. The access road is narrow and a transport assessment is needed to determine a safe solution for access. An ecology assessment will also be needed. The site is close to open countryside so a landscaping assessment will need to address this and mitigate the developments impact.
- 7.23. The signed S106 agreement requires greenspace provision.

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

- 7.24. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 7.25. 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 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).
- 7.26. The 2014 URS Detailed Water Cycle Study FLO/11 for Huntingdonshire states that the site is served by Peterborough wastewater treatment plant and that there is some capacity. In addition the IDP (INF/01 page 188) also identifies capacity.
- 7.27. 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.
- 7.28. 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?**

7.29. A S106 agreement was signed in 2015. There is no provision for affordable housing as the site falls below the requirement threshold.

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

7.30. In response to the Council's Annual Monitoring Report housing trajectory survey 2017, the site's agent has confirmed the sites availability. The agent also confirmed that the site is in the final stages of being sold to a developer and can be developed within the first five years of the Local Plan with the proposed 10 homes expected to be completed in the year 2020/2021 (MON/01, page 69).

7.31. This is deemed to be realistic as this development is small in nature with Outline permission already granted on the site and the subsequent Reserved Matters application is pending consideration.

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

7.32. The boundary of the site is appropriate as it represents the land submitted as available for development and as part of the approved planning application. No representations were received to the Local Plan proposed submission suggesting the boundary should be amended.

7.33. The defined boundary allows for comprehensive redevelopment of the site with enhanced access link with natural boundaries to the countryside to the south and east and existing adjacent residential development to the north.

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

7.34. 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.

7.35. 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 36, 59, 83, 116, 232, 348, 409, and 468) and Statement of Representations (CORE/04, Page 124 and 158).

7.36. There were also no objections raised on technical grounds to the outline consent application from Cambridgeshire Police, Environmental Health, or the Local Highway Authority.

7.37. 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 the site is in the final stages of being sold to a developer. It is considered that this scale of development can be completed within a five year time period.

## YX2- Yax Pak

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

7.38. The land is currently used for growing and processing mushrooms.

7.39. This piece of land was put forward during production of the Core Strategy 2009 and originally assessed for the Local Plan to 2036 in the Draft Environmental Capacity Study: Yaxley document consulted upon between August 2012 and November 2012 (HOUS/02: Availability, page 708). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 706-708 for full assessment).

7.40. This site is situated to the east of the East Coast Mainline railway which separates it from the main residential part of the village and so is considered unsuitable for residential development. However, it is considered to be suitable for employment development to comprise business (class B1) or general industrial (class B2) uses with an estimated capacity of 12,800m<sup>2</sup> ground floor space (HOUS/02: Suitability, page 708).

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

7.41. The proposed use is for employment development to comprise business uses (class 'B1') or general industrial uses (class 'B2').

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

7.42. No representations were received in respect of the Yax Pak proposed allocation.

7.43. The land is used for growing and processing mushrooms and much of the site is built on so is considered to be previously developed, that lies between the Eagle Business Park and the East Coast Mainline Railway. The railway separates the site from the main residential part of the settlement of Yaxley and so is considered unsuitable for residential development. However, it is considered to be suitable for employment development to comprise business (class B1) or general industrial (class B2) uses with an estimated capacity of 12,800m<sup>2</sup> ground floor space. The HELAA confirmed that the site is in Flood Zone 1.

7.44. The site has previously benefited from outline planning permission for business/industrial development (1202024OUT approved April 2013).

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

7.45. An Outline planning application (planning reference 1202024OUT) for the demolition of existing buildings, proposed B1(b), B1(c) and B2 development was approved in April 2013.

7.46. The subsequent Reserved Matters application has not yet been submitted.

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

7.47. The site is highly visible from the south due to open Fenland landscape. Low visibility from east and west due to business park and railway line. Low visibility from the north. The redevelopment of the site has the potential to bring a visual enhancement to the area from the proposal including landscaping to minimise impacts on long distance views from and to the south.

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

7.48. The HELAA identifies the following potential adverse impacts:

- The site is highly visible from the south due to open Fenland landscape, and lies within the Great Fen Landscape and Visual Setting Area.
- Middle Level Commissioners have advised that the use of soakaways or other infiltration devices will not be effective and that the water management system downstream is sensitive to increased discharges and over-loaded during high rainfall events, which has led to flooding in the area.
- Development at this site could give rise to light pollution.
- The site is located in the vicinity of an Iron Age and Roman settlement, and stray Roman remains have been found on nearby sites. There is therefore potential for archaeological finds on the land.
- Demonstrate that a safe, appropriate access can be provided to the road network, via the existing non adopted estate road within Eagle Business Park.

7.49. Mitigation measures are identified in the HELAA and include mitigation against light pollution; that a safe, appropriate access can be provided and that any adverse off-site transport impacts can be adequately mitigated; the design and layout of any development proposal must reflect the setting of the Great Fen Landscape and mitigate/minimise adverse impacts on long distance views; an archaeological investigation may be required before development takes place ; agreement from Anglian Water Services and Middle Level Commissioners in respect of flood risk and drainage strategy.

**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?**

- 7.50. The site is in Flood zone 1 (FLO/01, page 29). 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?**

- 7.51. HOUS/02 highlights that the design and landscaping must take into account the sites Fenland setting. A flood risk assessment/drainage strategy is needed and a transport assessment to determine a safe access point. An archaeological investigation may be required before development takes place.
- 7.52. An assessment of appropriate infrastructure was considered through the planning application and subsequent approval sets out a range of conditions relating to landscaping and access.

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

- 7.53. 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 substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 7.54. 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 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).

- 7.55. The 2014 URS Detailed Water Cycle Study FLO/11 for Huntingdonshire states that the site is served by Peterborough wastewater treatment plant and that there is some capacity. In addition the IDP (INF/01 page 188) also identifies capacity.
- 7.56. 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.
- 7.57. 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?**

- 7.58. The Employment Land Study (ECON/01) considers the need to make employment sites available. Additional housing, without additional employment could lead to unsustainable development (page 3). Yax Pak is identified as meeting qualitative and quantitative employment needs. The likelihood of the site meeting local employment needs is assessed as high. The site will therefore contribute to creating a sustainable pattern of development as highlighted in Matter 5 Question 3.
- 7.59. In terms of viability, ECON/01 paragraph 2.54 recognises that Huntingdonshire remains more affordable than other neighbouring locations. Growth at the neighbouring Eagle Business Park is highlighted at paragraph 6.7. The site does not have any adverse constraints of significance. No high infrastructure cost requirements have been identified so the site is considered viable for employment development.
- 7.60. The viability of the site has also been addressed through the approval of planning application 1202024OUT, as referred to above. Delivery of infrastructure is through appropriate developer contributions.

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

- 7.61. The overall strategy for development and broad distribution for growth was derived from the Huntingdonshire Employment Land Study (2014) (ECON/01). Site YX2 is part of the Council’s Development Strategy to meet overall employment need in the District (further information

included in the Council's response to Matter 5, questions 1 to 3). Employment sites have been distributed across the district which allows for choice and diversity in the employment market by creating a sustainable pattern of employment development based around key services and population.

- 7.62. The Outline approval (1202024OUT) and the assessment of the site (see above) demonstrates that the site is suitable for employment development and is in a prominent area where there is an undersupply of the identified B uses (ECON/01, page 71).

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

- 7.63. 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.

- 7.64. The defined boundary allows for comprehensive re-development of previously developed land and brings benefits to the site such as improved views to and from the south.

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

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

- 7.66. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Historic England, and Cambridgeshire County Council as Highways, LLFA and Archaeology. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation and Statement of Representations.

- 7.67. Responses to the questions above demonstrate that the 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 the site is in multiple ownership, however an agent is now acting for all the landowners with a view to submitting a planning application in the near future and can be completed within a five year time period.