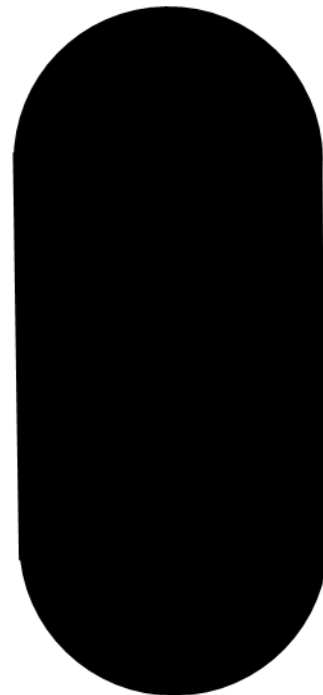
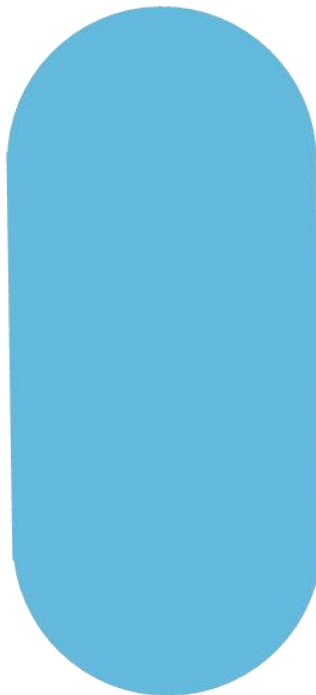


**FURTHER COMMENTARY IN RESPECT OF THE
HUNTINGDONSHIRE LOCAL PLAN TO 2036 FINAL DOCUMENT
FOR SUBMISSION MARCH 2018**

DOCUMENTS EXAM/03 AND EXAM/04

On Behalf of Larkfleet Homes
HLP2036-PS:688/690/674/689



1. INTRODUCTION

- 1.1 These comments are made on behalf of our client, Larkfleet Homes, in respect of their land interests at Glatton Road, Sawtry as part of the ongoing examination (EIP) of the Huntingdonshire District Submission Local Plan (March 2018) and specifically in respect of further evidence provided by the Council since the Matter 3 hearing sessions concluded.

2. EXAM/03 - HUNTINGDONSHIRE LOCAL PLAN TO 2036 SUSTAINABILITY APPRAISAL EXPLANATORY NOTE

- 2.1 It is noted that the Sustainability Appraisal Explanatory Note (SAEN) states at paragraph 2.11 that, *“The development strategy, however, draws a distinction between the objectively assessed need for housing and the amount of housing which the Local Plan seeks to deliver; this reflects an uplift to this figure in excess of 15%. Existing completions, commitments and proposed allocations are expected to deliver around 22,068 new homes; additional numbers from rural exceptions sites and sites of under 10 dwellings are expected to increase this to around 23,600 dwellings. Larger windfall sites would be additional to this again. This level of uplift reflects a balanced approach between the desirability of providing flexibility, supporting the provision of additional affordable housing and avoiding a detrimental impact on neighbouring districts with weaker housing markets.”*
- 2.2 At the examination hearings to date, it materialised that the currently proposed policy LP8 to deal with windfall development would only allow for such development where they would accord with other policies of the plan resulting in the very strict and limited circumstances covered by policies LP 11 'The Countryside', LP 20 'Rural Economy', LP 23 'Local Services and Community Facilities', LP 24 'Tourism and Recreation', LP 29 'Community Planning Proposals', LP 30 'Rural Exceptions Housing', LP 35 'Rural Buildings' and LP 40 'Water Related Development. This therefore contradicts the assertion above in the SAEN that *“larger windfalls will be additional to this again.”* And *“providing flexibility”* as

there is no policy mechanism in place which would assist larger windfall sites coming forward unless in very special circumstances and thus this approach is flawed.

- 2.3 It is also clear from the SAEN that the final Sustainability Appraisal (and indeed the final Local Plan submission document) did not take into account representations made during the consultation undertaken in January – February 2018. Rather as noted in our matter 3 statement, the Council provided a Statement of Representations March 2018 (examination document reference CORE/04) (SR) which does not properly assess additional sites submitted nor does it address a number of fundamental comments made in respect of delivery of the currently proposed SEL's. No real consideration, and only a brief acknowledgement in the SR, has been made by the Council in relation to other potential site allocations. The Council have not clearly assessed the sites submitted and have not provided any reasoning as to why they have discounted the proposed additional sites. Sites submitted during this round of consultation should properly be assessed as part of the Sustainability Appraisal process.

3. EXAM/04 - NOTE FOR THE INSPECTOR REGARDING AVAILABILITY OF SERVICES WITHIN SETTLEMENTS

- 3.1 This document has been reviewed and the updated assessment of the Key Service Centres (KSC's), Local Service Centres (LSC's) and Small Settlements (SS's) is welcomed.

- 3.2 However, it is noted that the Council have included a number of vacant shop units in their assessment. It is queried whether this approach is flawed as it could distort the portrayal of the level of sustainability of a settlement and the services and amenities actually available at present. It could be argued, for example, that these vacant units could change to residential development through permitted development rights and then would not be available as services moving forward.

- 3.3 Whilst it is appreciated that the updated assessment of sustainability

boosts the sustainability credentials for a number of the villages, it remains clear that Sawtry and Yaxley are undoubtedly the most sustainable settlements of the KSC's and LSC's. We have prepared a helpful summary table below which clearly illustrates this point in line with the categories of the Settlement Portraits in Section 2 of the submitted Local Plan document.

Table 1 - Summary of services and facilities						
Settlement	Retail and Commercial Services	Community and Leisure	Education and Health	Employment	Transport	Total
Key Service Centres						
Buckden	17	7	6	0	2	32
Fenstanton	18	4	8	1	5	36
Warboys	17	6	7	1	5	36
Kimbolton	22	3	7	2	3	37
Somersham	23	5	7	1	3	39
Sawtry	26	8	9	2	3	48
Yaxley	57	8	12	2	5	84
Local Service Centres						
Alconbury	3	2	6	0	3	12
Great Staughton	8	1	4	1	1	15
Bluntisham	8	6	4	0	3	21

3.4 Consequently, Sawtry and Yaxley should be allocated the most development (if land is available) given that they are the most sustainable settlements and then development at lower order settlements would then follow according to their sustainability hierarchy.

3.5 The Council have not set out any real justification for including the site allocations in the emerging plan. The Council have no clear methodology with reference to population size or sustainability criteria to demonstrate how the current site allocations and indeed numbers of houses for each settlement is derived. For example, it is unclear why Bluntisham, which is a lower order Local Service Centre, is to receive circa 180 dwellings when other KSC's are to receive less development than this but are substantially more sustainable. Another example is in the case of Buckden, which is the least sustainable KSC, but is set to receive the

most development of all of the KSC's. There should be a clear delineation of what numbers would be acceptable in each settlement with reference to the words "at least" so that there is still the required flexibility in the allocations. The plan should provide an indication of the expected levels of growth for each of the KSC's and LSC's with reference to a justified methodology setting out why the proposed levels of growth are deemed appropriate by the Council.

3.6 More development should be allocated to the likes of Sawtry and Yaxley which are considerably more sustainable than other centres in this bracket of the settlement hierarchy. Particularly, in the case of Sawtry, it has a smaller population than Yaxley and is therefore considered to have the potential to support a bigger population than it currently does, and, importantly, Sawtry is also the only KSC with a secondary school and a leisure centre for the community.

3.7 In addition, as noted in our full representations to the Local Plan submission document, there are clearly other sites that would be suitable for allocation. In this respect, the site being promoted by Larkfleet Homes west of Glatton Road, Sawtry would be a suitable, available and wholly deliverable additional allocation moving forward in the plan. By way of update, a planning application has now been submitted for the site with a target determination date of 8 October 2018. Importantly, it is being promoted by Larkfleet Homes who has a strong track record for quickly delivering residential development in the East of England and Midlands regions; and the site should thus be considered deliverable in the context of the NPPF. The council have had no real regard to sites submitted during consultation and have provided no justification as to why these sites such as this one have been discounted as allocations moving forward.