

# Huntingdonshire Local Plan to 2036 Examination

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## EXAM/47: Representations to the Proposed Main Modifications 2018 Consultation (in Representor Order)

### Part 1 of 4 – A to F

Huntingdonshire District Council  
February 2018

## Comment

Consultee	Mr Stewart Patience (875884)
Email Address	[REDACTED]
Company / Organisation	Anglian Water
Address	.
	.
	.
Event Name	Proposed Main Modifications 2018
Comment by	Anglian Water (Mr Stewart Patience - 875884)
Comment ID	PMM2018:6
Response Date	08/01/19 14:14
Consultation Point	Proposed Main Modification 2 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  Support

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

### **Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

Anglian Water welcomes the proposed modification to the wording of second paragraph of Policy LP3. The proposed wording is consistent with that suggested by Anglian Water as part of our response to the Proposed Submission Local Plan and included in the agreed Statement of Common Ground for Policy LP3. This modification addresses our previous concerns relating to Policy LP3 of Proposed Submission Local Plan.

**Summary**

Support Main Modification 2.

## Comment

<b>Consultee</b>	Mr Stewart Patience (875884)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Anglian Water
<b>Address</b>	. . .
<b>Event Name</b>	Proposed Main Modifications 2018
<b>Comment by</b>	Anglian Water (Mr Stewart Patience - 875884)
<b>Comment ID</b>	PMM2018:7
<b>Response Date</b>	08/01/19 14:14
<b>Consultation Point</b>	Proposed Main Modification 3 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.4

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  **Object**

**Do you consider this proposed main modification to be sound?**  **Not Sound**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**  **Effective**

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

**Do you consider this proposed main modification to be legally compliant?** Legally compliant

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

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**Please enter your representation here.**

We note that a modification is proposed in response to comments from the Environment Agency and Cambridgeshire County Council as LLFA to include additional supporting text relating to surface water management. Anglian Water is generally supportive of the proposed new paragraph as currently drafted. The term rainwater harvesting is used in relation to surface water attenuation (first bullet point of the new paragraph). Both stormwater and rainwater harvesting can contribute to surface water attenuation, if they are designed to do so. It is suggested that reference should also be made to stormwater harvesting (which is collecting the surface water runoff) as well as rainwater harvesting (which only collects the rainwater from roof areas) for the reasons set out above.

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

It is therefore proposed that the text of the first bullet point of new paragraph be amended as follows:

- additional surface water attenuation through SuDS and rainwater **and stormwater** harvesting;

**Summary**

Generally supportive of Main Modification 3, although the text of the first bullet point of new paragraph be amended as follows: 'additional surface water attenuation through SuDS and rainwater and stormwater harvesting;'

Family or Company Name: Bellway Homes Ltd

Agent: Turley (Armfield, Tom)

PMM: Whole Document

## Comment

Agent	Mr Tom Armfield (1015815)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Bellway Homes (1151924)
Company / Organisation	Bellway Homes Limited
Address	x x x
Event Name	Proposed Main Modifications 2018
Comment by	Bellway Homes Limited ( Bellway Homes - 1151924)
Comment ID	PMM2018:57
Response Date	29/01/19 14:07
Consultation Point	Huntingdonshire Local Plan to 2036: Proposed Main Modifications 2018 for Consultation ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Files	<a href="#">Armfield, Turleys for Bellway Homes_Redacted.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you  Object

Do you consider this proposed main modification  Not Sound to be sound?

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

We write on behalf of our client, Bellway Homes Limited (Bellway), in response to the Main Modifications proposed by the Council following the Huntingdonshire Local Plan 2036 examination hearing sessions closing. Bellway participated in hearing sessions for Matters 3, 4, 8 and 12 in respect of land they are promoting to the north of Houghton Road, St Ives (the site is currently subject to an outline planning application for residential development – reference: 18/01882/OUT). The Inspector has recognised a number of critical points we made at the examination, including the deletion of five proposed allocations for residential development in flood zones 2 and 3, removal of the 'Local Service Centre' tier of the settlement hierarchy and the associated proposed allocations, and small reductions in the plan's housing trajectory. The above however does not provide a sufficient resolution so that the plan can now be found sound, as we discuss further below.

**Sequential test** The proposed modifications, including the deletion of five proposed allocations in flood zones 2 and 3, do not remedy the fact there is no evidence the emerging Local Plan has satisfied the sequential test. Indeed the plan continues to propose the allocation of 13 sites for residential development in areas affected by flood risk, totalling 1,446 dwellings. The relevant National Planning Policy Framework (NPPF1) and planning practice guidance is clear that development should not be allocated in areas of medium-high flood risk (i.e. flood zones 2 and 3) if there are reasonably available alternatives within flood zone 1. In such cases the sequential test should be applied to ensure that development is focused on all suitable and available sites located within flood zone 1 before looking at alternatives which are at a greater risk of flooding. Although modifications have been made to the Sustainability Appraisal (SA) to provide further explanation for including some sites within flood zones 2 and 3, there is still no clear justification for why suitable alternative sites in flood zone 1 were not considered at the first stage of selecting sites, as required by planning guidance, including Bellway's site to the north of Houghton Road, St Ives. The emerging plan has therefore not satisfied the sequential test and subsequently is not justified or positively prepared.

**Housing supply** The concerns expressed in our letter of 5 October 2018 in respect to the Council's housing trajectory remain. Except for rural exception schemes (which is covered by a separate category), the plan does not allow for development beyond settlement boundaries. The Council's brownfield register indicates that there is capacity for 22 dwellings from known sites. As such there is no compelling evidence for including 1,200 dwellings (80 dwellings per annum from 2021/22) from small sites (i.e. less than 10 dwellings) in the supply. Whilst the modified trajectory represents a 10 dwelling reduction in the assumed supply from rural exception sites (from 45 to 35 dwellings per annum from 2021/22), there have been no allocations in the district since the Alterations Plan in 2002, other than the Huntingdon West Action Plan in 2011. As such it is no surprise that a rural exceptions scheme has received approval in the last year. The emerging plan will allocate new affordable housing development, therefore it is unlikely the Council will be as reliant on a significant number of rural exception sites to make up their affordable housing supply. As such there is still no compelling evidence for including 525 dwellings from exception sites. The above is critical given the modifications to delete a number of proposed allocations (including all those proposed at Local Service Centres) and reduce anticipated delivery rates leaves the Council with a limited 4.8% buffer in supply against the district's housing requirement, once the plan is adopted. Relying on delivery from rural exception sites and small sites only compounds the risk of the plan not delivering sufficient sites to meet the district's needs. The opportunity should be taken now to de-risk the plan and reduce the reliance on these aspects of the supply, particularly given the Council's five year housing land supply position will be assessed against the revised NPPF (NPPF2) once the plan is adopted. At this point the Council's supply will be subject to a more stringent definition of the deliverability of a site, as demonstrated by recent appeals, including the Woolpit appeal decision in Mid Suffolk District (appeal ref: 3194926).

This decision recognises the extent of evidence which is necessary to demonstrate a site is deliverable, as set out in National Practice Guidance (paragraph:36, 47 and 48 of the housing and economic land availability assessment section). Indeed sites which were allocated, but did not benefit from planning permission at the base date for the calculating the five year housing land supply, were discounted. To de-risk the plan's strategy and future proof its supply, additional sustainable sites including Bellway's site to the north of Houghton Road, St Ives should be proposed for allocation now. This will ensure the plan is effective and positively prepared. St Ives The overall spatial strategy is not reflected in the sites proposed for allocation. St Ives is one of the four Spatial Planning Areas and one of the most sustainable settlements in the district, indeed it benefits from the Cambridge guided busway, providing regular services to Cambridge and Huntingdon. Bus stops for routes A and B are within walking distance of Bellway's site to the north of Houghton Road, running at a frequency of approximately every 10 minutes. Despite this, St Ives will only accommodate 539 new homes (a reduction on that originally proposed following the removal of the proposed allocation at the former car showroom), whilst a significant amount of growth continues to be directed to less sustainable locations. Moreover, the proposed allocation at St Ives West (policy SI 1) does not represent a completely new allocation; part of the site was first allocated in the Local Plan Alternation adopted in 2002. Despite its allocation, the site has not yet delivered and there was no evidence presented at the examination that it will deliver in the future. Housing delivery has therefore been suppressed in St Ives, which runs contrary to the plan's strategy. Additional sites should be proposed for allocation in St Ives in order to ensure the plan's overall spatial strategy is delivered, and ultimately the plan is justified and positively prepared. Conclusion We remain concerned that the proposed modifications do not de-risk the plan's ability to deliver the district's housing needs in the most sustainable locations. The plan still does not satisfy the flood risk sequential test and there is no compelling evidence to demonstrate the proposed supply is deliverable and will be able to withstand the test of deliverability provided by NPPF2. The proposed allocations also do not reflect the plan's overall spatial strategy, the delivery of housing at St Ives, one of the district's most sustainable locations, remains suppressed when compared to less sustainable locations. The plan is therefore not sound in its current form. This can only be remedied by including further allocations at the most sustainable locations, including Bellway's site to the north of Houghton Road, St Ives.

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed Yes  
by making changes to the proposed main  
modification?**

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Including further allocations at the most sustainable locations, including Bellway's site to the north of Houghton Road, St Ives.

**Summary**

We remain concerned that the proposed modifications do not de-risk the plan's ability to deliver the district's housing needs in the most sustainable locations. The plan still does not satisfy the flood risk sequential test and there is no compelling evidence to demonstrate the proposed supply is deliverable and will be able to withstand the test of deliverability provided by NPPF2. The proposed allocations also do not reflect the plan's overall spatial strategy, the delivery of housing at St Ives, one of the district's most sustainable locations, remains suppressed when compared to less sustainable locations. The plan is therefore not sound in its current form. This can only be remedied by including further allocations at the most sustainable locations, including Bellway's site to the north of Houghton Road, St Ives.



23 January 2019

Delivered by email ([local.plan@huntingdonshire.gov.uk](mailto:local.plan@huntingdonshire.gov.uk))

Clara Kerr  
Huntingdonshire District Council  
Pathfinder House  
St Mary's Street  
Huntingdon  
PE29 3TN

Ref: BELQ3008

Dear Ms Kerr

## **HUNTINGDONSHIRE LOCAL PLAN 2036 – PROPOSED MAIN MODIFICATIONS**

We write on behalf of our client, Bellway Homes Limited (Bellway), in response to the Main Modifications proposed by the Council following the Huntingdonshire Local Plan 2036 examination hearing sessions closing.

Bellway participated in hearing sessions for Matters 3, 4, 8 and 12 in respect of land they are promoting to the north of Houghton Road, St Ives (the site is currently subject to an outline planning application for residential development – reference: 18/01882/OUT).

The Inspector has recognised a number of critical points we made at the examination, including the deletion of five proposed allocations for residential development in flood zones 2 and 3, removal of the 'Local Service Centre' tier of the settlement hierarchy and the associated proposed allocations, and small reductions in the plan's housing trajectory.

The above however does not provide a sufficient resolution so that the plan can now be found sound, as we discuss further below.

### **Sequential test**

The proposed modifications, including the deletion of five proposed allocations in flood zones 2 and 3, do not remedy the fact there is no evidence the emerging Local Plan has satisfied the sequential test. Indeed the plan continues to propose the allocation of 13 sites for residential development in areas affected by flood risk, totalling 1,446 dwellings.

The relevant National Planning Policy Framework (NPPF1) and planning practice guidance is clear that development should not be allocated in areas of medium-high flood risk (i.e. flood zones 2 and 3) if there are reasonably available alternatives within flood zone 1. In such cases the sequential test should be applied to ensure that development is focused on all suitable and available sites located within flood zone 1 before looking at alternatives which are at a greater risk of flooding.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Although modifications have been made to the Sustainability Appraisal (SA) to provide further explanation for including some sites within flood zones 2 and 3, there is still no clear justification for why suitable alternative sites in flood zone 1 were not considered at the first stage of selecting sites, as required by planning guidance, including Bellway's site to the north of Houghton Road, St Ives.

The emerging plan has therefore not satisfied the sequential test and subsequently is not justified or positively prepared.

## **Housing supply**

The concerns expressed in our letter of 5 October 2018 in respect to the Council's housing trajectory remain.

Except for rural exception schemes (which is covered by a separate category), the plan does not allow for development beyond settlement boundaries. The Council's brownfield register indicates that there is capacity for 22 dwellings from known sites. As such there is no compelling evidence for including 1,200 dwellings (80 dwellings per annum from 2021/22) from small sites (i.e. less than 10 dwellings) in the supply.

Whilst the modified trajectory represents a 10 dwelling reduction in the assumed supply from rural exception sites (from 45 to 35 dwellings per annum from 2021/22), there have been no allocations in the district since the Alterations Plan in 2002, other than the Huntingdon West Action Plan in 2011. As such it is no surprise that a rural exceptions scheme has received approval in the last year.

The emerging plan will allocate new affordable housing development, therefore it is unlikely the Council will be as reliant on a significant number of rural exception sites to make up their affordable housing supply. As such there is still no compelling evidence for including 525 dwellings from exception sites.

The above is critical given the modifications to delete a number of proposed allocations (including all those proposed at Local Service Centres) and reduce anticipated delivery rates leaves the Council with a limited 4.8% buffer in supply against the district's housing requirement, once the plan is adopted. Relying on delivery from rural exception sites and small sites only compounds the risk of the plan not delivering sufficient sites to meet the district's needs.

The opportunity should be taken now to de-risk the plan and reduce the reliance on these aspects of the supply, particularly given the Council's five year housing land supply position will be assessed against the revised NPPF (NPPF2) once the plan is adopted. At this point the Council's supply will be subject to a more stringent definition of the deliverability of a site, as demonstrated by recent appeals, including the Woolpit appeal decision in Mid Suffolk District (appeal ref: 3194926). This decision recognises the extent of evidence which is necessary to demonstrate a site is deliverable, as set out in National Practice Guidance (paragraphs 36, 47 and 48 of the housing and economic land availability assessment section). Indeed sites which were allocated, but did not benefit from planning permission at the base date for the calculating the five year housing land supply, were discounted.

To de-risk the plan's strategy and future proof its supply, additional sustainable sites including Bellway's site to the north of Houghton Road, St Ives should be proposed for allocation now. This will ensure the plan is effective and positively prepared.

## **St Ives**

The overall spatial strategy is not reflected in the sites proposed for allocation. St Ives is one of the four Spatial Planning Areas and one of the most sustainable settlements in the district, indeed it benefits from

the Cambridge guided busway, providing regular services to Cambridge and Huntingdon. Bus stops for routes A and B are within walking distance of Bellway's site to the north of Houghton Road, running at a frequency of approximately every 10 minutes.

Despite this, St Ives will only accommodate 539 new homes (a reduction on that originally proposed following the removal of the proposed allocation at the former car showroom), whilst a significant amount of growth continues to be directed to less sustainable locations. Moreover, the proposed allocation at St Ives West (policy SI 1) does not represent a completely new allocation; part of the site was first allocated in the Local Plan Alternation adopted in 2002. Despite its allocation, the site has not yet delivered and there was no evidence presented at the examination that it will deliver in the future.

Housing delivery has therefore been suppressed in St Ives, which runs contrary to the plan's strategy. Additional sites should be proposed for allocation in St Ives in order to ensure the plan's overall spatial strategy is delivered, and ultimately the plan is justified and positively prepared.

### Conclusion

We remain concerned that the proposed modifications do not de-risk the plan's ability to deliver the district's housing needs in the most sustainable locations. The plan still does not satisfy the flood risk sequential test and there is no compelling evidence to demonstrate the proposed supply is deliverable and will be able to withstand the test of deliverability provided by NPPF2. The proposed allocations also do not reflect the plan's overall spatial strategy, the delivery of housing at St Ives, one of the district's most sustainable locations, remains suppressed when compared to less sustainable locations.

The plan is therefore not sound in its current form. This can only be remedied by including further allocations at the most sustainable locations, including Bellway's site to the north of Houghton Road, St Ives.

[Redacted]

[Redacted]

[Redacted]

Director

[Redacted]

Family or Company Name: Bellway Homes Ltd. and Henry H Bletsoe & Son

Agent: Amec Foster Wheeler (Fovargue, David)

PMM: Whole Document

## Comment

Agent	Mr David Fovargue (1116988)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Mr Fergus Thomas (1117482)
Email Address	[REDACTED]
Company / Organisation	Bellway Homes Limited and Henry H Bletsoe & Son LLP
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Bellway Homes Limited and Henry H Bletsoe & Son LLP (Mr Fergus Thomas - 1117482)
Comment ID	PMM2018:63
Response Date	29/01/19 16:21
Consultation Point	Huntingdonshire Local Plan to 2036: Proposed Main Modifications 2018 for Consultation ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Files	<a href="#">Proposed Main Modifications - representations - 29th Jan 2019.pdf (1)</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you  Support  Object

**Do you consider this proposed main modification to be sound?** Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

- Do you consider this proposed main modification is not sound because it is not...**
- . Positively prepared
  - . Justified
  - . Effective
  - . Consistent with national policy

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

At the examination hearings Wood plc, on behalf of Bellway Homes Ltd and Henry H Bletsoe & Son LLP, raised a key matter of soundness with respect to the application of national flood risk planning policy. Further detail is provided in our Matter 3 hearing statement in particular, which explains how a number of site allocations were in Flood Zones 2 and 3a (medium to high risk of flooding) and that other selected allocations were affected by pluvial (surface water flooding) because 'Step 1' of the sequential test did not take all forms of flood risk into account. It is on this basis that we identified conflict with the sequential test in NPPF101 and the associated planning practice guidance. Whilst we support the subsequent removal of some of the allocations affected by flood risk under the main modifications now proposed, 14 of the remaining allocations are still affected by either fluvial or surface water flood risk. This is despite sequentially preferable and sustainable alternatives being available, including my client's landholding at Dexter's Farm. Dexter's Farm is in an area at lowest risk of flooding and the Sustainability Appraisal for the site is positive (HELAA, HOUS/02, page 169, ref 188), with page 171 concluding that: "Overall the appraisal is positive. The site is classed as Grade 2, is at low flood risk, is close to sports and social facilities. It is close to a bus stop and has no known transport infrastructure constraints". The only reason that Dexter's Farm was rejected from Step 1 of the Council's sequential test was perceived landscape impacts, but the site is at the lower end of the spectrum in terms of landscape sensitivity (with no designations) and no explanation is given as to why limited landscape impact would outweigh the sequential test at the heart of national planning policy. Furthermore, landscape impacts are accepted by the Council at a considerable scale on sites preferred for allocation in the plan. We therefore continue to support Dexter's Farm as a sequentially preferable, suitable, deliverable and sustainable alternative for allocation in the new local plan.

**Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to a website where it is available or give a full reference (including author(s), full title and date of publication) in your comment.

By submitting a supporting document you give permission for the council to use it for the purposes of drawing up planning policy for Huntingdonshire and to reproduce the document for such purposes.

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To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

Proposed Main Modifications - representations - 29th Jan 2019.pdf (1)

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Include Dexter's Farm as an allocation in the Local Plan.

### **Summary**

Support the removal of some of the allocations affected by flood risk under the main modifications now proposed, 14 of the remaining allocations are still affected by either fluvial or surface water flood risk. This is despite sequentially preferable and sustainable alternatives being available, including my client's landholding at Dexter's Farm. Continue to support Dexter's Farm as a sequentially preferable, suitable, deliverable and sustainable alternative for allocation in the new local plan.

# Huntingdonshire Local Plan 2036

## Proposed Main Modifications

### Response on behalf of Bellway Homes Ltd and Henry H Bletsoe & Son LLP (Representor ID:1117482)

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#### Summary

At the examination hearings Wood plc, on behalf of Bellway Homes Ltd and Henry H Bletsoe & Son LLP, raised a key matter of soundness with respect to the application of national flood risk planning policy. Further detail is provided in our Matter 3 hearing statement in particular, which explains how a number of site allocations were in Flood Zones 2 and 3a (medium to high risk of flooding) and that other selected allocations were affected by pluvial (surface water flooding) because 'Step 1' of the sequential test did not take all forms of flood risk into account. It is on this basis that we identified conflict with the sequential test in NPPF101 and the associated planning practice guidance.

Whilst we support the subsequent removal of some of the allocations affected by flood risk under the main modifications now proposed, 14 of the remaining allocations are still affected by either fluvial or surface water flood risk. This is despite sequentially preferable and sustainable alternatives being available, including my client's landholding at Dexter's Farm. Dexter's Farm is in an area at lowest risk of flooding and the Sustainability Appraisal for the site is positive (HELAA, HOUS/02, page 169, ref 188), with page 171 concluding that: *"Overall the appraisal is positive. The site is classed as Grade 2, is at low flood risk, is close to sports and social facilities. It is close to a bus stop and has no known transport infrastructure constraints".*

The only reason that Dexter's Farm was rejected from Step 1 of the Council's sequential test was perceived landscape impacts, but the site is at the lower end of the spectrum in terms of landscape sensitivity (with no designations) and no explanation is given as to why limited landscape impact would outweigh the sequential test at the heart of national planning policy. Furthermore, landscape impacts are accepted by the Council at a considerable scale on sites preferred for allocation in the plan. We therefore continue to support Dexter's Farm as a sequentially preferable, suitable, deliverable and sustainable alternative for allocation in the new local plan.

**David Fovargue, MRTPI (Technical Director, Wood plc)**

**Word count: 347**

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## Comment

Consultee	Mrs Tracey Davidson (251454)
Email Address	[REDACTED]
Company / Organisation	Bluntisham Parish Council
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Bluntisham Parish Council (Mrs Tracey Davidson - 251454)
Comment ID	PMM2018:2
Response Date	08/01/19 11:22
Consultation Point	Proposed Main Modification 1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.4

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  Support

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

Bluntisham Parish Council support the following changes to the Local Plan 2036: MM1 - removal of Local Service Centre category

**Summary**

Support Main Modification 7 and the removal of the Local Service Centre category.

## Comment

Consultee	Mrs Tracey Davidson (251454)
Email Address	[REDACTED]
Company / Organisation	Bluntisham Parish Council
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Bluntisham Parish Council (Mrs Tracey Davidson - 251454)
Comment ID	PMM2018:3
Response Date	08/01/19 11:46
Consultation Point	Proposed Main Modification 7 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.4

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  **Support**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

Bluntisham Parish Council support the following changes to the Local Plan 2036: MM7 - removal of the pages describing the Local Service Centre definition

**Summary**

Support Main Modification 7 and the removal of the Local Service Centre definition.

## Comment

Consultee	Mrs Tracey Davidson (251454)
Email Address	[REDACTED]
Company / Organisation	Bluntisham Parish Council
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Bluntisham Parish Council (Mrs Tracey Davidson - 251454)
Comment ID	PMM2018:4
Response Date	08/01/19 11:47
Consultation Point	Proposed Main Modification 8 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.4

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  **Support**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

Bluntisham Parish Council support the following changes to the Local Plan 2036: MM8 - support the reinstate classification of Bluntisham as a Small Settlement

**Summary**

Support Main Modification 8 and the reinstatement of Bluntisham as a small settlement.

## Comment

Consultee	Mr Stuart Carruthers (1198485)
Email Address	[REDACTED]
Address	- - -
Event Name	Proposed Main Modifications 2018
Comment by	Mr Stuart Carruthers (1198485)
Comment ID	PMM2018:74
Response Date	28/01/19 08:36
Consultation Point	Huntingdonshire Local Plan to 2036: Proposed Main Modifications 2018 for Consultation ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6
Files	<a href="#">Stuart Carruthers - email 3 attachment.pdf</a> <a href="#">Stuart Carruthers - email 3 Redacted.pdf</a> <a href="#">Stuart Carruthers - email 1 Redacted.pdf</a> <a href="#">Stuart Carruthers - email 2 Redacted.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you  Support  Object

Do you consider this proposed main modification to be sound?  Yes  Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

**Do you consider this proposed main modification to be legally compliant?** Not legally compliant

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

The local plan being proposed by Huntingdonshire does not appear to be sound or legally compliant in relation to the accommodation needs of Gypsy / Travellers. This appears to be at least partly due to their not having been representations made by the Gypsy Traveller community. There has been a GTAA undertaken in 2016 by ORS. The GTAA takes account of the new definition of Gypsy Travellers. The result of the GTAA appears to be flawed. I am currently acting for family's in four of the districts covered by the GTAA's. These family's all meet the new revised definition of Gypsy / Traveller under planning policy. They have all had identified that they are unable to secure planning consent for a pitch as the Council had met its allocation under the GTAA (based on the ORS results). The issues in some cases have either progressed to court or to appeal to the Secretary of State through the appeals process. There are significant issues associated with 'council' sites that provide most of the accommodation needs of the Gypsy / Traveller population. There appears to be a flaw in the methodologies used to determine the GTAA's for Council's. The flaw could be due to the culture of the Gypsy / Traveller population, failure to take account of 'slum' living conditions of many Gypsy / Traveller sites, Gypsy / Travellers taking up the Traveller style again or migration to areas considered to be home areas for Gypsy / Travellers from private sites (particularly in the South East) who have become homeless due to sale of the private sites for housing without an adequate exit strategy. There appears to be a need for the above issues to be more fully considered in the Huntingdonshire Local Plan and / or provision for the effects described above to be incorporated into the modifications to the local plan.

## **Summary**

The local plan being proposed by Huntingdonshire does not appear to be sound or legally compliant in relation to the accommodation needs of Gypsy / Travellers. No representations have been made by the Gypsy Traveller community. There is a flaw in the GTAA undertaken in 2016, this could be due to the culture of the Gypsy / Traveller population, failure to take account of 'slum' living conditions, Gypsy / Travellers taking up the Traveller style again or migration to areas considered to be home as a result of homelessness through the sale of private sites.



**From:** [REDACTED]  
**To:** [Local Plan](#)  
**Cc:** [Planning Appeals](#)  
**Subject:** Representations  
**Date:** 28 January 2019 08:36:13

---

Dear Sir / Madam

The local plan being proposed by Huntingdonshire does not appear to be sound or legally compliant in relation to the accommodation needs of Gypsy / Travellers. This appears to be at least partly due to their not having been representations made by the Gypsy Traveller community.

There has been a GTAA undertaken in 2016 by ORS. The GTAA takes account of the new definition of Gypsy Travellers. The result of the GTAA appears to be flawed. I am currently acting for family's in four of the districts covered by the GTAA's. These family's all meet the new revised definition of Gypsy / Traveller under planning policy. They have all had identified that they are unable to secure planning consent for a pitch as the Council had met its allocation under the GTAA (based on the ORS results). The issues in some cases have either progressed to court or to appeal to the Secretary of State through the appeals process. There are significant issues associated with 'council' sites that provide most of the accommodation needs of the Gypsy / Traveller population.

There appears to be a flaw in the methodologies used to determine the GTAA's for Council's. The flaw could be due to the culture of the Gypsy / Traveller population, failure to take account of 'slum' living conditions of many Gypsy / Traveller sites, Gypsy / Travellers taking up the Traveller style again or migration to areas considered to be home areas for Gypsy / Travellers from private sites (particularly in the South East) who have become homeless due to sale of the private sites for housing without an adequate exit strategy.

There appears to be a need for the above issues to be more fully considered in the Huntingdonshire Local Plan and / or provision for the effects described above to be incorporated into the modifications to the local plan.

Yours faithfully

Stuart H Carruthers  
[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [Local Plan; Planning Appeals](#)  
**Subject:** Fwd: Representations  
**Date:** 29 January 2019 09:18:40

---

Hi

There appears to be something emerging in the Gypsy / Traveller population dynamics that is having an impact on the GTAA's. This might just be an eastern England phenomena.

I have a feeling that it is mainly associated with migration from areas where private sites have closed to areas where the Gypsy / Travellers have an association, and also problems with Council sites.

The private sites are shutting particularly in the vicinity of London and other cities as they are being sold as housing land. There appears to have been a sale of about 10 - 15 per cent of the larger private sites in these locations. The number of sites being sold is likely to increase. I am dealing with three sites that are being included in local plans for housing. In these cases the land is owned by the owners of the pitches. However,, there will be a relocation of about 250 family's (very big sites in Essex). In the majority of cases the sites is owned by a single Gypsy / Traveller and they are not 'spreading the jam'. This normally leads to about 15 family's being made homeless and the site owner obtaining between £4-£5 million. The site owner then normally purchases another site further away from London.. A lot of the bigger private sites in Eastern England have been purchased recently in this way.. and this then normally leads to another 15 family's being made homeless who then seek another local site. I have just had planning permission granted for a 10 pitch site where this happened.. in Suffolk and there are at least another 10 pitches that local GT are seeking to develop in the vicinity. The original site was sold without the occupiers being aware to a Showman from Essex who had sold his site. The site has been totally refurbished and is now being used to provide accommodation to those decanted from the London Boroughs (about £500 a week for each occupier). None of these are G/T. This is all in one district where you have produced a GTAA.. the existing 20 pitch GTAA site is now a refuge for London homeless.. the 20 GT family's displaced have purchased additional land in the vicinity.. and are 'happily' applying for planning permission (lots of mini-diggers). The local 'public site' has recently been sold (40 pitches) and about 20 family's are seeking to escape - pitches on the 'public site' are being sublet to London homeless. There is a demand for at least 40 pitches in the district due to changes in the market. Probably about 20 per cent of the remaining public sites in London are being rented out to London Boroughs. As a rough estimate I would guess that about 1,000 GT family's have been displaced from about 50 districts and have become nomadic.. of these about 100 of these family's are displacing the family's on existing sites - leading to about another 800 family's becoming homeless - and increasing the number of nomadic GT who seek to have a liking for eastern England.

The GTAA's are based on 'static' populations.. not the actual population.. where additional pressure is being placed on existing infrastructure.

The 250 pitches being sold in Essex have an exit strategy associated with them.. the residents are either purchasing bricks and mortar (about 50 %) or are purchasing a private site / pitch (about 50%). None of them are staying in Essex. There will be about 5,000 houses built on the land they occupy. The dynamics are quite odd. This is a similar ratio to the private sites that have been developed

in the area of London.

I have a feeling that there is a need for a correction in the methodology used to assess the GTAA requirements of districts to take account of the sale of sites to provide accommodation for the settled community (20 accommodation units of varying affordability for each G/T accommodation unit). The issues are complicated.

Your thoughts would be welcomed as the GTAA for Cambridgeshire, King's Lynn & West Norfolk, Peterborough and West Suffolk appears to be flawed due to the failure to take account of the fact that the GT accommodation is experiencing substantial structural adjustment due to changes in the market and also due to problems with the existing social infrastructure.

Stuart H Carruthers

[REDACTED]

----- Forwarded message -----

From: **Stuart Carruthers** [REDACTED]  
Date: Mon, 28 Jan 2019 at 08:35  
Subject: Representations  
To: <[local.plan@huntingdonshire.gov.uk](mailto:local.plan@huntingdonshire.gov.uk)>  
Cc: Planning Appeals <[Planning.Licensing@huntingdonshire.gov.uk](mailto:Planning.Licensing@huntingdonshire.gov.uk)>

Dear Sir / Madam

The local plan being proposed by Huntingdonshire does not appear to be sound or legally compliant in relation to the accommodation needs of Gypsy / Travellers. This appears to be at least partly due to their not having been representations made by the Gypsy Traveller community.

There has been a GTAA undertaken in 2016 by ORS. The GTAA takes account of the new definition of Gypsy Travellers. The result of the GTAA appears to be flawed. I am currently acting for family's in four of the districts covered by the GTAA's. These family's all meet the new revised definition of Gypsy / Traveller under planning policy. They have all had identified that they are unable to secure planning consent for a pitch as the Council had met its allocation under the GTAA (based on the ORS results). The issues in some cases have either progressed to court or to appeal to the Secretary of State through the appeals process. There are significant issues associated with 'council' sites that provide most of the accommodation needs of the Gypsy / Traveller population.

There appears to be a flaw in the methodologies used to determine the GTAA's for Council's. The flaw could be due to the culture of the Gypsy / Traveller

population, failure to take account of 'slum' living conditions of many Gypsy / Traveller sites, Gypsy / Travellers taking up the Traveller style again or migration to areas considered to be home areas for Gypsy / Travellers from private sites (particularly in the South East) who have become homeless due to sale of the private sites for housing without an adequate exit strategy.

There appears to be a need for the above issues to be more fully considered in the Huntingdonshire Local Plan and / or provision for the effects described above to be incorporated into the modifications to the local plan.

Yours faithfully

Stuart H Carruthers

A black rectangular redaction box covering the signature of Stuart H Carruthers.

**From:** [REDACTED]  
**To:** [Local Plan: Planning Appeals](#)  
**Subject:** Fwd: Representations  
**Date:** 29 January 2019 10:57:29  
**Attachments:** [Mimecast Attachment Protection Instructions.msg](#)  
[south-cambis-report-final.pdf](#)

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Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

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Attached is a copy of the Inspectors report into the South Cambis Local Plan.

I have spoken with ORS who identify that their report is in all probability out of date. There was a similar conclusion in relation to South Cambis that was part of the GTAA on which Huntingdonshire rely. It is understood that additional work on the South Cambis GTAA is being carried out.

Stuart H CARRUTHERS

t: 01502 719 731

----- Forwarded message -----

**From:** **Stuart Carruthers** [REDACTED]  
**Date:** Tue, 29 Jan 2019 at 09:18  
**Subject:** Fwd: Representations  
**To:** [REDACTED]  
**Cc:** <[local.plan@huntingdonshire.gov.uk](mailto:local.plan@huntingdonshire.gov.uk)>, Planning Appeals  
<[Planning.Licensing@huntingdonshire.gov.uk](mailto:Planning.Licensing@huntingdonshire.gov.uk)>

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London Boroughs (about £500 a week for each occupier). None of these are G/T. This is all in one district where you have produced a GTAA.. the existing 20 pitch GTAA site is now a refuge for London homeless.. the 20 GT family's displaced have purchased additional land in the vicinity.. and are 'happily' applying for planning permission (lots of mini-diggers). The local 'public site' has recently been sold (40 pitches) and about 20 family's are seeking to escape - pitches on the 'public site' are being sublet to London homeless. There is a demand for at least 40 pitches in the district due to changes in the market. Probably about 20 per cent of the remaining public sites in London are being rented out to London Boroughs. As a rough estimate I would guess that about 1,000 GT family's have been displaced from about 50 districts and have become nomadic.. of these about 100 of these family's are displacing the family's on existing sites - leading to about another 800 family's becoming homeless - and increasing the number of nomadic GT who seek to have a liking for eastern England.

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Your thoughts would be welcomed as the GTAA for Cambridgeshire, King's Lynn & West Norfolk, Peterborough and West Suffolk appears to be flawed due to the failure to take account of the fact that the GT accommodation is experiencing substantial structural adjustment due to changes in the market and also due to problems with the existing social infrastructure.

Stuart H Carruthers  
[REDACTED]

----- Forwarded message -----

From: **Stuart Carruthers** [REDACTED]  
Date: Mon, 28 Jan 2019 at 08:35  
Subject: Representations  
To: <[local.plan@huntingdonshire.gov.uk](mailto:local.plan@huntingdonshire.gov.uk)>

Cc: Planning Appeals <[Planning.Licensing@huntingdonshire.gov.uk](mailto:Planning.Licensing@huntingdonshire.gov.uk)>

Dear Sir / Madam

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There appears to be a flaw in the methodologies used to determine the GTAA's for Council's. The flaw could be due to the culture of the Gypsy / Traveller population, failure to take account of 'slum' living conditions of many Gypsy / Traveller sites, Gypsy / Travellers taking up the Traveller style again or migration to areas considered to be home areas for Gypsy / Travellers from private sites (particularly in the South East) who have become homeless due to sale of the private sites for housing without an adequate exit strategy.

There appears to be a need for the above issues to be more fully considered in the Huntingdonshire Local Plan and / or provision for the effects described above to be incorporated into the modifications to the local plan.

Yours faithfully

Stuart H Carruthers





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# **Report to South Cambridgeshire District Council**

**by Laura Graham BSc MA MRTPI and Alan Wood MSc FRICS**

**Inspectors appointed by the Secretary of State**

**Date: 29 August 2018**

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## **Report on the Examination of the South Cambridgeshire Local Plan**

The Plan was submitted for examination on 28 March 2014

The examination hearings were held between 04 November 2014 and 30 April 2015;  
and between 07 June 2016 and 18 July 2017

File Ref: PINS/W0530/429/13



## Abbreviations used in this report

AA	Appropriate Assessment
AAP	Area Action Plan
CIGBBS	Cambridge Inner Green Belt Boundary Study
DtC	Duty to Co-operate
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
JSPU	Joint Strategic Planning Unit
LDS	Local Development Scheme
LGS	Local Green Space
LP	Local Plan
MDS	Major Development Site
MM	Main Modification
NPPF	National Planning Policy Framework
OAHN	Objectively assessed need for housing
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SDSR	Sustainable Development Strategy Review
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
WMS	Written Ministerial Statement

## **Non-Technical Summary**

This report concludes that the South Cambridgeshire Local Plan provides an appropriate basis for the planning of the South Cambridgeshire District, provided that a number of main modifications [MMs] are made to it. South Cambridgeshire District Council has specifically requested that we recommend any MMs necessary to enable the Plan to be adopted.

All the MMs were proposed by the Council, and were subject to public consultation over periods of seven weeks in December 2015-January 2016 and six weeks in January – February 2018. In some cases, we have amended their detailed wording and/or added consequential modifications where necessary. We have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- A modification to recognise the Council's intention to carry out an early review of this Plan through the preparation of a joint Local Plan with Cambridge City Council;
- Modifications to provide clarity over the calculation of a five year housing land supply;
- Modifications to the Cambridge East Strategic Site, including the allocation of additional land for residential development,
- An additional allocation of land as an extension to the Cambridge Biomedical Campus;
- Changes to the designation of sites as Local Green Space to reflect the Council's review of the evidence base and to accord with national planning policy;
- Amendment to the policies relating to Waterbeach and Bourn Airfield new settlements to remove phasing requirements and to change from the preparation of AAPs to SPDs.
- Amendments to policies regarding provision for gypsies and travellers and travelling showpeople;
- Amendments to policies relating to energy efficiency standards, technical housing standards and wind energy to reflect national planning policy;
- Amendments to ensure that the approach to the provision of affordable housing is consistent with national policy; and
- A revised framework for monitoring.

## Introduction

1. This report contains our assessment of the South Cambridgeshire Local Plan (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The South Cambridgeshire Local Plan, submitted in March 2014, is the basis for our examination. It is the same document as was published for consultation in July 2013. The Plan was submitted for examination alongside the Cambridge City Local Plan 2014. The two plans share a joint core document library and a common spatial development strategy, as explained below.

## Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that we should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and /or not legally compliant and thus incapable of being adopted. Our report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearing(s), are necessary. The MMs are referenced in bold in the report in the form **SC1, SC2, SC3** etc, and are set out in full in the Appendix.
4. The Council carried out consultation on a first set of MMs between 02 December 2015 and 25 January 2016 and carried out sustainability appraisal (SA) on them. Following the close of the examination hearings, the Council prepared a further schedule of proposed MMs and carried out SA on them. The second schedule and the SA were subject to public consultation between 5 January 2018 and 16 February 2018. We have taken account of the consultation responses in coming to our conclusions in this report and in this light we have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary, we have highlighted these amendments in the report.
5. The Council has proposed a number of modifications which are intended to update the text of the Plan, which is understandable given the length of the examination, or in some cases to make improvements to the Plan. However, where these are not necessary to make the Plan sound, we have removed them from the Appendix. Within the limits prescribed by the Regulations, the Council can make additional minor modifications to the Plan at adoption.

## **Policies Map**

6. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as Proposed Submission South Cambridgeshire Policies Map as set out in RD/Sub/SC/020.
7. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective. These further changes to the policies map were published for consultation alongside the Council's proposed modifications in December 2015 and in January 2018 (RD/MC/010 and RD/MM/010) and are now contained in document RD/EX/150.
8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in RD/Sub/SC/20 as amended by RD/EX/150.

## **Assessment of Duty to Co-operate**

9. Section 20(5)(c) of the 2004 Act requires that we consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
10. There has been a long history of joint working between the District Council, Cambridge City Council and the other Cambridgeshire Districts. Together with Peterborough City Council, the Cambridgeshire Districts set up a Joint Strategic Planning Unit (JSPU) in 2012. The JSPU facilitated meetings of senior Members from each of the Districts and produced the Joint Statement on Strategic Planning in Cambridgeshire (RD/Strat/030) and the Cambridgeshire and Peterborough Memorandum of Cooperation: Supporting the Spatial Approach 2011-2031 (RD/Strat/100). The Memorandum supported the development of a coherent and comprehensive growth strategy across Cambridgeshire and Peterborough.
11. A wide range of potential strategic matters have been considered by the JSPU and through engagement with other bodies including the Environment Agency, Highways England, Natural England and English Heritage. Strategic issues considered include: housing need and distribution; employment land; flood risk; and the provision of infrastructure, including transport.

12. Section 28 of the Act gives the power to local planning authorities to prepare a joint plan. Section 33A(6)(b) requires local planning authorities to consider whether to agree under section 28 to prepare joint local development documents. Section 33A(7) requires anyone who is subject to the duty to cooperate to have regard to any guidance given by the Secretary of State about how the duty is to be complied with.
13. Guidance has been provided by the Secretary of State at paragraph 16 of PPG which states: *Where two or more local planning authorities decide to work together to prepare Local Plans or policies they should consider how to achieve this most effectively. For some authorities the most appropriate way might be to form a joint committee ..... Alternatively, the local planning authorities could prepare a joint plan, using powers **section 28 of the 2004 Act**, or align their Local Plans, so that they are examined and adopted at broadly the same time.*
14. The Guidance suggests, therefore, that the preparation of a joint plan is one way of complying with the duty to cooperate. South Cambridgeshire District Council and Cambridge City Council advised that the preparation of a joint local plan had been considered at officer level, but was not subject to a formal resolution by Members.
15. The Councils have chosen the last of the options referred to in PPG, that is to align, closely, their two plans. A Joint Strategic Transport and Spatial Planning Group, comprising Members from Cambridge City, South Cambridgeshire District and Cambridgeshire County Councils was set up in March 2012. One of the tasks for the Group has been to ensure policy alignment that will allow the timely development of both authorities new Local Plans.
16. Overall, we are satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

## **Assessment of Soundness**

### **Main Issues**

17. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified 17 main issues upon which the soundness of the Plan depends. Under these headings our report deals with the main matters of soundness rather than responding to every point raised by representors.

### **Issue 1 – Is the spatial strategy sound?**

18. The starting point for the spatial strategy, which is common to this Plan and the Cambridge City Local Plan 2014, is the non-statutory Cambridge and South Cambridgeshire Sustainable Development Strategy Review (SDSR) (RD/Strat/040), prepared by the Cambridgeshire and Peterborough Joint Strategic Planning Unit. The SDSR establishes a sustainable development sequence for the Cambridge sub-region as follows: within the urban area of Cambridge; on the edge of Cambridge; one or more new settlements; within or adjoining market towns; and at sustainable villages. The market towns, as defined for the purposes of the SDSR, are outside the administrative areas of

Cambridge and South Cambridgeshire (Greater Cambridge) and therefore this level is not relevant to the hierarchy as applied to Greater Cambridge.

19. The SDSR recognises the significant advantages in sustainability terms of locating development on the urban edge but conflict with Green Belt purposes is also noted. The SA Addendum Report November 2015 (RD/MC/020) and Supplement (RD/MC/021) also recognises the sustainability benefits of sites located on the edge of Cambridge particularly in relation to the use of sustainable transport modes. However most of the land on the edge of Cambridge, within South Cambridgeshire, is in the Green Belt and with the exception of a limited number of small sites referred to later in this report the Council is not proposing to release any significant areas of land from the Green Belt. Significant tracts of land have been taken out of the Green Belt on the edge of Cambridge through previous rounds of plan making and these sites are carried forward into this Plan and still have significant remaining development capacity. And so, having regard to the degree of protection afforded to the Green Belt in national policy, moving to the third tier of the SDSR is justified.
20. **SC7** and **SC8** are necessary to update the tables showing the distribution of housing development across the development sequence. **SC20** modifies the Key Diagram and is necessary to reflect various modifications including the extension to the CBC (policy E/1B) and the revised proposals for Cambridge East (policy SS/3). We have amended the wording to reflect our findings regarding policy E/2 and the Council will need to amend the revised Figure 2 to revert to what is shown on the submission draft Figure 2 in respect of this allocation.
21. The Plan proposes that development needs will be met at two new settlements at Waterbeach and Bourn Airfield. We have some concerns regarding the challenges of delivering new development at Waterbeach and Bourn, as set out below. However, there is no requirement for these sites to deliver housing in the early years of the plan period and consequently there will be an opportunity to review progress through the preparation of the joint local plan with Cambridge City Council, as required by the terms of the Greater Cambridge City Deal (see issue 17 below).
22. The NPPF affords a very high degree of protection to the Green Belt and we consider later in this report whether there are exceptional circumstances to justify the alterations to the boundary of the Green Belt.

### *Conclusion*

23. We therefore conclude that the spatial strategy is sound.

## **Issue 2 – Whether the Plan identifies a sound assessment of the overall level of housing need**

### *Housing Market Area (HMA)*

24. The Strategic Housing Market Assessment (RD/Strat/090) is based on the Cambridge HMA which comprises the City Council, South Cambridgeshire District Council, East Cambridgeshire District Council, Fenland District Council,

Huntingdonshire District Council, Forest Heath District Council and St Edmundsbury District Council.

25. The evidence provided by the Council (PM1/CCC&SCDC – Supplement 1) based on data from the 2011 Census demonstrates that the Cambridge HMA has a higher level of commuting self-containment than other options tested, and also a higher level of migration self-containment. It is probably inevitable that any defined HMA will have links with areas beyond its boundary but it is not practical, in this case, to attempt to subdivide local authority areas when defining an HMA.
26. The Cambridge HMA was the basis for the Memorandum of Co-operation (MoC) (RD/Strat/100) between the 7 Authorities in the Area together with Peterborough City Council. The MoC distributed the objectively assessed housing need derived from the sub-regional SHMA. This has been a long-standing arrangement and we find this definition of the HMA is reasonable.

*Objectively assessed need for market and affordable housing (OAHN)*

27. The OAHN of 19,000 new homes for South Cambridgeshire, included in the submission draft plan, is derived from the Cambridge Sub Region Strategic Housing Market Assessment (SHMA) (RD/Strat/090). In our interim findings (RD/GEN/170) we expressed our concerns that the methodology of the 2013 SHMA was not entirely consistent with Planning Policy Guidance (PPG) which was published in 2014.
28. PPG advises that household projections published by the Department for Communities and Local Government (now MHCLG) should provide the starting point estimate of overall housing need, whereas the SHMA relies on population figures from the 2011 Census, rather than household projections. We also expressed concern that the SHMA did not fully take into account the PPG advice relating to market signals, particularly in relation to affordability.
29. The Council commissioned further work to address these issues. The resulting report by Peter Brett Associates (the PBA report) (RD/MC/040) finds that the CLG 2012 household projections identify a housing need in the District of 17,579 dwellings for the period 2011-2031. The report compares the CLG household projections against alternative demographic scenarios from the Greater Essex Demographic Forecasts produced by the demographers Edge Analytics for the Essex Planning Officer's Society. The Edge Analytics study included South Cambridgeshire (and Cambridge City) to provide a broader picture. The CLG figure is higher than any of the Edge Analytics alternatives, although the differences are relatively small (all the Edge Analytics scenarios are within a range of less than 3,000 dwellings below the CLG projections). In the circumstances, there is no justification for departing from the CLG 2012 projections as the 'starting point' for determining OAHN.
30. PPG advocates the use of the most up-to-date evidence of future household growth, although it suggests that that the national household projection may require adjustment to reflect local demographic factors such as suppressed household formation rates. The Council's evidence (RD/MC/041), which is based on the 2011 Census, demonstrates that household formation rates for South Cambridgeshire are lower than those for England as a whole. This may be explained by the fact that the Census shows that South Cambridgeshire has

above average proportions of people living as a couple. We are not, therefore, persuaded that there is any justification for departing from the rates used in the 2012 national household projections.

31. In July 2016 the Government's 2014-based household projections were issued. The PPG states that, wherever possible, assessments of OAHN should be informed by the latest evidence, but that a change does not automatically mean that housing assessments are rendered outdated every time new projections are issued. To avoid further, potentially substantial, delay in the adoption of the Plan, we have taken the view that the most pragmatic approach is for the latest Government household projections to be considered through the early review of the Plan.
32. The PBA report then considers market signals and concludes that an uplift to the starting point is warranted to take account of market signals relating to affordability. PPG advises that any such upward adjustment should be set at a level which is reasonable. This is a matter of judgement and the report concludes that the appropriate level of uplift for South Cambridgeshire is 10%, citing the fact that market signals point to a modest market pressure, similar to Eastleigh and Uttlesford where a 10% uplift was considered reasonable by the examining Inspectors. We concur with this view. Applying a 10% uplift,  $(17,579 \times 110\%) = 19,337$ . This figure is slightly above the SHMA figure of 19,000. The SHMA methodology incorporates economic-based projections as well as those based solely on demographic change. The implication is that adopting the higher number will provide very slightly more workers than are required to support expected job growth. On this basis there is no justification for a further uplift to support job growth.
33. The PBA report was criticised for a number of reasons including the fact that it only deals with Cambridge City and South Cambridgeshire whereas the NPPF requires an assessment for the Housing Market Area. We consider that there is some force to this argument but, with the various authorities in the HMA at different stages in preparing or reviewing their local plans, it could lead to an excessive delay in completing this examination if an update for the whole HMA were to be required now. South Cambridgeshire is seeking to meet its OAHN in full and there is no evidence before us that other authorities have made a request to South Cambridgeshire to accommodate their unmet needs. It is reasonable and pragmatic in these circumstances to plan on the basis of these LPA areas and there is no clear evidence that it would lead to a significant under-estimate across the wider area.
34. For the reasons given above, we accept that the assessment of OAHN has some flaws and we are also aware that alternative methodologies used by some representors indicate that the OAHN for the District should be significantly higher than the SHMA figure. However, PPG notes that no single approach will provide a definitive answer. The figure of 19,337 is slightly above the figure derived from the SHMA. We are satisfied that it is acceptable and is the figure that should be included in the Local Plan to ensure it is positively prepared and justified. **SC3, SC12 – SC15** and **SC17**. The issues identified can be reconsidered, as necessary, in the review of the Plan, see issue 17 below.



### *Affordable housing*

35. The SHMA assessed the need for affordable housing according to the then current 2007 Planning Practice Guidance, which has since been replaced by similar guidance at paragraphs 022 – 029 of PPG. These calculations were revised later in the light of new data for 2013/14. The resulting net affordable need for South Cambridgeshire is 5,573 homes over the plan period.
36. The PBA report calculates that, if OAHN is met over the Plan period, the Council will receive enough developer contributions to meet its affordable housing need in full. There is, therefore no justification for applying any further uplift beyond the OAHN to meet affordable housing needs.

### *Conclusions on OAHN*

37. In all the circumstances we consider that the OAHN assessment of 19,337 new dwellings for South Cambridgeshire District is based on a reasoned judgement of the available evidence and is acceptable.

### **Issue 3 – Whether there is a reasonable prospect of a five-year supply of deliverable sites on adoption, and whether the policies and allocations in the Plan will ensure that the housing requirement is met.**

#### *Housing requirement*

38. The submission draft plan seeks to meet the OAHN, identified in the SHMA, of 19,000 new homes over the Plan period. Following the further work on OAHN which identified a figure of 19,337 the Council decided to revise the housing requirement in the Plan to 19,500 new homes. Rounding the figure upwards provides a degree of flexibility. **SC3, SC12, SC18** insert the revised figure into the Plan to ensure it is justified and effective. This implies an annual delivery rate of 975 homes per year.

#### *Buffer*

39. In their statement for Matter 8, the Councils provided information on housing completions compared with the targets set out in the adopted development plans for the years 1999/2000 to 2013/2014. In South Cambridgeshire, completions met or exceeded the target set out in the adopted Local Plan 2004 or Core Strategy 2007 on only 4 occasions. In the four years preceding the adoption of the Local Plan 2004, the adopted Structure Plan target was met only twice. The reasons for the failure to deliver housing at the required rates will include factors beyond the Council's control, including poor market conditions in the years following the recession in 2007/2008. Nonetheless, the failure to meet targets in so many years across the 15 year period represents persistent underdelivery, and we conclude that the appropriate buffer at this point should be 20%.

#### *Shortfall*

40. There has been a shortfall in housing delivery since the start of the plan period of 1,880 up to 31 March 2017. There are two generally recognised approaches to dealing with this undersupply: either within the next five years (known as the Sedgefield method), or over the remainder of the plan period

(the Liverpool method). The PPG advises that local planning authorities should aim to deal with any undersupply within the first five years of the plan period 'where possible'.

41. The Local Plan is reliant on two new settlements at Waterbeach and Bourn to deliver a significant proportion of the housing requirement. Both sites require significant investment in infrastructure and, realistically, may not start to deliver new housing until the mid or later years of the plan period. If the Sedgefield method were to be used it would almost certainly result in increased pressure to develop new housing in the rural areas which are a lower tier in the Sustainable Development Strategy. In the circumstances, the use of the Liverpool method is justified.
42. In summary therefore, the housing requirement is 975 dwellings per annum (dpa) which equates to 4875 over a 5 year period. Added to this is the shortfall spread over the remainder of the plan period ( $1880/14 = 134 \text{ dpa} \times 5 = 671$ ) ( $4875 + 671 = 5546$ ); and the 20% buffer ( $5546 \times 0.2 = 1109$ ), giving a total of  $5546 + 1109 = 6655$  at this point. The number in the Council's Figure A2 differs slightly (6656) due to the way the calculations have been rounded.

#### *Use of joint trajectory*

43. During the Examination the District Council, together with Cambridge City Council, prepared a Memorandum of Understanding (RD/Strat/350) which advocates the use of a joint housing trajectory for the two authorities. The foundation for the Cambridge City Local Plan and the South Cambridgeshire Local Plan is the Sustainable Development Strategy Review, as discussed under issue 1 above. Although a joint plan has not been prepared the two plans are both based on the SDSR, as explained above. In the early years of the Plan period, the majority of development in sites on the edge of Cambridge is likely to take place within the administrative area of the City whereas in the later years of the plan period most development will take place within South Cambridgeshire, including at the new settlements. The Memorandum of Understanding will therefore assist in securing sustainable development in accordance with the SDSR.
44. Planning Practice Guidance Ref 010 2a-010-20140306 advises: *Where there is a joint plan, housing requirements and the need to identify a five year supply of sites can apply across the joint plan area. The approach being taken should be set out clearly in the plan.* The use of the joint trajectory across the two plans will be a temporary measure until a joint local plan is prepared (see issue 17), which will bring the situation fully into line with PPG. In all the circumstances, this is a reasonable approach.
45. **SC4, SC28, SC30 – SC33, SC35, SC36** and **SC273** are necessary to establish the approach to calculating the five year housing land supply which will be used and to confirm the housing land supply position in November 2017. This will ensure that this part of the Plan is effective and consistent with national policy.

#### *Components of supply*

46. Figure A6, which is included in **SC273**, sets out the components of supply and the expected rates of delivery. We consider the main components of supply

(sites on the edge of Cambridge and new settlements) in more detail elsewhere in this report but the Council's assessment of supply is reasonable and evidence-based. Taking account of all forms of housing supply, comprising completions in the first years of the plan period, new and existing allocations and an allowance for windfall sites, the Plan makes provision for over 23,500 new dwellings. This is above the housing requirement figure of 19,500 new homes and therefore allows a significant degree of flexibility. The fact that some 15,000 of these new dwellings will be provided from the early completions, existing allocations and sites with planning permission, gives confidence that the housing requirement will be met.

## Conclusions

47. Subject to the inclusion of the MMs identified, we conclude that there is a reasonable prospect that the Plan will provide for a five year housing land supply on adoption and that the housing requirement will be met.

### **Issue 4 – Is the Plan consistent with national policy in its approach to the Green Belt? Are the allocations of Green Belt land justified by exceptional circumstances? Should other Green Belt allocations be made?**

#### *Purposes of the Green Belt*

48. Paragraph 80 of the Framework sets out 5 purposes of the Green Belt. Paragraph 2.29 of the Plan sets out three Cambridge Green Belt purposes: to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre; to maintain and enhance the quality of its setting; and to prevent communities in the environs of Cambridge from merging into one another and with the city. It is not the role of the Local Plan simply to reiterate national policy. It can, however, interpret national policy in a local context. The Cambridge Green Belt purposes reflect the importance of Cambridge as a historic city and the particular role of the Green Belt in preserving its setting. The Cambridge purposes have been included in previous development plans including the Cambridgeshire and Peterborough Structure Plan 2003 and the South Cambridgeshire Core Strategy (2007). In any event, the national Green Belt purposes can be taken into account, where relevant in the context of any specific proposal. In our view the Cambridge Green Belt purposes are not inconsistent with national policy and the Plan is sound in this respect.

#### *Development Management in the Green Belt*

49. Policy S/4 establishes the overall approach to the Cambridge Green Belt within South Cambridgeshire. **SC9** is necessary to establish that the new development will only be permitted in accordance with the NPPF.
50. Policy NH/8 of the LP requires that development proposals *outside but in the vicinity of the Green Belt* (our emphasis) should not have an adverse effect on the rural character and openness of the Green Belt. We can find no support for this approach in the Framework. **SC161** is therefore necessary to ensure consistency with national policy.
51. **SC162** is necessary to clarify that there are no villages in the Cambridge Green Belt, as each is an 'island' inset within it, and to ensure the Plan is

effective. **SC163** is necessary to ensure that the Plan is consistent with paragraph 87 of the NPPF in relation to inappropriate development in the Green Belt. **SC166** and **SC167** are necessary to ensure consistency with paragraphs 81 - 89 of the NPPF in relation to new facilities for outdoor sport and recreation. **SC164** and **SC165** are necessary to reflect the NPPF approach to previously developed sites and infill development in the Green Belt.

### *Green Belt Review*

52. Significant tracts of land were taken out of the Cambridge Green Belt in the South Cambridgeshire Local Development Framework Documents (2007 – 2010) at sites on the edge of the City. These sites are now being developed and will contribute to the delivery of new housing in the early years of this plan period.
53. It was suggested, by some representors, that there may be areas of previously-developed land within South Cambridgeshire, which had not been identified in the SHLAA, which could be allocated for development to avoid the need to release land from the Green Belt, but no specific sites were identified. The District is a rural area under significant development pressure and we find it highly unlikely that there are a significant number of previously developed sites which have been overlooked through the SHLAA process.
54. Having regard to the overall spatial strategy and the finding of the SDSR that the edge of Cambridge is the second most sustainable location for growth in the Greater Cambridge area, the Council, together with Cambridge City Council, undertook a further review of land in the Cambridge Green Belt with a view to establishing whether any land could be released from the Green Belt without significant harm to the purposes of the Green Belt. The review focused on areas close to the inner Green Belt boundary which therefore had most potential for development in line with the SDSR. The Cambridge Green Belt extends beyond the area studied in the review.
55. The review identified a limited number of sites that could be released from the Green Belt, which we comment on below. The review assessed parcels of land in the Green Belt and scores their importance on a scale of 'low', 'medium' and 'high' with respect to the Green Belt purposes of setting, character and separation. An overall score of importance to Green Belt is then given for each parcel of land. As we set out in our initial findings of May 2015 (RD/GEN/170) we found it difficult, in some cases, to understand how the overall score for importance to Green Belt had been derived from the individual scorings for setting, character and separation. In response to our concerns, the Councils commissioned an independent assessment of the Inner Green Belt boundary. This study (CIGBBS) (RD/MC/030) found that the great majority of the land within the Cambridge Green Belt was assessed as being important to Green Belt purposes and in broad terms confirmed the overall findings of the Councils' 2012 review.
56. A number of criticisms were made of both the Councils' 2012 review and the later assessment, including the identification of areas for assessment, and whether the identification of the qualities/assessment criteria against which the different areas were assessed.

57. Both the Councils' Review and the CIGBBS identify areas for assessment as sectors and subsectors. The sectors were broadly defined using the main radial routes and other features such as the river. The sectors were then divided into subsectors where there were clear changes in the characteristics of the land. It was argued by some that a much finer grain should have been used. However, the nature of the purposes of the Green Belt, including preventing urban sprawl and the merging of settlements require assessment at a broad scale. We consider that the methodology employed is based on a reasoned judgement having regard to physical features and landscape characteristics and is a reasonable approach to take.
58. There is no widely accepted methodology to guide the way in which assessments of the Green Belt should be carried out, although the Planning Advisory Service (PAS) document *Planning on the Doorstep: The Big Issues – Green Belt (RD/Strat/460)* advises that '*Any review of Green Belt should involve an assessment of how the land still contributes to the five purposes*', although the document accepts that Green Belt purpose 5 '*to assist in urban regeneration.....*' is likely to apply equally to all land within the Green Belt, and the value of different land parcels is unlikely to be distinguished by application of this purpose. The 16 qualities/assessment criteria used in the LDA study draw on the other 4 national purposes and the Cambridge Green Belt purposes in identifying factors which are particularly important for the City and its surrounding landscape. In general terms, we find the CIGBBS to be a robust approach which follows the PAS good practice advice, although for the reasons given below we disagree with its conclusions regarding policy E/2. **SC5** and **SC10** are necessary to update the text of the Plan to reflect the additional work undertaken on the Green Belt Review, and other matters. We have made minor amendments to the wording of **SC10** to avoid confusion bearing in mind our conclusions on policy E/2.

#### *Green Belt allocations*

59. The Plan proposes to release a limited number of sites from the Green Belt. These are: a site between Huntingdon Road and Histon Road as an extension to the urban extension which is currently being developed; a site on Fulbourn Road as an extension to the Peterhouse Technology Park; and sites for residential development in Sawston, Comberton and Impington.
60. More detailed consideration is given elsewhere in this report to the issue of whether exceptional circumstances exist to justify the alterations to the boundary of the Green Belt but, in summary, we find that these allocations are sound.

#### *Should any further changes be made to the Green Belt to allocate land for development?*

61. A number of sites have been promoted for development, by some representors, on the edge of Cambridge in the Green Belt. These sites straddle the boundary of the City and South Cambridgeshire District and were referred to as: Land to north of Barton Road, proposed as a sustainable urban extension for 1,450 new homes and associated facilities and services; Land at Grange Farm, proposed for 400-500 new homes and open space/sports use; Cambridge South, promoted for employment-led mixed use development; and

Cambridge South East (initially proposed as a site for the development of 3,500 to 4,000 dwellings with associated services and facilities, but also as a smaller site for up to 1,200 dwellings and a primary school); Land at Fen Ditton, proposed for residential-led mixed use development to provide 400-500 new homes; Land West of Hauxton Road, Trumpington, which is promoted as a site for housing and sports uses or simply housing. In the light of our findings relating to the spatial strategy and the assessment of housing, employment and other needs, and the overall supply of land to meet that need including sites outside the Green Belt, we conclude that the Plan is sound without the allocation of additional sites in the Green Belt.

### *Conclusions*

62. Subject to the inclusion of the MMs identified, we find that the Plan is consistent with national policy in its approach to the Green Belt, that the allocations in Green Belt are justified by exceptional circumstances, and that there is no justification for the allocation of additional sites for development in the Green Belt.

### **Issue 5 – Whether the Strategic Allocations on the edge of Cambridge will deliver sustainable development to meet identified needs**

63. A significant proportion of the overall housing requirement will be provided in the major allocations carried forward from the Core Strategy and AAPs for North West Cambridge, Cambridge Southern Fringe and Cambridge East. These are large sites which straddle the boundary of South Cambridgeshire and Cambridge City.

### *Land between Huntingdon Road and Histon Road*

64. Land was taken out of the Green Belt in the South Cambridgeshire Site Specific Policies DPD to provide an urban extension to Cambridge. Policy SS/2 of that Plan makes provision for the development of approximately 1,000 new dwellings in South Cambridgeshire. This Local Plan proposes a minor realignment of the Green Belt boundary along the northern edge of the MDS. This will marginally decrease the separation of the MDS from the A14 but will make no appreciable difference to the perception of the City and its setting, nor to the separation between the City and the villages of Girton and Histon and Impington, or the separation between the villages. The land to be released from the Green Belt will allow for approximately 100 dwellings to help meet the OAHN in a very sustainable location on the edge of Cambridge. In the circumstances we consider that the very limited harm to the Green Belt is outweighed by the benefits of the provision of new dwellings in a sustainable location, thus amounting to the exceptional circumstances necessary to justify an alteration to the boundary of the Green Belt. The Council has proposed a number of MMs (**SC42-54**) which will, generally, provide greater flexibility in relation to the number of houses to be provided through a design-led approach, and regarding the achievement of sustainable patterns of travel. **SC67** updates the illustrative diagram in the Plan. These MMs are necessary to ensure the Plan is effective.

### *Cambridge East*

65. This strategic site is already the subject of an AAP which was jointly adopted in 2008 by Cambridge City Council and South Cambridgeshire District Council. The AAP remains extant after the adoption of this Plan subject to the policies identified as being superseded in proposed Appendix Ba (**SC274**). This MM, which also applies to the adopted AAPs for Northstowe and Cambridge Southern Fringe, is necessary to ensure clarity, effectiveness and compliance with the Regulations. The Cambridge East AAP allocates land in South Cambridgeshire and the City for between 10,000 and 12,000 new homes. The development was contingent upon the relocation of Marshall Aerospace. In 2010 Marshalls found that they did not have an appropriate site for relocation. The submission draft plan only allocates those parts of the site which were considered to be capable of development whilst the airport remains in operation.
66. During the course of the examination, however, the intentions of the landowners have been clarified and it has been established that additional areas of land can be developed during the plan period. **SC55** provides a revised text for the policy which reflects the most up-to-date expectations regarding delivery of development during the Plan period having regard to the continued use of Cambridge airport, and **SC69** updates the illustrative diagram in the Plan. These MMs are necessary to ensure that the Plan is effective in bringing forward comprehensive development on this sustainable site on the edge of Cambridge, and to ensure consistency with the emerging Cambridge Local Plan 2014.
67. The numbers of dwellings in the policy are approximations and Policy CE/10 of the AAP requires adequate highway capacity to serve all stages of the development. This AAP policy is wide ranging and includes primary road access, managing traffic impacts through Transport Assessments, and contributions in respect of capacity on existing orbital routes related to the volume of traffic generated by Cambridge East on those routes. The policy addresses the need for the provision of a new secondary school, and other infrastructure to support the development.

### *Cambridge Northern Fringe East*

68. Policy SS/4 sets the context for development of the strategic site that lies within South Cambridgeshire. The quantum, phasing and other details of development will be established through the joint preparation of an AAP with the City Council. **SC56 – SC66** and **SC70** reflect the most up-to-date position which is also consistent with the emerging Cambridge City Local Plan 2014, and will ensure the policy is effective. We have made a minor amendment to the wording of **SC62** to clarify the way in which applications submitted before the adoption of the AAP will be considered as the Council has no control over the making of planning applications, only the way in which it deals with them. We have also made minor amendments to **SC65** to ensure flexibility and effectiveness.

## *Conclusion*

69. The strategic sites on the edge of the Cambridge urban area, will provide sustainable development to help meet identified needs, particularly for new housing.

## **Issue 6 – Whether the proposed new settlements will deliver sustainable development to meet identified needs**

### *Waterbeach*

70. Policy SS/5 allocates land at the former Waterbeach Barracks and adjoining land to the east and north for a new town of 8,000 to 9,000 dwellings. The former barracks site is one of very few substantial areas of previously developed land in South Cambridgeshire and therefore a significant development opportunity. The inclusion of adjoining land is necessary to achieve a settlement of a size which can sustain local services and facilities and make a significant contribution to meeting housing need in the District. The Council accepts that the capacity of the site was derived from the high level assessment in the SHLAA, and that it can only be regarded as an approximation.
71. The policy envisages that the development of the site will be guided by the preparation of an Area Action Plan. During the course of the Examination the Council received legal advice that the matters intended to be included in the second tier of planning documents for both Waterbeach and Bourn new settlements should, as a matter of law, be prepared as a Supplementary Planning Document (SPD). We have no reason to dispute this advice. A number of MMs are necessary to reflect this change and to include the most up-to-date position (**SC71 – SC74, SC76 – SC92, SC215**).
72. The policy, as submitted, envisages that development will be phased with no more than 1,400 dwellings to be completed by 2031. The Council has proposed to delete this restriction. Whilst we think that the Council is correct to assume a modest delivery rate for the purposes of the housing trajectory, there is nothing to be gained by phasing development if the necessary infrastructure can be put in place at an earlier date. **SC22, SC29, SC75 and SC19** will provide greater flexibility in accordance with the requirements of the NPPF.
73. The policy recognises the need to protect the settings of listed buildings near the site, including Denny Abbey which is also a scheduled monument. Following consultation with Historic England, the Council is proposing a revised northern boundary to the site. An amendment to the policies map is necessary to protect the setting of Denny Abbey and ensure consistency with the NPPF, which requires heritage assets to be conserved.
74. The submission plan sought to allocate land between the proposed new settlement and the existing Waterbeach village as an extension to the Cambridge Green Belt. Shortly after the Plan was submitted for examination, planning permissions were granted, at appeal, for residential development on these sites. **SC11 and SC72** and the amendments to the policies map are necessary to reflect this reality. We agree with the view of the appeals



Inspector that it is not necessary to extend the Green Belt to meet the objective of maintaining the separate identity of the existing village.

75. We are mindful of the concerns expressed by local residents and others in relation to a range of issues including: the effect on A10 trunk road, which is already operating at capacity; the impact on the existing village of Waterbeach; and the potential inconvenience of relocating the existing train station to the new town. All these issues are recognised in the policy and the SPD may provide further guidance. However, we are not persuaded that there are any overriding constraints that cannot be satisfactorily resolved. The review of the Plan (see issue 17 below) will provide an opportunity to assess progress.

### *Bourn Airfield*

76. Policy SS/6 allocates land at Bourn Airfield, shown on the policies map as a Major Development Site (MDS), for the development of a new village of approximately 3,500 dwellings.
77. Bourn Airfield was a World War II airfield. Since it closed as a military airfield a low level of aviation activity has continued with use by a private flying club. There is also some employment related activity on the site but the majority of the site has been in agricultural use for many years. There are some remnants of the former airfield use, but the extent to which the site can be regarded as previously developed land is disputed. However, the rural nature of South Cambridgeshire means that, apart from the former barracks at Waterbeach, no other sites have been identified with a greater proportion of previously developed land which are available or suitable to accommodate development of this scale.
78. The SHLAA and SA considered potential alternatives to the development of Bourn Airfield, including an area of land to the north of the A428, referred to for the purposes of the examination as Harborne. A number of planning constraints to the development of the Harborne site were identified including the proximity of sites of national and local nature conservation importance and its separation from Cambourne by the dual carriageway A428. The promoter of the site argues that the perceived constraints could be mitigated and we accept that acceptable mitigating measures, including new physical infrastructure, may overcome a number of the identified constraints. However, the site is in an elevated location which is part of an attractive open and rolling landscape. Development on the site would be highly visible when viewed from surrounding roads and villages. Even with the incorporation of open space, landscaping and other mitigation measures, development of the scale proposed on this site would have a significant adverse impact on the attractive rural landscape. The site promoter argues that the Council's sustainability appraisal and comparison with Bourn Airfield is defective. There is an element of judgement which has to be exercised in carrying out the SA, and we find the Council's overall approach to be reasonable. In any event, it is our view that the adverse landscape impact of this proposal outweighs any other considerations including the potential of the site to deliver a Park and Ride site.

79. Some respondents suggest that the development proposed for Bourn Airfield could be better accommodated as a further extension to Northstowe. The Plan already allocates the 'reserve' land included in the adopted Northstowe AAP and there is no evidence before us that land outside the AAP is available or developable.
80. The policy envisages that the development of the site will be guided by the preparation of an Area Action Plan. As indicated above in relation to Waterbeach, the Council received legal advice that the matters intended to be included in the second tier of planning documents should, as a matter of law, be prepared as SPD. A number of modifications (**SC93, SC95 - SC109, SC215**) are necessary to reflect this change, including an increase in the site area to be addressed through the SPD. However, this would not necessarily mean an increase in the area covered by built development. We agree that the inclusion of an existing employment site in the Major Development Site will allow for a comprehensive approach to development of the new settlement.
81. Concerns have been expressed that the proposed development of Bourn Airfield would lead to a coalescence of development south of the A428 from Highfields Caldecote through to the development at West Cambourne which has recently been granted planning permission. Development on the scale proposed at Bourn Airfield will inevitably change the character of the area but the policy requires measures to address landscape and townscape issues and to avoid the impression of ribbon development south of the A428. We are aware that proposals for development at Bourn Airfield have been previously rejected by Planning Inspectors expressing concerns about whether the size of the site would allow sufficient room to give adequate separation from Highfields Caldecote (RD/EX/120). This judgement, however, was made in 1992, in the context where a preferable option, the land now developed as Cambourne, was available.
82. The Local Plan sets the framework for considering development proposals which will be expanded upon in the SPD. On the basis of the information before us, including the latest iteration of the Masterplan, we consider that there is a reasonable prospect that a satisfactory form of development can be achieved through a design led approach which may include residential densities higher than those in some of the existing villages. It is not intended that the Bourn Airfield development will be created as a wholly self-contained settlement. The proximity of the site to Cambourne offers opportunities for interaction recognised that Cambridge will continue to be the major source of employment opportunities for residents between the settlements in relation to the provision of services and facilities. It is also of the new settlement.
83. The Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) recognises that the A428/A1303 corridor is subject to congestion and proposes a high quality public transport route to serve the Bourn Airfield and Cambourne West proposals. Policy SS/6 recognises the need for on and off-site infrastructure provision to mitigate the impact of the development on the highway network. The infrastructure Delivery Study 2015 (RD/MC/080) and the Local Plans Viability Update (RD/MC/090) consider infrastructure needs for this site and, taking into account viability, conclude that there will be sufficient developer funding available to deliver on site infrastructure requirements and to make a contribution to off-site infrastructure. It is also envisaged that the

Greater Cambridge City Deal which has secured £100 million as the first five year tranche of funding with two further five year tranches of up to £200 million, will contribute to delivering sustainable transport infrastructure including the improvements to bus services in the A428 corridor.

84. At the time this matter was considered at the examination, a certain amount of work had been undertaken investigating options for what is known as the Cambourne to Cambridge Better Bus Journeys project, but no clear route alignment had been confirmed. It is fair to say that the scheme is still at an early phase of development, but the City Deal Executive Board allocated £59 million towards the eastern section of the scheme in January 2015, and we consider that there is a reasonable prospect that the scheme will be completed during the Plan period.
85. Policy SS/6 seeks to phase development at Bourn Airfield, so that the first housing completions will come forward in 2022, with no more than 1,700 dwellings being completed by 2031. Whilst we think that the Council is correct to assume a modest delivery rate for the purposes of the housing trajectory, there is nothing to be gained by deliberately phasing development if the necessary infrastructure can be put in place at an earlier date. The removal of phasing requirements for both Bourn Airfield and Waterbeach new settlements will introduce greater flexibility into the development strategy of the Plan (**SC19, SC29, SC34** and **SC94**) are therefore necessary to ensure flexibility and deliverability.
86. Concern about flooding is also raised. The site lies within Flood Zone 1 which indicates a low risk of flooding and policy SS/6 together with other policies in the Plan provides an appropriate framework for the consideration of surface runoff and foul drainage.
87. We are mindful of the significant levels of opposition to the Bourn Airfield proposal expressed by the local community and others, including fears of coalescence and traffic implications, including local traffic management issues relating to the Broadway. There is a degree of scepticism from the local community about whether their concerns can be adequately addressed. But there is nothing to indicate that these concerns cannot be satisfactorily addressed through the development management process and further guidance provided by SPD. The review of the Plan (see issue 17 below) offers an opportunity for the proposal to be reviewed in the light of the further work that will have been completed at that time.

#### *Northstowe*

88. The New Settlement of Northstowe is currently under construction in accordance with the Northstowe Area Action Plan (AAP). Policy SS/7 of the Local Plan allocates the reserve land included in the AAP as an extension to the new town, to provide flexibility for the delivery of the new development. The Plan refers to a total of 9,500 new homes to be developed at Northstowe, whereas the AAP sets a target of 10,000 new homes as a reasonable expectation. **SC110** which amends the figure in the Local Plan to 10,000 homes is therefore necessary to ensure consistency with the AAP which is also part of the development plan.

### *Cambourne West*

89. Following the submission of the Local Plan the Council resolved to grant planning permission for a mixed use development including 2,350 new homes on a site which includes, but is larger than the allocation in policy SS/8. The fact that a different proposal has been granted permission does not necessarily make the allocation in the submission plan unsound. **SC22** and **SC114** make reference to the planning permission and **SC111** and **SC112** clarify the approach to be taken to footpaths and drainage. These MMs are necessary for clarity and effectiveness but we are not persuaded that the modification proposed to distinguish between the village and Parish of Caxton is necessary for soundness.

### *Conclusion*

90. The proposals for Northstowe and Cambourne West are well advanced and highly likely to make a significant contribution to meeting development needs, particularly for housing, during the plan period. The proposals for Waterbeach and Bourn Airfield raise a number of issues, particularly in relation to the provision of new infrastructure. Work is underway, however, to address these issues. The review of the Plan offers an opportunity to opportunity to consider progress towards ensuring that the requirements of the policies can be met, particularly in relation to sustainable transport measures. On the basis of the evidence before us, we conclude that there is a reasonable prospect that the new settlements will deliver sustainable development to meet identified needs during the plan period.

## **Issue 7 – Development in the rural area**

### *Village Hierarchy and development limits*

91. The Council's methodology for classifying villages into the Plan's hierarchy of Rural Centres, Minor Rural Centres, Group Villages, and Infill Villages is set out in the South Cambridgeshire Village Classification Report 2012 (RD/Strat/240) Representations were made in relation to a number of villages, suggesting that they had been incorrectly classified. The classification report, which is supplemented by the Village Services and Facilities Study 2014 (RD/Strat/250) together provide a comprehensive evidence base on which to base the judgements necessary to allocate individual villages to a specific level in the hierarchy. Individual components of that analysis may change over time but it is not practical to update the analysis on a rolling basis. Having reviewed the evidence base, the Council is proposing to add Streetly End to the list of infill villages (**SC27**), we are satisfied that this is a reasoned judgement and that the hierarchy set out in the plan is justified and effective.

### *Development frameworks*

92. We have reviewed the Council's approach to determining the development framework boundaries which is summarised in paragraph 2.49 of the Plan. We consider it to be a robust methodology for defining the boundaries which assist in the implementation of policies designed to guard against the development of isolated dwellings or incremental growth in unsustainable locations. A

number of representors sought changes to the development framework boundaries for individual settlements, most commonly to seek inclusion of additional land within the boundaries. With the exception of the site at Sawston/Pampisford (see below), we are satisfied that the Council applied its stated methodology in a consistent and reasonable manner and no changes to the development framework boundaries are necessary to ensure the soundness of the Plan.

93. Policy S/7 resists development outside village framework boundaries and we consider this to be justified to avoid development in unsustainable locations. The limits on the scale of development in minor rural centres, group villages and infill villages set out in policies S/9 – S/11 are necessary for the same reason. The most appropriate way to provide for local needs on sites which have the support of the local community is through the preparation of Neighbourhood Plans. In this context, **SC23** and **SC24** are necessary to ensure flexibility to enable Neighbourhood Plans to make allocations outside the development frameworks, in a way which is in general conformity with the Local Plan.
94. In some cases, changes to the development framework boundaries and/or the Green Belt boundary were sought to avoid undue restrictions on the growth of local businesses. However, there are many employment uses and businesses which happen to be located in the Green Belt and these circumstances would not constitute the exceptional circumstances necessary to alter the Green Belt boundary.

*Land at London Road, Sawston*

95. This employment site is shown in the submission policies map as being part of Pampisford, which is classified as an infill village. Although the site lies within Pampisford parish it is contiguous with the Rural Centre of Sawston and is separated from the village of Pampisford by a stretch of open countryside. The Council's own evidence concludes that the site 'better relates to Sawston' and it included a proposed change to include the site in the Sawston Development Framework in its Issues and Options 2 Document. The change was not carried forward into the submission draft Plan because it 'did not have local support'. However, the Council was not able to point to any *planning reasons* why the site should continue to be included in the Pampisford Development Framework and I note that parish boundaries are not included in the criteria that were used to define the settlement boundaries. We have, therefore, come to the view that the submission plan is not sound in relation to this matter because it is not justified by the evidence. **SC26** which includes the site within the Rural Centre of Sawston is therefore necessary to ensure the Plan is justified and effective.

*Residential development in the villages and the rural area*

96. Policy H/1 makes allocations for residential development at Sawston, Histon and Impington, Melbourn, Gamlingay, Willingham and Comberton.
97. Allocation H/1:a relates to Dales Manor Business Park in Sawston. **SC177** adds an additional development requirement that the tree belt and hedges on the south-west part of the site should be retained except as necessary to

provide access. This MM is necessary to ensure an acceptable relationship with existing residential development and the effectiveness of the Plan.

*Sites in the Green Belt*

98. Sawston is one of the largest and most sustainable villages in the District with good transport links to the City. The Plan seeks to remove two sites on the east of the village from the Green Belt on either side of Babraham Road and allocates them for residential development (sites H/1:b and H/1:c). The two sites are currently fields in arable use. As the sites are on the edge of the village they are some distance from the facilities and services available in Sawston, but generally within 2km which is a reasonable distance for cycling.
99. The development of these two arable fields would have a negative impact on the purposes of the Green Belt as it would result in encroachment into the countryside but this impact is mitigated to some extent by the relatively small size of the sites which have a combined area of 15.28ha. Development of these sites would also result in a minor reduction in the separation between Sawston and Babraham. However, the eastern edge of Sawston is currently a hard urban edge. Development of these sites incorporating a significant landscape buffer along the eastern boundaries of both sites and the southern boundary of site H/1:c, as required by the policy, offers the opportunity to provide a softer green edge to the village.
100. These sites are good quality agricultural land but that applies to much of the District and the use of such land is necessary if the housing requirement is to be met. Issues relating to infrastructure provision including school capacity and highway works are capable of resolution through the development management process.
101. In all the circumstances we conclude that the limited harm to the Green Belt is outweighed by the provision of 340 new dwellings in a sustainable location and the opportunity to improve the character of the Green Belt boundary, thereby comprising the exceptional circumstances necessary to justify the alterations to the Green Belt boundary.
102. A site north of Impington Lane, in Histon and Impington, is proposed to be taken out of the Green Belt and allocated for residential development with an indicative capacity of 25 dwellings. The site is currently open land on the edge of the village and adjoins new residential development to the west. Inappropriate development is, by definition, harmful to the Green Belt and in this case, there would be some encroachment into the countryside. Development of this site would, however, have a very limited impact on the setting and special character of Cambridge due to its size and relative degree of containment by existing development to the south and west. Development in accordance with policy H/1:d, offers the opportunity to create a landscape buffer to provide a softer green edge to the village. Histon and Impington is a rural centre and one of the most sustainable villages in the District. The site lies within easy reach of the shops, schools and other services that the village has to offer. This location is also close to good public transport links with the City. We conclude that the limited harm to the Green Belt is outweighed by the provision of 25 new dwellings in a highly sustainable location, thereby constituting the exceptional circumstances necessary to justify the alteration

to the boundary of the Green Belt. Access to the site has been raised as a constraint to development but the County Council, as Highway Authority, has confirmed that there are no insurmountable problems which cannot be dealt with through the development management process and through the use of its powers under the Highways Act 1980.

103. The allocation within the Green Belt at Comberton (H/1:h) is an open field on the edge of Comberton which is designated as a Minor Rural Centre. The site is designated for development with an indicative capacity of 90 dwellings to include affordable housing provision to help meet the needs of the villages of Comberton and Toft. There is no evidence before us that sites outside the Green Belt are available in a suitable location to meet these locally identified needs. The policy also requires the provision of community facilities including a football pitch and changing facilities for Toft and community car parking which would also be available as overspill parking for Comberton Village College.
104. Inappropriate development is, by definition, harmful to the Green Belt and in this case development of the site would reduce the separation between Comberton and Toft, although it would not extend built development further west than the existing built development to the north of the site. The site is surrounded by mature hedgerows and trees which would help to limit the impact of development. Considered in the round we consider that the impact of the proposed development would have a moderate impact on the Green Belt that would be outweighed by the benefits of the provision of new housing and in particular affordable housing to meet local needs as well the provision of other community benefits, thereby constituting the exceptional circumstances necessary to justify an alteration to the boundary of the Green Belt. The site received outline planning permission during the course of the examination.

*Other sites and policies for the rural area*

105. The sites allocated for development in Melbourn and Willingham have had planning permission granted, as has a large proportion of the site at Gamlingay. The Council's proposed MM SC178 makes minor wording changes intended to ensure internal consistency in the policy. This would improve the Plan, but the intent of the Policy is clear and we do not consider the MM to be necessary for soundness.
106. In some cases, sites outside the development frameworks have been put forward by representors as being necessary to meet general housing need, or local needs. In response to requests from Parish Councils, the Council has sought the inclusion of sites at Great Abington, Little Abington and Graveley and has proposed the inclusion of these sites through MMs SC179 and SC180. However, we do not consider that the Plan can be found unsound because of a failure to allocate small sites in locations that are relatively unsustainable, in accordance with the SDSR, when the Plan already allocates sufficient land to meet the OAHN. As indicated above, the appropriate place to make such allocations is through the preparation of a Neighbourhood Plan or the review of the Local Plan.
107. **SC181** provides a listing of allocated sites which have received planning permission and is necessary for clarity. We have, however, removed the

reference to the site in Great Abington which, as a result of our conclusion above will not be a site allocated in this Plan. The appropriate place to consider revisions to development framework boundaries in the light of all permissions granted is through the review of the Plan.

108. Policy H/2 allocates the Bayer CropScience site in Hauxton for residential-led mixed-use development. **SC183** amends the wording of the supporting text to ensure consistency with paragraph 89 of the NPPF.
109. Policy H/4 guides proposals on the former Fen Drayton Land Settlement Association Estate. The policy requires residential buildings to achieve Level 6 of the (now withdrawn) Code for Sustainable Homes (CSH). The Council has proposed modifications (**SC184**, **SC185** and SC186) to delete references to CSH. However, the wording of MMs **SC184** and SC186 include a requirement for new dwellings on the site to be carbon neutral. This is not consistent with national policy and we have amended the wording of **SC184** and deleted SC186. **SC187** indicates that a SPD will be provided and this is necessary to ensure the policy is effective.
110. Policy H/5 makes it clear that windfall residential development will not be permitted south of the A1307 at Linton on the grounds of highway safety. The A1307 is a major transport route with a high casualty record despite the presence of a pelican crossing and a reduced speed limit. Windfall residential development will not therefore be sustainable due to the inadequate access to the village facilities and services which are to the north of the A1307.
111. As part of the Greater Cambridge City Deal, the partners have committed to delivering 1,000 additional new homes on rural exception sites by 2031. **SC39** clarifies the relationship between that commitment and delivery of the Local Plan housing requirement. The MM specifies that only once delivery exceeds the level needed to meet the requirement of this Plan and the emerging Cambridge City Local Plan will new dwellings, which meet the criteria specified by the Greater Cambridge City Deal Board, be counted towards the delivery of the City Deal commitment. This MM is necessary for clarity and effectiveness.

### **Issue 8 – Whether the Plan will deliver a wide choice of high quality homes, consistent with national policy.**

112. Policy H/8 aims to provide a wide choice, type and mix of housing. This accords with the aspirations of paragraph 50 of the NPPF. **SC188**, **SC189**, **SC191** and **SC192** introduce references to the provision of starter homes and people wishing to build their own homes. This is necessary to ensure consistency with PPG. We have made a minor addition to the wording to include a reference to the private rented sector which is also referred to in PPG (Ref ID: 2a-021-20160401). Although the revised policy does not specify the number of plots that should be available for sale to self and custom builders, there is not at present a sufficient evidence base to justify it. Should that position change, it is a matter that can be addressed through the review of the Plan.
113. Section 3 of the policy refers to the (now withdrawn) Lifetime Homes standard. **SC190** replaces this with a requirement that 5% of homes should



be built to the accessible and adaptable dwellings M4(2) standard, to be split evenly between market and affordable housing. The Council's evidence shows that about 40% of households in Council housing include someone with a disability. The Cambridge and South Cambridgeshire Local Plans Viability Update (2015) (RD/MC/090) found that the proposed requirement for 5% would have a marginal impact on viability. There is therefore a local justification for the revised policy in accordance with the requirements of PPG and the MM is necessary to ensure consistency with national policy by the removal of the Lifetimes Homes standard. The Council's proposed MM **SC193** to paragraph 7.28 seeks to set a different requirement, that 5% of private new homes on sites of 20 or more dwellings should be built to the M4(2) standard. If this MM, as proposed, were to be included there would be a confusing difference between the policy and its supporting text. Our recommended MM removes reference to the Lifetimes Homes standard but does not set a different requirement from the modified policy H/8.

114. Policy H/9 requires all developments which increase the net number of homes on a site by 3 or more to provide affordable housing. For the reasons given in our interim findings (RD/GEN/390) **SC194** and **SC195** are necessary to increase the threshold to ensure conformity with national policy which requires that affordable housing should not be sought from developments of 10 units or less.
115. Policy H/10 seeks to enable the provision of affordable housing to meet identified local housing needs on sites adjoining development framework boundaries (rural exception sites). **SC196** adds a further sentence to Section 1d to allow Mortgagee in Possession (MiP) clauses where it can be demonstrated that this is necessary to enable development to proceed. Housing Associations borrow funds from the private finance market in order to deliver new affordable homes. However, lenders are becoming increasingly risk averse. A MiP clause in a Planning Deed entered into accordance with section 106 of the Town and Country Planning Act 1990 provides a means of overcoming the concerns of private market lenders in this regard.
116. **SC197** allows for the provision of some market housing where this would facilitate the delivery of significant affordable housing and **SC198** simplifies the requirements for demonstrating that market housing may be required for viability reasons. These MMs introduce a degree of flexibility to ensure the plan is effective.
117. Policy H/11 relates to residential space standards. The Written Ministerial Statement (25 March 2015) introduced new optional space standards for dwellings. Planning Policy Guidance (PPG) ID: 56-019-20150327 indicates that local planning authorities which are seeking to require an internal space standard should include a policy in their Local Plan referring to the standard. In order to justify the requirement, account should be taken in respect of the need, viability and timing.
118. The Council has produced a document entitled "Evidence for Residential Space Standards in South Cambridgeshire" [ERSS] (RD/H/810). The policy as originally drafted related to the Homes and Communities Agency (HCA) space standards for affordable homes.

119. The ERSS has considered all of the three criteria in the WMS. The Council has measured the gross internal area, bedroom sizes, built-in storage space, and ceiling heights of 115 new homes across 36 approved developments within the district. Those developments included schemes of 2 or more dwellings on the edge of Cambridge, at new settlements, and within or on the edge of a variety of villages across the settlement hierarchy.
120. The majority of new homes did not meet the national space standards in terms of floorspace of single bedroom(s) and built-in storage requirements for the whole dwelling. 54% of single bedrooms were smaller than the standard and 55% of all dwellings had less built-in storage for the whole dwelling. Given these shortfalls, there is therefore a sound basis for adopting the standards on the ground of need.
121. The study also considered the implications of requiring the national space standards on viability. It concluded that if the previously recommended affordable housing policies and CIL rates are maintained, alongside the inclusion of optional elements of national strategy (e.g. the space standards) viability would not jeopardize development coming forward across the City or district.
122. In the circumstances we conclude that the introduction of the national space standards is justified in accordance with PPG and **SC199** which replaces local standards with the national standards is necessary to ensure consistency with national policy.

### *Conclusions*

123. Subject to the inclusion of the MMs, the Plan will support and maintain a balanced supply of high quality housing.

### **Issue 9 – Whether the plan makes adequate provision to meet the needs of gypsies and travellers and travelling showpeople.**

124. At the time the Plan was submitted for examination the most up-to-date evidence relating to gypsies and travellers and travelling showpeople was a Needs Assessment completed in 2011. On the basis of this Needs Assessment, Policy H/19 seeks to make provision for a total of 85 pitches for gypsies and travellers between 2011 and 2031. This reflects the findings of the Assessment, as modified by an internal review.
125. The government published a revised Planning Policy for Travellers in August 2015 (PPTS 2015) which amended the definition of gypsy and traveller to exclude those who have ceased travelling. A new Gypsy and Traveller Accommodation Assessment (GTAA) was commissioned by the Cambridgeshire Authorities together with Kings Lynn and West Norfolk, Peterborough and West Suffolk. This assessment (RD/Strat/221) (GTAA 2016) identified 11 gypsy and traveller households that meet the new definition, 81 households who do not meet the new definition and 194 households whose status is unknown. For households who meet the definition in South Cambridgeshire, the GTAA identifies a current need of 8 pitches and a future need of 12 pitches, taking account of concealed households and household formation. An existing

supply of 29 pitches was identified (22 vacant and 7 new pitches). The GTAA concludes that needs arising from households meeting the definition can be met through existing supply.

126. It is immediately apparent from those figures that the GTAA was unable to ascertain the status of a very high proportion of the caravan dwelling households known to be living in the District. There has been a good deal of criticism of the methodology used but efforts were made to contact and to interview all households identified, and a total of 92 interviews were completed. Some households were unavailable, others were unwilling to be interviewed. Of course, more can always be done and given the very large numbers involved in South Cambridgeshire it suggests that efforts to establish an on-going relationship with the gypsy and traveller communities and their representatives should be pursued over a longer period of time than the four months taken to complete the fieldwork for the GTAA.
127. Notwithstanding these reservations, the GTAA (2016) is the best evidence before us. **SC16, SC176, SC201 – SC205** and **SC209** are necessary to reflect the new PPTS definition and the outcome of the GTAA (2016), and so ensure consistency with national policy. The Council accepts that there may be some gypsy and traveller households, who do not meet the PPTS definition, who may be able to demonstrate a need for culturally appropriate accommodation under Equalities legislation. This is a matter that can be addressed as a material planning consideration in the development management process, based on the individual circumstances of the applicant.
128. Policy H20 indicates that if a need is identified in the future, opportunities to meet that need will be sought as part of significant major development sites. As discussed above there are a number of major development sites, originally allocated in the 2006 Local Plan which are coming forward for development. We find no convincing reasons why such sites should not be considered suitable for the provision of pitches for gypsies and travellers. Consideration of the particular circumstances of individual sites can be taken into account through the masterplanning and planning application processes. **SC207** and **SC208** are necessary to clarify the approach that will be taken and ensure the effectiveness of the Plan.
129. Section 124 of the Housing and Planning Act 2016 amended section 8 of the Housing Act 1985 which now requires each local housing authority in England to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed. At the time this matter was considered at the examination, the Council had not yet completed the assessment required under the Housing Act 1985 (as amended). The evidence that is available from the GTAA (2016) suggests that demand for sites on which caravans can be stationed may be considerable (up to 68 pitches to meet the needs of households whose status is unknown and 61 pitches to meet the needs of households who do not meet the definition, a total of almost 130 pitches).
130. The Council suggests that the needs of gypsies and travellers who do not meet the new definition can be met as part of the housing provision for the settled population. We agree that, in principle, that is the correct approach but the need for caravan sites has to be assessed, as required by the Housing Act.

Once that assessment has been carried out, the ways in which that need can be met must be considered in accordance with paragraph 14 of the Framework. Given the potential requirement for almost 130 pitches careful consideration will need to be given to whether this need is likely to be met through the use of a criteria based policy and the development management process, or whether site allocations will be necessary. We find, therefore, that the evidence base of the Plan is inadequate in relation to this issue and consequently the Policy response is inadequate. However, it would be disproportionate to find the entire Plan unsound, particularly as the amendment to the Housing Act was not enacted until after the Examination had started, and addressing this issue could lead to a significant delay in the adoption of the Plan. In the circumstances we consider that this is a matter that can be addressed through the planned review of the Plan. **SC206** commits the Council to considering the implications of that assessment through the early review of the Local Plan.

131. Policy H/21 is a criteria-based policy against which proposals for gypsies, travellers and travelling showpeople outside development frameworks can be considered. **SC210** and **SC213** are necessary to clarify the approach to proposals in the Green Belt, and to conform with PPTS. **SC214** reflects the wording of paragraph 25 of PPTS that local authorities should very strictly limit new traveller site development in the open countryside that is away from existing settlements, and is necessary to ensure consistency with national policy. **SC211** refers to the additional need that may arise from households who could not be assessed through the GTAA and clarifies that proposals from applicants who meet the PPTS definition will be considered against policy H/21 and is necessary to ensure the Plan is effective.
132. **SC212** explains that the revised GTAA identified a need for 9 additional plots for travelling showpeople. As this need was identified at a late stage in the examination process we agree that the most appropriate way to consider this need is through the early review of the Plan. In the interim, proposals can be considered against policy H/21.

### *Conclusion*

133. The Plan makes adequate provision for gypsies and travellers and travelling showpeople who have been identified as meeting the current PPTS definition. However, the Council has not yet completed the review, required under the Housing Act (as amended) which is not limited to those meeting the PPTS definition. For the reasons given above, we have concluded that this matter should be addressed through the review of the Plan.

### **Issue 10 – Whether the employment policies in the Plan will facilitate a robust and competitive rural economy**

134. The forecast employment growth within the period 2011 to 2031 is a net additional 22,000 jobs. There is a degree of consensus that this is a reasonable figure. Research and development plays an important part in the economy of the Cambridge area. The Council's Employment Land Reviews have identified a need for 50,000sqm of B1b land in South Cambridgeshire to help meet employment growth. The supply of land currently exceeds that figure. The Plan provides opportunities for new high technology and research

and development at various locations close to the boundary with Cambridge City including Cambridge Science Park through Policy E/1.

*Cambridge Biomedical Campus Extension*

135. The biomedical sciences are an important sector of the Cambridge economy. The Cambridge Biomedical Campus (CBC), which includes Addenbrooke's Hospital, is the largest allocated employment site in the City, and is an internationally recognised centre of excellence for biomedical research. Although the overall supply of employment land in Greater Cambridge is adequate, there are limited opportunities for further growth or expansion of the campus, which is due, in part, to its location adjoining the Green Belt.
136. The Cambridge Inner Green Belt Boundary Study (November 2015) (CIGBBS) identified a parcel of land immediately to the south of the campus development, within South Cambridgeshire, which could be the subject of limited development without significant harm to Green Belt purposes, if carefully planned and designed in accordance within the parameters set out in the document. On this basis, the Council has proposed an extension to the biomedical medical campus, as a MM to the Plan.
137. The MM will enable the further growth of biomedical and biotechnology research and development and related higher education and medical research in an appropriate location immediately adjacent to the campus. This would therefore accord with paragraph 7 of the NPPF which seeks to ensure that sufficient land of the right type is available in the right places to support growth and innovation.
138. Representors have expressed concerns that the amount of land would not be sufficient and further land should be allocated. However, the CIGBBS has indicated that the land released from the Green Belt in this location should be restricted to the relatively flat ground and should not therefore encroach on the adjacent sloping ground leading onto the Gog Magog foothills including White Hill.
139. The allocation would also be separate from the Nine Wells Local Nature Reserve (LNR) to the south. Concerns have also been expressed with regard to the effect on biodiversity as a consequence of developing this area of land. The proposed policy text however includes requirements which seek to address these concerns both in respect of the nature reserve and measures to mitigate any adverse ecological effects. The requirements also include the conservation of farmland biodiversity to deliver an overall net gain with regard to biodiversity. The policy also provides further requirements to manage and mitigate flood risks both on the site and elsewhere.
140. The policy also addresses other requirements including mitigation of surface water flood risk. We have added a minor addition to the wording of **SC216** to reflect the need, identified by Anglian Water for a Foul Drainage Strategy. A doubt has been raised regarding the grant of access rights to the site but the full details are not before us. This matter was raised at a fairly late stage in the Council's consideration of the proposed MM and we therefore consider that further investigation should be carried out as part of the Plan review.

141. We agree, for the reasons set out in the CIGBBS that the release of this site from the Green Belt would have a limited impact on the purposes of the Green Belt which are outweighed by the economic benefits that would arise from allowing the expansion of the CBC. This therefore constitutes the exceptional circumstances necessary to justify an alteration to the boundary of the Green Belt. **SC21, SC68, SC216** and **SC217**, which allocate the land as an extension to the CBC, and make consequential amendments elsewhere in the Plan are necessary to ensure the Plan makes appropriate provision for the expansion of the CBC to meet the requirements of paragraph 7 of the NPPF.

#### *Fulbourn Road East*

142. The Plan proposes the removal of a site at Fulbourn Road from the Green Belt and its allocation for employment purposes. The site is adjacent to the Peterhouse Technology Park an important employment location in the City. The Council's own review of the Green Belt found that the release of the site would have a limited impact on the Green Belt. The CIGBBS found the Yarrow Road roundabout to be the furthest extent of the urban area from the historic core and recommended that the proposed extension to the Technology Park should not extend further east. The Council sought to advance MMs to the Plan to reduce the site area of the allocation from 6.9ha to 4.3ha.

143. Our own site visit revealed that there is a reasonably recent two storey residential development known as the Alms Houses development which forms an integral part of the street scene in this location and provides a natural break to the built development of the urban area. The 6.9ha extension proposed in the submission Plan would result in a similar eastward extent to the built development to south of Fulbourn Road. Accordingly, we agree with the Council's initial consideration that the release of the 6.9ha site would have a limited impact on the Green Belt which would be outweighed by the benefits of employment development through the expansion of the Technology Park in this sustainable location, thereby constituting the exceptional circumstances necessary to justify an alteration to the boundary of the Green Belt. Accordingly, we find no compelling reason to find the submission Plan unsound and recommend any MMs to this allocation.

#### *Employment Allocations*

144. The plan makes a limited number of allocations for employment development in the villages. Most form the residue of allocations from previous plans which will provide opportunities for relatively small scale development in the villages to support the rural economy.

#### *Papworth Hospital*

145. Policy E/5 seeks to ensure that the reuse or redevelopment of the Papworth Hospital site will be achieved through a sequential approach in terms of land use beginning with healthcare. This requirement reflects the fact that the hospital relocation provides a significant threat to the future viability of the village and the maintenance of a sustainable community. This is supported by the 2011 census which indicated that the village had a workplace population of 3,227. The NHS Trust was the major employer of people living in the village. The supporting text however also recognises that a mix of uses within B1 would be the most appropriate alternative in the parkland setting.

146. Papworth Hospital is in the process of moving to the Biomedical Campus so the requirement in the policy for a two year marketing period for the site before the final closure and vacation of the hospital is no longer a realistic expectation. **SC219** is therefore necessary to ensure that the Plan is realistic and effective.
147. The site is situated within the Papworth Everard Conservation Area (CA). Accordingly, there are constraints in respect of the redevelopment of the site. The preservation of the setting of Papworth Hall and the buildings located within the CA required by the policy will maintain the setting of the village and take into account the history of the site. The Council's proposed MMs on this topic appear to go beyond the duty under section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. We have amended the wording of **SC220** and **SC221** accordingly.
148. Concerns have been expressed with regard to the flexibility of the policy in terms of additional uses. The Council has confirmed however that the village has seen the development of over 500 dwellings in recent years and there is no proven need for any further residential development in the village. However, **SC222** introduces a degree of flexibility in relation to residential development on the site and is necessary to ensure the Plan is effective.

#### *Imperial War Museum*

149. The Imperial War Museum at Duxford is undoubtedly an asset of national significance. The Council's proposed MMs add descriptive text to the policy and correct a spelling error. These are not necessary for soundness.

#### *Mixed Use Development in Histon and Impington*

150. Policy E/8 aims to rejuvenate the area around the former railway station in Histon & Impington providing a range of uses including B1, A1 and A3. The Council has proposed SC226 to explain that this is a Parish Council led proposal. This is not necessary for soundness.

#### *Promotion of Clusters*

151. Policy E/9 seeks to promote employment clusters in suitable locations. The Council's proposed MMs which amend the policy wording to require consistency with other policies in the Plan and to correct a typographical error are not necessary for soundness.

#### *Shared Social Spaces*

152. Policy E/10 aims to support the development of shared social spaces in employment areas. The Cambridge Cluster at 50 report identified that some business parks were isolated and were lacking in respect of social facilities. The policy therefore supports the development of complementary facilities in this regard. **SC229** amends the wording of the policy text to ensure that the appropriate scale of facilities is provided. This is necessary to ensure the policy is effective.

### *Employment Land in or close to the Villages*

153. Policy E/13 establishes criteria for considering proposals for new employment development adjacent or very close to the development frameworks for the villages. Policy E/14 seeks to resist the conversion, change of use or redevelopment of existing employment sites to non-employment uses within or on the edge of development frameworks. The Council has proposed a MM to make it clear that the policy does not apply where a change of use is permitted development. Self-evidently development plan policies will not be engaged where permitted development is concerned and this MM is not necessary for soundness.
154. It was questioned whether the requirement for a 12 month marketing period is consistent with paragraph 22 of the NPPF which seeks to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. However, the premature loss of employment sites in villages could lead to less sustainable commuting patterns. We therefore are of the view that the 12 month period provides an appropriate safeguard when marketing industrial sites in these locations.

### *Tourism*

155. Policies E/19 and E/20 seek to support tourist facilities and visitor attractions. The Council has proposed a MM to policy E/19 (**SC231**) to add a requirement that a scheme should be in scale with the nature of the facility it supports. This is necessary to ensure the Plan is effective.
156. The proposed MMs to policy E/20 seek to move wording regarding the length of holiday lets from the supporting text into the policy wording. However, the principle of controlling holiday lets is embedded in the policy and we are not convinced that this MM is necessary for soundness.

### *Conclusions*

157. The Plan is consistent with national policy and will facilitate a robust and competitive rural economy, subject to the inclusion of the main modifications.

## **Issue 11 – Whether the Plan will protect, preserve and enhance the built and historic environment and whether the policies are consistent with the NPPF**

158. South Cambridgeshire is a primarily rural area with a variety of settlements ranging from hamlets to larger villages, new settlements and extensions to the urban area of Cambridge. Policy HQ/1 seeks to ensure that all new development is of a high quality and respects its surroundings. The policy promotes a design-led approach and includes a number of criteria against which proposals for new development will be judged. The policy broadly accords with paragraph 57 of the NPPF. However, a number of changes and additions to the text are necessary to ensure it will be effective and fully consistent with national policy. **SC143 – SC150.**



159. Policy HQ/2 aims to encourage the provision of public art in residential schemes of over 10 dwellings and schemes of over 1,000 sq. m of employment and retail development. The Council has recognised that where public art cannot be provided on site a financial contribution may be appropriate. **SC151** adds such a provision and we consider this to be necessary to ensure the policy is effective. We have added further wording to the proposed modification to restrict the pooling of contributions in accordance with national policy. We have no doubt that the involvement of Parish Councils in the provision of public art will be beneficial but we do not consider this to be a soundness issue for the Plan. **SC153** updates the supporting text to the policy with regard to the Council's current proposals for the preparation of SPD and is necessary for clarity and effectiveness.

### *Historic Environment*

160. Policy NH/14 seeks to sustain and enhance the district's historic environment and sets out a range of criteria which have to be met in order for development relating to heritage assets to be supported. **SC169** amends Section 2 of the policy to clarify that the level of significance of a heritage asset has to be considered when assessing a development proposal which would affect it. This is necessary to ensure consistency with section 12 of the NPPF. **SC170** corrects the wording in criterion 2d so as to clarify that it refers to non-designated heritage assets, which is necessary for consistency with national policy.

161. **SC171** adds wording to paragraph 6.48 of the supporting text which refers to an understanding of traditional materials in vernacular buildings in the context of the historic environment. This is necessary to ensure consistency with paragraph 126 of the NPPF which refers to new development making a positive contribution to local character and distinctiveness.

162. **SC172** amends the wording of the second and third sentences of paragraph 6.49 of the supporting text to achieve consistency with Section 12 of the NPPF. **SC173** adds text to paragraph 6.51 to confirm that the Council is committed to ensuring the future viable uses of heritage assets. This is necessary to ensure conformity with one of the core planning principles in paragraph 17 of the NPPF with regard to conserving heritage assets for the benefit of future generations. **SC175** revises paragraph 6.57 relating to the complete loss of a heritage asset. The revised wording sets out the requirements necessary for recording and advancing the understanding of the asset to be lost and is necessary to ensure the Plan is effective in this respect. We have no doubt that the Cambridgeshire Historic Environment Record is a useful resource. However, the Council's proposed MM relating to this is largely descriptive and is not necessary for soundness.

### *Conclusions*

163. Subject to the inclusion of the MMs identified above the Plan will protect, preserve and enhance the built and historic environment and will accord with the NPPF.

## **Issue 12 – Whether the Plan will protect and enhance the natural environment and whether these policies are consistent with national policy**

164. Policy NH/2 seeks to protect and enhance landscape character in individual National Character Areas. The supporting text indicates the five National Character Areas identified by Natural England in respect of the South Cambridgeshire landscape. **SC154** adds additional text to paragraph 6.8 to provide further clarification on the East of England Landscape Typology which is relevant to South Cambridgeshire, and is necessary to ensure the Plan is effective.
165. Policy NH/4 aims to support biodiversity. **SC155** which clarifies the contribution that green corridors can make to wider ecological networks is necessary for clarity and effectiveness. Policy NH/5 seeks to protect Sites of Biodiversity or Geological Importance. **SC156**, **SC157** and **SC158** are necessary to ensure consistency with paragraphs 117 and 118 of the NPPF.
166. Policy NH/6 seeks to conserve and enhance green infrastructure. **SC159** adds a reference to bridleways, which are a significant element in the green infrastructure of South Cambridgeshire, and is necessary to ensure the policy is effective.
167. Policy NH/7 seeks to protect ancient woodland and veteran trees in the context of development proposals. **SC160** makes changes to paragraph 6.33 of the supporting text to remove the intention of compiling a list of veteran trees by introducing a requirement that any development proposal where the application site contains trees and/or could affect trees will need to be supported by a tree survey in accordance with BS5837: *Trees in relation to construction-recommendations to determine the significance and amenity value of trees on or near the site*. The changes will therefore make it possible to identify ancient woodland or ancient trees at the planning application stage. As the Council no longer intends to compile a list of veteran trees this MM is necessary to ensure that the Plan is effective and consistent with paragraph 118 of the NPPF.

### *Local Green Space*

168. Policy NH/12 relates to the Local Green Space (LGS) designation in paragraphs 77 and 78 of the Framework. The policy refers to the allocations of Local Green Spaces identified in the Policies Map and the criteria for their designation. Paragraph 78 of the Framework affirms that local policy for managing development within a LGS should be consistent with policy for Green Belts. **SC168** brings the policy into line with the wording of paragraph 87 of the Framework in respect of inappropriate development in the Green Belt.
169. During the course of the examination we expressed our concerns that the Council's assessment of the proposed LGS designations had not been carried out with sufficient rigour (RD/GEN/420) and our preliminary view was that a number of the sites did not meet the requirements of the NPPF and PPG. In response, the Council undertook further work (RD/NE/370) which concluded that only 83 of the proposed areas met the requirements in paragraphs 77 and 78 of the Framework.

170. In respect of those sites which the Council considered did not meet the Framework criteria for LGS, it concluded that 25 sites should return to Protected Village Amenity Areas (PVAA), 43 sites should be designated as new PVAA sites, and 4 sites should be designated as Important Countryside Frontages.
171. We have given full consideration to the Council's findings as a consequence of the review and are satisfied that it was carried out with due rigour. We have also taken into account the representations in respect of the LGS sites. However, we find no compelling evidence which would cause us to differ from the conclusions of the Council's analysis. **SC275** sets out a new Appendix to list the LGS sites which will be shown on the policies map.

### *Conclusions*

172. Subject to the inclusion of the MM identified above, and changes to the policies map in respect of LGS sites, we conclude that the Plan contains a comprehensive set of policies to protect and enhance the natural environment of the District, consistent with the aims of national policy.

### **Issue 13 – Whether the Plan will facilitate the retention and provision of local services and facilities**

173. Policy SC/1 allocates sites for local open space provision. **SC235** deletes three of the sites reflecting the most up-to-date information on the deliverability of these sites. The Council has proposed SC236 to include a reference to its Recreation and Open Space Study of 2013, but this is simply a factual reference and not, in our view, necessary for soundness. **SC237** reflects the part that Neighbourhood Plans can play in addressing local needs for open space. These modifications are necessary for clarity and effectiveness.
174. Policy SC/3 lists village services which will be protected. **SC239** adds to the list 'sports venues, cultural buildings, places of worship'. We agree that these uses would generally be regarded as important local facilities and the MM is therefore necessary to ensure the Plan is effective.
175. Policy SC/4 guides the provision of new services and facilities in connection with new development. **SC242** clarifies that the Council will not seek tariff style planning obligations from small sites. **SC247** provides revised wording in relation to proposals in the Green Belt. These MMs are necessary to ensure conformity with national policy. The Council's proposed MM SC243 repeats information given elsewhere about the relationship between this Plan and the extant AAPs, and is not necessary for soundness. Proposed MM SC244 seeks to include information about working with parish councils to establish the form of governance for major new developments. We have no doubt that this is a desirable course of action but it is not necessary for soundness. **SC245** includes reference to the Playing Pitch Strategy and Indoor Sports Facility Strategy which have been completed in association with Cambridge City Council. As these reflect the latest position and are likely to provide background information to inform the consideration of planning applications this MM is necessary to ensure the policy is justified and effective. Proposed MM SC246 states that neither of the Strategies identified a need for a sub-regional sports facility or stadium. In fact, neither of the Strategies assessed

the need for such a development. This MM is therefore not justified by the evidence.

176. Policy SC/5 deals with hospice provision. **SC248 – SC250** broaden the scope of the policy to cover community healthcare facilities. This is necessary to ensure the Plan is positively prepared in relation to this important area of healthcare.
177. Policy SC/7 addresses requirements for outdoor play space and informal open space. The standards to be met are contained in policy SC/8. As currently drafted the relationship between the two policies is not entirely clear. **SC251** and **SC252** combine the two policies and are necessary for clarity and effectiveness.
178. Policy SC/9 seeks to protect existing recreation areas, allotments and community orchards. **SC253** expands the policy to include playing fields and is necessary to ensure full conformity with paragraph 74 of the NPPF.
179. Policy SC/13 addresses the air quality implications of development. **SC260** adds a reference to the requirements of paragraph 124 of the NPPF relating to Air Quality and is necessary to ensure full conformity with national policy.
180. A number of other MMs are proposed to policies in Chapter 9 which are intended, for the most part, to update the text or provide cross references to other documents, or include matters, e.g. impact on heritage assets, that are already dealt with elsewhere in the Plan. We do not consider they are necessary for soundness.

### *Conclusions*

181. Subject to the inclusion of the MMs identified we conclude that the Plan will facilitate the retention and provision of local services and facilities.

### **Issue 14 – Will the Plan's policies contribute to the mitigation of and adaptation to climate change and are they consistent with national policy?**

182. Chapter 4 of the plan contains a range of policies which are intended to contribute to the mitigation of, and adaptation to, climate change. **SC115** adds delivering community renewable projects to the list of measures which can contribute to reducing greenhouse emissions and is necessary for effectiveness.
183. Policy CC/1 requires applicants to submit a sustainability statement to demonstrate that climate change mitigation and adaptation principles are taken into account. **SC117 – SC120** provide additional guidance on how the policy will be implemented and are necessary for clarity and effectiveness. **SC121** is necessary to remove reference to the Government's zero carbon policy which has been withdrawn.
184. Policy CC/2 includes criteria against which proposals for renewable energy can be considered. The WMS of 18 June 2015 set out new considerations to be applied to proposals for wind energy, including a requirement that the site should have been identified as suitable for wind energy development in a Local or Neighbourhood Plan. The WMS was published after the plan had been

submitted for examination and no evidence is available regarding areas in the District which may be suitable for wind energy. Concern was expressed that communities who may wish to bring forward community led proposals, such as the successful community turbine scheme at Gamlingay, would find the process of preparing a Neighbourhood Plan too onerous. However, Neighbourhood Plans have now been adopted by a significant number of communities across the country, and in any event a different approach would not be consistent with the clear and unambiguous intention of the WMS.

**SC122** and **SC125** are necessary to ensure that the requirements introduced by the WMS are included in policy CC/2. The policy also requires renewable energy developments to connect to existing national energy infrastructure. **SC124** which allows connection to an associated development or community project is necessary to ensure flexibility and effectiveness. **SC123** amends the criteria against which proposals will be considered to clarify that the impact of associated infrastructure will be taken into account and that impact on high quality agricultural land will also be a consideration. This MM is necessary for clarity and effectiveness.

185. Policy CC/3 requires new development to reduce carbon emissions by a minimum of 10% over the requirements set by Building Regulations. There is evidence that the Council has engaged with appropriate partners and has a good track record of achieving a similar requirement under an existing development plan policy. There is also evidence that this requirement will not have an unacceptable impact on viability. The requirement is therefore consistent with paragraph 174 of the NPPF and PPG. **SC126** and **SC127** which provide more detail on how the policy will be implemented are necessary for clarity and effectiveness.

186. Policy CC/4 requires new residential development to achieve the equivalent of CSH Level 4 for water efficiency. The Deregulation Act 2015 prohibits local authorities from setting any additional local technical standards relating to the construction or performance of new dwellings. However, if justified, the optional national technical standard for water efficiency can be included in local plans. South Cambridgeshire is within an area of water stress and the inclusion of the optional national standard is justified. **SC128 – SC131** achieve this and are necessary to ensure consistency with legal requirements and national policy.

187. **SC116** clarifies that South Cambridgeshire is not in an area of 'serious' water stress and this part of the MM is necessary for clarity and effectiveness. However, the elements of the MM which simply add dates for the opening of showhomes are not necessary for soundness as they are very minor additions to the text. We have therefore deleted them. The wording of policy CC/5 that 'unreasonable premiums' should not be added for environmentally friendly options is somewhat vague and therefore **SC132** is necessary to clarify the meaning of the policy and ensure effectiveness.

188. Policy CC/6 relates to construction methods. **SC133** clarifies that the level of information required will be proportionate to the scale and nature of the proposed development. This is necessary to ensure that unnecessary burdens are not placed on small scale development and to ensure the plan is effective.

189. Policy CC/8 requires the incorporation of Sustainable Drainage Systems. **SC134 – SC136** update the text to refer to the national non-statutory technical standards that have been introduced since the Plan was submitted for examination. Similarly, they also add a reference to local guidance in Cambridgeshire Flood and Water SPD. These MMs are necessary to ensure effectiveness.
190. Policy CC/9 seeks to manage flood risk. **SC137 – SC141** modify the policy so as to ensure that requirements are imposed where appropriate and practicable and to specify that an SPD will be prepared to provide further guidance on the implementation of the policy. A number of other relatively minor amendments to the text are proposed but taken together these MMs ensure that the plan will be effective in relation to managing flood risk.

### *Conclusions*

191. Subject to the inclusion of the MMs identified, the Plan will contribute to the mitigation of and adaptation to climate change and will be consistent with national policy.

### **Issue 15 – Whether the Plan makes adequate provision for transport and related infrastructure.**

192. The Plan proposals are broadly consistent with the Transport Strategy for Cambridge and South Cambridgeshire prepared by the County Council. There was considerable dispute during the course of the examination over the adequacy of the evidence base supporting the Plan in this regard, particularly in relation to the transport infrastructure associated with the development of the new settlements. The new settlements are not expected to deliver new development in the early years of the Plan period and for the reasons given above we have come to the view that there is a reasonable prospect that the necessary infrastructure can be delivered and that progress can be assessed through the early review of the Plan.
193. **SC265** amends Policy TI/3 to specify that the parking standards included in the Plan are intended to be indicative for car parking provision but applied as a minimum for cycle parking. This is necessary to promote the use of sustainable modes of transport. **SC266** corrects an error in the car parking standard for A2 uses to read 1 space per 25 m<sup>2</sup> (rather than 2 m<sup>2</sup>) and is necessary to ensure the Plan is effective.
194. Policy TI/5 sets criteria for assessing aviation-related proposals. The Council's proposed MM SC267 seeks to include a reference to IWM Duxford. Whilst this may improve the Plan we do not consider this factual addition to the text is necessary for soundness. Policy TI/6 establishes an air safeguarding zone in connection with Cambridge Airport. **SC268** adds greater detail regarding the implications for development within the safeguarding zone and also includes a similar air safeguarding zone in association with the Imperial War Museum in Duxford. This MM is necessary to ensure the effectiveness of the Plan.
195. Policy T1/8 deals with the infrastructure required in relation to new development. **SC270** specifies that contributions will not be sought in connection with some forms of development as set out in PPG. This is necessary to ensure consistency with national policy. Policy TI/9 relates to

education facilities. **SC272** identifies that there is a shortfall of over 1,000 secondary school places. It is expected that this need will be met by a new secondary school to serve the eastern part of Cambridge. This MM is consistent with policy SS/3, as modified, and is necessary to ensure the effectiveness of the Plan.

196. Other modifications are proposed by the Council to policies in Chapter 10 of the Plan but these are relatively minor wording changes for updating or clarification and we are not persuaded that these are necessary for soundness.

### *Conclusion*

197. Subject to the inclusion of the MMs identified we are satisfied that the plan makes adequate provision for transport and other infrastructure requirements.

### **Issue 16 – Is the approach to monitoring the plan's policies effective?**

198. Figure 4 of the Local Plan lists monitoring indicators such as 'total dwellings built by settlement category'. The accompanying text states: *If, as a result of monitoring and review, it appears that development is not coming forward in a sustainable or timely manner, the Council will be proactive in using its powers to respond to changing circumstances.....* However, the Plan does not include any targets or trigger points/action to be taken in the event that targets are not being met. **SC37, SC38** and **SC40** replace Figure 4 with a new Appendix E which includes targets, triggers and actions, and is necessary to ensure that Plan will be effective.

### **Issue 17 – Should a commitment to a review of the Plan, within an agreed period, be included in the Plan**

199. There are a number of issues outlined in this report where our conclusion that the Plan can be found sound depends, to some extent, on a review of the Plan within an agreed period. The Council has indicated that the preparation of a joint plan with Cambridge City is a requirement of the Greater Cambridge City Deal. The preparation of a joint plan is an opportunity to review the Local Plans of both areas.

200. No timetable for plan preparation is set out within the City Deal. The Council's proposed MM **SC41** sets a timetable for the submission of the joint local plan for examination by the summer of 2022. This timescale has been set to allow for two stages of consultation (at Regulation 18 and 19). Bearing in mind the level of public interest in this Plan and the emerging Cambridge City Local Plan 2014, and the number of representations received at all stages, we consider that the proposed timescale is reasonable.

201. The Council does not have sole control of the adoption date because of the examination process and it would not be reasonable to specify an adoption date. Nor should the policy seek to identify every area of the Plan that will need review. That will be a matter for judgement in the light of local circumstances, including the non-statutory spatial plan that is being prepared for the Cambridgeshire and Peterborough Combined Authority, and national policy, including the revised NPPF.

202. In the event that the joint plan is not prepared within the anticipated timescale, the weight to be attached to the policies in the development management process will be a matter for the decision maker, having regard to national policy.

### *Conclusion*

203. In the light of the concerns identified in our report, we conclude that it is necessary to include a commitment to an early review of the Plan, and that the policy included in **SC41** is an appropriate way to achieve that without prejudging what the content of the joint Local Plan or its evidence base should address.

## **Assessment of Legal Compliance**

204. Our examination of the legal compliance of the Plan is summarised below.

205. The Local Plan has been prepared broadly in accordance with the Council's Local Development Scheme, which was updated in 2016. The adoption date for the Plan will be later than anticipated in the LDS but this is because of the time taken to complete the examination which is a factor not solely within the Council's control.

206. Consultation on the Local Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement.

207. Sustainability Appraisal has been carried out and is adequate. The concerns expressed in our preliminary conclusion have been resolved through the SA Addendum 2015, which appraises sites on the edge of Cambridge. SA of the main modifications has also been carried out. Some representors have argued that not all reasonable alternatives have been subject to sustainability appraisal. However, the Council can exercise its discretion in deciding what the reasonable alternatives may be and we are satisfied that it has exercised that discretion in a reasonable way.

208. The Habitats Regulations Appropriate Assessment Screening Report (March 2014) sets out why an AA is not necessary and Natural England supports this. Following the judgement by the Court of Justice of the European Union in the case of People over Wind, Peter Sweetman v Coillte Teoranta the HRA screening process was reviewed for the Council. The review (RD/EX/160) concluded that the conclusions of the previous HRA screening reports remain valid.

209. The Local Plan includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change, most notably those in chapter 4 of the plan which are considered under issue 14 above.

210. Subject to the inclusion of **SC1** which clarifies the relationship between the Local Plan and the adopted AAPs, and **SC2** and its accompanying Appendix (**SC284**) which define the strategic policies that a Neighbourhood Plan must be in general conformity with, the Local Plan complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.



## **Overall Conclusion and Recommendation**

211. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

212. The Council has requested that we recommend MMs to make the Plan sound and capable of adoption. We conclude that with the recommended main modifications set out in the Appendix the South Cambridgeshire Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*Laura Graham*

Inspector

*Alan Wood*

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

Family or Company Name: Childerley  
Agent: Barford & Co. (Tindle, Simon)  
PMM: MM1

## Comment

Agent	Mr Simon Tindle (1032436)
Email Address	[REDACTED]
Company / Organisation	Brown&Co Barfords
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Mrs S Childerley (1117058)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Mrs S Childerley (1117058)
Comment ID	PMM2018:64
Response Date	29/01/19 16:35
Consultation Point	Proposed Main Modification 1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.5
Files	<a href="#">Covering letter</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you  Object

Do you consider this proposed main modification  Not Sound to be sound?

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

- Do you consider this proposed main modification is not sound because it is not...**
- . Positively prepared
  - . Justified
  - . Effective
  - . Consistent with national policy

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

**Do you consider this proposed main modification to be legally compliant?** Not legally compliant

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

We highlight previously raised concerns regarding the expected housing delivery trajectory and the reliance upon the unreasonable high rate of delivery at the Strategic Expansion Locations. We note that the Loves Farm Site, which is expected to deliver dwellings in 2019-20, is still awaiting planning permission and the Wintringham Park Reserved matters, also aiming to commence delivery of housing in 2019-20, is also awaiting reserved matters approval for the housing element. It is apparent that the Inspector has now recommended the capping of delivery rates at the SELs and included an allowance for windfall development. It is further observed that an allowance of 35 rural exception dwellings has been included as a makeweight, despite any compelling evidence of past delivery. This inclusion is more than optimistic and therefore unjustified. The NPPF highlights the importance of a variety of land coming forward where needed. It also places emphasis on the important contribution that can be made by small and medium sites to the housing requirement of the area, which can be built out quickly. This adds to the flexibility of the plan and allows growth and vitality in rural areas. Notwithstanding the above, should the settlement tier of Local Service Centers be removed from the settlement hierarchy as proposed by the modifications, it does not necessarily follow that all site allocations therein must also be expunged. Modified Policy LP2 makes provision for a quarter of the OAN to be accommodated in Key Service Centres together with Small Settlements to support the vitality of those communities and proportionate allocations at the larger of those small settlements will accord with these aims. We object to the proposed modifications as they are unjustified and will impact upon the effectiveness of the plan. We further question the consistency with national policy.

**Supporting documents**

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### Covering letter

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Reiterates concerns over reliance on high delivery rates at SELs. Contends the NPPF places emphasis on the important contribution that can be made by small and medium sites to the housing requirement of the area, which can be built out quickly. Suggests that even if the Local Service Centres category is removed the allocations should be retained.

**Summary**

Reiterates concerns over reliance on high delivery rates at SELs. Contends the NPPF places emphasis on the important contribution that can be made by small and medium sites to the housing requirement of the area, which can be built out quickly. Suggests that even if the Local Service Centres category is removed the allocations should be retained.

**Objection representation in regard to proposed Main Modifications  
1 and 38 to the Huntingdonshire Local Plan to 2036 and  
associated Main Modifications Sustainability Appraisal in respect  
of the intended deletion of site GS1 for residential development of  
approximately 20 homes on land at The Green Great Staughton**

**on behalf of Mrs S Childerley**

---

Prepared by: Simon Tindle, Divisional Partner

For and on behalf of Brown & Co.

Brown & Co is a leading provider of agency, professional and consultancy services across the whole range of rural, commercial, residential, and agricultural markets.

Date: January 2019.

Reference: 017234.

## **1.0 Introduction**

- 1.1** Brown & Co Barfords have been instructed to submit the following Objection on behalf of Mrs S Childerley the owner of land at The Green, Great Staughton which is currently allocated for residential development of approximately 20 homes (Site GS1) in the Submission Local Plan and is proposed to be deleted as a result of Modifications 1 and 38.

## **2.0 Background**

- 2.1** The Council's Housing & Economic Land Availability Assessment (HELAA) December 2017 appraisal of the site indicated that the site is considered suitable for low density residential development, with few identified constraints.
- 2.2** The site was subsequently allocated in the proposed submission version of Huntingdonshire's Local Plan to 2036, attracting 2No. technical objections from Historic England and the Environment Agency respectively. It is considered that both objections could be suitably addressed at planning application stage with neither objecting to the principle of development.
- 2.3** At the Examination in Public the Council indicated that residential development of the site would bring important economic, social and environmental benefits along with contributing to the Council's housing land supply, whilst identifying no major adverse impacts.
- 2.4** The allocation of the site has subsequently been recommended for deletion from the Local Plan as a result of modifications 1 and 38.

## **3.0 Objection to Modification 1 and 38**

- 3.1** We highlight previously raised concerns regarding the expected housing delivery trajectory and the reliance upon the unreasonable high rate of delivery at the Strategic Expansion Locations. We note that the Loves Farm Site, which is expected to deliver dwellings in 2019-20, is still awaiting planning permission and the Wintringham Park Reserved matters, also aiming to commence delivery of housing in 2019-20, is also awaiting reserved matters approval for the housing element.
- 3.2** It is apparent that the Inspector has now recommended the capping of delivery rates at the SEL's and included an allowance for windfall development. It is further observed that an allowance of 35 rural exception dwellings has been included as a makeweight, despite any compelling evidence of past delivery. This inclusion is more than optimistic and therefore unjustified.
- 3.3** The NPPF highlights the importance of a variety of land coming forward where needed. It also places emphasis on the important contribution that can be made by small and medium sites to the housing requirement of the area, which can be built out quickly. This adds to the flexibility of the plan and allows growth and vitality in rural areas.

3.4 Notwithstanding the above, should the settlement tier of Local Service Centers be removed from the settlement hierarchy as proposed by the modifications, it does not necessarily follow that all site allocations therein must also be expunged. Modified Policy LP2 makes provision for a quarter of the OAN to be accommodated in Key Service Centres together with Small Settlements to support the vitality of those communities and proportionate allocations at the larger of those small settlements will accord with these aims.

3.5 We object to the proposed modifications as they are unjustified and will impact upon the effectiveness of the plan. We further question the consistency with national policy.

#### **4.0 Objection to Sustainability Appraisal in relation Proposed Main Modification 38**

4.1 The appraisal of the proposed main modification indicates the impacts of removal of the allocation to be neutral, as “not allocating this site may result in alternative development”. We object to this appraisal as non allocation this site will result in alternative development if the Council are to meet their OAN.

4.2 Specifically, the OAN needs to consider the impact of alternative development against that of the original proposed allocation. Such alternatives are indicated in the housing trajectory as increases in numbers at some allocated sites, windfall sites including prior approvals/ rural exception sites. The impacts of alternative development can therefore be quantified where an increase in housing numbers is proposed on other allocated sites e.g. HU6, SN1. Furthermore, by their very nature, prior approvals/ rural exceptions sites are located in less sustainable locations and must be considered as such. Impacts of modifications cannot simply be ignored or ‘written off’ as unknown or uncertain.

4.3 The current approach simply serves to highlight the uncertainty of delivery and that the modified approach will provide for the most sustainable opportunities.





Family or Company Name: Childerley  
Agent: Barford & Co. (Tindle, Simon)  
PMM: MM38

## Comment

Agent	Mr Simon Tindle (1032436)
Email Address	[REDACTED]
Company / Organisation	Brown&Co Barfords
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Mrs S Childerley (1117058)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Mrs S Childerley (1117058)
Comment ID	PMM2018:65
Response Date	29/01/19 16:36
Consultation Point	Proposed Main Modification 38 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.6
Files	<a href="#">Childerley Statement 28.01.19.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you  Object

Do you consider this proposed main modification  Not Sound  
to be sound?

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

**Do you consider this proposed main modification to be legally compliant?** Not legally compliant

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**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

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**What changes would address the issue(s) that you have identified?**

Reiterates concerns over reliance on high delivery rates at SELs. Contends the NPPF places emphasis on the important contribution that can be made by small and medium sites to the housing requirement of the area, which can be built out quickly. Suggests that even if the Local Service Centres category is removed the allocations should be retained.

**Summary**

Reiterates concerns over reliance on high delivery rates at SELs. Contends the NPPF places emphasis on the important contribution that can be made by small and medium sites to the housing requirement of the area, which can be built out quickly. Suggests that even if the Local Service Centres category is removed the allocations should be retained.

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**on behalf of Mrs S Childerley**

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Prepared by: Simon Tindle, Divisional Partner

For and on behalf of Brown & Co.

Brown & Co is a leading provider of agency, professional and consultancy services across the whole range of rural, commercial, residential, and agricultural markets.

Date: January 2019.

Reference: 017234.

## **1.0 Introduction**

- 1.1** Brown & Co Barfords have been instructed to submit the following Objection on behalf of Mrs S Childerley the owner of land at The Green, Great Staughton which is currently allocated for residential development of approximately 20 homes (Site GS1) in the Submission Local Plan and is proposed to be deleted as a result of Modifications 1 and 38.

## **2.0 Background**

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- 3.2** It is apparent that the Inspector has now recommended the capping of delivery rates at the SEL's and included an allowance for windfall development. It is further observed that an allowance of 35 rural exception dwellings has been included as a makeweight, despite any compelling evidence of past delivery. This inclusion is more than optimistic and therefore unjustified.
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4.3 The current approach simply serves to highlight the uncertainty of delivery and that the modified approach will provide for the most sustainable opportunities.





Family or Company Name: Church Commissioners for England

Agent: Deloitte (Tucker, Nolan)

PMM: MM1

## Comment

Agent	Mr Nolan Tucker (1184539)
Email Address	[REDACTED]
Company / Organisation	Deloitte LLP
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Mr Nolan Tucker (1198417)
Email Address	[REDACTED]
Company / Organisation	Deloitte LLP
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Deloitte LLP (Mr Nolan Tucker - 1198417)
Comment ID	PMM2018:59
Response Date	29/01/19 14:39
Consultation Point	Proposed Main Modification 1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Files	<a href="#">Proposed Main Modification rep MM1.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you  Object

Do you consider this proposed main modification  Not Sound to be sound?

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification**  Consistent with national policy  
**is not sound because it is not...**

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

**Do you consider this proposed main modification**  Legally compliant  
**to be legally compliant?**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

These representations are made on behalf of the Church Commissioners for England. As part of the Main Modifications (MM1) the proposed 'Local Service Centres' tier of the settlement hierarchy has been removed and the associated settlements – Alconbury, Bluntisham and Great Stoughton have been redefined as 'small settlements'. There are no allocations in 'small settlements' and as a result all draft allocation sites will have their allocation removed. We object the removal of the 'Local Service Centres' tier of the settlement hierarchy and specifically the removal of Alconbury from the settlement hierarchy. This is on the basis that Alconbury is a sustainable location for residential development. Our client, the Church Commissioners for England, were preparing an application for the development of up to 95 residential units in Alconbury. The proposals of this application have been the subject of pre-application discussion with Huntingdonshire District Council and have been welcomed in principle by the Local Planning Authority, as indicated by the Site's draft allocation (Policy AL1). The Site (Policy AL1) was considered an appropriate and sustainable location as it is located immediately adjacent to the village of Alconbury and provides a logical extension to an established settlement with a good existing provision of facilities and services. A small settlement is identified by the Local Plan (Policy 4.105) as one with very limited or no services or facilities available. These settlements are less sustainable than settlements in the Spatial Planning Area settlements and Key Service Centres due to the need to travel to access services and facilities elsewhere on a regular basis. Local Services are defined by Policy LP23 as including, but not limited to, shops, public houses, places of worship, cemeteries, health centres, libraries, fuel filling stations and public halls. The village of Alconbury provides a range of these services including a primary school, doctor's surgery, church, village hall, public house, Post Office and convenience store. Please see the attached document for a table which indicates that Alconbury is comparable to the Key Service Centres in terms of the services and facilities included within the settlement. Additionally the development of the draft allocation site (Policy AL1) would contribute to Alconbury's social vitality and economic vitality. Therefore we object to Alconbury being defined as a small settlement and maintain that the settlement hierarchy should continue to include an allowance for Local Service Centres. Paragraph 47 of the NPPF (2012) requires local planning authorities to identify and update annually a supply of specific sites sufficient to provide five years' worth of housing against their housing requirements, with an additional buffer of 5% to ensure choice and competition in the market of land. The AMR (2018) stated that the council could demonstrate a 5.15 year supply, however this supply included Draft Allocations which have now been deleted from the local plan as a result of the removal of 'Local Service Centres' tier. The recent Gladman Appeal Decision (ref. APP/H0520/W/16/3159161) demonstrated that Huntingdonshire District Council does

not have a 5 year housing supply. As a result of MM1 the draft allocations for Alconbury, Bluntisham and Great Stoughton will fall away, totalling 315 residential units. Therefore for Huntingdonshire District Council to demonstrate their housing supply they should provide alternative allocation sites which can provide sustainable development to replace the 315 units lost. Furthermore, HDC's current evidence base suggests that there is a demonstrable need for new housing and the Housing Land Supply Position August 2017 document, which forms part of the evidence base for the Draft Huntingdonshire District Council Local Plan to 2036 (HLP36), identifies that 20,100 dwellings will be required over the Plan period. While the trajectory data suggests that sufficient land will be available to deliver this amount of housing (with a small surplus projected), meeting these targets is contingent on the realisation of development on allocated sites, including the Application Site which is allocated under Policy AL1. Therefore as a result of MM1, Huntingdonshire District Council will need to identify additional sites. We remain of the view that the more appropriate approach would be to continue to include Local Service Centres in the settlement hierarchy. This would ensure that a range of future sites are identified in the Local Plan in order to provide a suitable level of dwellings for future residents. We consider that the removal of this level of the settlement hierarchy makes the Local Plan unsound and contrary to the requirements of Paragraph 50 of the NPPF (2012) which seeks to promote a wide choice of homes. Local Service Centres have previously been identified by the Local Planning Authority as being sustainable locations and we see no reason to change this approach following the Local Plan Examination. Paragraph 52 of the NPPF (2012) makes reference to the supply of new homes being delivered by extensions to existing villages and it is considered that in the case of Huntingdonshire there is clear evidence to show that the extension of existing villages is appropriate in order to provide a supply of deliverable housing land. On this basis we are of the view that MM1 is unsound and would be contrary to the requirements of the NPPF (2012). As such the modification should not be progressed as part of the Local Plan Examination.

### Supporting documents

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[Proposed Main Modification rep MM1.pdf](#)

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Main Modification 1 should be deleted.

## Proposed Main Modification reference number MM1 – LP2 Strategy for Development and paragraphs 4.10, 4.18 and 4.20

These representations are made on behalf of the Church Commissioners for England.

As part of the Main Modifications (MM1) the proposed 'Local Service Centres' tier of the settlement hierarchy has been removed and the associated settlements – Alconbury, Bluntisham and Great Stoughton have been redefined as 'small settlements'. There are no allocations in 'small settlements' and as a result all draft allocation sites will have their allocation removed.

We object the removal of the 'Local Service Centres' tier of the settlement hierarchy and specifically the removal of Alconbury from the settlement hierarchy. This is on the basis that Alconbury is a sustainable location for residential development. Our client, the Church Commissioners for England, were preparing an application for the development of up to 95 residential units in Alconbury. The proposals of this application have been the subject of pre-application discussion with Huntingdonshire District Council and have been welcomed in principle by the Local Planning Authority, as indicated by the Site's draft allocation (*Policy AL1*). The Site (*Policy AL1*) was considered an appropriate and sustainable location as it is located immediately adjacent to the village of Alconbury and provides a logical extension to an established settlement with a good existing provision of facilities and services.

A small settlement is identified by the Local Plan (*Policy 4.105*) as one with very limited or no services or facilities available. These settlements are less sustainable than settlements in the Spatial Planning Area settlements and Key Service Centres due to the need to travel to access services and facilities elsewhere on a regular basis. Local Services are defined by *Policy LP23* as including, but not limited to, shops, public houses, places of worship, cemeteries, health centres, libraries, fuel filling stations and public halls. The village of Alconbury provides a range of these services including a primary school, doctor's surgery, church, village hall, public house, Post Office and convenience store. The table below indicates that Alconbury is comparable to the Key Service Centres in terms of the services and facilities included within the settlement.

	Shops	Pubs	Places of worship	Cemeteries	Health Centres	Libraries	Petrol stations	Public Halls	Schools
Alconbury	Yes	1	1	1	1	-	-	1	2
Buckden	Yes	3	3	1	1	1	1	1	1
Fenstanton	Yes	3	2	1	1	-	1	1	1
Kimbolton	Yes	2	1	1	1	-	-	1	3
Sawtry	Yes	2	1	1	1	1	1	1	2
Somersham	Yes	3	2	1	1	1	-	2	2
Warboys	Yes	2	3	1	1	1	-	-	1
Yaxley	Yes	3	2	1	1	1	2	3	3

Additionally the development of the draft allocation site (*Policy AL1*) would contribute to Alconbury's social vitality and economic vitality. Therefore we object to Alconbury being defined as a small settlement and maintain that the settlement hierarchy should continue to include an allowance for Local Service Centres.

Paragraph 47 of the NPPF (2012) requires local planning authorities to identify and update annually a supply of specific sites sufficient to provide five years' worth of housing against their housing requirements, with an additional buffer of 5% to ensure choice and competition in the market of land. The AMR (2018) stated that the council could demonstrate a 5.15 year supply, however this supply included Draft Allocations which have now been deleted from the local plan as a result of the removal of 'Local Service Centres' tier. The recent Gladman Appeal Decision (ref. APP/H0520/W/16/3159161) demonstrated that Huntingdonshire District Council does not have a 5 year housing supply. As a result of MM1 the draft allocations for Alconbury, Bluntisham and Great Stoughton will fall away, totalling 315 residential units. Therefore for Huntingdonshire District Council to demonstrate their housing supply they should provide alternative allocation sites which can provide sustainable development to replace the 315 units lost.

Furthermore, HDC's current evidence base suggests that there is a demonstrable need for new housing and the *Housing Land Supply Position August 2017* document, which forms part of the evidence base for the *Draft Huntingdonshire District Council Local Plan to 2036 (HLP36)*, identifies that 20,100 dwellings will be required over the Plan period. While the trajectory data suggests that sufficient land will be available to deliver this amount of housing (with a small surplus projected), meeting these targets is contingent on the realisation of development on allocated sites, including the Application Site which is allocated under *Policy AL1*. Therefore as a result of MM1, Huntingdonshire District Council will need to identify additional sites.

We remain of the view that the more appropriate approach would be to continue to include Local Service Centres in the settlement hierarchy. This would ensure that a range of future sites are identified in the Local Plan in order to provide a suitable level of dwellings for future residents. We consider that the removal of this level of the settlement hierarchy makes the Local Plan unsound and contrary to the requirements of Paragraph 50 of the NPPF (2012) which seeks to promote a wide choice of homes.

Local Service Centres have previously been identified by the Local Planning Authority as being sustainable locations and we see no reason to change this approach following the Local Plan Examination. Paragraph 52 of the NPPF (2012) makes reference to the supply of new homes being delivered by extensions to existing villages and it is considered that in the case of Huntingdonshire there is clear evidence to show that the extension of existing villages is appropriate in order to provide a supply of deliverable housing land.

On this basis we are of the view that MM1 is unsound and would be contrary to the requirements of the NPPF (2012). As such the modification should not be progressed as part of the Local Plan Examination.

Family or Company Name: Church Commissioners for England  
Agent: Deloitte (Tucker, Nolan)  
PMM: MM21

## Comment

Agent	Mr Nolan Tucker (1184539)
Email Address	[REDACTED]
Company / Organisation	Deloitte LLP
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Mr Nolan Tucker (1198417)
Email Address	[REDACTED]
Company / Organisation	Deloitte LLP
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Deloitte LLP (Mr Nolan Tucker - 1198417)
Comment ID	PMM2018:58
Response Date	29/01/19 14:29
Consultation Point	Proposed Main Modification 21 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.5
Files	<a href="#">MM21 - Church Commissioners for England.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you  Object

Do you consider this proposed main modification  Not Sound to be sound?

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...** . Positively prepared

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

**Do you consider this proposed main modification to be legally compliant?** Legally compliant

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

These representations are made on behalf of the Church Commissioners for England. This allocation proposes an increase to the size of the existing country park and proposes that it would provide a strategic area of publicly accessible natural green space capable of serving a significant population in and around the Huntingdon Spatial Planning Area. Whilst we note that as part of the MM21 the proposed extension has been reduced (from 44 hectares to 27.5 hectares), a significant part of the proposed Country Park extends on to our client's land. There have been limited discussions between the Council and our client, the Church Commissioners for England, in respect of the delivery of the proposed allocation for county park uses; especially as our clients are a significant landowner of the proposed allocation. We note that as part of the allocation / Policy HU10, there is the requirement for the following: a. provision of additional pedestrian paths including a north to south route via the eastern edge of the island b. provision of interpretation boards, way marking signs and bird watching hides c. management to improve the site's value for biodiversity d. a flood management strategy including appropriate practices including closures to the public during flood events e. a new car park off Huntingdon Road Additionally, it is noted that at paragraph 9.91 of the Main Modifications document, the extension to Hinchingsbrooke Country Park is an important part of the overall strategy to provide strategic green infrastructure alongside development. The policy goes on to say that this extension would increase the size of the Country Park considerably and provide a strategic scale area of publicly accessible natural green space capable of serving a significant population in and around the Huntingdon Spatial Planning Area. Whilst the Church Commissioners support a strategy to provide green infrastructure in the District, we remain of the view that further discussion is required with the Council on how the park will be delivered and the maintenance it will require. We note that at paragraph 9.93 the reference to the land being farmed has been deleted. However, we can confirm the land within our client's ownership is farmed and is within a tenancy to a third party. As stated in our previous response to an earlier stage of the emerging Local Plan, we would have welcomed more comprehensive discussions around the proposed allocation and we hope that should the allocation be found sound that the Council will enter into these discussions as soon as possible.

### **Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.



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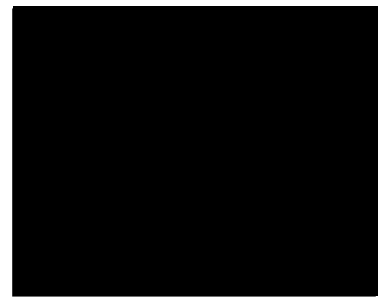
Please note: There is no limit to the size of documents that can be uploaded but please only upload relevant documents and consider the use of extracts for long documents.

To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

[MM21 - Church Commissioners for England.pdf](#)

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes



## **Proposed Main Modification reference number MM21**

These representations are made on behalf of the Church Commissioners for England.

This allocation proposes an increase to the size of the existing country park and proposes that it would provide a strategic area of publicly accessible natural green space capable of serving a significant population in and around the Huntingdon Spatial Planning Area.

Whilst we note that as part of the MM21 the proposed extension has been reduced (from 44 hectares to 27.5 hectares), a significant part of the proposed Country Park extends on to our client's land.

There have been limited discussions between the Council and our client, the Church Commissioners for England, in respect of the delivery of the proposed allocation for county park uses; especially as our clients are a significant landowner of the proposed allocation.

We note that as part of the allocation / Policy HU10, there is the requirement for the following:

- a. provision of additional pedestrian paths including a north to south route via the eastern edge of the island
- b. provision of interpretation boards, way marking signs and bird watching hides
- c. management to improve the site's value for biodiversity
- d. a flood management strategy including appropriate practices including closures to the public during flood events
- e. a new car park off Huntingdon Road

Additionally, it is noted that at paragraph 9.91 of the Main Modifications document, the extension to Hinchingsbrooke Country Park is an important part of the overall strategy to provide strategic green infrastructure alongside development. The policy goes on to say that this extension would increase the size of the Country Park considerably and provide a strategic scale area of publicly accessible natural green space capable of serving a significant population in and around the Huntingdon Spatial Planning Area.

Whilst the Church Commissioners support a strategy to provide green infrastructure in the District, we remain of the view that further discussion is required with the Council on how the park will be delivered and the maintenance it will require.

We note that at paragraph 9.93 the reference to the land being farmed has been deleted. However, we can confirm the land within our client's ownership is farmed and is within a tenancy to a third party.

As stated in our previous response to an earlier stage of the emerging Local Plan, we would have welcomed more comprehensive discussions around the proposed allocation and we hope that should the allocation be found sound that the Council will enter into these discussions as soon as possible.

Family or Company Name: Conroy, Messrs M & N  
Agent: Brown & Co. (Pravin, Lydia)  
PMM: MM1

## Comment

**Agent** Lydia Pravin (1198346)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Consultee** Messrs M & N Conroy (1151536)  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Messrs M & N Conroy (1151536)  
**Comment ID** PMM2018:37  
**Response Date** 28/01/19 15:51  
**Consultation Point** Proposed Main Modification 1 ([View](#))  
**Status** Processed  
**Submission Type** Email  
**Version** 0.8  
**Files** [Pravin, Lydia for M](#)

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Object

**Do you consider this proposed main modification to be sound?** Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

2.1 Paragraph 154 of the National Planning Policy Framework 2012 (hereafter referred to as the Framework) requires that Local Plans are aspirational but realistic. The evidence for the need for further housing has been submitted as part of previous representations which set out the Local Plan will not deliver enough housing to meet its needs and therefore cannot be considered sound. This is due to the very high rates of delivery at the Strategic Expansion Locations (SELs) which are unrealistic. The proposed delivery rates are still considered unrealistic as they are reliant upon factors including favourable market conditions and therefore the Plan cannot be considered sound. 2.2 The modifications continue to raise concerns regarding the Plan strategy and the sustainability of the approach which has very limited of growth on the edge of the town of Huntingdon, the most sustainable location. 2.3 To compensate for the reduction in the number of units proposed to come forward at the SELs, Main Modification 1 introduces additional sources of supply, including prior approval and exception sites. There are significant concerns regarding the inclusion of prior approvals at a steady rate of 20 dwellings per annum. This is reliant on there being a supply of buildings suitable for conversion and as opportunities for prior approval are taken, the supply of buildings will naturally reduce. Therefore a reduced rate of prior approvals should be reflected in the Plan period. The location of prior approvals are often in unsustainable locations and the addition of the Land at Green End, Great Stukeley which is a sustainable location on the edge of Huntingdon should be allocated to compensate for the reduced rate of housing delivery. 2.4 With regard to rural exception sites, these sites come forward where a landowner is willing to bring land forward at a reduced development value and to meet a specific housing need of a particular Parish. Therefore when calculating the source of supply the potential contribution of 35 dwellings per annum from 2020/1 is optimistic. 2.5 Given the aspirational sources of supply, coupled with the overall reduction in delivery anticipated at the SELs, this has implications for the Council's ability to maintain a rolling five year supply of housing land, and to meet the requirements of the Housing Delivery Test. Therefore the Land at Green End, Great Stukeley is a sustainable housing development, well-related to the edge of Huntingdon which should be allocated and is consistent with the Local Plan's spatial strategy.

## **Supporting documents**

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Pravin, Lydia for M

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes**

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Include the Land at Green End, Great Stukeley as an allocation.

**Summary**

Object to Main Modification 1. Unrealistic delivery rates at strategic expansion locations which are reliant on favourable market conditions, this is contrary to NPPF (2012) 154. The reduction in delivery anticipated at the SELs has implications for the Council's ability to maintain a rolling five year supply of housing land, and to meet the requirements of the Housing Delivery Test Concerns over inclusion of prior approvals as windfall. There are limited sources of supply to maintain this therefore the number should be reduced. The rural exceptions delivery rate is too optimistic. Limited growth has been attributed to Huntingdon which is the most sustainable location for development. Land at Green End, Great Stukeley is a sustainable location on the edge of Huntingdon and should be allocated to compensate for the reduced rate of housing delivery.

# Representations to the Huntingdonshire Local Plan - Main Modifications

Land at Green End, Great Stukeley, Huntingdon

On behalf of Messrs M and N Conroy

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Prepared by: Lydia Pravin, Associate

Checked by: Martin Page, Consultant

For and on behalf of Brown & Co. Barfords

Brown & Co is a leading provider of agency, professional and consultancy services across the whole range of rural, commercial, residential, and agricultural markets.

Date: January 2019

Reference: Conroy

## **1.0 Introduction**

- 1.1 My name is Lydia Pravin (Associate) at Brown & Co Barfords representing Messrs M and N Conroy who have an interest in Land at Green End, Great Stukeley, Huntingdon (rep no. HLP2036-PS:55).
- 1.2 The site has been promoted previously through earlier stages of the Local Plan and through verbal and written submissions at the Examination in Public of the Plan.

## **2.0 Proposed Modification 1**

- 2.1 Paragraph 154 of the National Planning Policy Framework 2012 (hereafter referred to as the Framework) requires that Local Plans are aspirational but realistic. The evidence for the need for further housing has been submitted as part of previous representations which set out the Local Plan will not deliver enough housing to meet its needs and therefore cannot be considered sound. This is due to the very high rates of delivery at the Strategic Expansion Locations (SELs) which are unrealistic. The proposed delivery rates are still considered unrealistic as they are reliant upon factors including favourable market conditions and therefore the Plan cannot be considered sound.
- 2.2 The modifications continue to raise concerns regarding the Plan strategy and the sustainability of the approach which has very limited of growth on the edge of the town of Huntingdon, the most sustainable location.
- 2.3 To compensate for the reduction in the number of units proposed to come forward at the SELs, Main Modification 1 introduces additional sources of supply, including prior approval and exception sites. There are significant concerns regarding the inclusion of prior approvals at a steady rate of 20 dwellings per annum. This is reliant on there being a supply of buildings suitable for conversion and as opportunities for prior approval are taken, the supply of buildings will naturally reduce. Therefore a reduced rate of prior approvals should be reflected in the Plan period. The location of prior approvals are often in unsustainable locations and the addition of the Land at Green End, Great Stukeley which is a sustainable location on the edge of Huntingdon should be allocated to compensate for the reduced rate of housing delivery.
- 2.4 With regard to rural exception sites, these sites come forward where a landowner is willing to bring land forward at a reduced development value and to meet a specific housing need of a particular Parish. Therefore when calculating the source of supply the potential contribution of 35 dwellings per annum from 2020/1 is optimistic.
- 2.5 Given the aspirational sources of supply, coupled with the overall reduction in delivery anticipated at the SELs, this has implications for the Council's ability to maintain a rolling five year supply of housing land, and to meet the requirements of the Housing Delivery Test. Therefore the Land at Green End, Great Stukeley is a sustainable housing development, well-related to the edge of Huntingdon which should be allocated and is consistent with the Local Plan's spatial strategy.

## **3.0 Proposed Modification 7**

- 3.1 The deletion of the Local Service Centre designation (and associated allocations) reduces the flexibility of the plan, by limiting the opportunities for development to come forward at three villages. In order to ensure there is sufficient flexibility within the Local Plan further allocations should come forward in the most sustainable locations, such as the Spatial Planning Area of Huntingdon. Land at Green End, Great Stukeley is a logical extension



---

that is well related to Huntingdon and is considered to be in a sustainable location for housing growth and should be allocated to ensure the Plan can be considered sound.

**4.0 Proposed Modifications 23, 27 and 29**

4.1 A number of allocations are proposed to be deleted for flooding reasons. The deletion of these sites raises an issues of soundness given the concerns raised in Modification 1, which will reduce the housing delivery in Huntingdonshire. Therefore the Land at Green End, Great Stukeley is ready for immediate development as an appropriate option for allocation to compensate and ensure the Plan can be considered sound.

Family or Company Name: Conroy, Messrs M & N  
Agent: Brown & Co. (Pravin, Lydia)  
PMM: MM7

## Comment

**Agent** Lydia Pravin (1198346)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Consultee** Messrs M & N Conroy (1151536)  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Messrs M & N Conroy (1151536)  
**Comment ID** PMM2018:38  
**Response Date** 28/01/19 16:02  
**Consultation Point** Proposed Main Modification 7 ([View](#))  
**Status** Processed  
**Submission Type** Email  
**Version** 0.5  
**Files** [Pravin, Lydia for M](#)

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Object

**Do you consider this proposed main modification to be sound?** Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

The deletion of the Local Service Centre designation (and associated allocations) reduces the flexibility of the plan, by limiting the opportunities for development to come forward at three villages. In order to ensure there is sufficient flexibility within the Local Plan further allocations should come forward in the most sustainable locations, such as the Spatial Planning Area of Huntingdon. Land at Green End, Great Stukeley is a logical extension that is well related to Huntingdon and is considered to be in a sustainable location for housing growth and should be allocated to ensure the Plan can be considered sound.

### **Supporting documents**

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Pravin, Lydia for M

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed Yes by making changes to the proposed main modification?**

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Include the Land at Green End, Great Stukeley as an allocation.

### **Summary**

Object to Main Modification 7. The deletion of the Local Service Centre designation (and associated allocations) reduces the flexibility of the plan, by limiting the opportunities for development to come forward at three villages. To ensure flexibility within the Local Plan further allocations should come

forward in the most sustainable locations. Land at Green End, Great Stukeley is considered to be in a sustainable location for housing growth and should be allocated to ensure the Plan can be considered sound.

Family or Company Name: Conroy, Messrs M & N  
Agent: Brown & Co. (Pravin, Lydia)  
PMM: MM23

## Comment

**Agent** Lydia Pravin (1198346)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Consultee** Messrs M & N Conroy (1151536)  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Messrs M & N Conroy (1151536)  
**Comment ID** PMM2018:39  
**Response Date** 28/01/19 16:04  
**Consultation Point** Proposed Main Modification 23 ([View](#))  
**Status** Processed  
**Submission Type** Email  
**Version** 0.6  
**Files** [Pravin, Lydia for M](#)

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Object

**Do you consider this proposed main modification to be sound?** Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

A number of allocations are proposed to be deleted for flooding reasons. The deletion of these sites raises an issues of soundness given the concerns raised in Modification 1, which will reduce the housing delivery in Huntingdonshire. Therefore the Land at Green End, Great Stukeley is ready for immediate development as an appropriate option for allocation to compensate and ensure the Plan can be considered sound.

### **Supporting documents**

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Pravin, Lydia for M

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed Yes by making changes to the proposed main modification?**

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Include the Land at Green End, Great Stukeley as an allocation.

### **Summary**

Object to Main Modification 23. The deletion of allocations on the grounds of flooding reduces housing delivery in Huntingdonshire. Land at Green End, Great Stukeley is ready for immediate development as an appropriate option for allocation to compensate and ensure the Plan can be considered sound.

Family or Company Name: Conroy, Messrs M & N  
Agent: Brown & Co. (Pravin, Lydia)  
PMM: MM27

## Comment

**Agent** Lydia Pravin (1198346)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Consultee** Messrs M & N Conroy (1151536)  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Messrs M & N Conroy (1151536)  
**Comment ID** PMM2018:40  
**Response Date** 28/01/19 16:05  
**Consultation Point** Proposed Main Modification 27 ([View](#))  
**Status** Processed  
**Submission Type** Email  
**Version** 0.6  
**Files** [Pravin, Lydia for M](#)

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Object

**Do you consider this proposed main modification to be sound?** Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

A number of allocations are proposed to be deleted for flooding reasons. The deletion of these sites raises an issues of soundness given the concerns raised in Modification 1, which will reduce the housing delivery in Huntingdonshire. Therefore the Land at Green End, Great Stukeley is ready for immediate development as an appropriate option for allocation to compensate and ensure the Plan can be considered sound.

### **Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

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Pravin, Lydia for M

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed Yes  
by making changes to the proposed main  
modification?**

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Include the Land at Green End, Great Stukeley as an allocation.

### **Summary**

Object to Main Modification 27. The deletion of allocations on the grounds of flooding reduces housing delivery in Huntingdonshire. Land at Green End, Great Stukeley is ready for immediate development as an appropriate option for allocation to compensate and ensure the Plan can be considered sound.



## Comment

**Agent** Lydia Pravin (1198346)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Consultee** Messrs M & N Conroy (1151536)  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Messrs M & N Conroy (1151536)  
**Comment ID** PMM2018:41  
**Response Date** 28/01/19 16:07  
**Consultation Point** Proposed Main Modification 29 ([View](#))  
**Status** Processed  
**Submission Type** Email  
**Version** 0.5  
**Files** [Pravin, Lydia for M](#)

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Object

**Do you consider this proposed main modification to be sound?** Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

A number of allocations are proposed to be deleted for flooding reasons. The deletion of these sites raises an issues of soundness given the concerns raised in Modification 1, which will reduce the housing delivery in Huntingdonshire. Therefore the Land at Green End, Great Stukeley is ready for immediate development as an appropriate option for allocation to compensate and ensure the Plan can be considered sound.

### **Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to a website where it is available or give a full reference (including author(s), full title and date of publication) in your comment.

By submitting a supporting document you give permission for the council to use it for the purposes of drawing up planning policy for Huntingdonshire and to reproduce the document for such purposes.

Please note: There is no limit to the size of documents that can be uploaded but please only upload relevant documents and consider the use of extracts for long documents.

To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

Pravin, Lydia for M

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed Yes  
by making changes to the proposed main  
modification?**

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Include the Land at Green End, Great Stukeley as an allocation.

### **Summary**

Object to Main Modification 29. The deletion of allocations on the grounds of flooding reduces housing delivery in Huntingdonshire. Land at Green End, Great Stukeley is ready for immediate development as an appropriate option for allocation to compensate and ensure the Plan can be considered sound.

Family or Company Name: Endurance Estates and Edmund Thornhill  
Agent: Bidwells (Skinner, Lisa)  
PMM: Whole Document

## Comment

Agent	Mrs Lisa Skinner (1057031)
Email Address	[REDACTED]
Company / Organisation	Bidwells
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Endurance Estates & Edmund Thornhill (1152129)
Company / Organisation	Endurance Estates and Edmund Thornhill
Address	c/o agent * *
Event Name	Proposed Main Modifications 2018
Comment by	Endurance Estates and Edmund Thornhill ( Endurance Estates & Edmund Thornhill - 1152129)
Comment ID	PMM2018:42
Response Date	28/01/19 09:24
Consultation Point	Huntingdonshire Local Plan to 2036: Proposed Main Modifications 2018 for Consultation ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6
Files	<a href="#">Skinner for Endurance Estates - Appendix 2.pdf</a> <a href="#">Skinner for Endurance Estates_Redacted.pdf</a> <a href="#">Skinner for Endurance Estates - Appendix 1.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you  Support  Object

Do you consider this proposed main modification to be sound?  Yes  Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

- Positively prepared
- Justified
- Effective
- Consistent with national policy

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

As you are aware Bidwells made representations in respect of the Regulation 19, Huntingdonshire's Local Plan to 2036: Proposed Submission 2017 on behalf of Endurance Estates and Edmund Thornhill. We also gave evidence at the Examination in Public, (EiP) that took place last year with particular reference to • The settlement hierarchy • How different settlements had been assessed in relation to services and facilities for Local Service Centres and Small Settlements. Our interest relates to Offord D'Arcy that currently falls within the small settlement classification and in particular Land to the West of Gravely Road, Offord D'Arcy that is clearly shown as indicated by the red line plan at Appendix 1 to this letter. Following the EiP, the Inspector's Report has now been received and this requires main modifications in order for the Plan to be found sound. The Council has now publicised the main modifications and has commenced the consultation process. We wish to make representations in relation to a number of points as stated in the following paragraphs. Policy LP 1 - Amount of development The Inspector's comments regarding housing delivery are noted. At the time of the Hearings in July and September 2018, the Council provided evidence on housing land supply through the Annual Monitoring Report (AMR) that was published for the period 2016/2017. This AMR identified that the current housing land supply position for the District was 5.78 years, equating to 22,068 dwellings up to 2036 and concluded a need of 804 dwellings per annum to meet the District's housing requirements. The latest AMR 2017/2018 was published in December 2018 (AMR 2018) and this confirms that the housing supply has declined whichever method of calculation is used. With a Sedgfield approach and a 20% buffer a 5.33 years housing supply exists or with the Inspector's suggestion using a capped trajectory, a 5.15 year supply. The Council also acknowledge in the latest AMR that they have underdelivered on the requirement of 804 dwellings per annum. Table 7.4, on page 61 of the AMR 2018, confirms that between 2011 to 2017, the under delivery was 1,210 dwellings. The Council believes this shortfall is short term and that the completions over the next 5 years will exceed this requirement and make up the difference. The evidence supporting these statements within the AMR however appears to be limited and not fully justified. The Council claims at paragraph 7.2 that it has used the national formula for calculating objectively assessed housing need and the fact that the emerging Plan was submitted before 31 March 2018, they are able to rely on the existing evidence to justify the housing need figure for 2 years from the date of submission for examination, 29 March 2018. However, we believe this statement is incorrect as the Government's Guidance within the Planning Policy Guidance states at paragraph 2a-016-20180913 this only applies when the standard method of calculation is used. We therefore query this position and request that the Council seeks an early review of the Local Plan if it is adopted in its current form. Conclusion The main modifications are therefore considered to be contrary to Government Guidance and would not deliver the housing as required to meet the Council's overall strategy. We believe the amendments requested to the small settlements policy are essential to ensure the Plan meets the four tests: • Positively prepared; • Justified; • Effective; and • Consistent with National Policy Without the amendments requested, the Plan in our view is not sound. The current approach would: • Not support a thriving rural area; • Adversely affect the choice and availability of housing in a rural area; • Restrict development in small settlements that

are clearly sustainable and already support other villages within the community that offer practically no services or facilities. The amendments requested would lead to a positive approach being taken to deliver sustainable development in the in the rural area. It would avoid uncertainty and create equal opportunities.

## **Summary**

The latest AMR 2017/2018 was published in December 2018 (AMR 2018) and this confirms that the housing supply has declined. The Council also acknowledge in the latest AMR that they have under delivered on the requirement of 804 dwellings per annum. The Council claims at paragraph 7.2 that it has used the national formula for calculating objectively assessed housing need and the fact that the emerging Plan was submitted before 31 March 2018, they are able to rely on the existing evidence to justify the housing need figure for 2 years from the date of submission for examination, 29 March 2018. However, we believe this statement is incorrect as the Government's Guidance within the Planning Policy Guidance states at paragraph 2a-016-20180913 this only applies when the standard method of calculation is used. We therefore query this position and request that the Council seeks an early review of the Local Plan if it is adopted in its current form.

Your ref: Proposed Main Modifications  
Our ref: 41813  
DD: [REDACTED]  
[REDACTED]  
Date: 28/01/2018

Huntingdonshire District Council  
FAO Mr A Moffat  
Planning Services  
Pathfinder House  
St Mary's Street  
Huntingdon  
Cambridgeshire  
PE29 3TN,

Dear Mr Moffat

## **HUNTINGDONSHIRE LOCAL PLAN - CONSULTATION ON PROPOSED MAIN MODIFICATIONS**

As you are aware Bidwells made representations in respect of the Regulation 19, Huntingdonshire's Local Plan to 2036: Proposed Submission 2017 on behalf of Endurance Estates and Edmund Thornhill. We also gave evidence at the Examination in Public, (EiP) that took place last year with particular reference to

- The settlement hierarchy
- How different settlements had been assessed in relation to services and facilities for Local Service Centres and Small Settlements.

Our interest relates to Offord D'Arcy that currently falls within the small settlement classification and in particular Land to the West of Gravely Road, Offord D'Arcy that is clearly shown as indicated by the red line plan at Appendix 1 to this letter.

Following the EiP, the Inspector's Report has now been received and this requires main modifications in order for the Plan to be found sound. The Council has now publicised the main modifications and has commenced the consultation process. We wish to make representations in relation to a number of points as stated in the following paragraphs.

### Policy LP 1 - Amount of development

The Inspector's comments regarding housing delivery are noted. At the time of the Hearings in July and September 2018, the Council provided evidence on housing land supply through the Annual Monitoring Report (AMR) that was published for the period 2016/2017. This AMR identified that the current housing land supply position for the District was 5.78 years, equating to 22,068 dwellings up to 2036 and concluded a need of 804 dwellings per annum to meet the District's housing requirements.

The latest AMR 2017/2018 was published in December 2018 (AMR 2018) and this confirms that the housing supply has declined whichever method of calculation is used. With a Sedgfield approach and a 20% buffer a 5.33 years housing supply exists or with the Inspector's suggestion using a capped

[REDACTED]  
[REDACTED]

trajectory, a 5.15 year supply. The Council also acknowledge in the latest AMR that they have underdelivered on the requirement of 804 dwellings per annum. Table 7.4, on page 61 of the AMR 2018, confirms that between 2011 to 2017, the under delivery was 1,210 dwellings. The Council believes this shortfall is short term and that the completions over the next 5 years will exceed this requirement and make up the difference. The evidence supporting these statements within the AMR however appears to be limited and not fully justified.

The Council claims at paragraph 7.2 that it has used the national formula for calculating objectively assessed housing need and the fact that the emerging Plan was submitted before 31 March 2018, they are able to rely on the existing evidence to justify the housing need figure for 2 years from the date of submission for examination, 29 March 2018. However, we believe this statement is incorrect as the Government's Guidance within the Planning Policy Guidance states at paragraph 2a-016-20180913 this only applies when the standard method of calculation is used. We therefore query this position and request that the Council seeks an early review of the Local Plan if it is adopted in its current form.

Proposed Main Modification M1 - Policy LP 2 - Strategy for Development

Proposed Main Modifications 4 - Amendment to the key diagram to remove Local Service Centres

Proposed Main Modification 7 - Local Plan Policy LP9 – Local Service Centres.

Proposed Main Modification 8 - Definition of small settlements and Policy LP10

Proposed Main Modification 34 - Local Service Centres deletion of the policy for site allocations and maps.

We continue to support the broad strategy for growth that seeks to meet the objectively assessed needs for development through a strategy that aims to balance providing a deliverable, sustainable pattern of future development whilst ensuring choice and diversity in the market.

In a rural district, the distribution of growth is critical to achieve a balanced, sustainable pattern of development that allows rural growth that would complement the main strategic sites and key service centres. The local service centre hierarchy included site allocations and with the removal of this category, there are no allocated sites within the wider rural area. We believe the approach within the main modification will restrict the growth and vitality of the rural settlements and adversely impact diversity in the housing supply. It will have a negative impact on the sustainability of rural villages. We therefore believe the fundamental aims of the Council's housing strategy will not be achieved or the requirements to promote sustainable development in rural areas.

The following paragraphs of NPPF 2018 are directly relevant:

Paragraph 78:

*“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”*

Paragraph 84

*“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”*

During the Examination in Public, the Council produced up to date evidence of the services and facilities at the Local Service Centres and other key small settlements such as Offord D'Arcy. The Council accepted that within the small settlement category, the level of services and facilities available in the villages varied significantly with the largest supporting a primary school, village shop and public hall etc and the smallest having virtually none at all. The distinction between the local service centre and small settlements was seen as key to delivering development in the rural area, as sites were allocated for housing developments within the local service centre but not the small settlements. The main modifications suggest the deletion of the local service centres but without modifying the approach to development within the small settlements.

The suggested approach restricts development to strategic sites and seven key service centres. In a rural area, this strategy fails to identify growth within other settlements and therefore will act as a constraint to development within what is a rural district. This will restrict and not support the approach identified to support a thriving rural economy and the guidance provided within the NPPF.

This is particularly relevant in the case of Offord D'Arcy given the range of services and facilities that are already available in the settlement. Our client's site is available to deliver now and there are no constraints to development as identified in the supporting documents that formed part of our previous submission for the Regulation 19 consultation.

Whilst we support the broad approach to a settlement hierarchy, we strongly object to the distribution of growth and believe this is contrary to the aim to support a thriving rural economy. The removal of the Local Service Centre Category, without differentiation within the small settlements policy and the fact that no allocations are included within this policy, is considered not to be the most appropriate strategy or is justified against reasonable alternatives.

The deletion of allocated sites other than the higher settlement hierarchies will not deliver a balanced approach to housing delivery or meet the aims of the Local Plan. The Plan relies heavily on the larger sites coming forward to deliver housing and this can often be restricted due to the delivery of infrastructure. Smaller site allocations would provide a variety of delivery without such constraints and a broader market offering.

We therefore believe this policy should be amended and a tiered approach introduced that accurately reflects the sustainability of each village in respect of services and facilities. In the higher order villages, such as Offord D'Arcy, allocations should be included that would allow some development to come forward other than solely rural exception sites. This would provide certainty and ensure deliverability for the overall housing strategy and support rural communities. Without such allocations, the policy for development in small settlements reverts to a rural housing exceptions policy.

As stated in our previous representations, there is a limited housing stock in rural areas and this is acknowledged in the document, Towards a one nation economy, 2015. The Council has also accepted that new dwellings would be required to maintain services due to the decline in household size. This is further expanded upon in the document produced by the County Land & Business Association (CLA), Sustainable Villages - Making Rural Communities Fit for the Future, that is attached as an Appendix 2 to this letter. In summary, the document looks at sustainable villages and making rural communities fit for the future.

The Council has stated at paragraph 4.105 that that no allocations were made within small settlements due to the need to travel to access services and facilities elsewhere on a regular basis. However, it was clear at the Examination in Public that the assessments for each village were inaccurate. The latest evidence clearly demonstrates that small settlements such as Offord D'Arcy are sustainable, and they support the day to day needs of their residents, providing key services such as a primary school and also support other villages.

In the case of Offord D'Arcy, there is a wide range of community facilities that include a primary school, a public house, village hall, village shop, recreation ground, three churches, children's clothes shop, gift shop, two garages that operate MOT's and services and a nursery school. Paragraph 78 of the NPPF clearly supports development in a village of this nature and acknowledges that in rural areas development in one village may support services in a village nearby.



## Equalities Impact Assessment of Proposed Main Modifications 2018

This document was submitted as supporting material necessary for the examination of the Local Plan and addressed the Council's duty under the Equalities Act 2010 to carry out race, gender and disability impact assessments. This has been updated to reflect the main modifications. We object to the conclusions of this Assessment. The lack of rural housing provision outside of the strategic allocations and key service centres creates a restrictive supply of housing. It adversely impacts an individual's choice on where to live by restricting opportunities and choice. The Council states that the removal of the Local Service Centre hierarchy will have a negligible impact on the Council's strategy. We disagree. The restrictive approach not only impacts older persons housing as referred to by the Council through the provision of suitable and accessible homes within their existing communities but restricts access to a wide range of groups including for example, young families who will not be able to have the choice of housing to remain in their Village. We therefore believe the assessment within this document is fundamentally flawed. It has failed to consider the wider impact of delivering housing in the rural area and the impact on equal access and choice of housing as required by the Council's housing strategy.

### Conclusion

The main modifications are therefore considered to be contrary to Government Guidance and would not deliver the housing as required to meet the Council's overall strategy. We believe the amendments requested to the small settlements policy are essential to ensure the Plan meets the four tests:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with National Policy

Without the amendments requested, the Plan in our view is not sound.

The current approach would:

- Not support a thriving rural area;
- Adversely affect the choice and availability of housing in a rural area;
- Restrict development in small settlements that are clearly sustainable and already support other villages within the community that offer practically no services or facilities.

The amendments requested would lead to a positive approach being taken to deliver sustainable development in the in the rural area. It would avoid uncertainty and create equal opportunities.

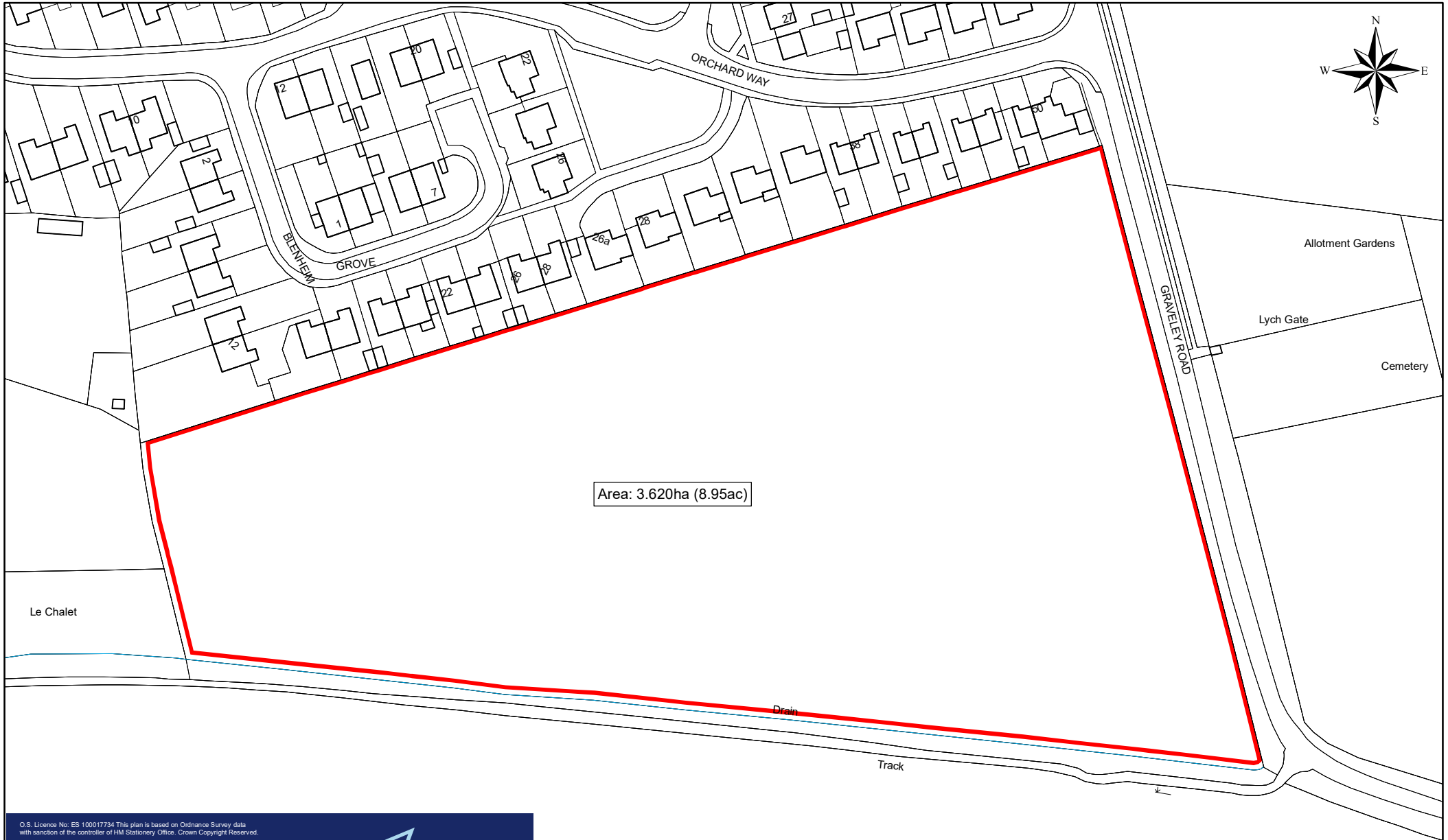
[REDACTED]

[REDACTED]

[REDACTED]

Partner

# Land off Graveley Road, Offord D'Arcy



Area: 3.620ha (8.95ac)

Le Chalet

Allotment Gardens

Lych Gate


Cemetery

Drain

Track

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Trumpington Road, Cambridge, CB2 9LD  
01223 841841 - bidwells.co.uk



**BIDWELLS**

Scale: 1:1,500 @ A4 OS Ref: TL 2265 Drawing No: A.50,598 Date: 10/10/2017  
Produced by Bidwells GIS Mapping - 01223 559288



## SUSTAINABLE VILLAGES – MAKING RURAL COMMUNITIES FIT FOR THE FUTURE

### EXECUTIVE SUMMARY

- **More than 2,000 villages across England are overlooked by the local planning process as they are judged to be ‘unsustainable’ due to a lack of public services like a post office.**
- **Unsustainable villages are not allocated housing and have very limited development options to improve their sustainability, leaving them in a cycle of decline.**
- **Sustainability assessments measure villages against a range of services and amenities more akin to how previous generations lived and used services.**
- **Local authorities should factor in how advances in technology have helped to shape modern life and consider how emerging technology will change rural England. Only 18% of local authorities analysed by the CLA include the availability of broadband in their sustainability assessments.**
- **Central government should address the housing needs of unsustainable communities by requiring and funding local authorities to conduct Housing Needs Assessments in any community not allocated housing in the Local Development Plan.**



#### WHAT DOES SUSTAINABLE MEAN?

Local authorities use ‘sustainability assessments’ to score settlements on the range of services available there or in close proximity. Villages are then placed in a hierarchy according to their score, with the Local Plan allocating new housing to those towards the top of the hierarchy. Settlements where development is allocated by the plan are deemed to be sustainable, while those with fewer services are deemed unsustainable.

### Introduction

Rural communities in England face a number of challenges in the 21<sup>st</sup> century. Funding cuts have led to a reduction in public services, the gap between rural house prices and rural wages continues to widen and a lack of digital connectivity cuts off rural communities from opportunities for social and economic growth.

This report focuses on the housing crisis in rural areas and how outdated sustainability assessments and a static approach to rural planning have led to the stagnation of thousands of rural communities. While housing is the focus, the implications of current policy and practice are as damaging for new economic development as they are for new homes.

In 2008 the Taylor Review of the Rural Economy and Affordable Housing critiqued local planning authorities for their approach to assessing whether villages could support additional growth. The report argued that a narrow approach to defining what makes a place a sustainable location for development was leading to villages falling into what Matthew Taylor referred to as a ‘sustainability trap’:

“Beneficial development can only be approved if the settlement is considered sustainable in the first place. Failure to overcome this hurdle essentially stagnates the settlement – freezing it in time – potentially for the life of the adopted development plan.”

Ten years on, the CLA has found that nearly all rural settlements across England continue to be assessed using the same process. Our research has revealed that out of 16,000 settlements of 3,000 people or less<sup>2</sup> more than 2,154 villages fall into the sustainability trap, with no clear mechanism in use by local authorities to lift them out.

# HOW ARE SETTLEMENTS ASSESSED AS “UNSUSTAINABLE”?

As part of developing a Local Plan, almost all local authorities with rural areas establish settlement hierarchies. The concept of a settlement hierarchy is sensible as it helps to understand what facilities are located in each settlement.

Establishing a settlement hierarchy requires local authorities to conduct sustainability assessments. Local authorities draw up a list of services they believe are necessary for a sustainable community and award a settlement a number of points for every service present in the community.

The scoring system is a snapshot in time that is then used in the local authority's plan for as long as it remains in place. Analysis carried out by the CLA has found that in some cases, hierarchies are still in place that were produced 10 years ago, raising concerns about the reliability of these documents as the availability of services change.

The scores are used to categorise settlements into groups. The lower the score the settlement achieves, the lower down the hierarchy it is placed. The vast majority of villages in the lower categories will have some services but in the view of the local authority are less sustainable than others.

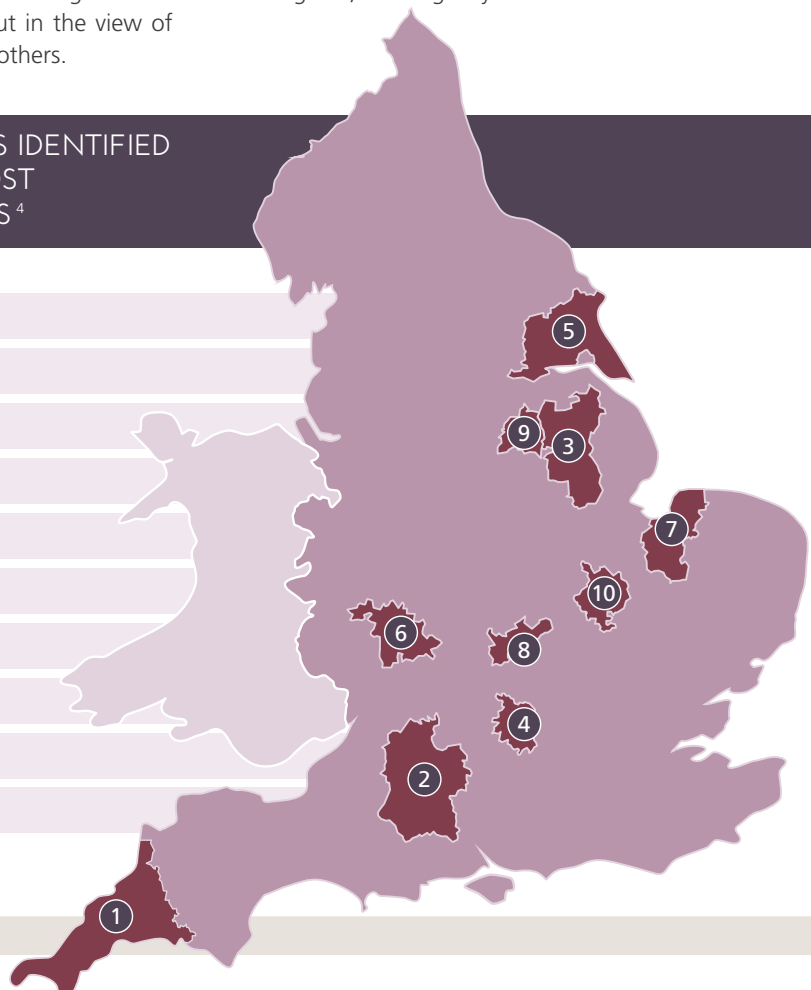
Housing is then allocated via the Local Plan towards the settlements that score more points on the hierarchy. This results in significant expansions to those market towns and villages that score highly, and a dearth of new homes lower down the hierarchy.

26 of out 70 local authorities do not list villages deemed as ‘unsustainable’ in their Local Plan so the total number is likely to be significantly higher than those identified by the CLA. In the case of the 2,154 identified, both housing allocations via the Local Plan and economic development are either highly restrictive or not permissible.

The assumption that a lack of services means these places are unsustainable for new housing has been challenged by The Taylor Review, The Affordable Rural Housing Commission<sup>3</sup> and academics due to the negative impact this process has on house price affordability, social cohesion and economic performance. The process effectively fossilises these villages instead of seeking to address the reasons behind why services are being lost, creating a cycle of decline.

## KEY FIGURES: TOP 10 AREAS IDENTIFIED BY THE CLA WITH THE MOST UNSUSTAINABLE VILLAGES<sup>4</sup>

1	Cornwall:	213
2	Wiltshire:	168
3	Central Lincolnshire:	132
4	South Oxfordshire:	102
5	East Riding of Yorkshire:	101
6	South Worcestershire:	97
7	Kings Lynn & West Norfolk:	84
8	South Northamptonshire:	82
9	Bassetlaw:	77
10	Huntingdonshire:	75



<sup>3</sup> Affordable Rural Housing Commission 2006

<sup>4</sup> CLA analysis of 70 Local Plans <https://bit.ly/2zYALHz> Examination of all local authorities defined as ‘mainly rural’ by the ONS urban/rural classification, omitting those local authorities without an adopted Core Strategy as of 31<sup>st</sup> July 2018.

# COMPILING SETTLEMENT HIERARCHIES

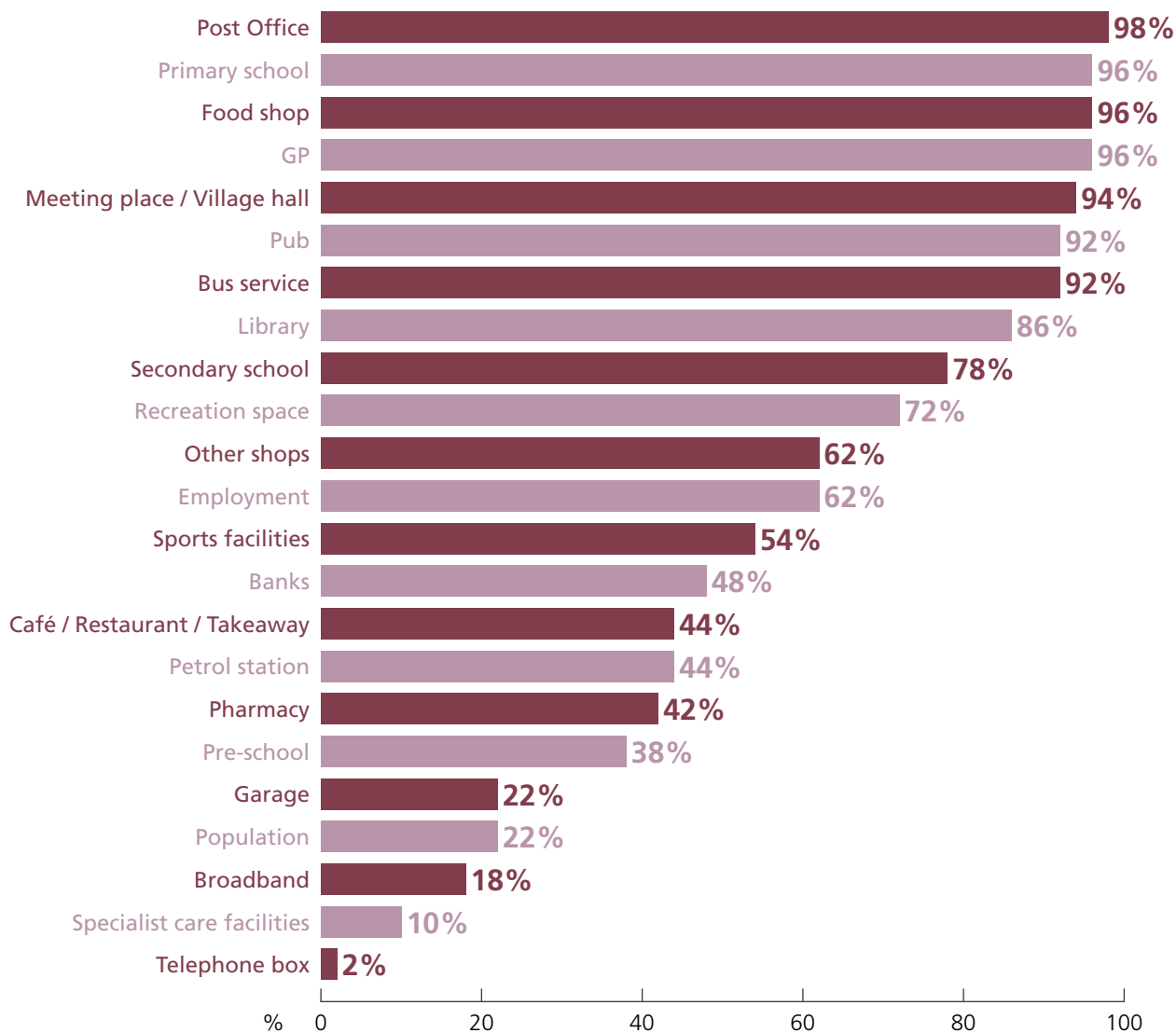
The CLA has analysed the services assessed by 50 rural local authorities when compiling settlement hierarchies. The table below shows the services assessed as well as the percentage of local authorities that include the particular service when assessing sustainability.

As can be seen, some services are included by nearly all assessments but there is significant variation. The CLA did not model this, but it is possible that a village deemed

unsustainable in one local planning authority (LPA) would not be in another, based on the services assessed.

While consistency of approach across local authorities would produce greater transparency, the CLA has more significant concerns with the type of services that are used to rank settlements.

## KEY FIGURES: PERCENTAGE OF LOCAL AUTHORITIES THAT INCLUDE SERVICES IN HIERARCHY



# BROADBAND AND SUSTAINABILITY

Perhaps the most startling fact from the analysis, considering the impact it has on modern life is that only 18% of local authorities consider broadband when determining the sustainability of a settlement.

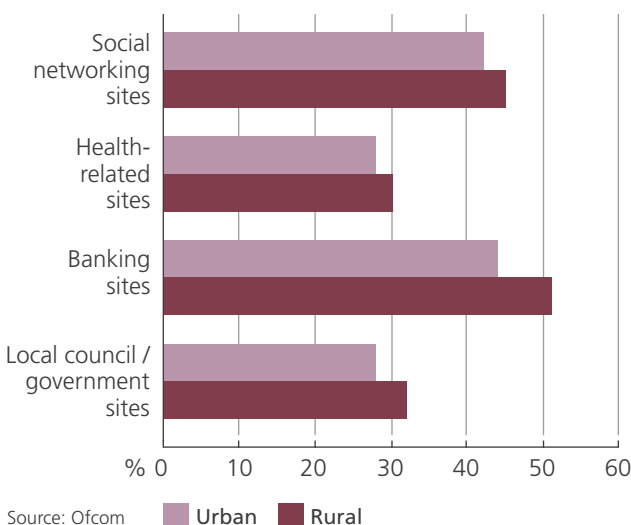
Internet access has a substantial impact on a wide facet of rural life. It reduces isolation and opens up access to services like banking, shopping, education, healthcare, communication, employment and entertainment services.

Technology and digitalisation is already helping to address the most significant challenge facing policymakers when considering how to ensure rural communities remain robust – how to deliver services to small numbers of people over larger distances?

Ofcom analysis of the internet use of people in rural and urban areas shows inhabitants<sup>5</sup> of rural areas use the internet to access services more than urban inhabitants. The biggest difference occurs in the use of banking sites in rural areas, with a majority of adults in rural areas (51%) reporting this use, compared with 44% of urban area internet users, but across the board rural residents make greater use of the internet to access goods and services.

## KEY FIGURES: USE OF DIFFERENT TYPES OF INTERNET SITE: BY AREA TYPE 2010

England, percentage of users aged 15 and over.



While this reflects the fact that physical services are not as accessible or closing in rural areas, it also shows behaviour is adapting and policy must adapt with it. Assessing communities on how they lived 50 years ago is leading to perverse outcomes and stagnation. If we are to truly understand what makes a place sustainable in the 21<sup>st</sup> century we must use 21<sup>st</sup> century criteria. Access to the internet unlocks a large number of services currently assessed by local authorities when establishing settlement hierarchies.

The Government has confirmed that universal high speed broadband will be delivered by a Universal Service Obligation giving everyone in the UK a legal right to access to speeds of at least 10 Mbps by 2020.

## CASE STUDY: 'DIGITAL VILLAGES' IN GERMANY

The "Digital Villages" project was initiated by the Ministry of Internal Affairs and Sports Rhineland-Palatinate and the Fraunhofer Institute for Experimental Software Engineering in the summer of 2015 (running until 2019) and has a total budget of around €4.5 million. Through an open innovation competition, associations of municipalities were invited to submit project ideas to improve the quality of life in their area by the means of digital services.

Key target domains for digital services were local products and services, voluntary work and communication. The scenario of local products and services is based on a local online marketplace (BestellBar), where local vendors can sell their products online.

Participating vendors include local bakeries, organic farms, vegetable farmer, regular supermarkets, but also non-food vendors, such as sports stores, pharmacies, laundries and libraries to name just a few. Once an order is registered, the system generates deliveries, which volunteers can help with using a mobile app (LieferBar). The idea is that people travelling on the required route could deliver a parcel to their neighbour. To motivate voluntary deliveries, those participating can earn so called DigiTaler (a virtual currency) that they can spend on other parts of the system to get benefits. The ecosystem is supplemented by parcel terminals, where residents can also collect purchased items.<sup>6</sup>

<sup>5</sup> Rural and urban areas: comparing lives using rural/urban classifications, ONS 2011

<sup>6</sup> European Network for Rural Development, Digital Villages Germany Working Document

# TRANSPORT AND SUSTAINABILITY

Almost all of the local authority documents reviewed by the CLA deemed a reliance on private car use made communities less sustainable. This is reflected in the importance attached to the availability of bus travel in assessments, as public transport links can get residents to services in another settlement, thus making it a more 'sustainable' location.

Beyond the obvious concern that settlements are being penalised for bus services being at their lowest point for nearly 30 years<sup>7</sup>, from a policy point of view as well as from a practical sense, the current approach adopted by local authorities lacks coherence.

Those who work in the countryside face house prices that far outstrip local salaries and therefore have to travel from where housing is more affordable to their place of work. To reduce carbon emissions from reverse commuters, local planning policies should be more supportive of building homes people can afford close to employment.

This point regarding the need for housing to reduce travel was made by the Affordable Rural Housing Commission in its final report in 2006 which stated "the lack of affordable development for those who work in the countryside has led to increased car use as low income families are forced to move to urban areas and commute back to their jobs."<sup>8</sup>

The National Planning Policy Framework (NPPF) requires development to be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised, but it does caveat this by explaining that different sustainable transport policies will be required in rural areas. This is not being reflected in the vast majority of local development policies.

Again, technology can play a role in reducing the carbon footprint of living in sparser locations. For example, none of the settlement hierarchies the CLA examined assessed settlements for charging points for electric cars, but they are set to become crucial infrastructure in reducing carbon emissions from car travel.

## CASE STUDY: THE ARUNDELL ARMS HOTEL

The Arundell Arms Hotel in the village of Lifton in Devon has installed Tesla charging points as part of its efforts to improve the sustainability of the business and the local area. It is an example of a business doing the right thing for the environment but also innovating to attract a new customer

base. It is in many ways a 21<sup>st</sup> century coaching inn, albeit that an in-car navigation system directs drivers to the hotel and lets them know how many bays are free. Customers come and enjoy the facilities of the hotel and when their car is ready to go, it lets them know via an app on their phone.



# WHAT HAPPENS TO UNSUSTAINABLE VILLAGES?

In practice, housing allocation is a trickle-down process. Housing sites are allocated in the settlements high up the settlement hierarchy. The settlements identified by the CLA are left with small-scale infill development, redevelopment or converting buildings within existing boundaries, Rural Exception Sites or Entry Level Exception Sites as the only options. The alternative is to produce a neighbourhood plan and allocate additional housing via that, which can take two or more years.

Some of the communities identified by the CLA have had their settlement boundary removed, which results in them being designated as open countryside in planning terms. This removes the possibility of any development with only a few exceptions.

Even when neighbourhood plans are put in place, there is no statutory requirement for neighbourhood plans to conduct a Housing Needs Assessment. If neighbourhood planners opt to conduct one, the NPPF advises groups against collecting their own primary data from residents, stating it is disproportionate to collect this data when other sources are available. Instead,

it advocates using data from the Local Plan to inform what housing an area needs. The CLA is concerned that this data will likely be at a strategic level and may therefore not reflect local need.

Villages that are cut off from the local planning process must either go through a neighbourhood plan or look to pursue a windfall site if housing needs are to be met. This puts an emphasis on local people to push forward development themselves via neighbourhood plans or windfall sites, such as Rural Exception sites. Unfortunately, these policies are not delivering at sufficient scale to be a national solution.

Having said that, some local authorities are very proactive in meeting the housing needs of small rural communities. While Cornwall has the highest number of unsustainable communities, between 2012 and 2017 it built roughly a third of all the affordable homes built on rural exception sites of the local authorities analysed by the CLA. This shows that while tools are available, they are not being used to their full potential by many local authorities.



## WHAT IS A HOUSING NEEDS ASSESSMENT?

Establishes how many people with a local connection to the parish have a need for affordable housing. It will also inform what size and type of housing they require.



## WHAT IS A WINDFALL SITE?

A site which has not been specifically identified as available in the Local Plan process such as a rural exception site or entry level exception site.



## KEY FIGURE

→ Since 2011 just under **8,000 affordable homes** have been built on rural exception sites in settlements of **3,000 or less**, in England.



# REDUCTION IN SOCIAL CAPITAL OF RURAL COMMUNITIES

## i WHAT IS SOCIAL CAPITAL?

The networks of relationships among people who live and work in a particular society, enabling that society to function effectively.

When discussing the sustainability of rural areas, one of the points not considered by the planning system is 'social capital'. These community links and informal support networks, especially in more sparsely located rural communities are vital to maintaining support structures when state services withdraw. The ONS examined the social capital of rural and urban communities in 2011 and found:

- **Rural residents are more trusting of people in their neighbourhood (78% compared with 61% in urban areas),**
- **Feel that others in their local area are willing to help their neighbours (81% compared with 67%),**
- **Feel safe walking alone after dark in their local area (82% compared with 71%), and**
- **Feel a sense of belonging to their neighbourhood (72% compared with 61%).<sup>9</sup>**

## THE NPPF STATES THAT:

“where there are groups of smaller settlements, development in one village may also support services in a village nearby.”<sup>10</sup>

While there are a multitude of factors for why people of all ages leave their rural community, the provision of housing is an important one. Communities deemed to be unsustainable will more likely see a reduction in social capital as homes to support the next generation will not be built.

Current planning policy recognises services in one settlement can support those in another. A post office in one village can be used by people living nearby. This clustering reflects how villages are mutually dependent and do not need to be self-sufficient. This works both ways. The loss of a service in one village has a correspondingly negative impact on the sustainability of others in the cluster. While clustering makes sense for service provision, it is less effective for housing. A carer who has to move away is less able to fulfil that role for a relative or neighbour. A fundamental part of sustaining the social capital of rural areas is the provision of housing in the same community to keep these links intact.



# REDEFINING SUSTAINABILITY



Having reviewed the services assessed to develop settlement hierarchies it is hard not to conclude that in many ways settlements are being ranked using criteria more reflective of the way people lived several generations ago than in the 21<sup>st</sup> century. Without proactively planning for the future now, rural communities will miss out on the advantages technological change will bring.

In their critique of rural planning Nigel Cohen and Stephen Owen conclude that “rural planning should be pursued as a continuous process of improving the sustainable development of each and every rural locality”<sup>11</sup>. Similarly, the Taylor Review states – “sustainable development is about action, not just maintaining the status quo, and it’s about more than just the environment, it has to address environmental, social and economic issues together.”

The current system does not go far enough in accomplishing this concept of continuous improvement. Rather than simply assessing settlements for the services they have now as we currently do, the question we must be asking is what do we want our community to look like in the next two decades or more and how can we work to achieve this?

The starting point for sustainable communities has to be the people who live and work there and a strong economy. While technology has changed how people access services, future services and businesses will only be located in areas with robust diversified economies. Improving the rural economy and creating higher paid jobs will make housing more affordable as wages increase to reduce the ratio between house prices and salaries.

While a strong economy is the only long-term solution to the rural housing crisis, there are steps that need to be taken now to address the challenges posed by the high cost of housing. The loss of young people to urban areas, the reduction in social capital as people are priced out of an area and the environmental cost of people reverse commuting all weaken the sustainability of rural communities.

## Putting people first

If planning is to shape sustainable communities it needs to be proactive in understanding the needs of the people living in them. While assessing services gives a snapshot in time, it does not reflect what the people living and working in those communities want to see happen in the future.

As can be seen in the case study opposite, only by asking communities what their needs are for the future will planning be able to meet them. This is the element missing from the current system.

## CASE STUDY: 'BLUEPRINT' WINCHESTER CITY COUNCIL



Blueprint is a community engagement toolkit designed by Winchester City Council. It is aimed at helping local people tell the Council what they think their local communities need now and in the future by asking them to consider the needs of different people; how their needs may be supported; and how things may need to change so that planning policies reflect local requirements. Communities were asked to consider three questions as part of their responses:

- Looking ahead ten or even twenty years what kind of places do we want to live in?
- How do we allow them to change?
- What matters most as we look into the future at the social and economic issues that affect us?

Blueprint ‘packs’ were prepared to help parish councils and local groups to run their own discussion events. Each pack contained information on a collection of six ‘characters’ which broadly represent the general population of the district. Their purpose was designed to get communities discussing the role of each character in their local area and how their housing, employment and community requirements may change over the longer term and whether their needs are or should be met in their local area. The purpose of these characters was not only to prompt debate and discussion, but to challenge people to put themselves in the position of others and to help provide focused responses.

The consultation exercise identified what was of most importance to people in their community. The key issues highlighted included housing for local people – for both young and old – broadband, small business units, support for local shops and services which provide jobs, car parking and leisure facilities. These concerns were fed in to the development of rural planning policies.



# THE SOLUTIONS

The impact of not taking more proactive steps to improve the sustainability of small rural locations will be a continuation and deterioration of the metrics shown in this paper.

Policy change at the national level is part of the response, but it is at the local level that change is most needed. The most important change required is for the Government to require local authorities to take a proactive role in supporting communities currently considered 'unsustainable'.

## CLA policy recommendations:

### 1. Criteria fit for the modern age

Settlement hierarchies provide a good evidence base for understanding the decline or regeneration of villages. However, no action has been taken to address the long-term sustainability of those settlements that do not come towards the top of the hierarchy.

Current criteria used to make these assessments are no longer fit for the modern, digital age and must be re-examined. Local authorities should take greater account of access to services such as broadband which provides vital connections to other services and amenities which reflect 21<sup>st</sup> century living.

A failure to think in these terms now will leave English villages trapped in analogue when the rest of the world is in the digital age. Updating sustainability assessments to capture this information on technological changes will also give local authorities and private enterprises a clearer picture of where investment in digital infrastructure is needed.

In addition, social capital should be assessed. This is not so much related to the way people in a community feel about their local area as it is about tangible examples of social capital in action, such as community transport arrangements, farmers markets or community bulk purchasing agreements for fuel.

### 2. Mandatory housing needs assessments

Central government should require local planning authorities to conduct housing needs assessments in those communities not allocated housing in Local Plans. In addition, local authorities should learn from the experiences of the Winchester City Council 'Blueprint' and conduct consultations with the rural population to understand their current socio-economic needs and how they believe these will change in the next few decades.

To ensure there are resources to carry this out, the Government should allocate funding from the Community Housing Fund to local authorities for housing needs assessments. These could then be completed by the local authority, the community or the parish council.

### 3. Continue with windfall sites and small site allocations

There is an argument that windfall sites should no longer exist and all housing should be allocated through the Local Plan. The concern with this is that applications for small sites in these settlements would not be picked up in the Local Plan in favour of larger more strategic sites, or arguments relating to sustainability would continue to restrict development.

### 4. Introduce cross subsidy on Entry Level Exception Sites

Having assessed the housing need in small rural communities not featured in Local Plans, the next step is to build the homes, raising the question of who will build them and who will pay for them?

Windfall sites depend on landowners donating or selling land just above agricultural value, which is significantly less than the value of land with planning permission for market housing. It is this reduction in price which provides the bulk of the subsidy required to build the affordable homes.



# THE SOLUTIONS

From a landowners' perspective, the decision to pursue a windfall site is socially motivated rather than in expectation of significant financial remuneration. However, selling land at reduced value is something only a small proportion of landowners will be financially able to do.

In order to provide sufficient incentive for a landowner/developer to build the homes identified in the needs assessment, there must be a financial interest. A lack of cross subsidy on entry level exception sites will reduce the likelihood of sites coming forward.

Some will be concerned about market homes being built on windfall sites, however, there is a need for all tenures of housing in rural areas and we should always be looking to build mixed communities. Homes for affordable or social rent could be managed by housing associations, community groups, the local authority or landowners themselves. There is a need for flexibility if homes are to come forward.

## KEY FIGURE

→ **13% of CLA members** have donated land for affordable housing in the last five years.



# CONCLUSION

Without recognising and adapting to the changes in how people live their lives in the 21<sup>st</sup> century the planning system will only continue to reduce the sustainability of rural communities.

For too long, villages which have fallen into the sustainability trap have been left with too few options to change. Rather than abandon them, local authorities must be more proactive in seeking to improve these areas.

Technology and digital connectivity have huge potential to achieve this and strengthen the rural economy. Ultimately, addressing the economic and social needs of the people who live in that area is the long-term solution to the rural housing crisis. The planning system has a huge role to play in facilitating this.



## CONTACTS

For more information about this report contact:

**MATTHEW O'CONNELL**  
HOUSING ADVISER  
matthew.oconnell@cla.org.uk  
@matt\_oc1

**TOM BARTOŠÁK-HARLOW**  
DIRECTOR OF EXTERNAL AFFAIRS  
tom.harlow@cla.org.uk  
@CLATomBH

 @clatweets  
@CLA\_Politics

Family or Company Name: Endurance Estates and Edmund Thornhill  
Agent: Bidwells (Skinner, Lisa)  
PMM: MM1

## Comment

Agent	Mrs Lisa Skinner (1057031)
Email Address	[REDACTED]
Company / Organisation	Bidwells
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Endurance Estates & Edmund Thornhill (1152129)
Company / Organisation	Endurance Estates and Edmund Thornhill
Address	c/o agent * *
Event Name	Proposed Main Modifications 2018
Comment by	Endurance Estates and Edmund Thornhill ( Endurance Estates & Edmund Thornhill - 1152129)
Comment ID	PMM2018:43
Response Date	28/01/19 09:48
Consultation Point	Proposed Main Modification 1 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Files	<a href="#">Skinner for Endurance Estates - Appendix 1.pdf</a> <a href="#">Skinner for Endurance Estates Redacted.pdf</a> <a href="#">Skinner for Endurance Estates - Appendix 2.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Object

Do you consider this proposed main modification to be sound? Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

- Do you consider this proposed main modification is not sound because it is not...**
- . Positively prepared
  - . Justified
  - . Effective
  - . Consistent with national policy

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

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**Please enter your representation here.**

We continue to support the broad strategy for growth that seeks to meet the objectively assessed needs for development through a strategy that aims to balance providing a deliverable, sustainable pattern of future development whilst ensuring choice and diversity in the market. In a rural district, the distribution of growth is critical to achieve a balanced, sustainable pattern of development that allows rural growth that would complement the main strategic sites and key service centres. The local service centre hierarchy included site allocations and with the removal of this category, there are no allocated sites within the wider rural area. We believe the approach within the main modification will restrict the growth and vitality of the rural settlements and adversely impact diversity in the housing supply. It will have a negative impact on the sustainability of rural villages. We therefore believe the fundamental aims of the Council's housing strategy will not be achieved or the requirements to promote sustainable development in rural areas. The following paragraphs of NPPF 2018 are directly relevant: Paragraph 78: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby." Paragraph 84 "Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist." During the Examination in Public, the Council produced up to date evidence of the services and facilities at the Local Service Centres and other key small settlements such as Offord D'Arcy. The Council accepted that within the small settlement category, the level of services and facilities available in the villages varied significantly with the largest supporting a primary school, village shop and public hall etc and the smallest having virtually none at all. The distinction between the local service centre and small settlements was seen as key to delivering development in the rural area, as sites were allocated for housing developments within the local service centre but not the small settlements. The main modifications suggest the deletion of the local service centres but without modifying the approach to development within the small settlements. The suggested approach restricts development to strategic sites and seven key service centres. In a rural area, this strategy fails to identify growth within other settlements and therefore will act as a constraint to development within what is a rural district. This will restrict and not support the approach identified to support a thriving rural economy and the guidance provided within the NPPF. This is particularly relevant in the case of Offord D'Arcy given the range of services and facilities that are already available in the settlement. Our client's site is available to deliver now and there are no constraints to development as identified in the supporting documents that formed part of our previous submission for the Regulation 19

consultation. Whilst we support the broad approach to a settlement hierarchy, we strongly object to the distribution of growth and believe this is contrary to the aim to support a thriving rural economy. The removal of the Local Service Centre Category, without differentiation within the small settlements policy and the fact that no allocations are included within this policy, is considered not to be the most appropriate strategy or is justified against reasonable alternatives. The deletion of allocated sites other than the higher settlement hierarchies will not deliver a balanced approach to housing delivery or meet the aims of the Local Plan. The Plan relies heavily on the larger sites coming forward to deliver housing and this can often be restricted due to the delivery of infrastructure. Smaller site allocations would provide a variety of delivery without such constraints and a broader market offering. We therefore believe this policy should be amended and a tiered approach introduced that accurately reflects the sustainability of each village in respect of services and facilities. In the higher order villages, such as Offord D'Arcy, allocations should be included that would allow some development to come forward other than solely rural exception sites. This would provide certainty and ensure deliverability for the overall housing strategy and support rural communities. Without such allocations, the policy for development in small settlements reverts to a rural housing exceptions policy. As stated in our previous representations, there is a limited housing stock in rural areas and this is acknowledged in the document, Towards a one nation economy, 2015. The Council has also accepted that new dwellings would be required to maintain services due to the decline in household size. This is further expanded upon in the document produced by the County Land & Business Association (CLA), Sustainable Villages - Making Rural Communities Fit for the Future, that is attached as an Appendix 2 to this letter. In summary, the document looks at sustainable villages and making rural communities fit for the future. The Council has stated at paragraph 4.105 that that no allocations were made within small settlements due to the need to travel to access services and facilities elsewhere on a regular basis. However, it was clear at the Examination in Public that the assessments for each village were inaccurate. The latest evidence clearly demonstrates that small settlements such as Offord D'Arcy are sustainable, and they support the day to day needs of their residents, providing key services such as a primary school and also support other villages. In the case of Offord D'Arcy, there is a wide range of community facilities that include a primary school, a public house, village hall, village shop, recreation ground, three churches, children's clothes shop, gift shop, two garages that operate MOT's and services and a nursery school. Paragraph 78 of the NPPF clearly supports development in a village of this nature and acknowledges that in rural areas development in one village may support services in a village nearby. Conclusion The main modifications are therefore considered to be contrary to Government Guidance and would not deliver the housing as required to meet the Council's overall strategy. We believe the amendments requested to the small settlements policy are essential to ensure the Plan meets the four tests: • Positively prepared; • Justified; • Effective; and • Consistent with National Policy Without the amendments requested, the Plan in our view is not sound. The current approach would: • Not support a thriving rural area; • Adversely affect the choice and availability of housing in a rural area; • Restrict development in small settlements that are clearly sustainable and already support other villages within the community that offer practically no services or facilities. The amendments requested would lead to a positive approach being taken to deliver sustainable development in the in the rural area. It would avoid uncertainty and create equal opportunities.

## Summary

Object to Main Modification 1. The main modifications are contrary to Government Guidance (NPPF 78 and 84) and would not deliver the housing to meet the Council's overall strategy. As stated in our previous representations, there is a limited housing stock in rural areas and this is acknowledged in the document, Towards a one nation economy, 2015. The following amendments to the small settlements policy are essential to ensure the Plan meets the four tests of soundness. • Identify growth within other settlements. • Introduce a tiered approach that accurately reflects the sustainability of each village in respect of services and facilities. Higher order villages should then include allocations. • Offord D'Arcy has a range of services and facilities. Land off Graveley Road, Offord D'Arcy should be included as an allocation is available to deliver now and there are no constraints to development as identified in the supporting documents that formed part of our previous submission for the Regulation 19 consultation. Without the amendments requested, the Plan in our view is not sound. The current approach would: • Not support a thriving rural area; • Adversely affect the choice and availability of housing in a rural area; • Restrict development in small settlements that are clearly sustainable and already support other villages within the community that offer practically no services or facilities.



Family or Company Name: Endurance Estates and Edmund Thornhill  
Agent: Bidwells (Skinner, Lisa)  
PMM: MM4

## Comment

Agent	Mrs Lisa Skinner (1057031)
Email Address	[REDACTED]
Company / Organisation	Bidwells
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Endurance Estates & Edmund Thornhill (1152129)
Company / Organisation	Endurance Estates and Edmund Thornhill
Address	c/o agent * *
Event Name	Proposed Main Modifications 2018
Comment by	Endurance Estates and Edmund Thornhill ( Endurance Estates & Edmund Thornhill - 1152129)
Comment ID	PMM2018:44
Response Date	28/01/19 10:08
Consultation Point	Proposed Main Modification 4 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.7
Files	<a href="#">Skinner for Endurance Estates_Redacted.pdf</a> <a href="#">Skinner for Endurance Estates - Appendix 1.pdf</a> <a href="#">Skinner for Endurance Estates - Appendix 2.pdf</a>

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- Positively prepared
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Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

We therefore believe this policy should be amended and a tiered approach introduced that accurately reflects the sustainability of each village in respect of services and facilities. In the higher order villages, such as Offord D'Arcy, allocations should be included that would allow some development to come forward other than solely rural exception sites. This would provide certainty and ensure deliverability

for the overall housing strategy and support rural communities. Without such allocations, the policy for development in small settlements reverts to a rural housing exceptions policy.

## Summary

The main modifications are contrary to Government Guidance (NPPF 78 and 84) and would not deliver the housing to meet the Council's overall strategy. As stated in our previous representations, there is a limited housing stock in rural areas and this is acknowledged in the document, *Towards a one nation economy, 2015*. The following amendments to the small settlements policy are essential to ensure the Plan meets the four tests of soundness.

- Identify growth within other settlements.
- Introduce a tiered approach that accurately reflects the sustainability of each village in respect of services and facilities. Higher order villages should then include allocations.
- Offord D'Arcy has a range of services and facilities. Land off Graveley Road, Offord D'Arcy should be included as an allocation is available to deliver now and there are no constraints to development as identified in the supporting documents that formed part of our previous submission for the Regulation 19 consultation. Without the amendments requested, the Plan in our view is not sound. The current approach would:
- Not support a thriving rural area;
- Adversely affect the choice and availability of housing in a rural area;
- Restrict development in small settlements that are clearly sustainable and already support other villages within the community that offer practically no services or facilities.

Family or Company Name: Endurance Estates and Edmund Thornhill  
Agent: Bidwells (Skinner, Lisa)  
PMM: MM7

## Comment

Agent	Mrs Lisa Skinner (1057031)
Email Address	[REDACTED]
Company / Organisation	Bidwells
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Endurance Estates & Edmund Thornhill (1152129)
Company / Organisation	Endurance Estates and Edmund Thornhill
Address	c/o agent * *
Event Name	Proposed Main Modifications 2018
Comment by	Endurance Estates and Edmund Thornhill ( Endurance Estates & Edmund Thornhill - 1152129)
Comment ID	PMM2018:45
Response Date	28/01/19 10:11
Consultation Point	Proposed Main Modification 7 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.8
Files	<a href="#">Skinner for Endurance Estates - Appendix 1.pdf</a> <a href="#">Skinner for Endurance Estates - Appendix 2.pdf</a> <a href="#">Skinner for Endurance Estates_Redacted.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you  Support  Object

Do you consider this proposed main modification to be sound?  Yes  Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

- Do you consider this proposed main modification is not sound because it is not...**
- . Positively prepared
  - . Justified
  - . Effective
  - . Consistent with national policy

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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Family or Company Name: Endurance Estates and Edmund Thornhill  
Agent: Bidwells (Skinner, Lisa)  
PMM: MM8

## Comment

Agent	Mrs Lisa Skinner (1057031)
Email Address	[REDACTED]
Company / Organisation	Bidwells
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Endurance Estates & Edmund Thornhill (1152129)
Company / Organisation	Endurance Estates and Edmund Thornhill
Address	c/o agent * *
Event Name	Proposed Main Modifications 2018
Comment by	Endurance Estates and Edmund Thornhill ( Endurance Estates & Edmund Thornhill - 1152129)
Comment ID	PMM2018:46
Response Date	28/01/19 10:15
Consultation Point	Proposed Main Modification 8 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6
Files	<a href="#">Skinner for Endurance Estates_Redacted.pdf</a> <a href="#">Skinner for Endurance Estates - Appendix 1.pdf</a> <a href="#">Skinner for Endurance Estates - Appendix 2.pdf</a>

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Do you  Support  Object

Do you consider this proposed main modification to be sound?  Yes  Not Sound

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Family or Company Name: Endurance Estates and Edmund Thornhill  
Agent: Bidwells (Skinner, Lisa)  
PMM: MM34

## Comment

Agent	Mrs Lisa Skinner (1057031)
Email Address	[REDACTED]
Company / Organisation	Bidwells
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Endurance Estates & Edmund Thornhill (1152129)
Company / Organisation	Endurance Estates and Edmund Thornhill
Address	c/o agent * *
Event Name	Proposed Main Modifications 2018
Comment by	Endurance Estates and Edmund Thornhill ( Endurance Estates & Edmund Thornhill - 1152129)
Comment ID	PMM2018:47
Response Date	28/01/19 10:17
Consultation Point	Proposed Main Modification 34 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6
Files	<a href="#">Skinner for Endurance Estates_Redacted.pdf</a> <a href="#">Skinner for Endurance Estates - Appendix 1.pdf</a> <a href="#">Skinner for Endurance Estates - Appendix 2.pdf</a>

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Do you Object

Do you consider this proposed main modification to be sound? Not Sound

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- Do you consider this proposed main modification is not sound because it is not...**
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- Restrict development in small settlements that are clearly sustainable and already support other villages within the community that offer practically no services or facilities.



## Comment

**Consultee** Adam Ireland (775665)  
**Email Address** [REDACTED]  
**Company / Organisation** Environment Agency  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Environment Agency ( Adam Ireland - 775665)  
**Comment ID** PMM2018:24  
**Response Date** 23/01/19 15:32  
**Consultation Point** Proposed Main Modification 23 ([View](#))  
**Status** Processed  
**Submission Type** Web  
**Version** 0.4

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Object

**Do you consider this proposed main modification to be sound?** Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...** . Positively prepared  
. Effective

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

**Do you consider this proposed main modification to be legally compliant?** Legally compliant

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

The Environment Agency spoke at the examination session, and concluded that whilst the allocation is Flood Zone 3b, the allocation of the site is the most appropriate 'positive' way forward to ensure that the regeneration takes place in a sustainable way. In particular we supported the allocation because:

- The site is in clear need of regeneration, and there is ambition on behalf of the Council, land owner and Town Council to develop it.
- The site would not be regenerated by building elsewhere, so the area of search for the sequential test is arguably the site. As the council appears to agree with this, it is hard to see why it would fail a sequential test.(the main reason HDC wishes to omit the site)
- Deallocation removes an opportunity for the Council to apply the sequential approach to development within the site
- The local plan provides an opportunity to be clear about mitigation standards, and would enable any off-site floodplain compensation areas to come forward through s106, or an advance application for off-site mitigation.
- The local plan allocation is conditional on delivering features that retain the site's contribution to the public realm and amenity - in the form of a café, public open space and moorings. De-allocation would remove those key aspects of sustainability on the main and most prominent gateway to Godmanchester for visitors by foot, bike and boat.
- Without the allocation it may be difficult to insist on the Water Framework Directive related benefits of softening the river frontage for biodiversity, erosion/sediment management and public amenity
- Retention [replacement] of the moorings is essential to bring about the visitor draw to the site (both boaters and the public attracted to boats) that would give the café best chance of viability success, or else it could soon be lost to a change of use. The fall-back position of de-allocation is arguably worse: Hunts DC is still able to grant permission for redevelopment on the site if it is not allocated. However this would cause serious unintended consequences for HDC, for example: >it would set a serious precedent for further development in flood zone 3b in Hunts, which would be very difficult to justify, especially if they had de-allocated it on flood risk grounds, and there was no clear plan policy setting out the reasons and exceptional circumstances why the site should be redeveloped. >the site could have a private, sterile and unwelcoming theme if it came forward as residential only without amenity space and a reason to visit.

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Reinstate the allocation as it was.

**Summary**

Object to Main Modification 23. If developed outside of the Plan framework it would set a dangerous precedent for development in Flood Zone 3b and be developed to lesser standards. Allocation of the site allows for regeneration of the area contributing positively to the public realm and amenity and would provide suitable mitigation through S106. The area of search for the sequential test is arguably the site. De-allocation removes an opportunity for the Council to apply the sequential approach to development within the site Without the allocation it may be difficult to insist on the Water Framework Directive related benefits. Retention [replacement] of the moorings is essential to bring about the visitor draw and maintain site viability, or else it could soon be lost to a change of use.

Family or Company Name: Fairfield Partnership  
Agent: Carter Jonas (Cronk, Paul)  
PMM: MM1

## Comment

**Agent** Mr Paul Cronk (1198339)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Consultee** Fairfield Partnership, The (1140352)  
**Company / Organisation** The Fairfield Partnership  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** The Fairfield Partnership ( Fairfield Partnership, The - 1140352)  
**Comment ID** PMM2018:36  
**Response Date** 28/01/19 15:26  
**Consultation Point** Proposed Main Modification 1 ([View](#))  
**Status** Processed  
**Submission Type** Email  
**Version** 0.4  
**Files** [Cronk, Paul for Fairfield Partnership.pdf](#)

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Object

**Do you consider this proposed main modification to be sound?** Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

Main Modification: MM1 (Policy LP 2: Strategy for Development) Introduction 1. This representation has been prepared on behalf of The Fairfield Partnership (respondent ref: 1140352) who submitted representations in response to the Council's decision to exclude land at Bearscroft Farm Godmanchester and land to its south and south east (now known and referred to as Romans' Edge and land East of Romans' Edge) as a residential allocation in the Huntingdonshire Local Plan 2036 Regulation 19 Proposed Submission 2017. 2. Whilst our clients are generally supportive of the Draft Plan and its overall approach, they strongly believe that due to a heavy reliance upon a small number of large strategic sites, in particular at Alconbury and St Neots, that the anticipated delivery numbers remain worryingly ambitious, even at the reduced rates now being advocated in the Main Modifications as a result of the proposed changes to the Housing Trajectory. 3. Our client's site was promoted as an allocation in the emerging Huntingdonshire Local Plan for a mixed-use development of around 1,000 dwellings. The proposed access arrangements include the construction of a new A1198 link road for Godmanchester. 4. The adjoining land (proposed allocation HU19 – Bearscroft Farm, Godmanchester) is currently being developed by David Wilson and Barratt Homes. The land has approval for the construction of some 750 dwellings. Since it was acquired by the homebuilders in 2014, the latest AMR (for 2017/18) identified that 179 dwellings had already been completed, together with a neighbourhood centre and a primary school. This having been achieved despite on-site works for the development having only commenced in 2015. Significant additional completions have occurred in addition to the aforementioned 179 completions recorded at the end of March 2018. Indeed, in their verbal evidence at the Local Plan Examination Hearings HDC officer witness referred to the site manager's comment that the properties on the site were selling as soon as they were built. 5. Within this representation we explain why we believe that the envisaged supply of housing provision from 'windfalls' will now be significantly less than originally envisaged in the Draft Plan, which is required to plan positively for the development and infrastructure required in the area. Accordingly, we believe that there is a necessity for the Main Modifications to make provision for additional sources of housing supply in sustainable locations within the District (especially within reach of Cambridge), where there is strong market demand. , Godmanchester is a prime location for such provision where a site is capable of boosting housing delivery (particularly much needed family sized accommodation) at a faster rate that will contribute to meeting the housing trajectory of the Draft Local Plan. 6. Indeed, it is noteworthy that the latest version of HDC's AMR highlights the fact that the highest proportion of C3 completions was in the 3 bed category. It reports that there has been an increase in the number of 3 and 4+ bed dwellings which together made up nearly two thirds of the number of completions in 2017/18. This is said to be due to the number of completions at Alconbury Weald, Bearscroft Farm in Godmanchester and former RAF Brampton where family sized dwellings have made up most of the completions so far on those sites. National Policy on Windfalls 7. In relation to 'windfalls' the Planning Practice Guidance (PPG) refers to Housing and Economic Land Availability Assessments Methodology – Stage 3: Windfall assessment (where justified). It states "How should a windfall allowance be determined in relation to housing? A windfall allowance may be justified in the 5-year supply if a local planning authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework. Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the National Planning Policy Framework)". 8. Both paragraph 48 of the NPPF (2012) and paragraph 70 of the Revised NPPF (2018) emphasise the fact that Local Planning Authorities

may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends (resisting the inappropriate development of residential gardens). However, no reference is made within the Framework to provision of very significant amounts of windfall provision over the whole course of the Plan period.

9. We believe that great caution needs to be had with regard to the calculation of windfalls. We strongly agree with the point made by PAS (the Planning Advisory Service) in its Good Plan-making Guide that it is necessary to exercise caution on windfalls, mainly because, if a 'robust' SHLAA is produced, then all available land will have been identified (within reason), so once it is in the SHLAA it cannot be windfall.

10. We consider that HDC should seek to identify sufficient sites for the full 15 year period and this is what the plan should do without reliance upon windfall provision, or other non-identified sites. We consider there to be a lack of 'compelling' evidence (our emphasis) to justify the overall amount of windfall provision being made.

Alconbury

11. We set out below the implications of the adjustments to the Alconbury housing delivery figures set out in EXAM 26, to accord with the Examination Inspector's Note on the HDC Housing Trajectory dated 14 November 2018 (paragraph 3 refers).

Year	Alconbury Weald	RAF Alconbury	Ermine Street	Total Effect
2018/19	207	0	0	207
2019/20	260	0	0	260
2020/21	260	0	0	260
2021/22	245	0	0	245
2022/23	250	0	50	300
2023/24	250	0	50	300
2024/25	250	0	100	350
2025/26	250	0	100	350
2026/27	250	0	100	350
2027/28	250	0	100	350
2028/29	300	50	100	450
2029/30	300	180	100	580
2030/31	300	185	100	585
2031/32	300	185	100	585
2032/33	300	180	100	580
2033/34	300	180	40	520
2034/35	285	180	0	465
2035/36	280	180	0	460

Total No. of Dwellings Lost from the Housing Supply -2,025

St Neots

12. We set out below the implications of the adjustments to the St Neots housing delivery figures set out in EXAM 26, to accord with the Examination Inspector's Note on the HDC Housing Trajectory dated 14 November 2018 (paragraph 3 refers).

Year	Loves Farm	East Wintringham	Park	Total Effect
2018/19	0	0	0	0
2019/20	0	65	65	130
2020/21	30	200	230	260
2021/22	115	200	315	415
2022/23	185	200	385	565
2023/24	185	200	385	565
2024/25	185	200	385	565
2025/26	115	200	315	415
2026/27	115	200	315	415
2027/28	65	200	265	330
2028/29	25	200	225	250
2029/30	0	200	200	200
2030/31	0	200	200	200
2031/32	0	200	200	200
2032/33	0	200	200	200
2033/34	0	135	135	270
2034/35	0	0	0	0
2035/36	0	0	0	0

Total No. of Dwellings Lost from the Housing Supply -1,020

13. The above table indicates a potential total loss to the housing supply figure of 1,020 dwellings. However, given the annual 200 dwellings per annum cap for St Neots East, it can be seen that there is potentially an opportunity to make up some of this loss in the final three years of the Plan period (2033/34, 2034/35 and 2035/36) given that the Housing Trajectory assumed the site would deliver only lower than 200 dpa, or no completions at all, in the final three years of the Plan period.

14. Consequently, we accept that 465 dwellings within the identified 1,020 dwelling loss figure could potentially still be delivered should they subsequently be brought forward for delivery within the final three years of the Local Plan period. However, this would still result in delayed housing delivery and an overall loss of 555 dwellings, which would need to be delivered beyond the Plan period.

15. Taken together the 2,025 dwellings lost at Alconbury and the 555 dwellings lost at St Neots East amount to a total loss of 2,580 dwellings from the supply.

16. Furthermore, it is vital to recognise that pushing housing delivery back to the tail end of the Plan period (or beyond) will do nothing to boost housing delivery in the short to medium term. Hence, we see an important need to ensure that there is a pool of sites allocated which can deliver much needed housing far sooner within the Plan period. We believe that our Client's site at Godmanchester could make a valuable contribution to boosting housing delivery in the early part of the Plan period.

17. It is also important to recognise that the 2017/2018 AMR shows that by the end of March 2018, Alconbury Weald had only delivered a total of 163 dwellings, and that no housing completions have yet been recorded for RAF Alconbury, Ermine Street or St Neots East. It would appear questionable, therefore, whether the Housing Trajectory's envisaged annual completion figures of 207 dwellings for 2018/19, and 260 dwellings for 2019/20 and 2020/21 for Alconbury Weald will actually be realised.

18. Below we set out the consequences of the Inspector's Note dated 14 November 2018, which stated the following six sites should be assumed to result in no completions.

Site Number	Number of Dwellings
S14 Former car showroom, London Road, St Ives	50
AL1 North of School Lane, Alconbury	95
BL1 Land West of Longacres, Bluntisham	135
BL2 North of 10 Station Road, Bluntisham	30
GS1 South of 29 The Green, Great Staughton	20
GS2 Between 20 Cage Lane and Averyhill, Great Staughton	14
<b>Total Loss of Dwellings</b>	<b>-344</b>

19. The consequence of the above amendments to the Housing Trajectory is to increase the loss from the overall housing supply from 2,580 to 2,924 dwellings.

Prior Approvals

20. Permitted

development provisions include changes of use such as for offices (Class 'B1a') to homes (Class 'C3') and shops (Class 'A1') to homes (Class 'C3'), which are dealt with through processes known as 'Prior Approval' or 'Prior Notification'. 21. Prior approval means that a developer has to seek approval from the local planning authority that specified elements of the development are acceptable before work can proceed. A local planning authority cannot consider any other matters when determining a prior approval application. 22. EXAM/41 identifies (p.6) an annual figure of 37 potential additional dwellings per annum from Prior Approvals for 17 years from 2019/20 onwards, giving a total of 629 dwellings over the Plan period. 23. Therefore, in accordance with the Inspector's instruction that the assumed annual prior approvals supply should be reduced from 37 to 20 dpa, the total provision from this particular source would be 340 dwellings (20 x 17 years), a reduction of 289 dwellings from the original 629 dwellings total). 24. The consequence of the above amendment to the Housing Trajectory is to increase the total loss to the overall housing supply by 289 dwellings from 2,924 to 3,213 dwellings. 25. Notwithstanding the aforementioned reduction in the Prior Notification future allowance figure, we do not consider that it is sound for the Local Plan to be seeking to make long-term provision for this particular source of housing supply based only upon a brief recent period of completions. We believe that this is an insufficient timeframe to establish compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply well into the future. Furthermore, we consider it to be contrary to paragraph 14 of the NPPF (2012) which states that for Plan-making "...local planning authorities should positively seek opportunities to meet the development needs of their area...". 26. This is particularly the case given that this is a new yet finite source of supply and there is no evidence that it will or can provide a sustained level of future dwellings. The easier buildings are likely to have already been converted. Furthermore, Huntingdonshire possesses only a limited stock of offices and other buildings that are suitable for conversion given that it is primarily a rural authority area. 27. Having undertaken research, we have been unable to readily identify any other recently produced Local Plan that incorporates a specific allowance for 'Prior Approvals'. However, we have identified the following recent evidence from Harrogate Borough Council that we consider to be pertinent, which highlights precisely why great caution should be applied to future assumptions regarding the role of Prior Approvals as a component of the identified housing supply. "...4 Delivering the Requirement 4.34 At 31 March 2017, 140 dwellings had received prior approval. This included 37 dwellings through conversion of agricultural buildings, four through the conversion of buildings in A1/A2 use, 98 through the conversion of offices and one through the conversion of a building in B8 use. 4.35 A 10% non-implementation allowance for sites identified through the prior approval process but which were not started at 31 March 2017 has been applied. 4.36 No allowance has been made for the contribution this source might make to housing supply beyond those that already have approval as there is not currently sufficient evidence, given these changes have only been in operation for a relatively short period of time, to demonstrate a sustained impact on housing supply. This is because firstly, there are a number of factors that impact on a decision to bring a site forward and whether or not this should be via the prior approval process and there is no certainty that the initial trend will continue, secondly some of the permitted developments are intended to operate for a time limited period and thirdly many of the sites are for fewer than five units and, therefore, would be captured by the windfall allowance...". 28. We strongly believe that the above evidence demonstrates why it would be inappropriate to include a specific long-term windfall allowance for Prior Approvals to be included in the Housing Trajectory. Small Sites Estimate 29. EXAM/41 made provision for small sites at 116 dwellings per year for 15 years from 2021/22 onwards (- the 19 already in the trajectory for 2021/22). The Inspector's instruction that this particular element of windfall provision should be reduced to 80 dpa results in a reduction of 540 dwellings to 1,181 dwellings. 30. The result of the aforementioned amendment to the Housing Trajectory is to increase the loss by 540 dwellings from 3,213 to 3,753 dwellings from the overall housing supply. Rural Exception Sites 31. In accordance with the Inspector's instruction that the assumed Rural Exceptions figure of 45 dwellings per year for 17 years from 2019/20 onwards, should be reduced to 35 dwellings per annum, the result being an overall reduction from 765 to 595 dwellings. 32. The result of the aforementioned amendment to the Housing Trajectory is to increase the total overall loss by 170 dwellings from 3,753 to 3,923 dwellings from the overall housing supply. 33. Again, based upon recent past delivery rates we would question the "compelling" evidence to demonstrate that 35 dpa are realistically likely to be delivered from rural exception sites and whether an allocation should be included at all. Summary of Windfall Provision 34. Below we set out an amended version of Exam 41 (p.6), which includes updates to the windfall provision figures to reflect the Examination Inspector's proposed amendment figures in respect of these sources. Summary of other potential sources of supply Source of supply Potential dwellings based on EXAM/26 Potential dwellings based upon Inspector's Note Known windfalls 363 363 Small sites at 116 per year for 15 years from

2021/22 onwards (-the 19 already in the trajectory for 2021/22) 1,721 1,181 Prior approvals at 37 per year for 17 years from 2019/20 onwards 629 340 Rural exceptions at 45 per year for 17 years from 2019/20 onwards 765 595 Total 3,478 \* 2,479 Total Loss of Dwellings -999 \* Reduced from the 3,579 dwellings discussed at Matter 12 on 25 September 2018 to reflect amendments made to the trajectory between EXAM24 and EXAM26 35. Whilst the effect of the application of reduced Windfall category allowances in accordance with the Inspectors Note is to reduce the windfalls total by almost 1,000 dwellings, we consider that the revised figure of almost 2,500 windfall dwellings over the course of the Plan period remains very high, particularly when compared with windfall provision elsewhere. 36. For instance, the East Cambridgeshire Local Plan (April 2015) includes provision for 1,133 dwellings from small site windfalls, Cambridge City Local Plan (October 2018) includes provision for 1,294 dwellings from windfalls, and the South Cambridgeshire Local Plan (October 2018) includes provision for 1,950 dwellings from windfalls. We would strongly question whether it is realistic to assume that Huntingdonshire is capable of delivering approximately twice the annual windfall rate of Cambridge City, which has a far greater scope to deliver such provision, given its greater supply of brownfield sites. 37. Similarly, we are aware that the East Hertfordshire Local Plan (October 2018) includes provision for a windfall allowance of 1,125 dwellings (based upon an updated analysis of past performance). 38. We consider that it is completely inappropriate for the Local Plan to include windfall provision categories in respect of prior approvals and rural exception sites given the lack of available evidence to demonstrate that these particular categories of development are likely to be capable of delivering the specified annual amounts of dwellings identified in the Housing Trajectory (as amended by Main Modification 1) long in to the future. The Local Plan should not rely upon such windfall provision, there should be a safety valve to ensure that adequate housing provision is made to ensure necessary housing delivery rates are capable of being met from the outset when the Local Plan is adopted. Housing Delivery Shortfall 39. Proposed Main Modification 1 sets out amended text in respect of paragraph 4.10. It states that between 1 April 2011 and 31 March 2018 there were 4,421 dwellings completed, equivalent to 22% of the objectively assessed need up to 2036 (we would point out that is over 28% of the Plan period). It also specifies that supply from the 1 April 2018 to 31 March 2036 is estimated at 16,647 dwellings (which includes sites with planning permission, sites subject to S106 agreements, sites allocated in the Draft Local Plan and estimated completions of additional small windfall sites, rural exceptions sites and prior approvals). The total estimated housing supply for the Plan period is said to equate to 21,068 new homes, the equivalent to 105% of the Council's objectively assessed need. 40. We consider it noteworthy that the text that it replaces within CORE/01 made reference to a housing supply of 22,500 new homes, equivalent to 112% of the OAN. It is now apparent that when carefully scrutinised, HDC's previously identified sources of housing supply within its housing trajectory are not as reliable as originally suggested. Furthermore, whilst 22% of the Local Plan may have been delivered over the first 7 years of the Plan period, this means that the remaining 78% of the supply needs to be delivered over the remainder of the Plan period, which is a period of only 18 years length in duration. The Case for Development 41. The land being promoted by the Fairfield Partnership is located to the east of the existing built-up area at Bearscroft Farm, Godmanchester. It is bounded to the north by the existing A14, to the east by the mature Emmanuel Knoll plantation and adjoining agricultural, land to the south by the A1198. The western boundary adjoins the Bearscroft Farm (Roman's Edge) development currently under construction and discussions are well advance in relation to the provision of a new secondary school on the land. 42. The allocation of the land would provide for a logical extension to Godmanchester. It is well-related to the town and would build upon the highly successful development that is already underway at Roman's Edge. It is anticipated that the land could accommodate up to 1,200 dwellings, containing a mixture of housing sizes, types and tenures, an employment area, a primary school, formal and informal recreation areas and associated green infrastructure. 43. The proposal is unique in that it would incorporate a new purpose-built link road, allowing the existing section of the A1198 which passes in front of the Roman's Edge development to be completely remodelled. The remodelling of this section of road would reduce its physical impact and provide for better integration of the existing and proposed built-up areas, enabling even greater connectivity than already exists. Linked with the construction of the link road the existing A14 / A1198 junction would be altered by the removal of the over bridge once the new A14(M) is opened in 2020. 44. The proposal would establish a new landscaped gateway into Godmanchester and deliver additional dwellings in a locality with excellent connectivity to address the uncertainties that still exist in relation to the supply of dwellings during the Plan period. This is considered to be particularly important given the location of the Alconbury and Ermine Street sites on the wrong side of Huntingdon, and on the outer edges of the Cambridge Housing Market Area. This is a further factor that is likely to influence the speed of delivery as these may be viewed as less desirable locations from a house buyers'



perspective. Conclusions 45. In combination, the 2,025 dwellings lost at Alconbury and the 555 dwellings lost at St Neots East amount to a total loss of 2,580 dwellings from the overall housing supply. A further 344 dwellings will be lost from the housing supply as a result of the Inspector's advice note, which found that nil completions should be assumed from six identified sites. Finally, a further 999 dwellings are lost as a result of the Inspector's proposed revised annual delivery figures in respect of small sites, prior approvals and rural exceptions. Consequently, a total of 3,923 dwellings are being removed from the identified overall housing supply. This is a very significant amount (19.5%) given that policy LP1 makes provision for at least 20,100 new homes. 46. The Draft Plan places too much reliance upon contributions from prior approval and rural exception sites as windfalls and without sufficient evidence to demonstrate that these sources will continue to deliver housing at similar rates long into the future. We also consider reliance upon the aforementioned categories as windfalls to be a contrary approach to that found in most other Local Plans. Such an approach is contrary to the NPPF which advocates planning positively to address requirements. 47. We fail to see how the removal of nearly 4,000 dwellings from the overall housing supply via these Main Modifications is being properly and adequately addressed within the Local Plan. 48. We believe that Land to the east and south east of Romans' Edge should be identified as a strategic location for growth within the Huntingdon Spatial Planning Area. The Local Plan should be revised to include a draft allocation at land east of Romans' Edge in order to address the deficit in the District Council's identified housing supply arising from the changes being undertaken by the Main Modifications. This will deliver additional housing at a location where there is high demand, and which importantly, is physically well related to the City of Cambridge where much of the demand arises. Tests of Soundness 49. In view of the above considerations, we consider that Main Modification 1 to Policy LP 2 is not sound because it is not "consistent with national policy" "positively prepared", "justified" or "effective". Proposed modifications 50. We propose the following amendments to Main Modification 1: (i) The Prior Approval and Rural Exception Figure categories be deleted from the Housing Trajectory; (ii) Land to the east and south east of Romans' Edge be allocated to replace housing lost as a result of the changes made to the Housing Trajectory; and (iii) Figure 2: Key Diagram as set out in MM 5 be amended to include our proposed housing allocation at Godmanchester being located within the Huntingdon Spatial Planning Area.

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

50. We propose the following amendments to Main Modification 1:(i) The Prior Approval and Rural Exception Figure categories be deleted from the Housing Trajectory;(ii) Land to the east and south east of Romans' Edge be allocated to replace housing lost as a result of the changes made to the Housing Trajectory; and(iii) Figure 2: Key Diagram as set out in MM 5 be amended to include our proposed housing allocation at Godmanchester being located within the Huntingdon Spatial Planning Area.

## Summary

Object to Main Modification 1. Generally supportive of the Draft Plan and its overall approach. Anticipated delivery is too ambitious. Delivery rates in the years 2018/19 to 2020/21 may not be realised as no housing completions have yet been recorded for RAF Alconbury, Ermine Street or St Neots East. There is a strong reliance upon a small number of large strategic sites. HDC should identify sufficient sites for the full 15 year period without reliance upon windfall provision. 78% of the supply needs to be delivered over the remainder of the Plan period, which is a period of only 18 years length in duration.

There is a lack of compelling evidence to justify windfall provision. The overall windfall figure still remains too high. The deletion of allocations through the proposed main modifications and the reduction in predicted prior approvals, small sites and rural exceptions windfall results in the loss of further housing. It is not sound for the Local Plan to be seeking to make long-term provision for prior approvals based on a brief recent period of completions and limited stock remains for this source. Land at Romans' Edge and land East of Romans' Edge adjacent to allocation HU19 would remedy this. The current adjacent allocation HU19 is already delivering at a fast rate. Proposed modifications (i) The Prior Approval and Rural Exception Figure categories be deleted from the Housing Trajectory; (ii) Land to the east and south east of Romans' Edge be allocated to replace housing lost as a result of the changes made to the Housing Trajectory; and (iii) Figure 2: Key Diagram as set out in MM 5 be amended to include our proposed housing allocation at Godmanchester being located within the Huntingdon Spatial Planning Area.



## **Main Modification: MM1 (Policy LP 2: Strategy for Development)**

### **Introduction**

1. This representation has been prepared on behalf of The Fairfield Partnership (**respondent ref: 1140352**) who submitted representations in response to the Council's decision to exclude land at Bearscroft Farm Godmanchester and land to its south and south east (now known and referred to as Romans' Edge and land East of Romans' Edge) as a residential allocation in the Huntingdonshire Local Plan 2036 Regulation 19 Proposed Submission 2017.
2. Whilst our clients are generally supportive of the Draft Plan and its overall approach, they strongly believe that due to a heavy reliance upon a small number of large strategic sites, in particular at Alconbury and St Neots, that the anticipated delivery numbers remain worryingly ambitious, even at the reduced rates now being advocated in the Main Modifications as a result of the proposed changes to the Housing Trajectory.
3. Our client's site was promoted as an allocation in the emerging Huntingdonshire Local Plan for a mixed-use development of around 1,000 dwellings. The proposed access arrangements include the construction of a new A1198 link road for Godmanchester.
4. The adjoining land (proposed allocation HU19 – Bearscroft Farm, Godmanchester) is currently being developed by David Wilson and Barratt Homes. The land has approval for the construction of some 750 dwellings. Since it was acquired by the homebuilders in 2014, the latest AMR (for 2017/18) identified that 179 dwellings had already been completed, together with a neighbourhood centre and a primary school. This having been achieved despite on-site works for the development having only commenced in 2015. Significant additional completions have occurred in addition to the aforementioned 179 completions recorded at the end of March 2018. Indeed, in their verbal evidence at the Local Plan Examination Hearings HDC officer witness referred to the site manager's comment that the properties on the site were selling as soon as they were built.



5. Within this representation we explain why we believe that the envisaged supply of housing provision from 'windfalls' will now be significantly less than originally envisaged in the Draft Plan, which is required to plan positively for the development and infrastructure required in the area<sup>1</sup>. Accordingly, we believe that there is a necessity for the Main Modifications to make provision for additional sources of housing supply in sustainable locations within the District (especially within reach of Cambridge), where there is strong market demand. , Godmanchester is a prime location for such provision where a site is capable of boosting housing delivery (particularly much needed family sized accommodation) at a faster rate that will contribute to meeting the housing trajectory of the Draft Local Plan.
6. Indeed, it is noteworthy that the latest version of HDC's AMR highlights the fact that the highest proportion of C3 completions was in the 3 bed category. It reports that there has been an increase in the number of 3 and 4+ bed dwellings which together made up nearly two thirds of the number of completions in 2017/18. This is said to be due to the number of completions at Alconbury Weald, Bearscroft Farm in Godmanchester and former RAF Brampton where family sized dwellings have made up most of the completions so far on those sites<sup>2</sup>.

### **National Policy on Windfalls**

7. In relation to 'windfalls' the Planning Practice Guidance (PPG) refers to Housing and Economic Land Availability Assessments Methodology – Stage 3: Windfall assessment (where justified). It states<sup>3</sup>

**“How should a windfall allowance be determined in relation to housing?”**

**A windfall allowance may be justified in the 5-year supply if a local planning authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework.**

<sup>1</sup> NPPF (2012), para. 157

<sup>2</sup> HDC AMR – December 2018, pages 40-41

<sup>3</sup> Paragraph: 24 Reference ID: 3-24-20140306



**Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the National Planning Policy Framework)”.**

8. Both paragraph 48 of the NPPF (2012) and paragraph 70 of the Revised NPPF (2018) emphasise the fact that Local Planning Authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends (resisting the inappropriate development of residential gardens). However, no reference is made within the Framework to provision of very significant amounts of windfall provision over the whole course of the Plan period.
9. We believe that great caution needs to be had with regard to the calculation of windfalls. We strongly agree with the point made by PAS (the Planning Advisory Service) in its Good Plan-making Guide that it is necessary to exercise caution on windfalls, mainly because, if a ‘robust’ SHLAA is produced, then all available land will have been identified (within reason), so once it is in the SHLAA it cannot be windfall<sup>4</sup>.
10. We consider that HDC should seek to identify sufficient sites for the full 15 year period and this is what the plan should do without reliance upon windfall provision, or other non-identified sites. We consider there to be a lack of **‘compelling’** evidence (our emphasis) to justify the overall amount of windfall provision being made.

### **Alconbury**

11. We set out below the implications of the adjustments to the Alconbury housing delivery figures set out in EXAM 26, to accord with the Examination Inspector’s

<sup>4</sup> PAS Good Plan Making Guide – Plan Making Principles for Practitioners – September 2014, p.48



Note on the HDC Housing Trajectory dated 14 November 2018 (paragraph 3 refers).

Year	Alconbury Weald	RAF Alconbury	Ermine Street	Total	Effect of 300 Dwellings Per Annum Cap for Locality
2018/19	207	0	0	207	
2019/20	260	0	0	260	
2020/21	260	0	0	260	
2021/22	245	0	0	245	
2022/23	250	0	50	300	
2023/24	250	0	50	300	
2024/25	250	0	100	350	- 50
2025/26	250	0	100	350	- 50
2026/27	250	0	100	350	- 50
2027/28	250	0	100	350	- 50
2028/29	300	50	100	450	-150
2029/30	300	180	100	580	-280
2030/31	300	185	100	585	-285
2031/32	300	185	100	585	-285
2032/33	300	180	100	580	-280
2033/34	300	180	40	520	-220
2034/35	285	180	0	465	-165
2035/36	280	180	0	460	-160
<b>Total No. of Dwellings Lost from the Housing Supply</b>					<b>-2,025</b>

### St Neots

12. We set out below the implications of the adjustments to the St Neots housing delivery figures set out in EXAM 26, to accord with the Examination Inspector's Note on the HDC Housing Trajectory dated 14 November 2018 (paragraph 3 refers).



Year	Loves Farm East	Wintringham Park	Total	Effect of 200 Dwellings Per Annum Cap for Locality
2018/19	0	0	0	
2019/20	0	65	65	
2020/21	30	200	230	<b>-30</b>
2021/22	115	200	315	<b>-115</b>
2022/23	185	200	385	<b>-185</b>
2023/24	185	200	385	<b>-185</b>
2024/25	185	200	385	<b>-185</b>
2025/26	115	200	315	<b>-115</b>
2026/27	115	200	315	<b>-115</b>
2027/28	65	200	265	<b>-65</b>
2028/29	25	200	225	<b>-25</b>
2029/30	0	200	200	
2030/31	0	200	200	
2031/32	0	200	200	
2032/33	0	200	200	
2033/34	0	135	135	
2034/35	0	0	0	
2035/36	0	0	0	
<b>Total No. of Dwellings Lost from the Housing Supply</b>				<b>-1,020</b>

13. The above table indicates a potential total loss to the housing supply figure of 1,020 dwellings. However, given the annual 200 dwellings per annum cap for St Neots East, it can be seen that there is potentially an opportunity to make up some of this loss in the final three years of the Plan period (2033/34, 2034/35 and 2035/36) given that the Housing Trajectory assumed the site would deliver only lower than 200 dpa, or no completions at all, in the final three years of the Plan period.



14. Consequently, we accept that 465 dwellings within the identified 1,020 dwelling loss figure could potentially still be delivered should they subsequently be brought forward for delivery within the final three years of the Local Plan period. However, this would still result in delayed housing delivery and an overall loss of 555 dwellings, which would need to be delivered beyond the Plan period.
15. Taken together the 2,025 dwellings lost at Alconbury and the 555 dwellings lost at St Neots East amount to a total loss of 2,580 dwellings from the supply.
16. Furthermore, it is vital to recognise that pushing housing delivery back to the tail end of the Plan period (or beyond) will do nothing to boost housing delivery in the short to medium term. Hence, we see an important need to ensure that there is a pool of sites allocated which can deliver much needed housing far sooner within the Plan period. We believe that our Client's site at Godmanchester could make a valuable contribution to boosting housing delivery in the early part of the Plan period.
17. It is also important to recognise that the 2017/2018 AMR shows that by the end of March 2018, Alconbury Weald had only delivered a total of 163 dwellings, and that no housing completions have yet been recorded for RAF Alconbury, Ermine Street or St Neots East. It would appear questionable, therefore, whether the Housing Trajectory's envisaged annual completion figures of 207 dwellings for 2018/19, and 260 dwellings for 2019/20 and 2020/21 for Alconbury Weald will actually be realised.
18. Below we set out the consequences of the Inspector's Note dated 14 November 2018, which stated the following six sites should be assumed to result in no completions.





### Table of Adjustments to EXAM 26 to reflect No Completions

Allocation	Site	Number of Dwellings
S14	Former car showroom, London Road, St Ives	50
AL1	North of School Lane, Alconbury	95
BL1	Land West of Longacres, Bluntisham	135
BL2	North of 10 Station Road, Bluntisham	30
GS1	South of 29 The Green, Great Staughton	20
GS2	Between 20 Cage Lane and Averyhill, Great Staughton	14
<b>Total Loss of Dwellings</b>		<b>-344</b>

19. The consequence of the above amendments to the Housing Trajectory is to increase the loss from the overall housing supply from 2,580 to 2,924 dwellings.

### Prior Approvals

20. Permitted development provisions include changes of use such as for offices (Class 'B1a') to homes (Class 'C3') and shops (Class 'A1') to homes (Class 'C3'), which are dealt with through processes known as 'Prior Approval' or 'Prior Notification'.
21. Prior approval means that a developer has to seek approval from the local planning authority that specified elements of the development are acceptable before work can proceed. A local planning authority cannot consider any other matters when determining a prior approval application.
22. EXAM/41 identifies (p.6) an annual figure of 37 potential additional dwellings per annum from Prior Approvals for 17 years from 2019/20 onwards, giving a total of 629 dwellings over the Plan period.



23. Therefore, in accordance with the Inspector's instruction that the assumed annual prior approvals supply should be reduced from 37 to 20 dpa, the total provision from this particular source would be 340 dwellings (20 x 17 years), a reduction of 289 dwellings from the original 629 dwellings total).
24. The consequence of the above amendment to the Housing Trajectory is to increase the total loss to the overall housing supply by 289 dwellings from 2,924 to 3,213 dwellings.
25. Notwithstanding the aforementioned reduction in the Prior Notification future allowance figure, we do not consider that it is sound for the Local Plan to be seeking to make long-term provision for this particular source of housing supply based only upon a brief recent period of completions. We believe that this is an insufficient timeframe to establish compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply well into the future. Furthermore, we consider it to be contrary to paragraph 14 of the NPPF (2012) which states that for Plan-making **"...local planning authorities should positively seek opportunities to meet the development needs of their area..."**.
26. This is particularly the case given that this is a new yet finite source of supply and there is no evidence that it will or can provide a sustained level of future dwellings. The easier buildings are likely to have already been converted. Furthermore, Huntingdonshire possesses only a limited stock of offices and other buildings that are suitable for conversion given that it is primarily a rural authority area.
27. Having undertaken research, we have been unable to readily identify any other recently produced Local Plan that incorporates a specific allowance for 'Prior Approvals'. However, we have identified the following recent evidence from Harrogate Borough Council<sup>5</sup> that we consider to be pertinent, which highlights precisely why great caution should be applied to future assumptions regarding the role of Prior Approvals as a component of the identified housing supply.

<sup>5</sup> Harrogate District Local Plan: Housing Background Paper – January 2018 (p.20)



#### **“...4 Delivering the Requirement**

**4.34 At 31 March 2017, 140 dwellings had received prior approval. This included 37 dwellings through conversion of agricultural buildings, four through the conversion of buildings in A1/A2 use, 98 through the conversion of offices and one through the conversion of a building in B8 use.**

**4.35 A 10% non-implementation allowance for sites identified through the prior approval process but which were not started at 31 March 2017 has been applied.**

**4.36 No allowance has been made for the contribution this source might make to housing supply beyond those that already have approval as there is not currently sufficient evidence, given these changes have only been in operation for a relatively short period of time, to demonstrate a sustained impact on housing supply. This is because firstly, there are a number of factors that impact on a decision to bring a site forward and whether or not this should be via the prior approval process and there is no certainty that the initial trend will continue, secondly some of the permitted developments are intended to operate for a time limited period and thirdly many of the sites are for fewer than five units and, therefore, would be captured by the windfall allowance...”.**

- 28.** We strongly believe that the above evidence demonstrates why it would be inappropriate to include a specific long-term windfall allowance for Prior Approvals to be included in the Housing Trajectory.

#### **Small Sites Estimate**

- 29.** EXAM/41 made provision for small sites at 116 dwellings per year for 15 years from 2021/22 onwards (- the 19 already in the trajectory for 2021/22). The Inspector’s instruction that this particular element of windfall provision should be reduced to 80 dpa results in a reduction of 540 dwellings to 1,181 dwellings.



30. The result of the aforementioned amendment to the Housing Trajectory is to increase the loss by 540 dwellings from 3,213 to 3,753 dwellings from the overall housing supply.

### **Rural Exception Sites**

31. In accordance with the Inspector's instruction that the assumed Rural Exceptions figure of 45 dwellings per year for 17 years from 2019/20 onwards, should be reduced to 35 dwellings per annum, the result being an overall reduction from 765 to 595 dwellings.
32. The result of the aforementioned amendment to the Housing Trajectory is to increase the total overall loss by 170 dwellings from 3,753 to 3,923 dwellings from the overall housing supply.
33. Again, based upon recent past delivery rates we would question the "compelling" evidence to demonstrate that 35 dpa are realistically likely to be delivered from rural exception sites and whether an allocation should be included at all.

### **Summary of Windfall Provision**

34. Below we set out an amended version of Exam 41 (p.6), which includes updates to the windfall provision figures to reflect the Examination Inspector's proposed amendment figures in respect of these sources.



### Summary of other potential sources of supply

Source of supply	Potential dwellings based on EXAM/26	Potential dwellings based upon Inspector's Note
Known windfalls	363	363
Small sites at 116 per year for 15 years from 2021/22 onwards (-the 19 already in the trajectory for 2021/22)	1,721	1,181
Prior approvals at 37 per year for 17 years from 2019/20 onwards	629	340
Rural exceptions at 45 per year for 17 years from 2019/20 onwards	765	595
<b>Total</b>	<b>3,478 *</b>	<b>2,479</b>
<b>Total Loss of Dwellings</b>		<b>-999</b>

\* Reduced from the 3,579 dwellings discussed at Matter 12 on 25 September 2018 to reflect amendments made to the trajectory between EXAM24 and EXAM26

35. Whilst the effect of the application of reduced Windfall category allowances in accordance with the Inspectors Note is to reduce the windfalls total by almost 1,000 dwellings, we consider that the revised figure of almost 2,500 windfall dwellings over the course of the Plan period remains very high, particularly when compared with windfall provision elsewhere.
36. For instance, the East Cambridgeshire Local Plan (April 2015) includes provision for 1,133 dwellings from small site windfalls, Cambridge City Local Plan (October 2018) includes provision for 1,294 dwellings from windfalls, and the South Cambridgeshire Local Plan (October 2018) includes provision for 1,950 dwellings from windfalls. We would strongly question whether it is realistic to assume that



Huntingdonshire is capable of delivering approximately twice the annual windfall rate of Cambridge City, which has a far greater scope to deliver such provision, given its greater supply of brownfield sites.

37. Similarly, we are aware that the East Hertfordshire Local Plan (October 2018) includes provision for a windfall allowance of 1,125 dwellings (based upon an updated analysis of past performance).
38. We consider that it is completely inappropriate for the Local Plan to include windfall provision categories in respect of prior approvals and rural exception sites given the lack of available evidence to demonstrate that these particular categories of development are likely to be capable of delivering the specified annual amounts of dwellings identified in the Housing Trajectory (as amended by Main Modification 1) long in to the future. The Local Plan should not rely upon such windfall provision, there should be a safety valve to ensure that adequate housing provision is made to ensure necessary housing delivery rates are capable of being met from the outset when the Local Plan is adopted.

### **Housing Delivery Shortfall**

39. Proposed Main Modification 1 sets out amended text in respect of paragraph 4.10. It states that between 1 April 2011 and 31 March 2018 there were 4,421 dwellings completed, equivalent to 22% of the objectively assessed need up to 2036 (we would point out that is over 28% of the Plan period). It also specifies that supply from the 1 April 2018 to 31 March 2036 is estimated at 16,647 dwellings (which includes sites with planning permission, sites subject to S106 agreements, sites allocated in the Draft Local Plan and estimated completions of additional small windfall sites, rural exceptions sites and prior approvals). The total estimated housing supply for the Plan period is said to equate to 21,068 new homes, the equivalent to 105% of the Council's objectively assessed need.
40. We consider it noteworthy that the text that it replaces within CORE/01 made reference to a housing supply of 22,500 new homes, equivalent to 112% of the OAN. It is now apparent that when carefully scrutinised, HDC's previously identified sources of housing supply within its housing trajectory are not as reliable as originally suggested. Furthermore, whilst 22% of the Local Plan may



have been delivered over the first 7 years of the Plan period, this means that the remaining 78% of the supply needs to be delivered over the remainder of the Plan period, which is a period of only 18 years length in duration.

### The Case for Development

41. The land being promoted by the Fairfield Partnership is located to the east of the existing built-up area at Bearscroft Farm, Godmanchester. It is bounded to the north by the existing A14, to the east by the mature Emmanuel Knoll plantation and adjoining agricultural, land to the south by the A1198. The western boundary adjoins the Bearscroft Farm (Roman's Edge) development currently under construction and discussions are well advance in relation to the provision of a new secondary school on the land.
42. The allocation of the land would provide for a logical extension to Godmanchester. It is well-related to the town and would build upon the highly successful development that is already underway at Roman's Edge. It is anticipated that the land could accommodate up to 1,200 dwellings, containing a mixture of housing sizes, types and tenures, an employment area, a primary school, formal and informal recreation areas and associated green infrastructure.
43. The proposal is unique in that it would incorporate a new purpose-built link road, allowing the existing section of the A1198 which passes in front of the Roman's Edge development to be completely remodelled. The remodelling of this section of road would reduce its physical impact and provide for better integration of the existing and proposed built-up areas, enabling even greater connectivity than already exists. Linked with the construction of the link road the existing A14 / A1198 junction would be altered by the removal of the over bridge once the new A14(M) is opened in 2020.
44. The proposal would establish a new landscaped gateway into Godmanchester and deliver additional dwellings in a locality with excellent connectivity to address the uncertainties that still exist in relation to the supply of dwellings during the Plan period. This is considered to be particularly important given the location of the Alconbury and Ermine Street sites on the wrong side of Huntingdon, and on the outer edges of the Cambridge Housing Market Area. This is a further factor



that is likely to influence the speed of delivery as these may be viewed as less desirable locations from a house buyers' perspective.

### **Conclusions**

45. In combination, the 2,025 dwellings lost at Alconbury and the 555 dwellings lost at St Neots East amount to a total loss of 2,580 dwellings from the overall housing supply. A further 344 dwellings will be lost from the housing supply as a result of the Inspector's advice note, which found that nil completions should be assumed from six identified sites. Finally, a further 999 dwellings are lost as a result of the Inspector's proposed revised annual delivery figures in respect of small sites, prior approvals and rural exceptions. Consequently, a total of 3,923 dwellings are being removed from the identified overall housing supply. This is a very significant amount (19.5%) given that policy LP1 makes provision for at least 20,100 new homes.
46. The Draft Plan places too much reliance upon contributions from prior approval and rural exception sites as windfalls and without sufficient evidence to demonstrate that these sources will continue to deliver housing at similar rates long into the future. We also consider reliance upon the aforementioned categories as windfalls to be a contrary approach to that found in most other Local Plans. Such an approach is contrary to the NPPF which advocates planning positively to address requirements.
47. We fail to see how the removal of nearly 4,000 dwellings from the overall housing supply via these Main Modifications is being properly and adequately addressed within the Local Plan.
48. We believe that Land to the east and south east of Romans' Edge should be identified as a strategic location for growth within the Huntingdon Spatial Planning Area. The Local Plan should be revised to include a draft allocation at land east of Romans' Edge in order to address the deficit in the District Council's identified housing supply arising from the changes being undertaken by the Main Modifications. This will deliver additional housing at a location where there is high demand, and which importantly, is physically well related to the City of Cambridge where much of the demand arises.





### **Tests of Soundness**

49. In view of the above considerations, we consider that Main Modification 1 to Policy LP 2 is not sound because it is not **“consistent with national policy”** **“positively prepared”**, **“justified”** or **“effective”**.

### **Proposed modifications**

50. We propose the following amendments to Main Modification 1:
- (i) **The Prior Approval and Rural Exception Figure categories be deleted from the Housing Trajectory;**
  - (ii) **Land to the east and south east of Romans’ Edge be allocated to replace housing lost as a result of the changes made to the Housing Trajectory; and**
  - (iii) **Figure 2: Key Diagram as set out in MM 5 be amended to include our proposed housing allocation at Godmanchester being located within the Huntingdon Spatial Planning Area.**

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PC/1513  
28 January 2019