

Huntingdonshire Local Plan to 2036 Examination

EXAM/48: Representations to the Proposed Main Modifications 2018 Sustainability Appraisal Consultation (in Document Order)

Huntingdonshire District Council
February 2018

Comment

Consultee	Ms Debbie Mack (56252)
Email Address	[REDACTED]
Company / Organisation	Historic England
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications Sustainability Appraisal
Comment by	Historic England (Ms Debbie Mack - 56252)
Comment ID	5
Response Date	29/01/19 11:10
Consultation Point	Huntingdonshire Local Plan to 2036: Proposed Main Modifications 2018 Sustainability Appraisal (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Mack for Historic England_Redacted.pdf
Comment Type	
How would you describe your comment?	Have Observations

Comment

Please tell us your views. If you would like to see changes made please say why making reference to evidence if available and describe how such changes should be made by identifying additional text by underlining it (**U**) and any text to be deleted by striking it through (**ABC**).

Please be as concise as possible.

Comment

Sustainability Appraisal of the Proposed Main ModificationsWe do not have the capacity to comment in any detail upon the Sustainability Appraisal at this stage in the process.

Supporting documents

If you would like you can support your comment with documents. 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 the 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 Huntingdonshire Local Plan and to reproduce the document for such purposes.

If you want to refer to a supporting document in several comments you only need to upload the document once - just refer to the document in subsequent comments and we will link the document to the comment when we process it.

Please note that any comments that are wholly contained within uploaded documents, with 'See attached' or similar in the comment field will not be accepted. [Mack for Historic England_Redacted.pdf](#)

Summary

Summary

No Comment.



Planning Policy Team
Huntingdonshire District Council

Direct Dial: [REDACTED]

Our Ref: PL00041045

29 January 2019

Dear Planning Policy Team

re: Proposed Main Modifications to the Huntingdonshire Local Plan 2018

Thank you for consulting Historic England about the Proposed Main Modifications to the Huntingdonshire Local Plan. We have the following comments to make on the suggested changes to the Plan:-

General Comments

We have made a number of comments on previous consultations of the Local Plan including our letters dated 25th August 2017 and 5th February 2018. Further to that, on 20th June 2018 we advised the Programme Officer that we would not be submitting hearing statements of Statements of Common Ground but would 'be relying on our previously submitted written representations, thereby indicating that our representations still stand.

It is therefore disappointing to see that there have been almost no changes to the Plan in response to our representations and indeed none in relation to the sites where we expressed greatest concern, namely sites **HU3, SM4 and WB2**.

Detailed Comments

Site Deletions

We note that a number of sites have been deleted from the Plan including:

- HU9 Main Street Huntingdon
- HU16 Tyrell's Marina, Godmanchester
- SN5 Former Youth Centre, Priory Road, St Neots
- SI4 Former Car Showroom, London Road, St Ives
- SM5 East of Robert Avenue, Somersham
- AL1 North of School Lane, Alconbury



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EAST OF ENGLAND OFFICE

- BL1 West of Longacres, Bluntisham
- BL2 North of 10 Station Road, Bluntisham
- GS1 South of 29, The Green, Great Staughton
- GS2 Between 20 Cage Land and Averyhill, Great Staughton

This therefore addresses any concerns we previously raised about these sites.

MM30 RA3 West Station Yard and Northern Mill, Ramsey

We note that this policy now includes the caveat that the retention of the existing Northern Mill building to act as a local landmark subject to viability.

We would highlight the importance of seeking to sustain and enhance heritage assets (whether designated or undesignated) (para 185a and 197 of the NPPF. Paragraph 195 that discusses viability matters relates to designated assets, though many of the same principles apply. We would continue to emphasise the desirability of retaining the Northern Mill building in the first instance.

MM31 SM2 Newlands, St Ives Road, Somersham

We welcome the addition of a reference to the nearby listed Somersham House and its setting. Rather than simply stating that the development should 'acknowledge the listed building and its setting', we recommend that it should also preserve the listed building and its setting in line with both legislation and policy. We suggest the following wording:

d. high quality development that preserves and acknowledges the nearby listed Somersham House and its setting

As it happens, we had specifically requested reference to Somersham House and the Conservation Area in relation to policy **SM3 The Pasture**. We are disappointed that this has not been included as a proposed modification.

Historic England's representations that have not addressed in the Proposed Modifications

Finally, we list below all of the policies/sites/parts of the plan where we have requested changes and yet, as far as we can see, no modifications have been proposed:

Policy LP20: Rural Economy

Policy LP21: Homes for Rural Workers

Policy LP22: Town Centre Vitality and Viability

Policy LP28: Gypsies, Travellers and Travelling Showpeople

Policy LP30: Rural Exceptions Housing

Heritage Strategy

Policy LP36: Heritage Assets and their Settings



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Site Allocations

Site Allocation General Policy wording

Comments on individual sites

SEL 1.1 Alconbury Weald
SEL 1.2 RAF Alconbury
HU3 Former Police HQ site, Huntingdon
HU4 West of Railway, Brampton Road
HU5 West of Edison Bell Way
HU6 George Street, Huntingdon
HU8 California Road, Huntingdon
HU13 Brampton Park
HU17 RGE Engineering, Godmanchester
HU19 Bearscroft Farm, Godmanchester
SEL 2 St Neots East
SN1 St Mary's Urban Village
SN3 Cromwell Road North
SN6 North of St James Road, Little Paxton
SI1 St Ives West
SI2 St Ives Football Club
RA1 Ramsey Gateway (High Lode)
RA2 Ramsey Gateway
RA3 West Station Yard and Northern Mill
RA5 Whytefield Road
RA6 94 Great Whyte
RA8 Former RAF Upwood and Upwood Hill House
BU1 East of Silver Street and South of A1
BU2 Lucks Lane, Buckden
FS1 Former Dairy Crest Factory
FS2 Cambridge Road West
FS3 Cambridge Road East
KB1 West of Station Road
KB2 North of Station Road/Stowe Road
SY2 South of Gidding Road
SM2 Newlands, St Ives Road
SM3 The Pasture
SM4 Somersham Town Football Ground
WB1 West of Ramsey Road
WB2 Manor Farm Buildings
WB3 South of Stirling Close
WB4 South of Farrier's Way
YX1 Askew's Lane

Proposals Map re Elton Park



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Glossary

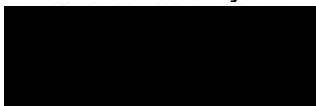
We would again express our concern that the above matters do not appear to have been addressed through the Proposed Main Modifications to the Plan.

Sustainability Appraisal of the Proposed Main Modifications

We do not have the capacity to comment in any detail upon the Sustainability Appraisal at this stage in the process.

If you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Yours Sincerely



Debbie Mack

Historic Environment Planning Adviser, Planning Group



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Comment

Agent	Mr Tom Ayres (1118740)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Larkfleet Homes Ltd (34707)
Company / Organisation	Larkfleet Homes
Address	c/o Agent c/o Agent c/o Agt
Event Name	Proposed Main Modifications Sustainability Appraisal
Comment by	Larkfleet Homes (Larkfleet Homes Ltd - 34707)
Comment ID	10
Response Date	29/01/19 16:56
Consultation Point	Huntingdonshire Local Plan to 2036: Proposed Main Modifications 2018 Sustainability Appraisal (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	Ayres, RPS for Larkfleet (Sibson).pdf
Comment Type	
How would you describe your comment?	Object

Comment

Please tell us your views. If you would like to see changes made please say why making reference to evidence if available and describe how such changes should be made by identifying additional text by underlining it (**U**) and any text to be deleted by striking it through (**ABC**).

Please be as concise as possible.

Comment

Note: representations regarding the Sustainability Appraisal process have been extracted and reproduced here. The main document is attached.

Sibson Garden Village as Strategic Reserve Site

Sustainability Appraisal

2.3.25 RPS and No5 Chambers have previously made representations as to the way Sibson has been assessed as part of the Council's Sustainability Appraisal process. Once Wyton was found to be undeliverable and removed from the Plan, the Council undertook, behind closed doors and without consultation or assessment of reasonable alternatives in a transparent way, to settle on an alternative growth strategy that principally accommodated more growth at Alconbury instead of a replacement SEL. This was a fundamental shift away from the Council's original preferred growth strategy to accommodate 3 SELs.

2.3.26 The Council have sought to retrospectively justify their approach within EXAM/03 -Sustainability Appraisal Explanatory Note (SAEN), within which it is accepted that 'it would have been more helpful if the Final Sustainability Appraisal had explained the process that was undertaken in relation to the assessment of alternative options'. In reality, the process the Council claims to have gone through was entirely unclear and entirely alien to the idea of SEA being a systematic and transparent process undertaken during the preparation of the Plan.

2.3.27 PPG on SEA makes clear that the SA itself should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in the light of the alternatives. Para18 makes clear that the SA should 'provide conclusions on the overall sustainability of the different alternatives including those selected as the preferred approach in the Local Plan'. Reasonable alternatives should be 'all reasonable alternatives'.

2.3.28 Larkfleet maintain that the Sustainability Appraisal process is not legally compliant and consider that the process the Council have been through could be subject to legal challenge. A copy of the legal representations submitted as part of the EIP, submitted by Thea Osmund-Smith of No5 Chambers is included within Appendix 2. There is nothing within the Modifications to the Sustainability Appraisal that address these fundamental concerns.

Summary

Summary

Larkfleet maintain that the Sustainability Appraisal process is not legally compliant and consider that the process the Council have been through could be subject to legal challenge. There is nothing within the Modifications to the Sustainability Appraisal that address these fundamental concerns.

Family or Company Name: Godfrey, Jane
Agent: PlanSurv Ltd (Hendry, Michael)
PMM: Table 1 Sustainability Appraisal
Summary Table

Comment

Agent	Mr Michael Hendry (772729)
Email Address	[REDACTED]
Company / Organisation	PlanSurv Ltd
Address	[REDACTED]
Consultee	Ms Jane Godfrey (1196923)
Address	[REDACTED]
Event Name	Proposed Main Modifications Sustainability Appraisal
Comment by	Ms Jane Godfrey (1196923)
Comment ID	2
Response Date	22/01/19 15:38
Consultation Point	Table 1 Sustainability Appraisal Summary Table (View)
Status	Processed
Submission Type	Web
Version	0.7
Files	Final Transport Statement for Cage Lane.pdf FRA and Drainage Statement Sketch Layout

Comment Type

How would you describe your comment? Object

Comment

Please tell us your views. If you would like to see changes made please say why making reference to evidence if available and describe how such changes should be made by identifying additional text by underlining it (**U**) and any text to be deleted by striking it through (**ABC**).

Please be as concise as possible.

Comment

The proposed Main Modification 7 (MM7) to remove Policy LP9 from the Local Plan risks the sustainability and currently available services of the existing settlements of Alconbury, Bluntisham and Great Staughton. The greater distribution of new dwellings across a wider number of settlements, proportionate to their size, helps to ensure the effectiveness and deliverability of the Plan and the housing growth contained therein. The removal of Policy LP9 makes the Local Plan more vulnerable to economic change and the deliver rates of fewer larger sites, where delays can often be significant. The deletion of Policy LP9 therefore negatively impacts the promotion of growth in sustainable locations and retaining the quiet rural character of the area (SA objective 8 and 10) by relying of larger allocations rather than a more dispersed approach. In addition the removal of Policy LP9 and its associated residential allocations fails to match population and employment growth (SA objective 18) in the Local Service Centres and therefore encourages commuting and prevents a critical mass of population in these settlement that might ultimately help to sustain existing services and attract new services to these Local Service Centres thereby improving their overall sustainability.

Main Modification 7 should be removed and Policy LP9 and its residential allocations should be reinstated in order to deliver proportionate growth to the Local Service Centres to ensure they remain vibrant communities.

An indicative layout plan, Transport Statement and Flood Risk Assessment accompany the representation to demonstrate the deliverability of the Land Between 20 Cage Lane and Averyhill, Great Staughton (Emerging Allocation GS 2).

Supporting documents

If you would like you can support your comment with documents. 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 the 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 Huntingdonshire Local Plan and to reproduce the document for such purposes.

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Please note that any comments that are wholly contained within uploaded documents, with 'See attached' or similar in the comment field will not be accepted. [Sketch Layout](#)

Summary

Summary

Object to Main Modification 7. Removal of Policy LP 9 is contrary to Sustainability objectives 8,10 and 18. It impacts upon the promotion of growth in sustainable locations, forces the Plan to rely on the delivery of large allocations making it more vulnerable to economic change, encourages commuting and reduces ability to retain existing services and attract new ones to the area. Allocations in the Local Service Centre Category should be retained. Allocation GS 2 is deliverable and sustainable; supporting documents provided.

Family or Company Name: Godfrey, Jane
Agent: PlanSurv Ltd (Hendry, Michael)
PMM: Table 1 Sustainability Appraisal Summary
Table

Comment

Agent	Mr Michael Hendry (772729)
Email Address	[REDACTED]
Company / Organisation	PlanSurv Ltd
Address	[REDACTED]
Consultee	Ms Jane Godfrey (1196923)
Address	[REDACTED]
Event Name	Proposed Main Modifications Sustainability Appraisal
Comment by	Ms Jane Godfrey (1196923)
Comment ID	3
Response Date	22/01/19 15:39
Consultation Point	Table 1 Sustainability Appraisal Summary Table (View)
Status	Processed
Submission Type	Web
Version	0.6
Files	Final Transport Statement for Cage Lane.pdf Cage Lane Gt Staughton SketchSitePlan-S3-P1.pdf FRA and Drainage Strategy
Comment Type	

How would you describe your comment? Object

Comment

Please tell us your views. If you would like to see changes made please say why making reference to evidence if available and describe how such changes should be made by identifying additional text by underlining it (**U**) and any text to be deleted by striking it through (**ABC**).

Please be as concise as possible.

Comment

Main Modification 1 (MM1) risks the on-going sustainability of the settlements of Alconbury, Bluntisham and Great Staughton through the removal of the Local Service Centres tier from the hierarchy and the opportunity that those allocations represent for the continued growth of these settlements, their ability to retain existing and attract new services and maintain a diverse population.

Main Modification 1 should be deleted and the Local Service Centres tier of the hierarchy maintained along with the proposed allocations.

An indicative layout plan, Transport Statement and Flood Risk Assessment accompany the representation to demonstrate the deliverability and sustainability of the Land Between 20 Cage Lane and Averyhill, Great Staughton (Emerging Allocation GS 2).

Supporting documents

If you would like you can support your comment with documents. 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 the 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 Huntingdonshire Local Plan and to reproduce the document for such purposes.

If you want to refer to a supporting document in several comments you only need to upload the document once - just refer to the document in subsequent comments and we will link the document to the comment when we process it.

Please note that any comments that are wholly contained within uploaded documents, with 'See attached' or similar in the comment field will not be accepted. [FRA and Drainage Strategy](#)

Summary

Summary

Object to Main Modification 1. Removal of Local Service Centres reduces the ability to retain existing services and attract new ones to the area. Allocations in the Local Service Centre Category should be retained. Allocation GS 2 is deliverable and sustainable; supporting documents provided.

Family or Company Name: Hallam Land Management
Agent: Carter Jonas LLP (Flynn, Brian)
PMM: MM1

Comment

Agent	Mr Brian Flynn (1104428)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas LLP
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Mr Tom Thornewill (1118661)
Company / Organisation	Hallam Land Management
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications Sustainability Appraisal
Comment by	Hallam Land Management (Mr Tom Thornewill - 1118661)
Comment ID	7
Response Date	29/01/19 15:10
Consultation Point	Proposed Main Modification 1 (View)
Status	Processed
Submission Type	Web
Version	0.5
Comment Type	
How would you describe your comment?	Object

Comment

Please tell us your views. If you would like to see changes made please say why making reference to evidence if available and describe how such changes should be made by identifying additional text by underlining it (**U**) and any text to be deleted by striking it through (**ABC**).

Please be as concise as possible.

Comment

Sustainability Appraisal of Main Modifications MM1, MM15, MM16, MM17 and MM25

The conclusions of the Sustainability Appraisal for MM1 are as follows:

“The reduced scale of growth anticipated within the plan period may have a detrimental impact on provision of affordable housing and that suitable for specialist needs (SA Objective 14); however, in the longer term the strategy remains unchanged with regard to the spatial planning areas minimising the impact.”

The conclusions of the Sustainability Appraisal for MM15, MM16, MM17 and MM25 are as follows:

“Slower anticipated delivery of the site has little impact on the sustainability appraisal overall although there is one negative arising from the potential slower rate of delivery of affordable housing (SA objective 14).”

SA Objective 14 seeks to ensure all groups in society have access to decent, appropriate and affordable accommodation.

It is agreed that Main Modifications MM1, MM15, MM16, MM17 and MM25 will have a negative effect on the supply of affordable housing. However, no action is suggested in the Sustainability Appraisal or proposed in the Proposed Submission Huntingdonshire Local Plan 2036 (PS HLP2036) to address the negative effects on the supply of affordable housing.

The purpose of the Sustainability Appraisal is to make the policies and allocations in PS HLP2036 more sustainable, but the option to increase the supply of affordable housing was not considered. One option to increase the supply of affordable housing is to allocate more land for housing on sites which can deliver affordable housing; land at Gifford’s Park in St Ives is promoted on behalf of Hallam Land Management for a residential-led mixed use development, and there are no significant constraints to development at this site – see representations to Main Modification MM1, representations to Policy SI 3, and Matter 8 Hearing Statement.

The under-delivery of affordable housing in Huntingdonshire (and elsewhere in Cambridgeshire) are highlighted by the following summary:

- . The outline approval for Alconbury Weald for 5,000 dwellings includes an affordable housing review mechanism. The 1st Phase of the development is for 631 dwellings. It was agreed that affordable housing levels for the 1st Phase is 0% for the first 300 dwellings and 10% for remaining 331 dwellings in the 1st Phase. The agreed proportion of affordable housing from the 1st Phase of Alconbury Weald would be 33 affordable dwellings, compared with a policy requirement of 264 affordable dwellings; which results in overall shortfall of 231 affordable dwellings from the 1st Phase. There is no agreement or commitment to increase affordable housing levels in later phases which are subject to the review mechanism, it is unlikely that affordable housing in excess of the 40% policy requirement will be provided in those later phases to compensate for the undersupply in the initial phases.
- . It has been agreed through the planning application process for Loves Farm - St Neots East that the proposed development for 1,020 dwellings will provide 28% affordable housing. The s106 Agreement has not yet been completed and a Decision Notice has not yet been issued. The agreed proportion of affordable housing from Loves Farm - St Neots East would be 286 affordable dwellings, compared with a policy requirement of 408 affordable dwellings; which results in overall shortfall of 122 affordable dwellings from the site.
- . The outline approval for Wintringham Park – St Neots East for 2,800 dwellings includes an affordable housing review mechanism. The 1st Phase of the development is for 500 dwellings. It was agreed that affordable housing levels for the 1st Phase of the proposed development is 25% for the first 500 dwellings. The agreed proportion of affordable housing from the 1st Phase of Wintringham Park - St Neots East would be 125 affordable dwellings, compared with a policy requirement of 200 affordable dwellings; which results in overall shortfall of 75 affordable dwellings from the 1st Phase of the proposed development. There is no agreement or commitment to increase affordable housing levels in later phases which are subject to the review mechanism, it is unlikely that affordable housing in excess of the 40% policy requirement will be provided in those later phases to compensate for the undersupply in the initial phases.
- . The approved and agreed position for the proposed developments at Alconbury Weald and St Neots East (Loves Farm and Wintringham Park) means that 428 fewer affordable dwellings will be delivered from these developments so far compared with policy requirements, which will increase unless policy compliant levels are agreed for the later phases of Alconbury Weald and Wintringham Park.
- . The affordable housing requirement in PS HLP2036 during the plan period is 7,900 dwellings, which equates to an average of 316 affordable dwellings per annum. Recent monitoring data

demonstrates that an insufficient amount of affordable housing has been delivered so far e.g. 129 in 2014/15; 55 in 2015/16; 128 in 2016/17; and, 142 in 2017/18.

It is accepted that only half of that affordable housing from Cambridge City would be met during the plan period for the recently adopted Cambridge Local Plan, which means that the affordable housing needs of approximately 5,200 households from Cambridge would remain unmet.

It is accepted that all of the affordable housing needs of South Cambridgeshire would be met during the plan period for the recently adopted South Cambridgeshire Local Plan. However, monitoring data demonstrates that there is a significant shortfall in the delivery of affordable housing. The planned strategic developments at Northstowe new settlement and the urban extension at Cambourne West will not meet the 40% affordable housing policy requirement, and the proportion of affordable housing required from the new settlements at Waterbeach and Bourn Airfield are unknown at this stage.

It is clear from the above summary that there will be a significant shortfall in the supply of affordable housing in Huntingdonshire as a result of PS HLP2036. It is acknowledged that the main modifications will worsen the supply of affordable housing during the plan period. The affordable housing needs of Cambridge and South Cambridgeshire will not be met in more affordable locations such as Huntingdonshire because the Council does not plan to meet its own locally generated affordable housing needs.

It is requested that positive action is identified through the Sustainability Appraisal and PS HLP2036 to address the negative effects on the supply of affordable housing.

Summary

Summary

The purpose of the Sustainability Appraisal is to make the policies and allocations in PS HLP2036 more sustainable, but the option to increase the supply of affordable housing was not considered. It is requested that positive action is identified through the Sustainability Appraisal and PS HLP2036 to address the negative effects on the supply of affordable housing. The option to increase the supply of affordable housing is to allocate more land for housing on sites which can deliver affordable housing; land at Gifford's Park in St Ives is promoted to achieve this.

Comment

Consultee	Janet Nuttall (34468)
Email Address	[REDACTED]
Company / Organisation	Natural England
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications Sustainability Appraisal
Comment by	Natural England (Janet Nuttall - 34468)
Comment ID	9
Response Date	29/01/19 15:51
Consultation Point	Proposed Main Modification 21 (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Nuttall for Natural England_Redacted.pdf
Comment Type	
How would you describe your comment?	Have Observations

Comment

Please tell us your views. If you would like to see changes made please say why making reference to evidence if available and describe how such changes should be made by identifying additional text by underlining it (**U**) and any text to be deleted by striking it through (**ABC**).

Please be as concise as possible.

Comment

The Proposed Main Modifications 2018 Sustainability Appraisal identifies the need for further appraisal of the sustainability implications of a number of the proposed main modifications. Whilst we are satisfied that most of the modifications will not give rise to additional significant environmental impact we are not convinced that MM21, which significantly reduces the area of the proposed Hinchbrook Country Park Extension, does not reduce the social and environmental benefits that could be achieved. Natural England welcomes the recommendation for further appraisal of the effects of MM21 given the 'mitigation' that the Country Park Extension is expected to provide through creation of alternative open space: this seeks to divert additional recreational pressure, through Plan development, away from more sensitive areas of the green infrastructure network, including European and nationally designated sites. The need for developments to deliver additional green infrastructure, in lieu of that 'lost' through MM21, should be considered in light of the need for adequate mitigation to address the effects of

recreational pressure on European and nationally designated sites, including Portholme SAC. The Sustainability Appraisal should be revised to provide clarification on this issue.

Summary

Summary

We are not convinced that MM21, which significantly reduces the area of the proposed Hinchingsbrooke Country Park Extension, does not reduce the social and environmental benefits that could be achieved. Natural England welcomes the recommendation for further appraisal of the effects of MM21 given the 'mitigation' that the Country Park Extension is expected to provide. The need for developments to deliver additional green infrastructure, in lieu of that 'lost' through MM21, should be considered in light of the need for adequate mitigation to address the effects of recreational pressure on European and nationally designated sites, including Portholme SAC. The Sustainability Appraisal should be revised to provide clarification on this issue.

Comment

Consultee	Mr Simon Phipps (443050)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications Sustainability Appraisal
Comment by	Mr Simon Phipps (443050)
Comment ID	1
Response Date	12/12/18 11:21
Consultation Point	Proposed Main Modification 25 (View)
Status	Processed
Submission Type	Web
Version	0.2
Comment Type	
How would you describe your comment?	Object

Comment

Please tell us your views. If you would like to see changes made please say why making reference to evidence if available and describe how such changes should be made by identifying additional text by underlining it (**U**) and any text to be deleted by striking it through (**ABC**).

Please be as concise as possible.

Comment

Doc Page 75-76 (PDF page 80 and 81)

SA 10 - there is no indication of what is planned to address the pollution. Perhaps consideration of wind direction for both noise and particulates/carcinogens?

SA 20 - Round House School is already OVERSUBSCRIBED. It cannot be included as a positive! May I suggest the extreme SW development parcel of Loves Farm is arrested from the current owners [nothing has been done in over 10 years] and used to build an infant school therefore alleviating the burden on Round House (as a junior). This will provide primary schooling for the arrival of residents of Wintringham Park.

Summary

Summary

Object to Main Modification 25. Contrary to Sustainability Appraisal objectives 10 and 20. There is no plan to address pollution. The school is oversubscribed an infant school should be built on the SW development parcel of Loves Farm.

Comment

Consultee	houghton (1198301)
Email Address	[REDACTED]
Company / Organisation	Houghton & Wyton Neighbourhood Plan
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications Sustainability Appraisal
Comment by	Houghton & Wyton Neighbourhood Plan (houghton - 1198301)
Comment ID	6
Response Date	29/01/19 13:31
Consultation Point	Proposed Main Modification 28 (View)
Status	Processed
Submission Type	Web
Version	0.4
Files	MM28 Table showing inconsistency.docx
Comment Type	

How would you describe your comment? Have Observations

Comment

Please tell us your views. If you would like to see changes made please say why making reference to evidence if available and describe how such changes should be made by identifying additional text by underlining it (**U**) and any text to be deleted by striking it through (**ABC**).

Please be as concise as possible.

Comment

Whilst we support the removal of the retail space we are concerned that the Sustainability Main Modifications Appraisal may contain references to a document quashed by the High Court in April 2013 and which therefore may lead to unlawful conclusions.

There are 4 references to what is called an Urban Design Framework which the council have used when assessing impacts on SA6; SA8; SA16; and SA21. This Framework has been particularly important in the council answering the decision aiding questions and arriving at their answer, because it apparently contains solutions mitigating issues of transport, pedestrian and cycle access and safety, low carbon energy and the detrimental impacts upon significant visibility from the surrounding

conservation area of any development on the site. These are the ones mentioned, but the UDF may have influenced HDC's decisions in other ways too.

Following a thorough search we can find no link to the UDF document other than *St.Ives west Urban design Framework (October 2011)*. However as the District Council is aware, following a successful challenge to the adoption by the Council of the St.Ives west UDF October 2011 (*R (Houghton & Wyton Parish Council) v Huntingdonshire District Council [2013] EWHC 1476 (Admin)*), the UDF was quashed.

In the judgement, Charles Gore QC stated, at paragraph 56, that "(u)nless formally quashed, the [UDF] will be invoked, possibly by developers and/or third parties, as well as by the [Council], in respect of planning applications, both those within the study area and elsewhere [...] if unquashed the [UDF] will inevitably mislead".

HDC have been made aware of this issue several times and the Parish Council have always reserved the right to take legal action should they feel the instructions of the court were not being followed.

This issue was raised with Mr Kevin Ward from the Planning Inspectorate at the start of the Local Plan Hearing covering St.Ives west on 13th September 2018, hence we are surprised it has not been properly addressed by HDC.

The issue is of course much larger than simply the comparison following the Main Modification 28 and the Final Sustainability Appraisal Report (CORE/07) plus HEELA 2017. Unfortunately the production of both of these consultations builds upon previous studies which were also heavily influenced by the UDF and we believe contain conscious and unconscious bias.

To demonstrate, a simple exercise looking at the decisions of each of the criteria versus the commentary results in a very different picture. The SA poses what are potentially negative questions and correctly answered in the affirmative but rather than be classified 'orange -ve', they are somehow given a positive 'green +' score.

For example, SA 1 Is more than half the site located on grade 3 agricultural land or lower (including urban and non-agricultural), Grade 2, or Grade 1? Answer = yes which should result in an orange negative answer rather than the green + it scores by HDC. (Other examples where we see inconsistency between HDC's commentary and the final classification are shown in a table at the end of this comment). Scored accurately, the results paint a far less positive and more realistic picture for the land in question.

Even with this, the latest SA has reaffirmed sustainability limitations, which coupled with the green field status, agricultural grade of land, plus flooding risk (lower slopes and topography making SUDS less suitable) reaffirms capacity limitations for the site.

However, we believe the outcome would be far more limiting for development if the SA went further as it should do to look more fully at the impacts on the surrounding area, valued the land as an asset as a backdrop to the Great Ouse Valley and the economic impact to our local tourism and sustainability of the surrounding villages, plus protecting the separate identity of the neighbouring settlements.

To this end we are surprised that given comments are been made in relation to the MMSA 28, which on the one hand bring some information up to date ,such as bus stops and greater exposure of the site, unfortunately there is still no reference to the Houghton & Wyton Neighbourhood Plan. Bearing in mind this was examined; made in March 2018; and is planning policy adopted by HDC, it is therefore a material change to the previous study. This contains an anti coalescence policy HWNP 3, which describes and defines the gap together with considerable evidence and justification which is very relevant to the site. This policy was recommended by the Examiner from the May 2016 Submission of the Houghton & Wyton Neighbourhood Plan, to maintain the important distinction between the village and Market Town of St.Ives. Hence it is a major omission not even to be referenced, particularly in the new SA conclusions, given certain development might easily compromise the policy. It is particularly pertinent to the BBSRC field given its pivotal role in providing the gap and worthy of consideration as it influences both capacity and densities on the site.

Quite correctly, the role of the gap is not new and has been seen as an important consideration in previous strategic Housing and Land assessments. It was considered so vitally important in the SHLAA of 2008 and which provided the evidence base for the current Core Strategy 2009, that it concluded the BBSRC field was not suitable for housing development. Yet as we say, gets no mention now.

These points have been raised before, but alas we do not know how much consideration has been given to them. However, we do feel they are sufficient to warrant that if the St.Ives West UDF (October 2011) has been used in this SA, it is not based on sound or legal judgement.

Likewise, to make this consultation meaningful and valid, if HDC have produced and are using a different St.Ives west UDF then it needs to have been produced properly and published so that we and others can see it. Given its importance in the conclusions drawn and decisions made in the SA then it should also have had a link to it as per the Final Sustainability Appraisal Report (CORE/07) and HEELA 2017.

It is noted that people did ask to see this document when making comments during the previous consultation (ref: Houghton & Wyton Parish Council comments) but we are not aware of anything being supplied. We have submitted a Freedom Of Information request to see the document, but sadly this has not materialised before the close of this consultation.

You will have gathered that we care a great deal about where we live and are keen to engage and make a positive contribution to the plan making process by offering local knowledge. However as it stands without seeing this document we do not feel, or indeed even know whether we have had the chance to make the comments we need to make from a local perspective as part of this consultation.

Supporting documents

If you would like you can support your comment with documents. 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 the 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 Huntingdonshire Local Plan and to reproduce the document for such purposes.

If you want to refer to a supporting document in several comments you only need to upload the document once - just refer to the document in subsequent comments and we will link the document to the comment when we process it.

Please note that any comments that are wholly contained within uploaded documents, with 'See attached' or similar in the comment field will not be accepted. [MM28 Table showing inconsistency.docx](#)

Summary

Summary

Object to Main Modification 28. Support the removal of the retail space requirement. Further assessment of the Sustainability Appraisal is needed to justify housing site allocation. There are 4 references to an Urban Design Framework used to assess the impacts on SA6; SA8; SA16; and SA21 and address mitigation measures. There is no link to this document and the UDF was quashed following a successful challenge to the adoption by the Council of the St.Ives west UDF October 2011 (R (Houghton & Wyton Parish Council) v Huntingdonshire District Council [2013] EWHC 1476 (Admin)). There is no reference to the Neighbourhood Plan and the anti coalescence policy which the BBSRC field plays an important role in. There are inconsistencies in the scoring of Sustainability Appraisal objectives 1, 5, 6, 9, 10, 12, 18, 19 and 21

Table showing inconsistency comparing HDC commentary with resultant scoring of St.Ives west Main Modifications Sustainability Appraisal.

SA 1 Is more than half the site located on grade 3 agricultural land or lower (including urban and non-agricultural), Grade 2, or Grade 1?	Answer = yes orange, but HDC score it green +.
SA5 Is the site a designated nature site, immediately adjacent to a designated nature site or within 2km of a Ramsar, SAC or SPA, 1km of a SSSI or NNR or 200m of a CWS?	Answer = Yes Orange (HDC's commentary), but score it blue neutral.
SA 5 Are protected species known to exist on the site or is there potential for protected species to exist on the site?	Answer = Yes Orange (HDC's commentary) but score it blue neutral.
SA6 Will development have a significant impact on the surrounding townscape or landscape?	Answer = Yes (HDC suggest this could be significant) but classify as blue neutral, due to urban design framework which we have not seen.
SA9 Is the site outside or adjacent to an air quality management area?	Answer = yes. HDC scores positive, yet mention traffic impacts and are well aware of complaints regards pollution from over capacity of A1123 and queuing traffic on Houghton Hill.
SA 10 Is the site located in such a position that development is unlikely to cause widespread light, noise or other forms of pollution?	Answer = Yes (HDC's commentary) but classify blue neutral.
SA 12 Is the site within 500m of an existing area of open space?	Answer = no (HDC's commentary) but scored green positive because HDC state that there will be open land provided to the south of the site. This is very specific and presumably once again comes from the urban design framework which must specify exactly how the land will be developed – much like A Development Plan Document DPD would do.
SA 18 Is the site within 2km of a major concentration of employment opportunities and/or potential employees?	Answer = about half the site, therefore suggests neutral, but HDC classify as green positive.
SA 19 Will the site provide opportunities for investment to create additional jobs?	Answer = No because with removal of shop only very limited (home working and community facilities) but HDC classify as blue neutral.
SA21 Will the site support a mix of uses such as housing, employment, retail and/or community facilities?	Answer = No because with removal of the shop there will be very limited mix use (residential and limited community facilities only) but HDC classify as green positive.

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Comment

Consultee	Miss Lois Dale (836660)
Email Address	[REDACTED]
Company / Organisation	Houghton & Wyton Parish Council
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications Sustainability Appraisal
Comment by	Houghton & Wyton Parish Council (Miss Lois Dale - 836660)
Comment ID	4
Response Date	28/01/19 14:12
Consultation Point	Proposed Main Modification 28 (View)
Status	Processed
Submission Type	Web
Version	0.4
Comment Type	
How would you describe your comment?	Have Observations

Comment

Please tell us your views. If you would like to see changes made please say why making reference to evidence if available and describe how such changes should be made by identifying additional text by underlining it (**U**) and any text to be deleted by striking it through (**ABC**).

Please be as concise as possible.

Comment

MM28 - Removal of retail space within LP St.Ives west

Whilst we support the removal of the retail space requirement we have concerns about this policy and want to assure that there is further assessment of the Sustainability Appraisal to justify housing site allocation.

We are concerned that the Sustainability Main Modifications Appraisal may contain references to a document quashed by the High Court in April 2013 and which therefore may lead to unlawful conclusions.

There are 4 references to what is called an Urban Design Framework which the council have used when assessing impacts on SA6; SA8; SA16; and SA21. This Framework has been particularly

important in the council answering the decision aiding questions and arriving at their answer, because it apparently contains solutions mitigating issues of transport, pedestrian and cycle access and safety, low carbon energy and the detrimental impacts upon significant visibility from the surrounding conservation area of any development on the site. These are the ones mentioned, but the UDF may have influenced HDC's decisions in other ways too.

Following a thorough search we can find no link to the UDF document other than *St.Ives west Urban design Framework (October 2011)*. However as the District Council is aware, following a successful challenge to the adoption by the Council of the St.Ives west UDF October 2011 (*R (Houghton & Wyton Parish Council) v Huntingdonshire District Council [2013] EWHC 1476 (Admin)*), the UDF was quashed.

In the judgement, Charles Gore QC stated, at paragraph 56, that "(u)nless formally quashed, the [UDF] will be invoked, possibly by developers and/or third parties, as well as by the [Council], in respect of planning applications, both those within the study area and elsewhere [...] if unquashed the [UDF] will inevitably mislead".

HDC have been made aware of this issue several times and the Parish Council have always reserved the right to take legal action should they feel the instructions of the court were not being followed.

This issue was raised with Mr Kevin Ward from the Planning Inspectorate at the start of the Local Plan Hearing covering St.Ives west on 13th September 2018, hence we are surprised it has not been properly addressed by HDC.

The issue is of course much larger than simply the comparison following the Main Modification 28 and the Final Sustainability Appraisal Report (CORE/07) plus HELAA 2017. Unfortunately the production of both of these consultations built upon previous studies which were also heavily influenced by the UDF and we believe contain conscious and unconscious bias.

To demonstrate, a simple exercise looking at the decisions of each of the criteria versus the commentary results in a very different picture. The SA poses what are potentially negative questions and correctly answered in the affirmative but rather than be classified 'orange -ve', they are somehow given a positive 'green +' score. Scored accurately, the results paint a far less positive and more realistic picture for the land in question.

Even with this, the latest SA has reaffirmed sustainability limitations, which coupled with the green field status, agricultural grade of land, plus flooding risk (lower slopes and topography making SUDS less suitable) reaffirms capacity limitations for the site.

However, we believe the outcome would be far more limiting for development if the SA went further as it should do to look more fully at the impacts on the surrounding area, valued the land as an asset and the economic impact to our local tourism and sustainability of the surrounding villages, plus protecting the separate identity of the neighbouring settlements.

We are surprised that comments that have been made in relation to the MMSA 28, which on the one hand bring some information up to date regards the bus stops and greater exposure of the site, **BUT WHICH STILL MAKE NO REFERENCE TO THE NEIGHBOURHOOD PLAN**. Bearing in mind this was examined, made in March 2018 and is planning policy adopted by HDC it is therefore a **MATERIAL CHANGE** to the previous study. This contains an **ANTI COALESCENCE POLICY HWNP 3**, which describes and defines the gap together with considerable evidence and justification which is very relevant to the site. **THIS POLICY WAS RECOMMENDED BY THE EXAMINER OF THE MAY 2016 SUBMISSION OF THE HOUGHTON & WYTON NEIGHBOURHOOD PLAN TO MAINTAIN THE IMPORTANT DISTINCTION BETWEEN THE VILLAGE AND MARKET TOWN OF ST.IVES AND HENCE IT IS A MAJOR OMISSION NOT EVEN TO BE REFERENCED**, particularly in the new SA conclusion if this might be compromised by development. It is particularly pertinent to the BBSRC field given its pivotal role in providing the gap and worthy of consideration as it influences both capacity and densities on the site.

The role of the gap is not new and has been seen as an important consideration in previous strategic Housing and Land assessments. It was considered so vitally important in the SHLAA of 2008 and which provided the evidence base for the current Core Strategy 2009, that it concluded the BBSRC field was not suitable for development. Yet as we say, gets no mention now.

These points have been raised before, but alas we do not know how much consideration has been given to them. However, we do feel they are sufficient to warrant that if the St.Ives west UDF (October 2011) has been used in this SA, it is not based on sound or legal judgement.

If HDC have produced and are using a different St.Ives west UDF where is this? And where is the evidence of due process and consultations leading to its adoption?

It is noted that people did ask to see this document when making comments during the previous consultation (Houghton & Wyton Parish Council) but we are not aware of anything being supplied.

Table showing inconsistency comparing HDC commentary with resultant scoring of St.Ives west Main Modifications Sustainability Appraisal.

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Answer = yes orange, but HDC score it green +.

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Family or Company Name: Childerley, S
Agent: Brown & Co. and Barfords
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 Sustainability Appraisal
Comment by	Mrs S Childerley (1117058)
Comment ID	8
Response Date	29/01/19 16:39
Consultation Point	Proposed Main Modification 38 (View)
Status	Processed
Submission Type	Web
Version	0.4
Files	Childerley Statement 28.01.19.pdf
Comment Type	
How would you describe your comment?	Object

Comment

Please tell us your views. If you would like to see changes made please say why making reference to evidence if available and describe how such changes should be made by identifying additional text by underlining it (**U**) and any text to be deleted by striking it through (**ABC**).

Please be as concise as possible.

Comment

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

Supporting documents

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Please note that any comments that are wholly contained within uploaded documents, with 'See attached' or similar in the comment field will not be accepted. [Childerley Statement 28.01.19.pdf](#)

Summary

Summary

We object to this appraisal as non allocation this site will result in alternative development if the Council are to meet their OAN. The OAN needs to consider the impact of alternative development against that of the original proposed allocation. Impacts of modifications cannot simply be ignored or 'written off' as unknown or uncertain. The current approach simply serves to highlight the uncertainty of delivery and that the modified approach will provide for the most sustainable opportunities.

**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.

