

Huntingdonshire Local Plan to 2036 Examination

EXAM/46: Representations to the Proposed Main Modifications 2018 Consultation (in Document Order)

Part 1 of 3 – General Comments to MM1

Huntingdonshire District Council
February 2018

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

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.

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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)

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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Family or Company Name: Bellway Homes Ltd

Agent: Turley (Armfield, Tom)

PMM: Whole Document

Comment

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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 (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Armfield, Turleys for Bellway Homes_Redacted.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 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...

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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)

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.

9 Colmore Row
Birmingham
B3 2BJ

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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

tom.armfield@turley.co.uk

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 (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	Stuart Carruthers - email 3 attachment.pdf Stuart Carruthers - email 3 Redacted.pdf Stuart Carruthers - email 1 Redacted.pdf Stuart Carruthers - email 2 Redacted.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 Support Object

Do you consider this proposed main modification to be sound? 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 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.

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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

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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>
Cc: Planning Appeals <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.

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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

A black rectangular redaction box covering the signature area.

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

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

Attached is a copy of the Inspectors report into the South Cambs 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 Cambs that was part of the GTAA on which Huntingdonshire rely. It is understood that additional work on the South Cambs 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>, Planning Appeals
<Planning.Licensing@huntingdonshire.gov.uk>

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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

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 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 m² (rather than 2 m²) 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: 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 (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	Skinner for Endurance Estates - Appendix 2.pdf Skinner for Endurance Estates_Redacted.pdf Skinner for Endurance Estates - Appendix 1.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 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
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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

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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.

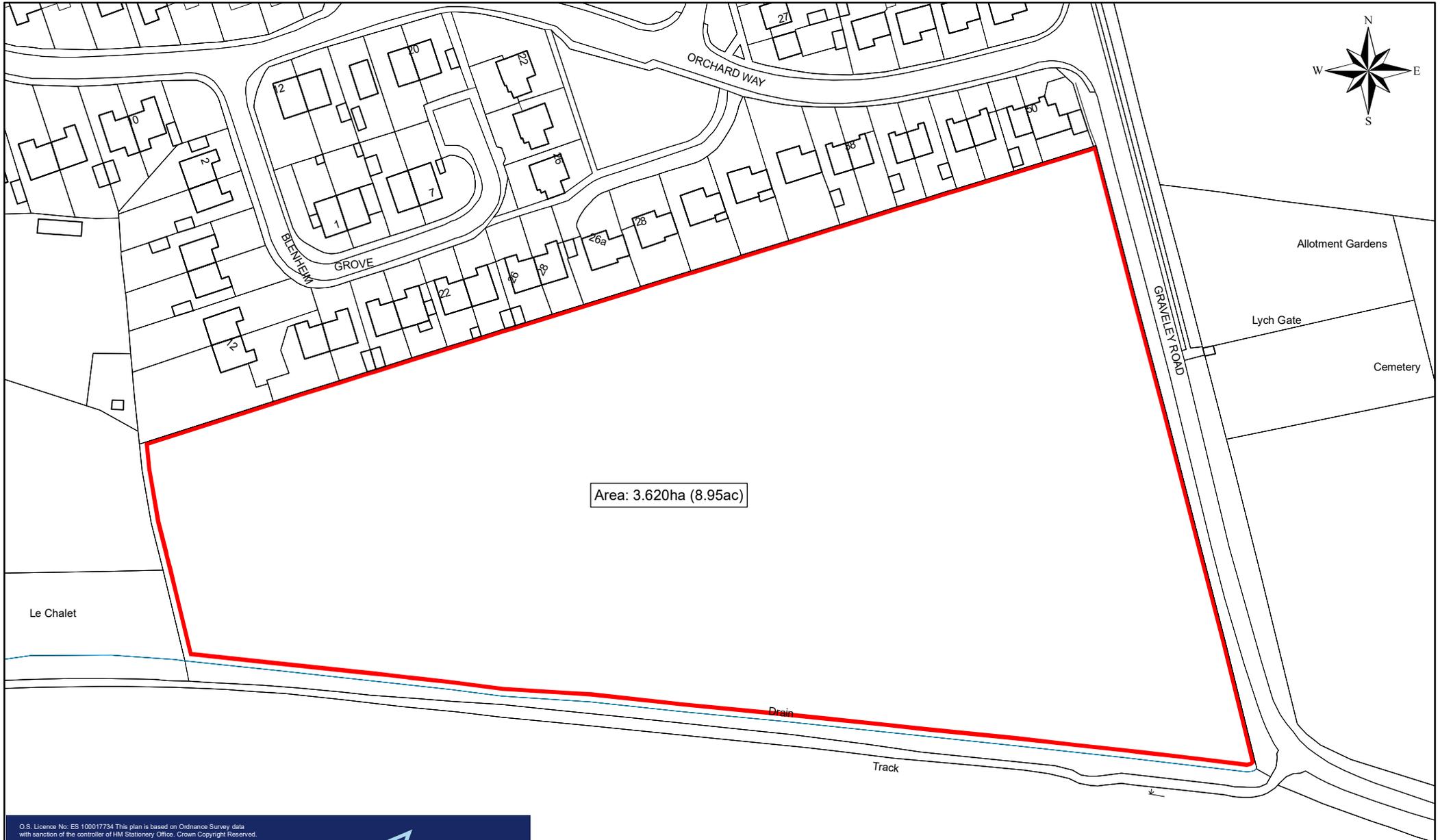
[REDACTED]

[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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Note: This plan is published for convenience only and although believed to be correct its accuracy is not guaranteed and it shall not be deemed to form part of the contract.

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Drawing No: A.50,598

Date: 10/10/2017

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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.**

i 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 21st 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 less² 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.

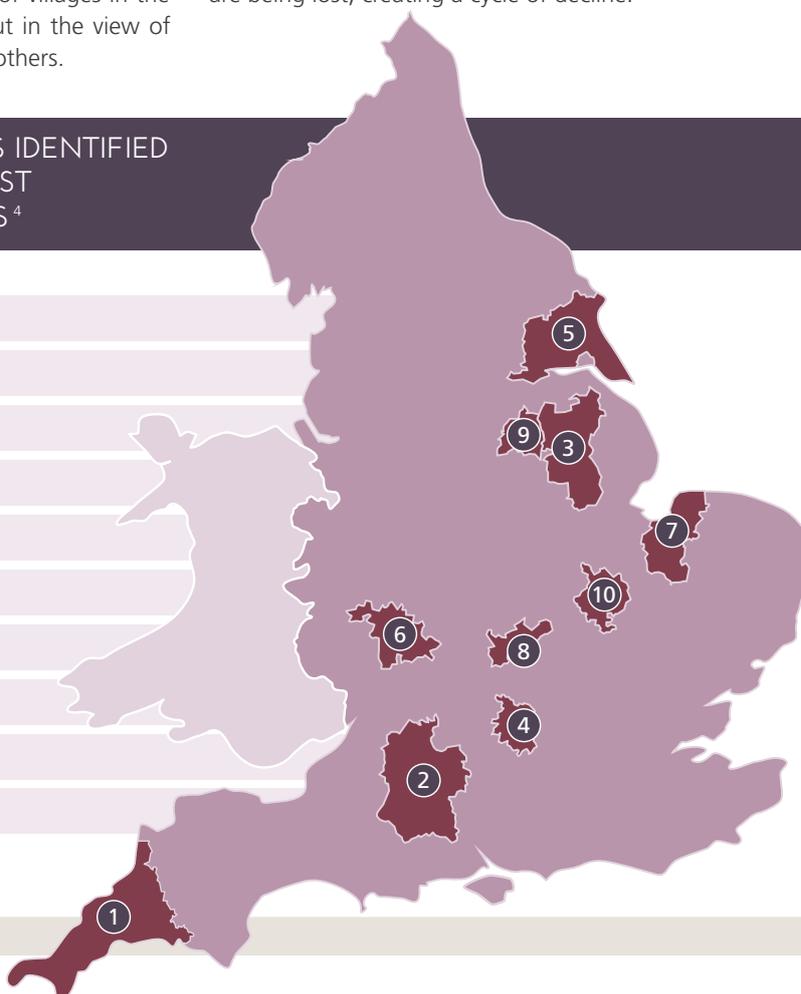
Housing is then allocated via the Local Plan towards the settlements that score more points on the hierarchy. This results in significant expansions to those market towns and villages that score highly, and a dearth of new homes lower down the hierarchy.

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 Commission³ 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 VILLAGES⁴

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



³ Affordable Rural Housing Commission 2006

⁴ CLA analysis of 70 Local Plans <https://bit.ly/2zYALHz> Examination of all local authorities defined as ‘mainly rural’ by the ONS under the 2011 classification, omitting those local authorities without an adopted Core Strategy as of 31st July 2018.

COMPILING SETTLEMENT HIERARCHIES

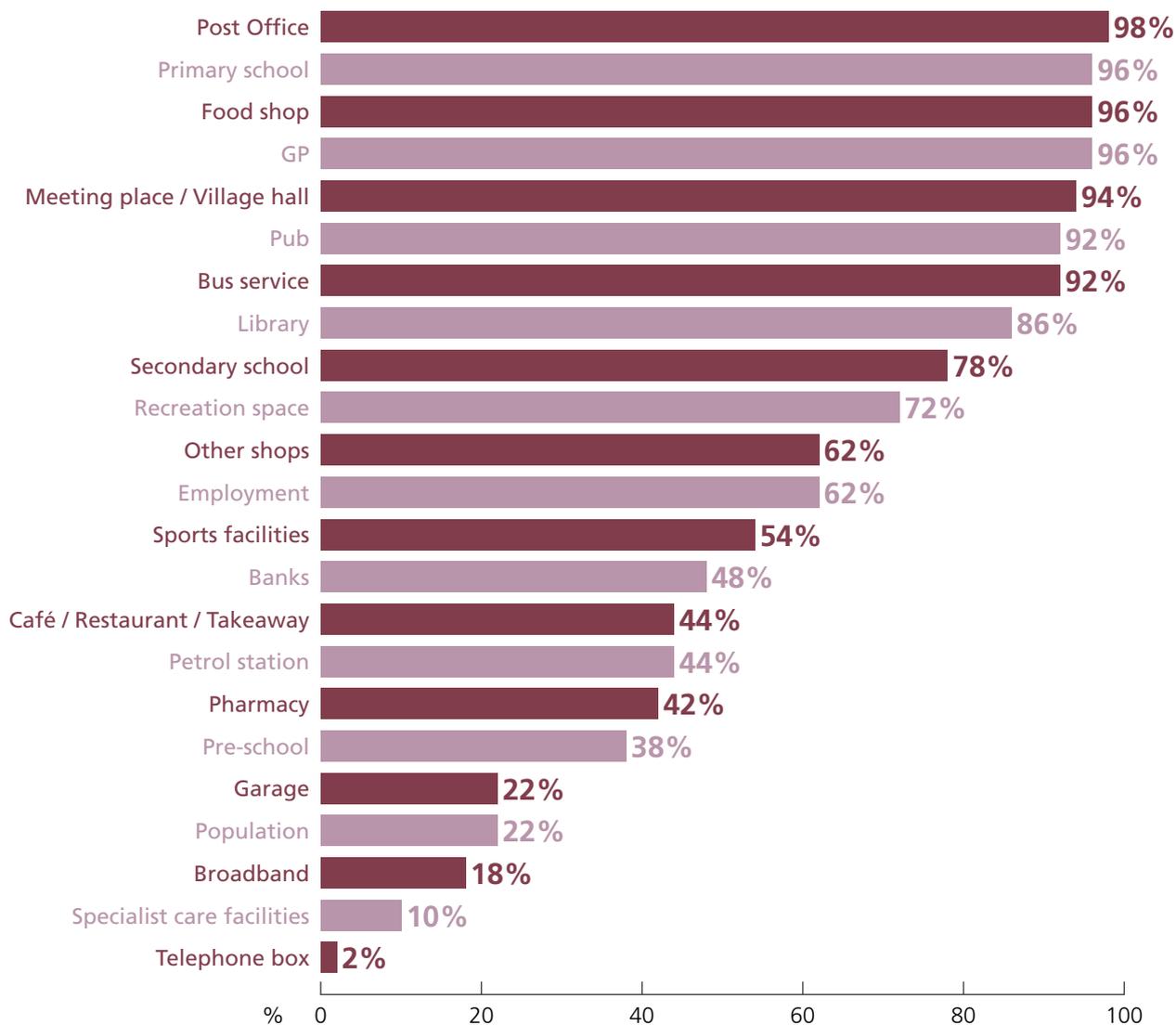
The CLA has analysed the services assessed by 50 rural local authorities when compiling settlement hierarchies. The table below shows the services assessed as well as the percentage of local authorities that include the particular service when assessing sustainability.

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.

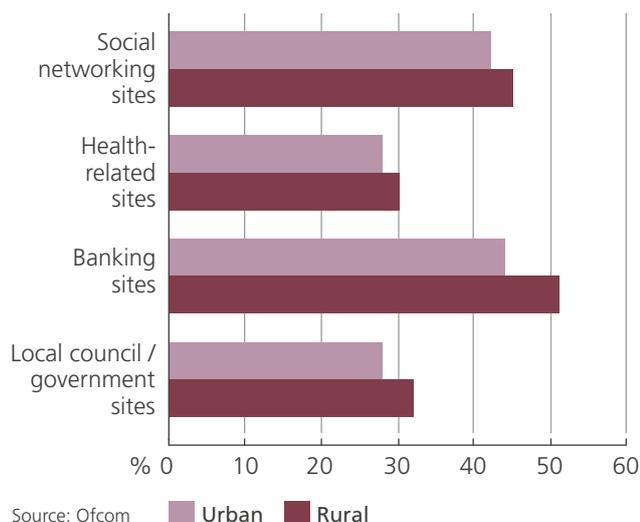
Internet access has a substantial impact on a wide facet of rural life. It reduces isolation and opens up access to services like banking, shopping, education, healthcare, communication, employment and entertainment services.

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 inhabitants⁵ 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 21st century we must use 21st 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.⁶

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

⁶ 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 years⁷, 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."⁸

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 21st 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%).⁹**

THE NPPF STATES THAT:

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

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 21st 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”¹¹. 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 21st 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 21st 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.



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Comment

Consultee	Katie Pell (1197826)
Email Address	[REDACTED]
Company / Organisation	Hemingford Grey Parish Council
Address	- - -
Event Name	Proposed Main Modifications 2018
Comment by	Hemingford Grey Parish Council (Katie Pell - 1197826)
Comment ID	PMM2018:25
Response Date	23/01/19 16:09
Consultation Point	Huntingdonshire Local Plan to 2036: Proposed Main Modifications 2018 for Consultation (View)
Status	Processed
Submission Type	Email
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.

Hemingford Grey Parish Council has no comments to make on the consultations.

Summary

Hemingford Grey Parish Council has no comments to make on the consultations.

Comment

Consultee	Ms Debbie Mack (56252)
Email Address	[REDACTED]
Company / Organisation	Historic England
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Historic England (Ms Debbie Mack - 56252)
Comment ID	PMM2018:48
Response Date	29/01/19 10:33
Consultation Point	Huntingdonshire Local Plan to 2036: Proposed Main Modifications 2018 for Consultation (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	Mack for Historic England_Redacted.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**

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.

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 · 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 been 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 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

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.

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?

Below are 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: LP20, 21, 22, 28, 30 and 36 and site allocation general policy wording and allocations SEL 1.1, SEL 1.2, HU3, HU4, HU5, HU6, HU8, HU13, HU17, HU19, SEL 2, SN1, SN3, SN6, SI1, SI2, RA1, RA2, RA3, RA5, RA6, RA8, BU1, BU2, FS1, FS2, FS3, KB1, KB2, SY2, SM2, SM3, SM4, WB1, WB2, WB3, WB4, YX1, The Proposals Map regarding Elton Park and the Glossary.

Summary

The deletion of sites HU9, HU16, SN5, SI4, SM5, AL1, BL1, BL2, GS1 and GS2 addresses any concerns previously raised about these sites. It is 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. 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: LP20, 21, 22, 28, 30 and 36 and site allocation general policy wording and allocations SEL 1.1, SEL 1.2, HU3, HU4, HU5, HU6, HU8, HU13, HU17, HU19, SEL 2, SN1, SN3, SN6, SI1, SI2, RA1, RA2, RA3, RA5, RA6, RA8, BU1, BU2, FS1, FS2, FS3, KB1, KB2, SY2, SM2, SM3, SM4, WB1, WB2, WB3, WB4, YX1, The Proposals Map regarding Elton Park and the Glossary. We do not have the capacity to comment in any detail upon the Sustainability Appraisal at this stage in the process.



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





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





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



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





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



Comment

Consultee	Hannah Bevins (1136581)
Email Address	[REDACTED]
Company / Organisation	National Grid
Address	* * *
Event Name	Proposed Main Modifications 2018
Comment by	National Grid (Hannah Bevins - 1136581)
Comment ID	PMM2018:5
Response Date	13/12/18 11:55
Consultation Point	Huntingdonshire Local Plan to 2036: Proposed Main Modifications 2018 for Consultation (View)
Status	Processed
Submission Type	Email
Version	0.5

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.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Summary

National Grid have no comments.

Comment

Consultee	Ms Diane Davis (701283)
Email Address	[REDACTED]
Company / Organisation	Sawtry Parish Council
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Sawtry Parish Council (Ms Diane Davis - 701283)
Comment ID	PMM2018:81
Response Date	31/01/19 13:04
Consultation Point	Huntingdonshire Local Plan to 2036: Proposed Main Modifications 2018 for Consultation (View)
Status	Processed
Submission Type	Email
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.

Late representation: Sawtry Parish Council have asked me to contact you to offer their support for the local plan amendments and that they look forward to a speedy completion of the process. Regards Diane Davis Clerk to Sawtry Parish Council

Comment

Consultee	Mr Alan Marnes (1038785)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Mr Alan Marnes (1038785)
Comment ID	PMM2018:1
Response Date	16/12/18 21:54
Consultation Point	1.2 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

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.

As the representative of Southoe and Midloe parish council, I attended many of the sessions to try and get over to H.D.C. and the inspector that the priority for the district is to get the infrastructure right before anymore development is allowed. The roads are a nightmare in the south of the district, especially the A1 which is unfit for the modern traffic that we see every day. This was pointed out to the inspector that the documentation (Cambridgeshire county councils long term transport strategy plan 2015) used to evaluate traffic flows/problems, was flawed. This in as much as the figures used are out by as much as 25% on the day to day vehicle flows on the A1 between the Blackcat roundabout and the Buckden roundabout. Hence most mornings and evenings there is often traffic backed up for many miles. The second flaw with the C.C.C. document it assumes central governments R.I.S2 identified 2 schemes that would have positive impact on Huntingdonshire that would be acted on. The 1st of these is to upgrade the A1 from Baldock to Alconbury. Highways England have told interested parties that this plan is will not be even considered for many years. The 2nd of the schemes to upgrade the A428 is in the pipeline once the A14 is finished. But when this is done it will only exacerbate the problems on the A1.

Summary

Southoe and Midloe parish council continue to express concern over traffic levels on the A1 and A428 and the methodology used for the long term transport strategy 2015.

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 (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 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.

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 (View)
Status	Processed
Submission Type	Web
Version	0.5
Files	Covering letter

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 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

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.

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: 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 (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Proposed Main Modification rep MM1.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 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.

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. 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

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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[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: 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...

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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

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: 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 (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Skinner for Endurance Estates - Appendix 1.pdf Skinner for Endurance Estates_Redacted.pdf Skinner for Endurance Estates - Appendix 2.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.

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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: 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](#)

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Do you Object

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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 of 300 Dwellings Per Annum Cap for Locality
2018/19	207	0	0	207	207
2019/20	260	0	0	260	260
2020/21	260	0	0	260	260
2021/22	245	0	0	245	245
2022/23	250	0	50	300	250
2023/24	250	0	50	300	250
2024/25	250	0	100	350	200
2025/26	250	0	100	350	100
2026/27	250	0	100	350	50
2027/28	250	0	100	350	0
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
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 of 200 Dwellings Per Annum Cap for Locality
2018/19	0	0	0	0	0
2019/20	0	65	65	130	130
2020/21	30	200	230	460	460
2021/22	115	200	315	630	630
2022/23	185	200	385	770	770
2023/24	185	200	385	770	770
2024/25	185	200	385	770	770
2025/26	115	200	315	630	630
2026/27	115	200	315	630	630
2027/28	65	200	265	530	530
2028/29	25	200	225	450	450
2029/30	0	200	200	400	400
2030/31	0	200	200	400	400
2031/32	0	200	200	400	400
2032/33	0	200	200	400	400
2033/34	0	135	135	270	270
2034/35	0	0	0	0	0
2035/36	0	0	0	0	0
Total No. of Dwellings Lost from the Housing Supply	-1,020	St Neots	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
Total Loss of Dwellings	-344

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 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?

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 area¹. 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 sites².

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 states³

“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.

¹ NPPF (2012), para. 157

² HDC AMR – December 2018, pages 40-41

³ 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 windfall⁴.
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

⁴ 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
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 of 200 Dwellings Per Annum Cap for Locality
2018/19	0	0	0	
2019/20	0	65	65	
2020/21	30	200	230	-30
2021/22	115	200	315	-115
2022/23	185	200	385	-185
2023/24	185	200	385	-185
2024/25	185	200	385	-185
2025/26	115	200	315	-115
2026/27	115	200	315	-115
2027/28	65	200	265	-65
2028/29	25	200	225	-25
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	
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.



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
Total Loss of Dwellings		-344

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 Council⁵ 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.

⁵ 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
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.**

PC/1513
28 January 2019

Family or Company Name: Gladman Developments
Agent: Hourigan, Marc
PMM: MM1

Comment

Agent Marc Hourigan (1198382)
Email Address [REDACTED]
Address [REDACTED]
Consultee Gladman Developments (1118265)
Email Address [REDACTED]
Company / Organisation Gladman Developments
Address [REDACTED]
Event Name Proposed Main Modifications 2018
Comment by Gladman Developments (Gladman Developments - 1118265)
Comment ID PMM2018:50
Response Date 28/01/19 10:44
Consultation Point Proposed Main Modification 1 ([View](#))
Status Processed
Submission Type Email
Version 0.6
Files [Hourigan for Gladman Developments.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 **Justified**
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.

POLICY LP – 2 – HOUSING TRAJECTORY 2.1 Main Modification (MM) 1 is concerned with amendments to Policy LP2 and the associated housing trajectory. 2.2 Our submissions on this matter are set out below. PAST COMPLETIONS 2.3 MM1 notes completions between 1 April; 2011 and 31 March 2018 of 4,421 dwellings whereas the Council's Annual Monitoring Report (AMR) published in December 2018 notes a figure of 4,418; this needs to be consistent. 5 YEAR SUPPLY AT 1 APRIL 2018 BASE DATE 2.4 The AMR notes a 5 year supply of 6,466 deliverable dwellings for the 5 year period 1 April 2018 – 31 March 2023. This figure assumes that delivery rates are capped at some of the strategic allocations in line with the Inspector's recommendations. Utilising the Council's annual housing requirement, taking into account the backlog figure of 1,210 dwellings and applying a 20% buffer generates a 5 year requirement of 6,276 dwellings (1,255 annually). Accordingly, the Council claims in the AMR to be able to demonstrate a 5.15 year supply of deliverable dwellings (adopting the capped rates mentioned above). On the Council's approach it has exceeded the minimum 5 year requirement by just 190 dwellings. 2.5 The 6,466 figure mentioned above also includes an allowance for Prior Approvals, small site windfalls and rural exceptions. All of these categories are effectively windfalls. We disputed inclusion of these elements of supply in our further submissions of 4 October 2018 in response to EXAM41; this being the document where these sources of supply were introduced to the Examination. We maintain our previous position that there simply isn't the compelling evidence before the Examination as required by the Framework to justify inclusion of these sources of supply at the rates given and that the approach is unjustified and unsound. 2.6 The AMR notes 160 dwellings in the 5 year supply from small sites windfalls, 70 on rural exception sites and 100 for prior approvals (330 in total). Were these sources removed from the supply as we advocate the position on the Council's requirement would be 4.88 years ($6,466 - 330 = 6,136 / 1,255 = 4.88$). 2.7 Even if the above points are not accepted there are some questionable lead-in times mentioned in the AMR for the St Neots allocation SEL2 where it is stated that 115 dwellings will be delivered in the period 1 April 2019 – 31 March 2020. In that respect it is notable that the outline planning application in respect of the Loves Farm East element of the site is still pending according to the Council's web site. In respect of the Wintringham Park element of the site whilst the hybrid planning application was approved in November 2018 a reserved matters application for housing was submitted to the LPA in December 2018 and remains undetermined. In our view this site will deliver no houses in the 2019/2020 monitoring year. That would necessitate moving the trajectory on by a year resulting in 385 dwellings dropping out of the five year period. This alone would be sufficient for the deliverable supply to drop below the minimum 5 year requirement and to 4.84 years ($6,466 - 385 = 6,081 / 1,255 = 4.84$). Again, the approach adopted by the Council is unjustified and unsound. 2.8 In our view this authority does not have a 5 year supply of deliverable dwellings and additional sites should be identified to make up the shortfall. 5 YEAR SUPPLY AT 1 APRIL 2018 BASE DATE 2.9 In terms of calculating the supply position at the 1 April 2019 base date it is material to note that MM1 anticipates 1,076 completions for 2018/2019 whereas the AMR anticipates 1,034 completions for the same period. In comparison MHCLG Live Tables 253a notes 420 completions for the 6 month period 1 April – 30 September 2018. On that basis it seems unlikely that completions will get anywhere near to the completion rates projected by the Council and consequently the accumulated backlog will grow. SUMMARY 2.10 In summary we object to MM1 and

the associated housing trajectory which should be amended as detailed above together with the identification of further land for housing to ensure a 5 year supply of deliverable dwellings.

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?

In our view this authority does not have a 5 year supply of deliverable dwellings and additional sites should be identified to make up the shortfall.

Summary

Dispute inclusion of an allowance for Prior Approvals, small site windfalls and rural exceptions; without this allowance a 5 year supply could not be demonstrated. Question lead-in times for SEL2; again the approach adopted by the Council is unjustified and unsound. This authority does not have a 5 year supply of deliverable dwellings and additional sites should be identified to make up the shortfall. Object to MM1 and the associated housing trajectory which should be amended as detailed above together with the identification of further land for housing to ensure a 5 year supply of deliverable dwellings.

EXAMINATION OF THE HUNTINGDONSHIRE LOCAL PLAN

PROPOSED MAIN MODIFICATIONS CONSULTATION

RESPONSE ON BEHALF OF GLADMAN DEVELOPMENTS LIMITED

RESPONDENT ID NUMBER: 1118265

28 JANUARY 2019



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1. INTRODUCTION

- 1.1 This document is submitted on behalf of Gladman Developments Limited (hereafter referred to as Gladman) and responds to Huntingdonshire Council's consultation on Proposed Main Modifications to the Huntingdonshire Local Plan. These representations follow on from Gladman's previous representations and participation in the Local Plan Examination. Hourigan Connolly also appeared at the Local Plan Examination for Gladman to deal with the issue of housing land supply. Accordingly, these representations should be read alongside earlier submissions made on behalf of Gladman.

2. MAIN MODIFICATION 1 - RESPONSE

POLICY LP – 2 – HOUSING TRAJECTORY

- 2.1 Main Modification (MM) 1 is concerned with amendments to Policy LP2 and the associated housing trajectory.
- 2.2 Our submissions on this matter are set out below.

PAST COMPLETIONS

- 2.3 MM1 notes completions between 1 April; 2011 and 31 March 2018 of 4,421 dwellings whereas the Council's Annual Monitoring Report (AMR) published in December 2018 notes a figure of 4,418; this needs to be consistent.

5 YEAR SUPPLY AT 1 APRIL 2018 BASE DATE

- 2.4 The AMR notes a 5 year supply of 6,466 deliverable dwellings for the 5 year period 1 April 2018 – 31 March 2023. This figure assumes that delivery rates are capped at some of the strategic allocations in line with the Inspector's recommendations. Utilising the Council's annual housing requirement, taking into account the backlog figure of 1,210 dwellings and applying a 20% buffer generates a 5 year requirement of 6,276 dwellings (1,255 annually). Accordingly, the Council claims in the AMR to be able to demonstrate a 5.15 year supply of deliverable dwellings (adopting the capped rates mentioned above). On the Council's approach it has exceeded the minimum 5 year requirement by just 190 dwellings.
- 2.5 The 6,466 figure mentioned above also includes an allowance for Prior Approvals, small site windfalls and rural exceptions. All of these categories are effectively windfalls. We disputed inclusion of these elements of supply in our further submissions of 4 October 2018 in response to EXAM41; this being the document where these sources of supply were introduced to the Examination. We maintain our previous position that there simply isn't the compelling evidence before the Examination as required by the Framework to justify inclusion of these sources of supply at the rates given and that the approach is unjustified and unsound.
- 2.6 The AMR notes 160 dwellings in the 5 year supply from small sites windfalls, 70 on rural exception sites and 100 for prior approvals (330 in total). Were these sources removed from the supply as we advocate the position on the Council's requirement would be 4.88 years ($(6,466 - 330) / 1255 = 4.88$).
- 2.7 Even if the above points are not accepted there are some questionable lead-in times mentioned in the AMR for the St Neots allocation SEL2 where it is stated that 115 dwellings will be delivered in the period 1 April 2019 – 31 March 2020. In that respect it is notable that the outline planning

application in respect of the Loves Farm East element of the site is still pending according to the Council's web site. In respect of the Wintringham Park element of the site whilst the hybrid planning application was approved in November 2018 a reserved matters application for housing was submitted to the LPA in December 2018 and remains undetermined. In our view this site will deliver no houses in the 2019/2020 monitoring year. That would necessitate moving the trajectory on by a year resulting in 385 dwellings dropping out of the five year period. This alone would be sufficient for the deliverable supply to drop below the minimum 5 year requirement and to 4.84 years ($6,466 - 385 = 6,081 / 1,255 = 4.84$). Again, the approach adopted by the Council is unjustified and unsound.

- 2.8 In our view this authority does not have a 5 year supply of deliverable dwellings and additional sites should be identified to make up the shortfall.

5 YEAR SUPPLY AT 1 APRIL 2018 BASE DATE

- 2.9 In terms of calculating the supply position at the 1 April 2019 base date it is material to note that MM1 anticipates 1,076 completions for 2018/2019 whereas the AMR anticipates 1,034 completions for the same period. In comparison MHCLG Live Tables 253a notes 420 completions for the 6 month period 1 April – 30 September 2018. On that basis it seems unlikely that completions will get anywhere near to the completion rates projected by the Council and consequently the accumulated backlog will grow.

SUMMARY

- 2.10 In summary we object to MM1 and the associated housing trajectory which should be amended as detailed above together with the identification of further land for housing to ensure a 5 year supply of deliverable dwellings.

3. MAIN MODIFICATION 9 – RESPONSE

- 3.1 In line with previous submissions made independently by our client regarding the unnecessarily restrictive nature of Policy LP11 Gladman support the wording change in LP11b) from 'protect' to 'recognise'.

4. MAIN MODIFICATION 15, 16 & 25 – RESPONSE

- 4.1 Whilst Gladman note that these modifications outline that the SEL's will not deliver in full within the Plan period and that some delivery will be beyond this it provides no further details within the Plan of the anticipated delivery rates for these key sites. Gladman recommend that the Council identify within the Plan the anticipated delivery from these sites within the plan period inline with the Inspectors recommendations. This will provide further clarity.

Family or Company Name: Godfrey, Jane
Agent: PlanSurv Ltd (Hendry, Michael)
PMM: MM1

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 2018
Comment by	Ms Jane Godfrey (1196923)
Comment ID	PMM2018:13
Response Date	22/01/19 15:41
Consultation Point	Proposed Main Modification 1 (View)
Status	Processed
Submission Type	Web
Version	0.7
Files	Cage Lane FRA and Drainage Strategy For Submission.pdf Cage Lane Gt Staughton SketchSitePlan-S3-P1.pdf Transport Statement

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... . Justified
Effective

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 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 residential 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 not be made as it is unjustified and limits the effectiveness of the Plan. The Local Service Centres tier of the hierarchy should be maintained along with the proposed allocations. If the Inspector feels that the Local Service Centres tier should be removed then the allocations proposed in the settlements of Alconbury, Bluntisham and Great Staughton should be retained within the Small Settlement tier to ensure that the positive impacts that proportionate growth will have on these settlements is not lost. 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 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.

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Transport Statement

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 not be made; however, if the Inspector feels that the Local Service Centres tier should be removed then the allocations proposed in the settlements of Alconbury, Bluntisham and Great Staughton should be retained within the Small Settlement tier to ensure that the positive impacts that proportionate growth will have on these settlements is not lost.

Summary

Object to Main Modification 1. It is considered unjustified and limits the effectiveness of the Plan. The Local Service Centres tier of the hierarchy should be maintained along with the proposed allocations. This ensures that the positive impacts that proportionate growth will have on these settlements is not lost and allows Local Service Centres to retain existing and attract new services. Allocation GS 2 is deliverable and sustainable. An indicative layout plan, Transport Statement and Flood Risk Assessment accompany the representation to demonstrate the deliverability of the site.



SCHEDULE OF ACCOMMODATION

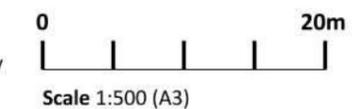
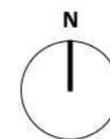
2 bed (75-80sqm) - 4no.
3 bed (90-110sqm) - 5no.
4 bed (120-130sqm) - 3no.

Total 12no. dwellings

Site Area: 0.39ha (subject to survey & land registry)

Subject to:

- Planning
- Highways
- Services
- Tree Survey
- Topographical Survey
- Site Investigation



Transport Statement

January 2019

EAS

**Land Between 20
Cage Lane
Avery Hill**

Great Staughton

Huntingdonshire

Document History

JOB NUMBER: 2026/2019
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1 Introduction

- 1.1 EAS has been commissioned to prepare a Transport Statement to support the promotion of land between 20 Cage Lane and Avery Hill, Great Staughton, Huntingdonshire. A location plan and red line boundary is included as **Appendix A**.
- 1.2 The red line boundary covers an area of 0.39 hectares. The existing site is undeveloped and is located on the edge of the village of Great Staughton. It is understood the proposed size of development at the site could offer approximately 14 homes as well as the provision of access for pedestrians and vehicles. The initial sketch of a site plan demonstrates 12 dwellings comprising of four 2-bed houses, five 3-bed houses and three 4-bed houses. The initial sketch is contained in **Appendix B**.
- 1.3 This Transport Statement has been commissioned to identify the sustainability of the site and to support the site for promotion through the Local Plan process.
- 1.4 This document includes:
 - Section 2 describes relevant transport policy;
 - Section 3 describes the local area including the existing facilities and transport network;
 - Section 4 describes the proposals including access, parking and servicing;
 - Section 5 describes the site sustainability and impact upon the local network; and
 - Section 6 provides a summary and conclusions.

2 Policy Context

Introduction

- 2.1 This section sets out the policy context. Development and growth are encouraged at National, and local level. How this is made sustainable in the longer term is by encouraging walking, cycling and public transport use.

National Planning Policy Framework (NPPF) 2018

- 2.2 The revised National Planning Policy Framework was published on 24 July 2018 and sets out the government's planning policies for England and how these are expected to be applied. The revised Framework replaces the previous National Planning Policy Framework published in March 2012.
- 2.3 Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.
- 2.4 The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 2.5 In respect of that, Paragraph 10 of the NPPF states:

“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.”

- 2.6 Section 9 of the NPPF relates to Promoting Sustainable Transport and paragraphs 102 to 104 say;

“102. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

a) the potential impacts of development on transport networks can be addressed;

b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

103. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine

choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

104. Planning policies should:

a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;

b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;

c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;

d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);

e) provide for any large-scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and

f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy.”

2.7 Paragraphs 105 and 106 discuss parking standards and say;

105. “If setting local parking standards for residential and non-residential development, policies should take into account:

a) the accessibility of the development;

b) the type, mix and use of development;

c) the availability of and opportunities for public transport;

d) local car ownership levels; and

e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles

106. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.”

2.8 When Considering development proposals, in relation to transport, paragraphs 108 to 111 say;

“108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;**
- b) safe and suitable access to the site can be achieved for all users; and**
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”**

“109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

“110. Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;**
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;**
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;**
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and**
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”**

“111. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.”

Cambridgeshire Design Guide for Streets and the Public Realm (2007)

2.9 Section 8 of this document sets out indicative levels of residential car parking provision reflecting the likely variations in density, level of local amenity and availability of alternative modes of transport. Table 2.1 shows the indicative minimum and maximum levels of car parking provision in rural areas.

Number of bedrooms	Allocated minimum	Allocated maximum
1	1	2
2 – 3	1.5	3
4	2	4

Table 2.1: Indicative parking provision in rural areas (Cambs Design Guide Section 8)

2.10 The table assumes that spaces are allocated to dwellings. The Guide recommends that where the maximum quantity of parking provision is proposed, it may be appropriate to provide some of the spaces on an unallocated basis to allow flexibility to accommodate casual visitors. Where the minimum quantity is proposed, parking space should also be provided on an unallocated basis to accommodate visitors and spaces for disabled drivers.

The Huntingdonshire LDF Core Strategy (2009)

- 2.11 Policy CS10 on Contributions to Infrastructure Requirements states that development proposals will be expected to provide or contribute towards the cost of providing appropriate infrastructure, and of meeting social and environmental requirements, where these are necessary to make the development acceptable in planning terms and where this complies with the requirements set out in Circular 5/2005 on Planning Obligations or successor documents. Contributions that may be required include transport (including footpaths, bridleways, cycleways, highways, public transport, car parks and travel planning).

Huntingdonshire's Local Plan to 2036 Proposed Submission 2017

- 2.12 This document is still in the process of consultation but may be a material consideration in planning decisions. Policy LP17 on Sustainable Travel states that a proposal will be supported where it is demonstrated that:
- *opportunities are maximised for the use of sustainable travel modes;*
 - *traffic volumes can be accommodated and will not cause significant harm to the character of the surrounding area;*
 - *any adverse effects of traffic movement to, from and within the site including the effect of car parking are minimised;*
 - *a clear network of routes is provided that provides connectivity and enables ease of access, to, around and within the proposal and with the wider settlement for all potential users, including those with impaired mobility; and*
 - *safe and convenient pedestrian and cycle routes, including links to new and existing services, facilities, footpaths, bridleways and the countryside are provided where appropriate and if possible formalised as rights-of-way.*
- 2.13 To demonstrate the likely impacts of a sustainable development proposal, and describe mitigation measures, a Transport Assessment or Transport Statement is likely to be required in accordance with the Council's planning application validation requirements.
- 2.14 Policy LP 18 on Parking Provision states that a proposal will be supported where it incorporates appropriately designed vehicle and cycle parking with a clear justification for the level of provision proposed, having regard to:
- *the potential to increase the use of alternative transport modes including public transport, walking and cycling;*
 - *highway safety;*
 - *servicing requirements;*
 - *the needs of potential users; and*
 - *the amenity of occupiers of nearby properties.*
- 2.15 Parking provision should be considered as an integral part of the design process and its impact on the surrounding landscape minimised. Reference should be made to the *Cambridgeshire Design Guide* and the *Huntingdonshire Design Guide* or successor

documents and to the *Lifetime Homes* standard. Parking facilities may be shared where location and patterns of use permit. Careful consideration will be given to the siting and design of garaging, responding to the character and appearance of the area. Minimum levels of car parking for disabled people as set out in national guidance such as Traffic Advisory Leaflet 05/05 or BS 8300: 2009 *Design of Buildings and their Approaches to Meet the Needs of Disabled People* will be required.

- 2.16 Paragraphs 7.9 and 7.10 acknowledge the high level of car ownership in Huntingdonshire and the limited public transport in many smaller settlements. For residential development adequate car parking is important. A combination of allocated and unallocated spaces can provide flexibility in providing appropriate levels of car parking, as identified in *Residential Car Parking Research* (DCLG, 2007) and *Car Parking: What Works Where*, published by English Partnerships. However, the Local Plan does not specify any levels of parking provision, whether minimum, maximum or recommended.
- 2.17 Paragraph 7.11 states that secure cycle parking is expected with all development to encourage cycling as an alternative for shorter journeys. Applications should identify the location of at least one secure cycle space per bedroom for homes.

The Huntingdonshire Design Guide (2017)

- 2.18 This document does not set out numerical standards for parking provision, focusing instead on design aspects:

“Accommodating enough cars to meet reasonable expectations from the owner / user of the development proposed is an important objective, but the parking debate cannot be exclusively about how much. Whatever the level of car parking, the focus has to be on providing it in convenient locations and making it safe and attractive. This is important for successful place making”.

- 2.19 To encourage cycle use, the document states (page 96) that it will be necessary to provide secured covered cycle parking provision within all new developments. This should be within garages where these are of suitable size but where there is no garage, cycle parking is to be provided by way of a covered and secure structure within the domestic curtilage, such as a garden shed.
- 2.20 With regard to refuse collection, the document states (page 98) that where it is not proposed to provide access to all dwellings' refuse bins individually a collection point will need to be provided but this must not be more than 30 metres from where bins are stored or 20 metres from the edge of the adopted highway.

3 Existing Site Assessment

Site Location and Local Facilities

- 3.1 The existing site is situated on the western side of Cage Lane adjacent to 20 Cage Lane. The site comprises of a total of 0.39 hectares and is currently undeveloped land.
- 3.2 Cage Lane is a residential street with circa 4.8metre wide carriageway width and circa 2metre footway present on the western side. There are residential accesses situated along Cage Lane on both sides of the carriageway for the first 150metres from The Highway with sporadic street lighting up to this point.
- 3.3 Cage Lane as a speed limit of 30mph until just outside the sites boundary where it changes to national speed limit and the aesthetics of the road change from a residential street to a rural road with agricultural fields situated on either side of the carriageway.
- 3.4 The main road that passes through Great Staughton is 'The Highway' and there are traffic calming measures present for vehicles entering from the east along the B645 where the speed limit changes from national speed limit to 30mph.
- 3.5 Within Great Staughton residents have access to a doctor's surgery, Great Staughton Primary School, hair salons, a farm butchers that also sells vegetables, a florist, and two pub/restaurants. A map showing the location of these facilities and the site's location within Great Staughton is contained in **Appendix C**.

Walking

- 3.6 The immediate pedestrian environment outside the site there is a footway present circa 2metre starting outside 20 Cage Lane leading south towards the B645 The Highway where there are footways present circa 2metre on either side of the carriageway in both directions.
- 3.7 In addition to the pedestrian 'on road' facilities there are various other footpaths and bridleways surrounding the site that are illustrated in **Appendix C**.

Cycling

- 3.8 Cambridgeshire County Council cycle routes and maps demonstrates the available cycle routes within Huntingdonshire and the surrounding areas. Cycle route 7 is present through Great Staughton. Cycle route 7 has been illustrated in **Appendix C**.

Bus

- 3.9 There is an existing bus stop located approximately 400metres south west of the site along The Highway for westbound travel. This bus stop is served by routes 150 and 400.
- 3.10 Route 150 provides access to St Neots – Kimbolton - Tillbrook. This service is provided by Traveline and it has 4 services Monday to Friday.
- 3.11 Route 400 provides access to Huntingdon – Spaldwick. This service is provided by Go-Whippet and it has 5 services per day.
- 3.12 The bus maps for the two routes are contained in **Appendix D**.

Accident Data

- 3.13 Accident data was obtained for the five-year period ending in 2017 from the Crashmap website. An overview of the accident data is contained in **Appendix E**.
- 3.14 In close proximity to the site a slight accident was recorded on Saturday the 11th April 2015 at 09:30 involving two vehicles. The accident appeared to be a shunt accident with both vehicles travelling straight along the road. This accident would not indicate any existing recurring accident issue therefore no mitigation measure would be required.

4 The Proposed Development

The Development Proposals

- 4.1 It is understood the proposed size of development at the site could offer approximately 14 homes as well as the provision of access for pedestrians and vehicles. The initial sketch of a site plan demonstrates 12 dwellings comprising of four 2-bed houses, five 3-bed houses and three 4-bed houses. The initial sketch is contained in **Appendix B**.

Pedestrian Facilities

- 4.2 The existing circa 2metre footway would need to be extended to the proposed new access into the site to aid safe passage for potential residents walking to and from the site into the village of Great Staughton.

Vehicle Access

- 4.3 Cage Lane narrows slightly outside the site to circa 3.8metres. It is proposed to widen the carriageway outside the site to 4.8metres which would tie in with the existing carriageway width outside 20 Cage Lane. Access for vehicles will be via Cage Lane in the form of a 5.5metre wide access road with 6metre radii, this has been demonstrated in **Appendix F**.
- 4.4 Visibility splays have been illustrated from the proposed access arrangement. To the south of the site access a visibility splay of 2.4metres X 113metres could be achieved, which is suitable for a design speed of 43mph based on the guidance of the Design Manual for Roads and Bridges (DMRB).
- 4.5 Due to vehicles travelling northbound towards the access would be either within or just exiting the 30mph speed restriction and proceeding towards a bend in the carriageway, the vehicle speeds are likely to be closer to 30mph. As such this splay length is deemed to be acceptable
- 4.6 To the north of the site access a visibility splay of 2.4metres X 133metres can be achieved, which is suitable for a design speed of 43mph based on the guidance of the Design Manual for Roads and Bridges (DMRB).
- 4.7 It is expected that this design speed is likely to be acceptable as southbound are likely to be driving at a lower speed due to the bend in the carriageway north of the site and the narrow carriageway width. An ATC speed survey could be undertaken at a later stage to establish the exact speed of vehicles travelling southbound along Cage Lane.
- 4.8 Some minor removal of vegetation, mostly low grade hedgerow, would be required at the position of the access and to facilitate the visibility splays.
- 4.9 It is noted that the current masterplan also illustrates a single residential access to the south of the main site access. This access would most likely be located just within the 30mph zone and would also have suitable visibility on both direction along Cage Lane.

Car Parking

- 4.10 Huntingdonshire's Local Plan to 2036: Proposed Submission 2017 - Policy LP 18 on Parking Provision states that; a proposal will be supported where it incorporates appropriately designed vehicle and cycle parking with a clear justification for the level of provision proposed.
- 4.11 Parking provision should be considered as an integral part of the design process and its impact on the surrounding landscape minimised. Reference should be made to the *Cambridgeshire Design Guide* and the *Huntingdonshire Design Guide* or successor documents and to the *Lifetime Homes* standard. Parking facilities may be shared where location and patterns of use permit. Careful consideration will be given to the siting and design of garaging, responding to the character and appearance of the area. Minimum levels of car parking for disabled people as set out in national guidance such as Traffic Advisory Leaflet 05/05 or BS 8300: 2009 *Design of Buildings and their Approaches to Meet the Needs of Disabled People* will be required.
- 4.12 Paragraphs 7.9 and 7.10 acknowledge the high level of car ownership in Huntingdonshire and the limited public transport in many smaller settlements. For residential development adequate car parking is important. A combination of allocated and unallocated spaces can provide flexibility in providing appropriate levels of car parking, as identified in *Residential Car Parking Research* (DCLG, 2007) and *Car Parking: What Works Where*, published by English Partnerships. However, the Local Plan does not specify any levels of parking provision, whether minimum, maximum or recommended.
- 4.13 The future car parking provision will take account of the above guidance when setting proposed parking levels.

Cycle Facilities

- 4.14 Huntingdonshire's Local Plan to 2036: Proposed Submission 2017 - Policy LP 18 on Parking Provision states that; parking provision should be considered as an integral part of the design process and its impact on the surrounding landscape minimised. Reference should be made to the *Cambridgeshire Design Guide* and the *Huntingdonshire Design Guide* or successor documents and to the *Lifetime Homes* standard.
- 4.15 Paragraph 7.11 states that secure cycle parking is expected with all development to encourage cycling as an alternative for shorter journeys. Applications should identify the location of at least one secure cycle space per bedroom for homes.
- 4.16 The future cycle parking provision will take account of the above guidance when setting proposed parking levels.

Servicing

- 4.17 It is recommended that a suitable turning head is incorporated into the future design to accommodate a large refuse vehicle.

Summary

- 4.18 The proposed access would be located shortly after the change in the speed restriction and it is proposed the carriageway adjacent to the site access would be widened to tie into the 4.8m carriageway width of Cage Lane to the south of the site.
- 4.19 Pedestrian access to the development will be from Cage Lane and the existing circa 2metre wide footway that would extend to the site leading to an internal shared surface.
- 4.20 A speed survey may be required at a later stage to establish the true vehicle speeds along Cage Lane in order to demonstrate the required visibility splays.
- 4.21 Any proposed development would be required to ensure that vehicle and cycle parking provision is in line with the standards set within the Cambridgeshire Design Guide and the Huntingdonshire's Local Plan to 2036: Proposed Submission 2017.

5 Development Impact

Introduction

- 5.1 For the purpose of this report this section discusses the predicted transport impacts of an approximate of up to 14 dwellings, with the current masterplan illustrating only 12 dwellings.

Trip Generation

- 5.2 To obtain an estimate of the likely vehicle trips associated with the development, a TRICS assessment has been undertaken for the proposed residential element. A summary of the TRICS trip rate generation for the residential element is shown below in table 4.1, and the TRICS datasheets are included in **Appendix G**.

	AM Peak (08:00 – 09:00)		PM Peak (17:00 – 18:00)	
	Arrivals	Departures	Arrivals	Departures
Trip Rate (unit)	0.139	0.392	0.353	0.161

Table 5.1 TRICS Vehicle Trip Rates (Residential)

- 5.3 Based on a development of 14 dwellings for the site the following trips are predicted to be generated from the proposed development:

	AM Peak (08:00 – 09:00)		PM Peak (17:00 – 18:00)	
	Arrivals	Departures	Arrivals	Departures
Trip Rate per dwelling	2	5	5	3

Table 5.2 Development Traffic Movements (residential) from TRICS

- 5.4 Therefore, a proposal of 14 residential properties would generate approximately 7 vehicle trips in the AM peak hour (2 in / 5 out) and 8 vehicle trips in the PM peak hour (5 in / 3 out).
- 5.5 This level of traffic of 1 vehicle trip every 7-8 minutes would have a negligible impact on the local road network and no mitigation measures would be expected to be required to support this level of development, other than the proposed access works.

Multi Modal Trip Rates

- 5.6 In accordance with best practice multi modal trip rates have been considered. There are two ways to readily provide information for multi modal trips, one is to review TRICS sites where multi modal data has been collected and the other is to look at census data to determine the mode of travel to work. Both have pitfalls. The TRICS data is based on surveys of other sites selected because of geographical similarities but there are of course many variables at the detailed level for example proximity to a cycle route or bus route. And the journey to work census data by definition does not include the multitude of other trip purposes taking place throughout the day. In this assessment we have looked at TRICS sites only.

TRICS multi modal data

5.7 TRICS sites have been selected that include multi modal information. The results are:

	All Day Trip Rate (07:00 to 22:00)			All Day Trip Number (14 units)		
	In	Out	Total	In	Out	Total
Rail	0.022	0.032	0.054	0	0	1
Bus	0.077	0.078	0.155	1	1	2
Walk	0.570	0.562	1.132	8	8	16
Cyclist	0.074	0.078	0.152	1	1	2
Total	0.743	0.75	1.493	10	11	21

Table 5.3 TRICS based All Day multi modal trips. (Allowing for rounding).

	AM Peak Trip Rate (08:00 to 09:00)			AM Peak Trip Number (14 units)		
	In	Out	Total	In	Out	Total
Rail	0.000	0.011	0.011	0	0	0
Bus	0.000	0.023	0.023	0	0	0
Walk	0.032	0.117	0.149	0	2	2
Cyclist	0.006	0.012	0.018	0	0	0
Total	0.038	0.163	0.201	1	2	3

Table 5.4 TRICS based AM Peak multi modal trips. (Allowing for rounding).

	PM Peak Trip Rate (17:00 to 18:00)			PM Peak Trip Number (14 units)		
	In	Out	Total	In	Out	Total
Rail	0.008	0.001	0.009	0	0	0
Bus	0.013	0.002	0.015	0	0	0
Walk	0.068	0.042	0.110	1	1	2
Cyclist	0.018	0.010	0.028	0	0	0
Total	0.107	0.055	0.162	1	1	2

Table 5.5 TRICS based PM Day multi modal trips. (Allowing for rounding).

5.8 Based on the TRICS multi modal data, shown in Tables 5.3 to 5.5 above, it is likely that a residential element of the site would generate of the order of 21 non-car trips throughout the course of the day, with 3 in the AM peak period and 2 in the PM peak period; these being walking trips in each of the peak periods.

6 Summary and Conclusions

- 6.1 This Transport Statement has been prepared in support of the promotion of land between 20 Cage Lane and Avery Hill, Great Staughton, Huntingdonshire.
- 6.2 This Transport Statement has been commissioned to identify the sustainability of the site and to support the site for promotion through the Local Plan process.
- 6.3 The existing site is undeveloped land that covers an area of 0.4 hectares located on the edge of the village of Great Staughton. It is understood the proposed size of development at the site could offer approximately 14 homes. An initial sketch of a site plan demonstrates 12 dwellings comprising of four 2-bed houses, five 3-bed houses and three 4-bed houses.
- 6.4 Within Great Staughton residents have access to a doctor's surgery, Great Staughton Primary School, hair salons, a farm butchers that also sells vegetables, a florist, and two pub/restaurants.
- 6.5 There are around 9 buses a day that frequent the bus stop situated approximately 400m south west of the site along The Highway in the village of Great Staughton.
- 6.6 The available pedestrian environment is adequate surrounding the site with a circa 2metre wide footway present on the same side of the carriageway as the site along Cage Lane that leads in to the village. In addition to the 'on road' pedestrian facilities there are various other footpaths and bridleways surrounding the site.
- 6.7 The review of accident data indicated that although there was a slight accident along Cage Lane to the north of the site, this single shunt type accident would not indicate any existing recurring accident issue therefore no mitigation measure would be required.
- 6.8 An access road of 5.5metre wide carriageway and 6metre radii can be accommodated and a speed survey could be undertaken in the future to establish the exact vehicle speeds of those vehicles travelling southbound through the bend in Cage Lane towards the site.
- 6.9 The proposed access would be located shortly after the change in speed restrictions and the existing residential properties, and it is proposed the carriageway adjacent to the site access would be widened to tie into the 4.8m carriageway width of Cage Lane to the south of the site. Pedestrian access will be from Cage Lane with the existing footway being extended into the site access.
- 6.10 Vehicle and cycle parking will need to be in accordance with the standards set within the Cambridgeshire Design Guide and the Huntingdonshire's Local Plan to 2036: Proposed Submission 2017.

Conclusion

- 6.11 The proposed development is compliant with national and local policies; a suitable access arrangement can be demonstrated; and the likely level of traffic generation will have negligible effect on the local highway network. No highways or transportation reasons have been identified why the proposed development should not be considered acceptable for promotion through the Local Plan process.

7 Appendices

- Appendix: A – Red Line Boundary Plan
- Appendix: B – Indicative Site Layout
- Appendix: C – Location and Facilities Plan
- Appendix: D – Bus Services Maps
- Appendix: E – Accident Data
- Appendix: F – Access Arrangement and Visibility Splays
- Appendix: G – TRICS Assessment



Appendix: A – Red Line Boundary Plan



REV	DATE	BY	DESCRIPTION	CHK	APD

DRAWING STATUS:
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Unit 23, The Maltings, Stanstead Abbots, Hertfordshire, SG12 8HG
 Tel: 01920 871777
 www.eastp.co.uk

CLIENT:

ARCHITECT:

PROJECT:
**LAND ADJACENT TO 20 CAGE LANE
 GREAT STAUGHTON**

TITLE:
LOCATION PLAN

SCALE @ A3: 1:10000	DESIGN-DRAWN: RC	DATE: 08/01/2019
-------------------------------	----------------------------	----------------------------

PROJECT No: 2026	DRAWING No: FIG02
----------------------------	-----------------------------



Appendix B – Indicative Site Layout



SCHEDULE OF ACCOMMODATION

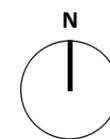
- 2 bed (75-80sqm) - 4no.
- 3 bed (90-110sqm) - 5no.
- 4 bed (120-130sqm) - 3no.

Total 12no. dwellings

Site Area: 0.39ha (subject to survey & land registry)

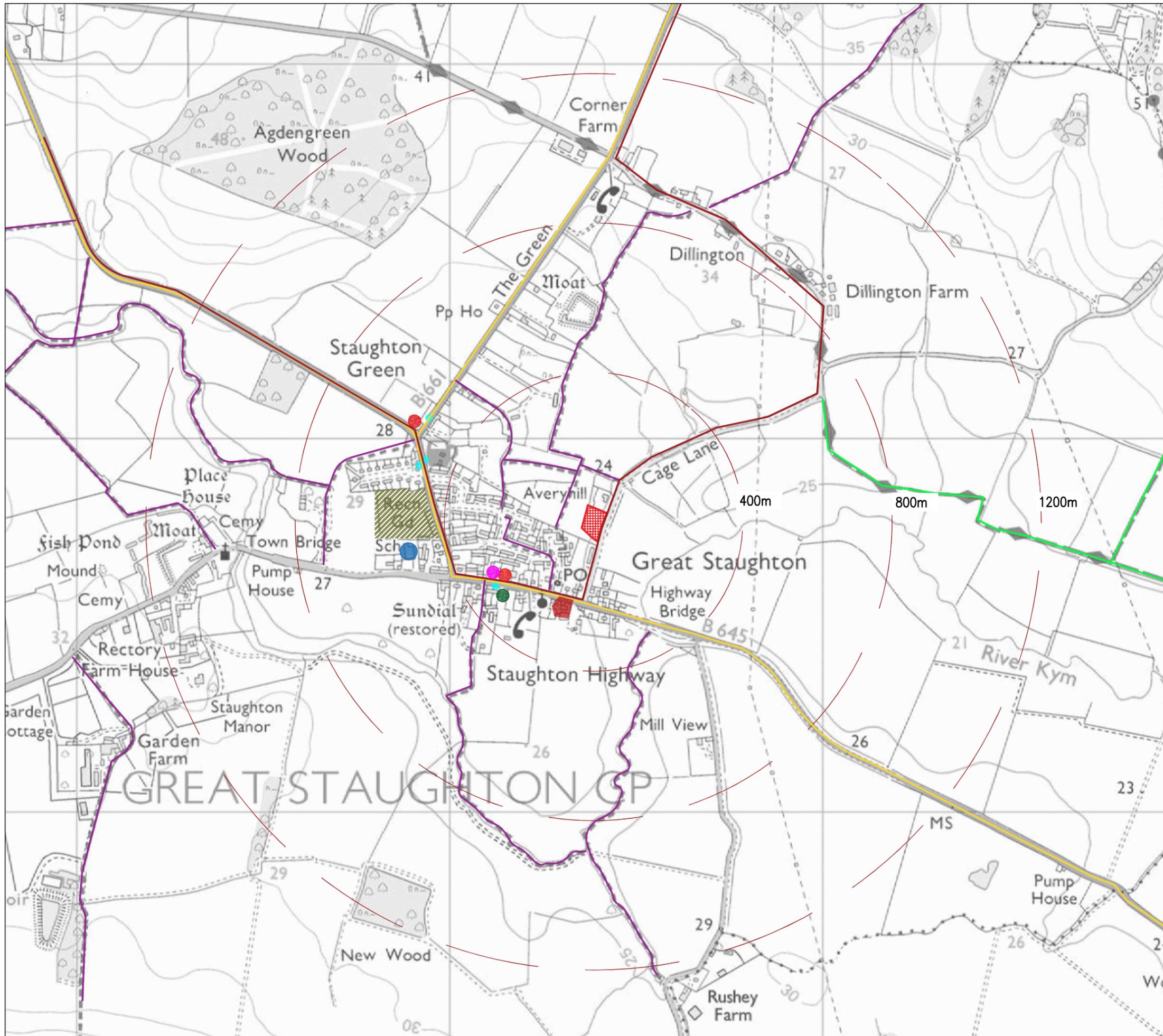
Subject to:

- Planning
- Highways
- Services
- Tree Survey
- Topographical Survey
- Site Investigation





Appendix: C – Location and Facilities Plan



- KEY:**
- SITE LOCATION
 - BUS STOPS
 - GREAT STAUGHTON PRIMARY SCHOOL
 - SNOOTY THE TAVERN / THE WHITE HART
 - RECREATIONAL GROUND
 - HAIR SALON
 - DOCTORS SURGERY
 - BUTCHERS / HAIR SALON / FLORISTS
 - HIGHWAY / FOOTPATHS
 - RESTRICTED BYWAYS / FOOTPATH
 - BRIDLEWAY
 - HUNTINGDONSHIRE (7) CYCLE RIDES. ROUTE FOLLOWS BUSY ROAD, TAKE EXTRA CARE

REV	DATE	BY	DESCRIPTION	CHK	APD

DRAWING STATUS:

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EAS

Unit 23, The Maltings, Stanstead Abbots, Hertfordshire, SG12 8HG
Tel: 01920 871777
www.eastp.co.uk

CLIENT:

ARCHITECT:

PROJECT:

**LAND ADJACENT TO 20 CAGE LANE
GREAT STAUGHTON**

TITLE:

LOCATION AND FACILITIES PLAN

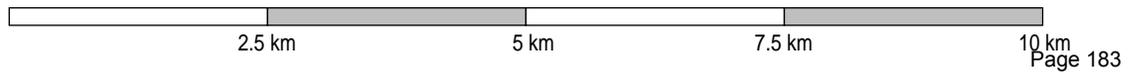
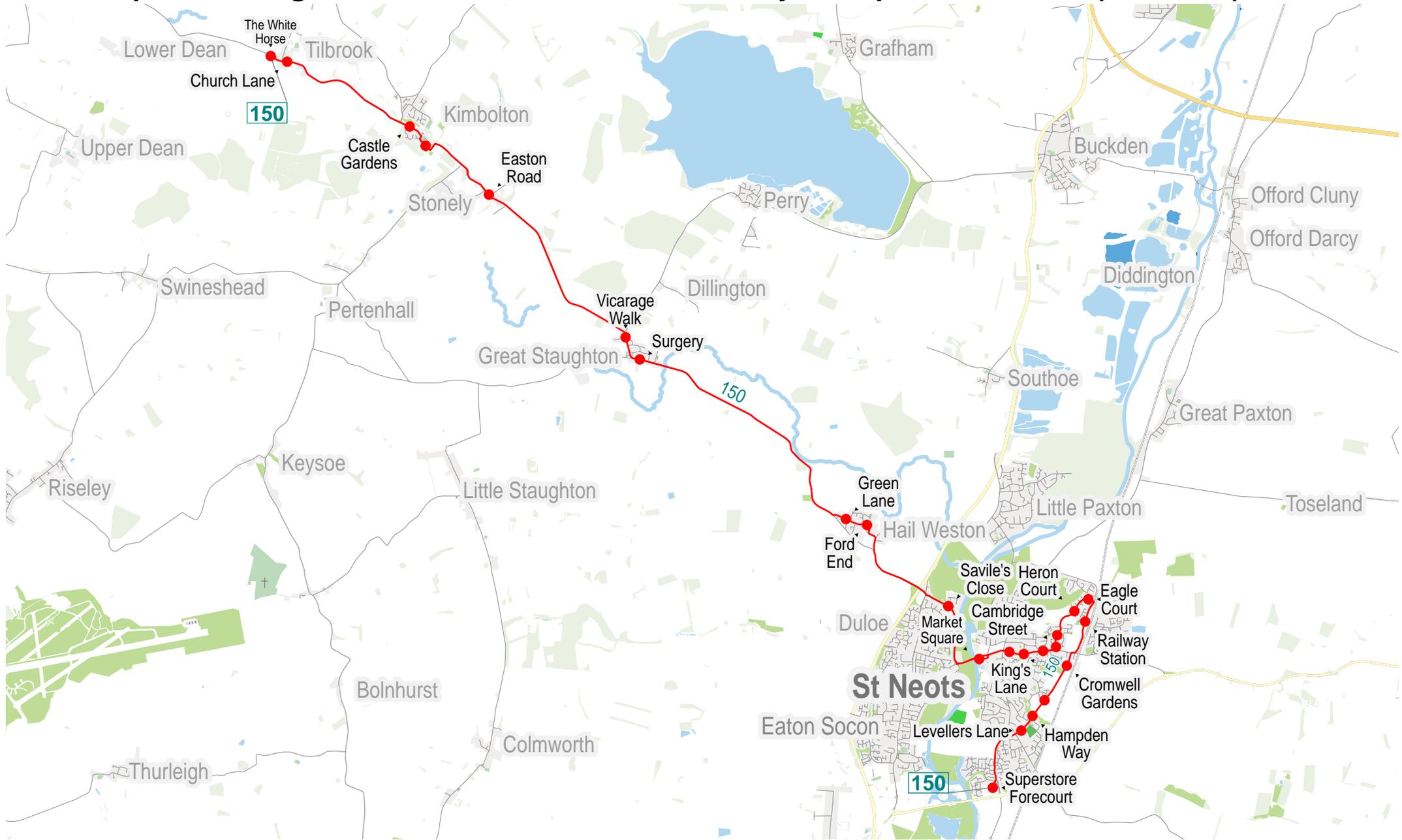
SCALE @ A3: 1:10000	DESIGN-DRAWN: EC	DATE: 04/01/2019
-------------------------------	----------------------------	----------------------------

PROJECT No: 2026	DRAWING No: FIG01
----------------------------	-----------------------------

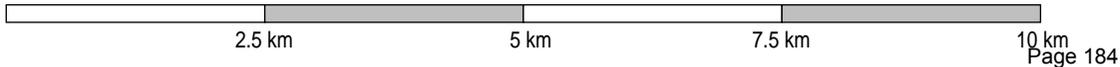
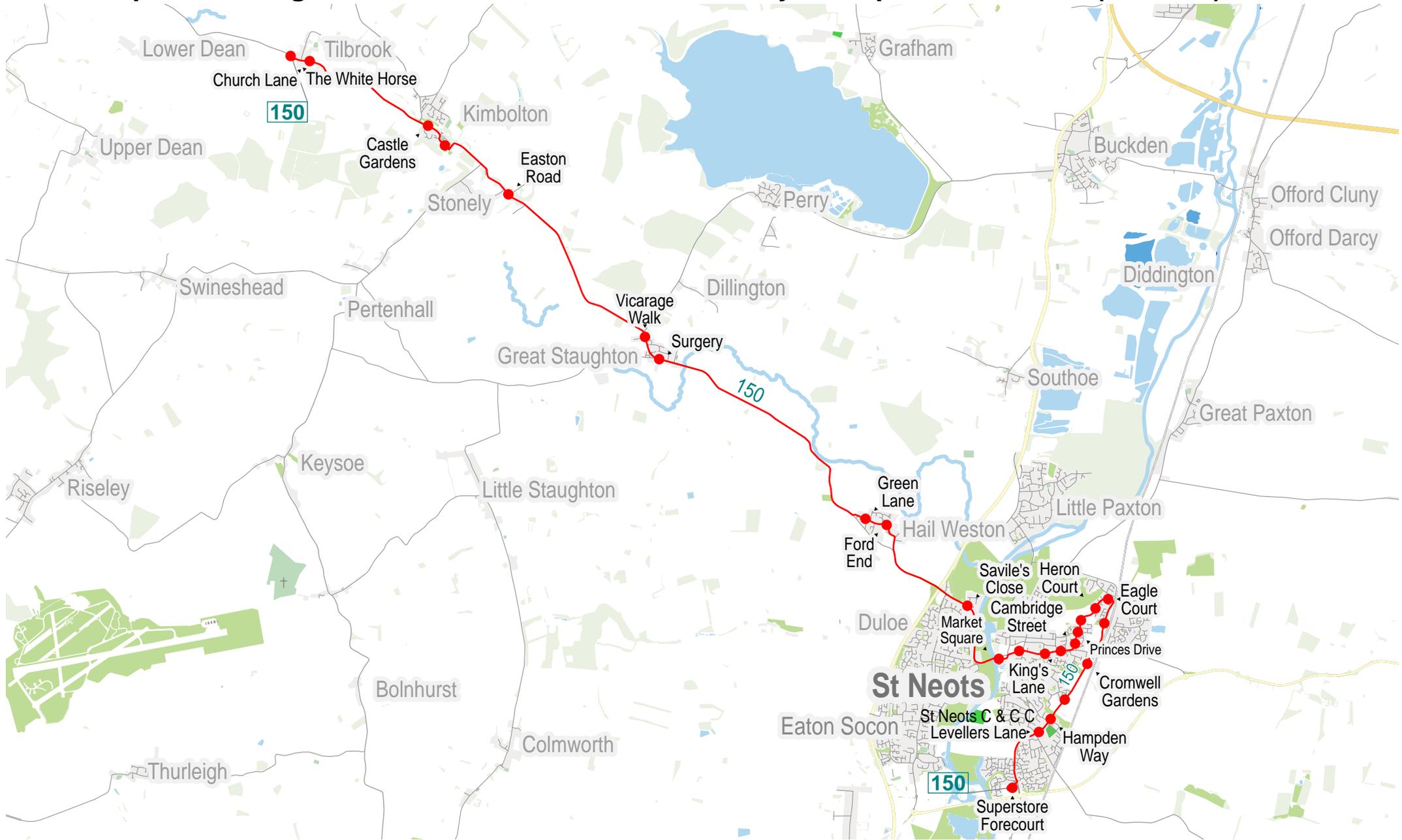


Appendix: D – Bus Services Maps

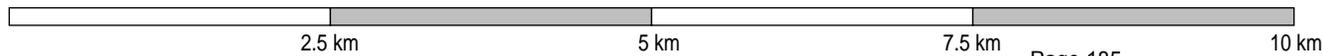
Route map for Huntingdonshire Association for Community Transport service 150 (outbound)



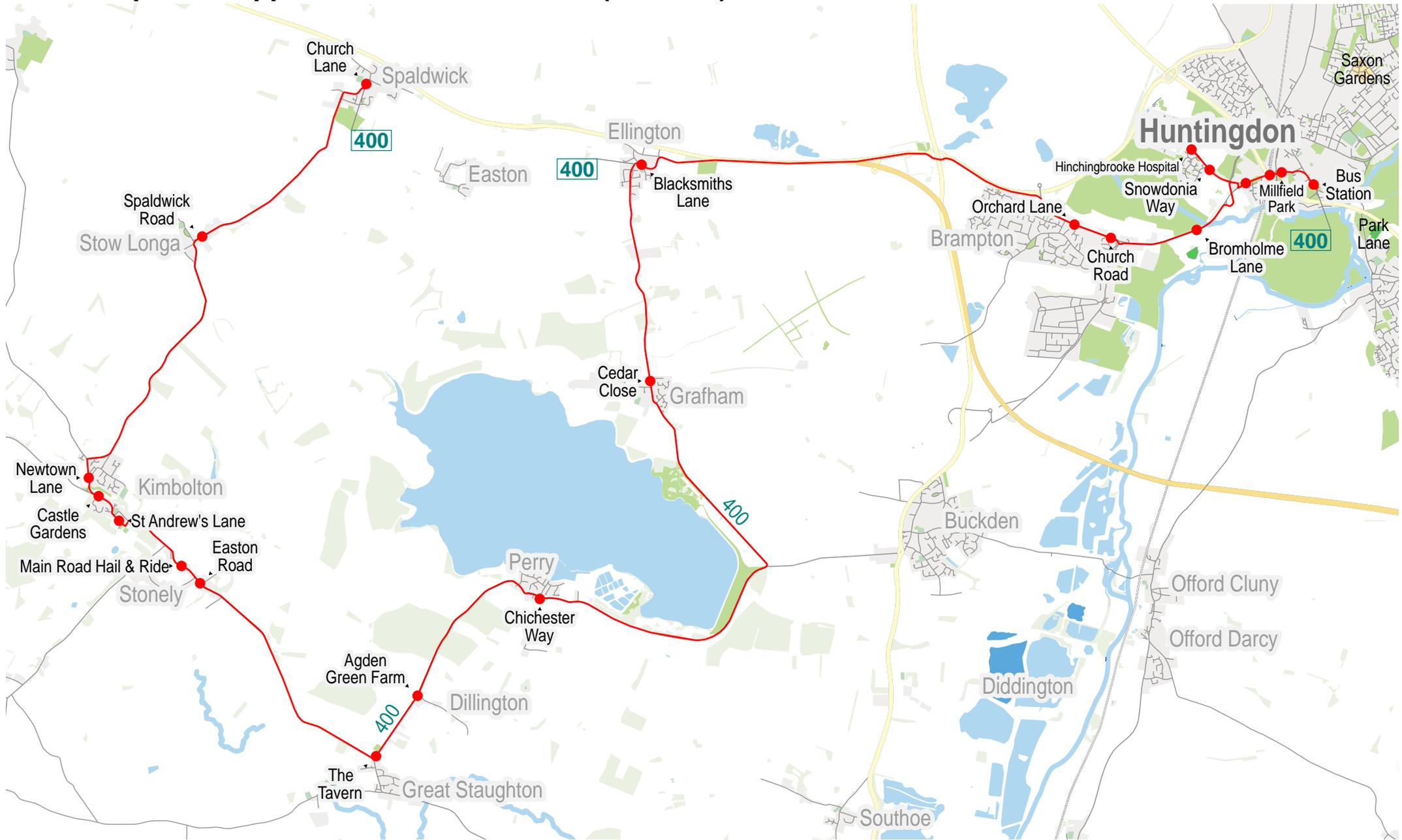
Route map for Huntingdonshire Association for Community Transport service 150 (inbound)



Route map for Whippet Coaches service 400 (outbound)



Route map for Whippet Coaches service 400 (inbound)





Appendix: E – Accident Data

Map Satellite

Manor Cr
Green Ln
Embroidery Hut
Beachampstead Rd
Lye Cr
Beachampstead Rd
Green Cl
Smiths Yard
Causeway Cl
Causeway
The Hwy
White Hart
Pagan Ange
May's Hair Lounge
Great Staughton Post Office
Cage Ln
River Kym
Olympus Hair Design
Gilbert Family Butchers
B645
Moor

Great Staughton Primary School

Incident Severity
Slight Serious Fatal

7 results found

Location: pe19 5db

Years
5 of 19 years selected

Severity
Fatal
Serious
Slight

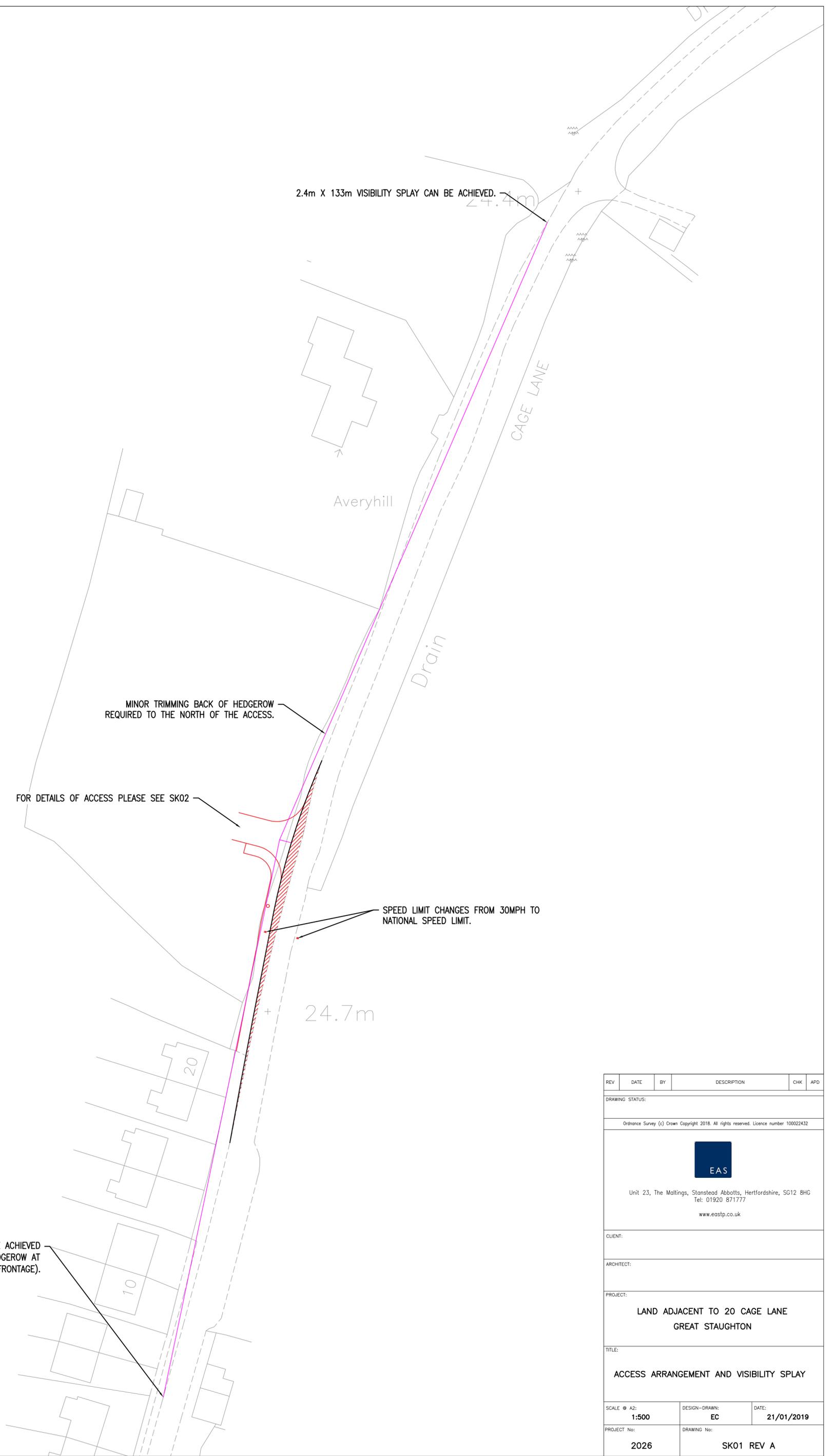
Casualty Types:
All Casualty Types

Vehicles Involved:
All Vehicle Types

Search

120%

Appendix: F – Access Arrangement and Visibility Splays



REV	DATE	BY	DESCRIPTION	CHK	APD
DRAWING STATUS:					
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 Unit 23, The Mallings, Stanstead Abbots, Hertfordshire, SG12 8HG Tel: 01920 871777 www.eastp.co.uk					
CLIENT:					
ARCHITECT:					
PROJECT: LAND ADJACENT TO 20 CAGE LANE GREAT STAUGHTON					
TITLE: ACCESS ARRANGEMENT AND VISIBILITY SPLAY					
SCALE: A2: 1:500		DESIGN-DRAWN: EC		DATE: 21/01/2019	
PROJECT No: 2026		DRAWING No: SK01 REV A			

Drain

PROPOSED 5.5m WIDE ACCESS ROAD AND 2m FOOTWAY. COULD BE SHARED SURFACE WITHIN THE SITE.

R6.0m

WIDEN CARRIAGEWAY TO 4.8m TO ALLOW TWO CARS TO PASS.

R6.0m

BT POLE

CURRENT POSITION OF 30mph / NATIONAL SPEED LIMIT SIGNS.

PROPOSED 2m FOOTWAY TO EXTEND TO EXISTING FOOTWAY.

+ 24.7m

REV	DATE	BY	DESCRIPTION	CHK	APD
DRAWING STATUS:					
Ordnance Survey (c) Crown Copyright 2018. All rights reserved. Licence number 100022432					
 Unit 23, The Mallings, Stanstead Abbots, Hertfordshire, SG12 8HG Tel: 01920 871777 www.eastp.co.uk					
CLIENT:					
ARCHITECT:					
PROJECT: LAND ADJACENT TO 20 CAGE LANE GREAT STAUGHTON					
TITLE: ACCESS ARRANGEMENT					
SCALE: A2: 1:200		DESIGN-DRAWN: EC		DATE: 21/01/2019	
PROJECT No: 2026		DRAWING No: SK03 REV A			



Appendix: G – TRICS Assessment

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED
 MULTI-MODAL VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	ES EAST SUSSEX	3 days
	HC HAMPSHIRE	1 days
	KC KENT	4 days
	SC SURREY	1 days
	WS WEST SUSSEX	5 days
04	EAST ANGLIA	
	CA CAMBRIDGESHIRE	2 days
	NF NORFOLK	3 days
	SF SUFFOLK	2 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Secondary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Number of dwellings
 Actual Range: 7 to 805 (units:)
 Range Selected by User: 7 to 805 (units:)

Parking Spaces Range: Selected: 16 to 1726 Actual: 16 to 1726

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/10 to 20/11/18

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	3 days
Tuesday	4 days
Wednesday	5 days
Thursday	6 days
Friday	3 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	21 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	9
Edge of Town	12

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	21
------------------	----

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3 20 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 1 mile:

1,000 or Less	1 days
1,001 to 5,000	2 days
5,001 to 10,000	5 days
10,001 to 15,000	5 days
15,001 to 20,000	3 days
20,001 to 25,000	5 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	1 days
25,001 to 50,000	2 days
50,001 to 75,000	4 days
75,001 to 100,000	5 days
100,001 to 125,000	1 days
125,001 to 250,000	8 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	5 days
1.1 to 1.5	16 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	7 days
No	14 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	21 days
-----------------	---------

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	CA-03-A-04	DETACHED		CAMBRI D G E S H I R E
	PETERBOROUGH THORPE PARK ROAD Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 9 <i>Survey date: TUESDAY 18/10/11</i>			<i>Survey Type: MANUAL</i>
2	CA-03-A-05	DETACHED HOUSES		CAMBRI D G E S H I R E
	EASTFIELD ROAD PETERBOROUGH Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 28 <i>Survey date: MONDAY 17/10/16</i>			<i>Survey Type: MANUAL</i>
3	ES-03-A-02	PRIVATE HOUSING		EAST SUSSEX
	SOUTH COAST ROAD PEACEHAVEN Edge of Town Residential Zone Total Number of dwellings: 37 <i>Survey date: FRIDAY 18/11/11</i>			<i>Survey Type: MANUAL</i>
4	ES-03-A-03	MIXED HOUSES & FLATS		EAST SUSSEX
	SHEPHAM LANE POLEGATE Edge of Town Residential Zone Total Number of dwellings: 212 <i>Survey date: MONDAY 11/07/16</i>			<i>Survey Type: MANUAL</i>
5	ES-03-A-04	MIXED HOUSES & FLATS		EAST SUSSEX
	NEW LYDD ROAD CAMBER Edge of Town Residential Zone Total Number of dwellings: 134 <i>Survey date: FRIDAY 15/07/16</i>			<i>Survey Type: MANUAL</i>
6	HC-03-A-20	HOUSES & FLATS		HAMPSHIRE
	CANADA WAY LIPHOOK Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 62 <i>Survey date: TUESDAY 20/11/18</i>			<i>Survey Type: MANUAL</i>
7	KC-03-A-03	MIXED HOUSES & FLATS		KENT
	HYTHE ROAD ASHFORD WILLESBOROUGH Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 51 <i>Survey date: THURSDAY 14/07/16</i>			<i>Survey Type: MANUAL</i>
8	KC-03-A-04	SEMI-DETACHED & TERRACED		KENT
	KILN BARN ROAD AYLESFORD DITTON Edge of Town Residential Zone Total Number of dwellings: 110 <i>Survey date: FRIDAY 22/09/17</i>			<i>Survey Type: MANUAL</i>

LIST OF SITES relevant to selection parameters (Cont.)

9	KC-03-A-06 MARGATE ROAD HERNE BAY	MIXED HOUSES & FLATS		KENT
	Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 363 <i>Survey date: WEDNESDAY 27/09/17</i>			
10	KC-03-A-07 RECVLVER ROAD HERNE BAY	MIXED HOUSES		KENT
	Edge of Town Residential Zone Total Number of dwellings: 288 <i>Survey date: WEDNESDAY 27/09/17</i>			
11	NF-03-A-01 YARMOUTH ROAD CAISTER-ON-SEA	SEMI DET. & BUNGALOWS		NORFOLK
	Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 27 <i>Survey date: TUESDAY 16/10/12</i>			
12	NF-03-A-02 DEREHAM ROAD NORWICH	HOUSES & FLATS		NORFOLK
	Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 98 <i>Survey date: MONDAY 22/10/12</i>			
13	NF-03-A-03 HALING WAY THETFORD	DETACHED HOUSES		NORFOLK
	Edge of Town Residential Zone Total Number of dwellings: 10 <i>Survey date: WEDNESDAY 16/09/15</i>			
14	SC-03-A-04 HIGH ROAD BYFLEET	DETACHED & TERRACED		SURREY
	Edge of Town Residential Zone Total Number of dwellings: 71 <i>Survey date: THURSDAY 23/01/14</i>			
15	SF-03-A-04 NORMANSTON DRIVE LOWESTOFT	DETACHED & BUNGALOWS		SUFFOLK
	Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 7 <i>Survey date: TUESDAY 23/10/12</i>			
16	SF-03-A-05 VALE LANE BURY ST EDMUNDS	DETACHED HOUSES		SUFFOLK
	Edge of Town Residential Zone Total Number of dwellings: 18 <i>Survey date: WEDNESDAY 09/09/15</i>			

LIST OF SITES relevant to selection parameters (Cont.)

17	WS-03-A-04	MIXED HOUSES		WEST SUSSEX
	HILLS FARM LANE			
	HORSHAM			
	BROADBRIDGE HEATH			
	Edge of Town			
	Residential Zone			
	Total Number of dwellings:		151	
	<i>Survey date: THURSDAY</i>		<i>11/12/14</i>	<i>Survey Type: MANUAL</i>
18	WS-03-A-05	TERRACED & FLATS		WEST SUSSEX
	UPPER SHOREHAM ROAD			
	SHOREHAM BY SEA			
	Suburban Area (PPS6 Out of Centre)			
	Residential Zone			
	Total Number of dwellings:		48	
	<i>Survey date: WEDNESDAY</i>		<i>18/04/12</i>	<i>Survey Type: MANUAL</i>
19	WS-03-A-06	MIXED HOUSES		WEST SUSSEX
	ELLIS ROAD			
	WEST HORSHAM			
	S BROADBRIDGE HEATH			
	Edge of Town			
	Residential Zone			
	Total Number of dwellings:		805	
	<i>Survey date: THURSDAY</i>		<i>02/03/17</i>	<i>Survey Type: MANUAL</i>
20	WS-03-A-08	MIXED HOUSES		WEST SUSSEX
	ROUNDSTONE LANE			
	ANGMERING			
	Edge of Town			
	Residential Zone			
	Total Number of dwellings:		180	
	<i>Survey date: THURSDAY</i>		<i>19/04/18</i>	<i>Survey Type: MANUAL</i>
21	WS-03-A-09	MIXED HOUSES & FLATS		WEST SUSSEX
	LITTLEHAMPTON ROAD			
	WORTHING			
	WEST DURRINGTON			
	Edge of Town			
	Residential Zone			
	Total Number of dwellings:		197	
	<i>Survey date: THURSDAY</i>		<i>05/07/18</i>	<i>Survey Type: MANUAL</i>

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL VEHICLES
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.076	21	138	0.309	21	138	0.385
08:00 - 09:00	21	138	0.139	21	138	0.392	21	138	0.531
09:00 - 10:00	21	138	0.153	21	138	0.179	21	138	0.332
10:00 - 11:00	21	138	0.125	21	138	0.161	21	138	0.286
11:00 - 12:00	21	138	0.144	21	138	0.156	21	138	0.300
12:00 - 13:00	21	138	0.158	21	138	0.149	21	138	0.307
13:00 - 14:00	21	138	0.178	21	138	0.164	21	138	0.342
14:00 - 15:00	21	138	0.166	21	138	0.191	21	138	0.357
15:00 - 16:00	21	138	0.267	21	138	0.179	21	138	0.446
16:00 - 17:00	21	138	0.283	21	138	0.172	21	138	0.455
17:00 - 18:00	21	138	0.353	21	138	0.161	21	138	0.514
18:00 - 19:00	21	138	0.316	21	138	0.192	21	138	0.508
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.358			2.405			4.763

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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Parameter summary

Trip rate parameter range selected:	7 - 805 (units:)
Survey date date range:	01/01/10 - 20/11/18
Number of weekdays (Monday-Friday):	21
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	3
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL TAXIS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.001	21	138	0.001	21	138	0.002
08:00 - 09:00	21	138	0.003	21	138	0.003	21	138	0.006
09:00 - 10:00	21	138	0.002	21	138	0.001	21	138	0.003
10:00 - 11:00	21	138	0.002	21	138	0.002	21	138	0.004
11:00 - 12:00	21	138	0.002	21	138	0.002	21	138	0.004
12:00 - 13:00	21	138	0.002	21	138	0.002	21	138	0.004
13:00 - 14:00	21	138	0.002	21	138	0.002	21	138	0.004
14:00 - 15:00	21	138	0.002	21	138	0.003	21	138	0.005
15:00 - 16:00	21	138	0.006	21	138	0.005	21	138	0.011
16:00 - 17:00	21	138	0.004	21	138	0.004	21	138	0.008
17:00 - 18:00	21	138	0.002	21	138	0.001	21	138	0.003
18:00 - 19:00	21	138	0.002	21	138	0.002	21	138	0.004
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.030			0.028			0.058

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL OGVS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.000	21	138	0.000	21	138	0.000
08:00 - 09:00	21	138	0.002	21	138	0.002	21	138	0.004
09:00 - 10:00	21	138	0.003	21	138	0.002	21	138	0.005
10:00 - 11:00	21	138	0.004	21	138	0.004	21	138	0.008
11:00 - 12:00	21	138	0.002	21	138	0.003	21	138	0.005
12:00 - 13:00	21	138	0.001	21	138	0.001	21	138	0.002
13:00 - 14:00	21	138	0.002	21	138	0.001	21	138	0.003
14:00 - 15:00	21	138	0.001	21	138	0.002	21	138	0.003
15:00 - 16:00	21	138	0.000	21	138	0.000	21	138	0.000
16:00 - 17:00	21	138	0.001	21	138	0.001	21	138	0.002
17:00 - 18:00	21	138	0.001	21	138	0.001	21	138	0.002
18:00 - 19:00	21	138	0.000	21	138	0.000	21	138	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.017			0.017			0.034

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL PSVS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.000	21	138	0.000	21	138	0.000
08:00 - 09:00	21	138	0.000	21	138	0.000	21	138	0.000
09:00 - 10:00	21	138	0.000	21	138	0.000	21	138	0.000
10:00 - 11:00	21	138	0.000	21	138	0.000	21	138	0.000
11:00 - 12:00	21	138	0.000	21	138	0.000	21	138	0.000
12:00 - 13:00	21	138	0.000	21	138	0.000	21	138	0.000
13:00 - 14:00	21	138	0.000	21	138	0.000	21	138	0.000
14:00 - 15:00	21	138	0.000	21	138	0.000	21	138	0.000
15:00 - 16:00	21	138	0.000	21	138	0.000	21	138	0.000
16:00 - 17:00	21	138	0.000	21	138	0.000	21	138	0.000
17:00 - 18:00	21	138	0.000	21	138	0.000	21	138	0.000
18:00 - 19:00	21	138	0.000	21	138	0.000	21	138	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.000			0.000			0.000

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL CYCLISTS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.007	21	138	0.011	21	138	0.018
08:00 - 09:00	21	138	0.006	21	138	0.012	21	138	0.018
09:00 - 10:00	21	138	0.001	21	138	0.003	21	138	0.004
10:00 - 11:00	21	138	0.002	21	138	0.003	21	138	0.005
11:00 - 12:00	21	138	0.003	21	138	0.004	21	138	0.007
12:00 - 13:00	21	138	0.004	21	138	0.004	21	138	0.008
13:00 - 14:00	21	138	0.002	21	138	0.003	21	138	0.005
14:00 - 15:00	21	138	0.003	21	138	0.003	21	138	0.006
15:00 - 16:00	21	138	0.009	21	138	0.006	21	138	0.015
16:00 - 17:00	21	138	0.009	21	138	0.010	21	138	0.019
17:00 - 18:00	21	138	0.018	21	138	0.010	21	138	0.028
18:00 - 19:00	21	138	0.010	21	138	0.009	21	138	0.019
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.074			0.078			0.152

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL VEHICLE OCCUPANTS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.096	21	138	0.436	21	138	0.532
08:00 - 09:00	21	138	0.180	21	138	0.686	21	138	0.866
09:00 - 10:00	21	138	0.196	21	138	0.252	21	138	0.448
10:00 - 11:00	21	138	0.165	21	138	0.222	21	138	0.387
11:00 - 12:00	21	138	0.187	21	138	0.222	21	138	0.409
12:00 - 13:00	21	138	0.213	21	138	0.210	21	138	0.423
13:00 - 14:00	21	138	0.249	21	138	0.228	21	138	0.477
14:00 - 15:00	21	138	0.225	21	138	0.259	21	138	0.484
15:00 - 16:00	21	138	0.464	21	138	0.255	21	138	0.719
16:00 - 17:00	21	138	0.468	21	138	0.253	21	138	0.721
17:00 - 18:00	21	138	0.535	21	138	0.235	21	138	0.770
18:00 - 19:00	21	138	0.465	21	138	0.290	21	138	0.755
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			3.443			3.548			6.991

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL PEDESTRIANS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.016	21	138	0.034	21	138	0.050
08:00 - 09:00	21	138	0.032	21	138	0.117	21	138	0.149
09:00 - 10:00	21	138	0.042	21	138	0.044	21	138	0.086
10:00 - 11:00	21	138	0.038	21	138	0.043	21	138	0.081
11:00 - 12:00	21	138	0.031	21	138	0.032	21	138	0.063
12:00 - 13:00	21	138	0.038	21	138	0.034	21	138	0.072
13:00 - 14:00	21	138	0.036	21	138	0.028	21	138	0.064
14:00 - 15:00	21	138	0.034	21	138	0.048	21	138	0.082
15:00 - 16:00	21	138	0.114	21	138	0.046	21	138	0.160
16:00 - 17:00	21	138	0.072	21	138	0.044	21	138	0.116
17:00 - 18:00	21	138	0.068	21	138	0.042	21	138	0.110
18:00 - 19:00	21	138	0.049	21	138	0.050	21	138	0.099
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.570			0.562			1.132

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL BUS/TRAM PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.001	21	138	0.014	21	138	0.015
08:00 - 09:00	21	138	0.000	21	138	0.023	21	138	0.023
09:00 - 10:00	21	138	0.002	21	138	0.008	21	138	0.010
10:00 - 11:00	21	138	0.003	21	138	0.004	21	138	0.007
11:00 - 12:00	21	138	0.001	21	138	0.004	21	138	0.005
12:00 - 13:00	21	138	0.003	21	138	0.004	21	138	0.007
13:00 - 14:00	21	138	0.004	21	138	0.003	21	138	0.007
14:00 - 15:00	21	138	0.005	21	138	0.003	21	138	0.008
15:00 - 16:00	21	138	0.015	21	138	0.005	21	138	0.020
16:00 - 17:00	21	138	0.014	21	138	0.004	21	138	0.018
17:00 - 18:00	21	138	0.013	21	138	0.002	21	138	0.015
18:00 - 19:00	21	138	0.016	21	138	0.004	21	138	0.020
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.077			0.078			0.155

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL TOTAL RAIL PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.001	21	138	0.006	21	138	0.007
08:00 - 09:00	21	138	0.000	21	138	0.011	21	138	0.011
09:00 - 10:00	21	138	0.000	21	138	0.004	21	138	0.004
10:00 - 11:00	21	138	0.000	21	138	0.002	21	138	0.002
11:00 - 12:00	21	138	0.000	21	138	0.001	21	138	0.001
12:00 - 13:00	21	138	0.000	21	138	0.003	21	138	0.003
13:00 - 14:00	21	138	0.001	21	138	0.001	21	138	0.002
14:00 - 15:00	21	138	0.001	21	138	0.000	21	138	0.001
15:00 - 16:00	21	138	0.002	21	138	0.001	21	138	0.003
16:00 - 17:00	21	138	0.003	21	138	0.001	21	138	0.004
17:00 - 18:00	21	138	0.008	21	138	0.001	21	138	0.009
18:00 - 19:00	21	138	0.006	21	138	0.001	21	138	0.007
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.022			0.032			0.054

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL COACH PASSENGERS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.000	21	138	0.000	21	138	0.000
08:00 - 09:00	21	138	0.000	21	138	0.000	21	138	0.000
09:00 - 10:00	21	138	0.000	21	138	0.000	21	138	0.000
10:00 - 11:00	21	138	0.000	21	138	0.000	21	138	0.000
11:00 - 12:00	21	138	0.000	21	138	0.000	21	138	0.000
12:00 - 13:00	21	138	0.000	21	138	0.000	21	138	0.000
13:00 - 14:00	21	138	0.000	21	138	0.000	21	138	0.000
14:00 - 15:00	21	138	0.000	21	138	0.000	21	138	0.000
15:00 - 16:00	21	138	0.001	21	138	0.000	21	138	0.001
16:00 - 17:00	21	138	0.000	21	138	0.000	21	138	0.000
17:00 - 18:00	21	138	0.000	21	138	0.000	21	138	0.000
18:00 - 19:00	21	138	0.000	21	138	0.000	21	138	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.001			0.000			0.001

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL PUBLIC TRANSPORT USERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.002	21	138	0.021	21	138	0.023
08:00 - 09:00	21	138	0.000	21	138	0.034	21	138	0.034
09:00 - 10:00	21	138	0.002	21	138	0.013	21	138	0.015
10:00 - 11:00	21	138	0.003	21	138	0.006	21	138	0.009
11:00 - 12:00	21	138	0.001	21	138	0.005	21	138	0.006
12:00 - 13:00	21	138	0.003	21	138	0.007	21	138	0.010
13:00 - 14:00	21	138	0.005	21	138	0.004	21	138	0.009
14:00 - 15:00	21	138	0.006	21	138	0.003	21	138	0.009
15:00 - 16:00	21	138	0.018	21	138	0.006	21	138	0.024
16:00 - 17:00	21	138	0.018	21	138	0.005	21	138	0.023
17:00 - 18:00	21	138	0.021	21	138	0.003	21	138	0.024
18:00 - 19:00	21	138	0.022	21	138	0.005	21	138	0.027
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.101			0.112			0.213

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL TOTAL PEOPLE
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.121	21	138	0.502	21	138	0.623
08:00 - 09:00	21	138	0.219	21	138	0.849	21	138	1.068
09:00 - 10:00	21	138	0.241	21	138	0.312	21	138	0.553
10:00 - 11:00	21	138	0.209	21	138	0.274	21	138	0.483
11:00 - 12:00	21	138	0.222	21	138	0.263	21	138	0.485
12:00 - 13:00	21	138	0.258	21	138	0.255	21	138	0.513
13:00 - 14:00	21	138	0.292	21	138	0.263	21	138	0.555
14:00 - 15:00	21	138	0.268	21	138	0.313	21	138	0.581
15:00 - 16:00	21	138	0.605	21	138	0.312	21	138	0.917
16:00 - 17:00	21	138	0.566	21	138	0.311	21	138	0.877
17:00 - 18:00	21	138	0.643	21	138	0.291	21	138	0.934
18:00 - 19:00	21	138	0.546	21	138	0.354	21	138	0.900
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			4.190			4.299			8.489

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL Servicing Vehicles

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.013	21	138	0.006	21	138	0.019
08:00 - 09:00	21	138	0.012	21	138	0.008	21	138	0.020
09:00 - 10:00	21	138	0.016	21	138	0.011	21	138	0.027
10:00 - 11:00	21	138	0.015	21	138	0.016	21	138	0.031
11:00 - 12:00	21	138	0.014	21	138	0.016	21	138	0.030
12:00 - 13:00	21	138	0.012	21	138	0.011	21	138	0.023
13:00 - 14:00	21	138	0.017	21	138	0.020	21	138	0.037
14:00 - 15:00	21	138	0.011	21	138	0.018	21	138	0.029
15:00 - 16:00	21	138	0.012	21	138	0.011	21	138	0.023
16:00 - 17:00	21	138	0.008	21	138	0.009	21	138	0.017
17:00 - 18:00	21	138	0.006	21	138	0.009	21	138	0.015
18:00 - 19:00	21	138	0.005	21	138	0.006	21	138	0.011
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.141			0.141			0.282

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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EAS

www.eastp.co.uk

Flood Risk Assessment
January 2019

The logo for EAS (East Angles Associates) is a dark blue square with the letters 'EAS' in white, bold, sans-serif font.

Land Between 20 Cage Lane and Avery Hill

Great Staughton
Huntingdonshire

Document History

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B	For Submission	RC	SA	SA	22/01/2019

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1 Introduction

- 1.1 EAS has been commissioned to prepare a Flood Risk Assessment (FRA) to support the promotion of land between 20 Cage Lane and Avery Hill, Great Staughton, Huntingdonshire. A location plan and red line boundary is included as **Appendix A**.
- 1.2 The red line boundary covers an area of 0.39 hectares. The existing site is undeveloped and is located on the edge of the village of Great Staughton. It is understood the proposed size of development at the site could offer approximately 14 homes as well as the provision of access for pedestrians and vehicles. The initial sketch of a site plan demonstrates 12 dwellings comprising of four 2-bed houses, five 3-bed houses and three 4-bed houses. The initial sketch is contained in **Appendix B**.
- 1.3 This document includes:
 - Section 2 describes relevant policy;
 - Section 3 describes site description, including site levels, proximity to watercourses etc;
 - Section 4 describes potential sources of flooding and any mitigation measures required;
 - Section 5 describes the existing site hydrology and outlines a surface water drainage strategy
 - Section 6 provides a summary and conclusions

2 Policy Context

Introduction

- 2.1 This section sets out the policy context. The contents of this FRA are based on the advice set out in The National Planning Policy Framework (NPPF) published in July 2018 and the Planning Practice Guidance (PPG), published March 2014.

National Planning Policy Framework

- 2.2 Paragraph 065 of the NPPF defines each Flood Zone along with appropriate land use and FRA requirements. The flood risk zones are defined as:
- Flood Zone 1- This zone comprises land assessed as having a less than 1 in 1,000 annual probability of river flooding (<0.1%)
 - Flood Zone 2- This zone comprises land assessed as having between a 1 in a 100 and 1 in 1,000 annual probability of river flooding.
 - Flood Zone 3a- This zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), and for tidal flooding at least a 0.5% annual probability of flooding from tidal sources.
 - Flood Zone 3b- This zone comprises land where water has to flow or be stored in times of flood.
- 2.3 Paragraph 155 discusses the suitability of development location, particularly with regard to future risks induced by climate change:

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere”.

- 2.4 Paragraph 156 of the National Planning Policy Framework (NPPF) sets out how:

“Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards”.

- 2.5 Paragraphs 165 NPPF discusses the application of sustainable drainage systems:

“Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- Take account of advice from the lead local flood authority;
- Have appropriate proposed minimum operational standards;
- Have maintenance arrangements in place to ensure an acceptable standard of operation of the lifetime of the development; and

- Where possible, provide multifunctional benefits.
- 2.6 The Flood Map for Planning (available at <https://flood-map-for-planning.service.gov.uk/>) shows the site to be located entirely within Flood Zone 1, at low risk from fluvial flooding. The Flood Map for Planning is enclosed in **Appendix C**.

Huntingdonshire District Council Core Strategy Development Plan Document (September 2009)

- 2.7 The Core Strategy Development Plan Document (DPD) was adopted by Huntingdonshire District Council on 23 September 2009. The Core Strategy sets the strategic spatial planning framework for how Huntingdonshire will develop up to 2026. It contains strategic policies to manage growth and guide new development in Huntingdonshire. Policy CS 1 includes flood risk and water consumption criteria:
- 2.8 Policy CS 1: Sustainable Development in Huntingdonshire

All plans, policies and programmes of the Council and its partners, with a spatial element, and all development proposals in Huntingdonshire will contribute to the pursuit of sustainable development.

Reflecting environmental, social and economic issues the following criteria will be used to assess how a development proposal will be expected to achieve the pursuit of sustainable development, including how the proposal would contribute to minimising the impact on and adaptability to climate change. All aspects of the proposal will be considered including the design, implementation and function of development. The criteria are:

...Reducing water consumption and wastage, minimising the impact on water resources and water quality and managing flood risk;

- 2.9 In addition to the Core Strategy the saved policies from the 1995 Local Plan remain part of the strategic policy background used to guide new development. Policies CS8 and CS9 include recommendations on surface water runoff and flood risk:

CS8: The district council will require satisfactory arrangements for the availability of water supply, sewerage and sewage disposal facilities, surface water runoff facilities and provision for land drainage when considering planning applications for development.

CS9: The district council will normally refuse development proposals that prejudice schemes for flood water management.

Huntingdonshire District Council Strategic Flood Risk Assessment (June 2017).

- 2.10 Published in June 2017, the document provides an update to the original 2010 document. The purpose of the document is to provide the latest flood information which can be utilized for flood risk assessment and emergency planning. The SFRA assess flood risk from all sources across the district and aims to explore opportunities to reduce flood risk.
- 2.11 Historically, Huntingdonshire has experienced flooding primarily from fluvial sources. The River Great Ouse and its tributaries are the main source of fluvial flooding in the district and there are now a number of flood defence systems in place along the River Great Ouse to protect urban areas.

- 2.12 Appendix E of the SFRA shows the surface water flood risk across the district. The site is shown not to be located within an area affected by surface water flooding.
- 2.13 Appendix F of the SFRA shows areas susceptible to ground water flooding. The site is shown to be at $\geq 75\%$ susceptibility to groundwater flooding, the highest classification of susceptibility.
- 2.14 The DG5 register of sewer flooding was not provided by Anglian Water at the time the SFRA was published and therefore no sewer flooding information has been provided.
- 2.15 The site is not shown as being covered by a Flood Warning Service.

3 Existing Site Assessment

Site Description

- 3.1 The site covers an area of 0.39 hectares and is currently undeveloped land. The site is located on the outskirts of the village of Great Staughton and is approximately 11km south west of the large town of Huntingdon.
- 3.2 Immediately west, north and east of the site is rural undeveloped land.
- 3.3 It is understood the proposed size of development at the site could offer approximately 14 homes as well as the provision of access for pedestrians and vehicles. The initial sketch of a site plan demonstrates 12 dwellings comprising of four 2-bed houses, five 3-bed houses and three 4-bed houses. The initial sketch is contained in Appendix B.

Local Watercourses

- 3.4 The River Kym is located approximately 230m west of the site. A ditch associated with River Kym located parallel to Cage Lane is located directly opposite the site on the other side of the road. There are various ditches likely to be associated with agricultural activity surrounding the site. There is a ditch located along the western perimeter of the site and to the north of the site running parallel to Cage Lane.
- 3.5 The Grafham Water Reservoir is located approximately 2km north of the site.

Geology

- 3.6 The online British Geological Survey (BGS) mapping shows the site to be located in an area with a bedrock of Oxford Clay Formation - Mudstone. Superficial deposits of River Terrace Deposits, 1 To 2 - Sand And Gravel.

Site Levels

- 3.7 LIDAR data shows the site has a level of approximately 25m AOD and a general fall to the east towards Cage Lane.

Sewer records

- 3.8 Anglian water records show there is a foul sewer flowing south in Cage Lane. There is another foul sewer located along the southern boundary of the site flowing east meeting the foul sewer in Cage Lane. Sewer mapping is enclosed in **Appendix D**.

Existing Drainage

- 3.9 As the site is currently undeveloped there is no formal drainage strategy in place. A site visit confirmed the site falls mainly to the east therefore any surface water runoff is likely to enter Cage Lane, some of which may enter the ditch on the opposite side of the road to the site. A sketch enclosed in **Appendix E** shows the location of various ditches near the site.
- 3.10 There are small deviations within the fall of the land meaning surface water may also fall to the north east and north west corners of the site, again likely entering the ditches located there.

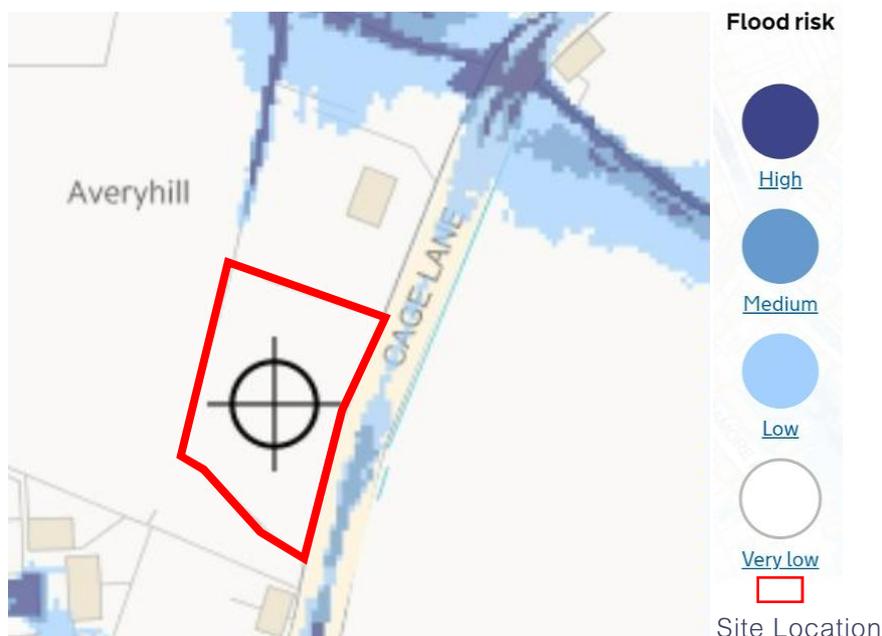
4 Potential Sources of Flooding

Fluvial

- 4.1 A copy of the Flood Map for Planning is enclosed in **Appendix C**. The mapping shows the site is located in Flood Zone 1, at low risk of flooding from fluvial. Areas at 'low' risk have a less than 1 in 1000 annual probability of flooding from rivers and the sea.
- 4.2 The risk from fluvial flooding is therefore deemed low.

Surface Water

- 4.3 Surface water flooding refers to flooding caused when the intensity of rainfall, particularly in urban areas, can create runoff which temporarily overwhelms the capacity of the local drainage systems or does not infiltrate into the ground. The water ponds on the ground and flows towards low-lying land. This source of flood risk is also known as 'pluvial'.
- 4.4 Figure 1 provides an extract from the EA surface water flood map.
- 4.5 The site is shown not be at 'very low' risk of surface water flooding meaning each year this area has a chance of flooding of less than 0.1%.
- 4.6 Areas at low to medium risk of surface water flood risk are present within Cage Lane which is unlikely to affect the site and remain within the road.
- 4.7 Accounting for the above, the risk of surface water flooding at the site can be considered low.



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*Figure 1: Extract from EA Surface Water Flood Map
Source: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?eastings=513388&northing=264775>*

Groundwater

- 4.8 Appendix F of the SFRA shows areas susceptible to ground water flooding. The site is shown to be at $\geq 75\%$ susceptibility to groundwater flooding, the highest classification of susceptibility.
- 4.9 The EA groundwater mapping located in MAGIC Maps (available at: <http://magic.defra.gov.uk/MagicMap.aspx>) shows the site is not located in a source protection zone.
- 4.10 The site is not shown to be located above an aquifer based on the bedrock. Based on the superficial drift, the site is located on the boundary of a Secondary Aquifer. A Secondary Aquifer is defined as “*predominantly lower permeability strata which may in part have the ability to store and yield limited amounts of groundwater by virtue of localised features such as fissures, thin permeable horizons and weathering*”.
- 4.11 Given the information above, there appears there could be a risk of groundwater flooding in the local area. There are no local borehole records available and therefore to get a better understanding of local groundwater conditions, ground investigation works could be undertaken at the site.

Sewer Flooding

- 4.12 Anglian Water sewer records show a foul water sewer flowing south in Cage Lane and south of the site flowing west to join the foul sewer in Cage Lane. Should the foul water sewer surcharge it is likely that the volumes would be low and the effluent would remain in the highway and not enter the site.
- 4.13 There are no surface water sewers located in the vicinity of the site.
- 4.14 Therefore, the risk of flooding from a sewer is deemed to be low.

Artificial

- 4.15 The GOV.UK website does not indicate the site to be within a reservoir flood risk extent. There are no other artificial sources in the area, therefore the risk of flooding to the site from artificial sources is considered to be low.
- 4.16 As the site has been shown to be at low risk of flooding from various sources it is not deemed necessary to provide any specific mitigation measures.

5 Drainage Strategy

Pre-development Runoff Rate

- 5.1 As the existing site is completely undeveloped, it is assumed that the existing runoff rate will be 100% greenfield. Runoff from the proposed development should therefore be restricted to the existing greenfield rate to reduce flood risk in the area as a result of increasing the impermeable area.
- 5.2 Greenfield runoff rates calculations have been carried out using the WINDES MicroDrainage software. The ICP SUDS Mean Annual Flood method was used. Greenfield runoff rates at the site for QBAR, 1 year, 30 year and 100-year events are summarised below per hectare and for the site area of 0.39 hectares:
- QBAR – 3.7l/s/ha (1.44l/s)
 - 1 in 100 year- 5.10l/s (13.1l/s/ha)
 - 1 in 30 year- 3.43l/s (8.8l/s/ha)
 - 1 in 1 year- 1.24l/s (3.2l/s/ha)
- 5.3 The WINDES MicroDrainage runoff output is included in **Appendix F**.

Relevant SUDS Policy

- 5.4 SUDS mimic the natural drainage system and provide a method of surface water drainage which can decrease the quantity of water discharged, and hence reduce the risk of flooding. In addition to reducing flood risk, these features can improve water quality and provide biodiversity and amenity benefits.
- 5.5 The SUDS management train incorporates a hierarchy of techniques and considers all three SUDS criteria of flood reduction, pollution reduction, and landscape and wildlife benefits. In decreasing order of preference, the preferred means of disposal of surface water runoff is:
- Discharge to ground.
 - Discharge to a surface water body.
 - Discharge to a surface water sewer.
 - Discharge to a combined sewer.
- 5.6 The philosophy of SuDS is to replicate as closely as possible the natural drainage from a site predevelopment and to treat runoff to remove pollutants, resulting in a reduced impact on the receiving watercourses. The benefits of this approach are as follows:
- Reducing runoff rates, thus reducing the flood risk downstream;
 - Reducing pollutant concentrations, thus protecting the quality of the receiving water body;
 - Groundwater recharge;
 - Contributing to the enhanced amenity and aesthetic value of development areas; and

- o Providing habitats for wildlife in developed areas, and opportunity for biodiversity enhancement.

Site Specific SUDS

- 5.7 The various SUDS methods have been considered in relation to site-specific constraints. Table 5.1 outlines the constraints and opportunities to each of the SUDS devices in accordance with the hierarchical approach outlined in The SUDS Manual CIRIA C753. It also indicates what could and could not be incorporated within the development, based upon site-specific criteria.

Device	Description	Constraints / Comments	Appropriate
Living roofs (source control)	Provide soft landscaping at roof level which reduces surface water runoff.	Unlikely to be viable due to residential nature of development.	No
Infiltration devices & Soakaways (source control)	Store runoff and allow water to percolate into the ground via natural infiltration.	Unlikely due to geology of Mudstone. It may be necessary to undertake infiltration tests to confirm.	No
Pervious surfaces (source control)	Storm water is allowed to infiltrate through the surface into a storage layer, from which it can either infiltrate and/or slowly release to sewers.	It is proposed to use lined permeable paving for all surfaces within the development.	Yes
Rainwater harvesting (source control)	Reduces the annual average rate of runoff from the Site by reusing water for non-potable uses e.g. toilet flushing, recycling processes.	May be possible to include these in design.	Possibly
Swales (permeable conveyance)	Broad shallow channels that convey / store runoff, and allow infiltration (ground conditions permitting).	Not included due to spatial limitations of the site.	No
Filter drains & perforated pipes (permeable conveyance)	Trenches filled with granular materials (which are designed to take flows from adjacent impermeable areas) that convey runoff while allowing infiltration.	Not proposed for this development.	No
Infiltration basins (end of pipe treatment)	Depressions in the surface designed to store runoff and allow infiltration.	Unlikely due to geology of Mudstone. It may be necessary to undertake infiltration tests to confirm.	No
Wet ponds & constructed wetlands (end of pipe treatment)	Provide water quality treatment & temporary storage above the permanent water level.	Not included due to spatial limitations of the site.	No
Attenuation Underground (end of pipe treatment)	Oversized pipes or geo-cellular tanks designed to store water below ground level.	This feature is not required as the proposed lined permeable paving will provide sufficient attenuation for the site.	No

Table 5.1: Site-Specific Sustainable Drainage Techniques

Proposed Drainage Strategy

- 5.8 At present, much of the site drains to the east where runoff would enter the ditch located along Cage Lane. In order to discharge to the existing ditch along Cage Lane and create a new headwall the ownership of the ditch will need to be further investigated.
- 5.9 Dependant on ownership, all surrounding ditches may need to be considered as potential locations for the site to outfall. It is also recommended that infiltration tests are undertaken in order to explore all potential drainage methods at the site. If infiltration tests prove that an infiltration strategy is not viable, and an agreement cannot be obtained to discharge to a nearby ditch then it may be necessary to explore discharging into the foul sewer in Cage Lane. Noteworthy all avenues must be explored before such an option is taken as discharging to a foul sewer is the least favourable option.
- 5.10 The underlying geology of mudstone suggests the ground may not be suitable for infiltration devices as a means of discharging runoff. However, this would be dependent upon the results of infiltration tests to determine the soakage rate across the site. Therefore, at this stage an attenuation and discharge strategy has been proposed.
- 5.11 An initial site sketch has been provided and is enclosed in Appendix B. At this preliminary stage, the drainage strategy described is an outline and provides potential options which could be applied to the site.
- 5.12 A quick storage estimate was carried out for the area to be covered by the proposed development assuming 50% of the site area would be impermeable following development. This would result in an impermeable area of 0.2 hectares. Using the WINDES MicroDrainage software, the required storage for a number of return periods (including 40% climate change) is shown in Table 5.2. The quick storage estimate parameters and output is included at **Appendix G**.

Return Period	Maximum Allowable Discharge (l/s)	Required Attenuation Storage
QBAR (+40% Climate Change)	0.74	128-167 m ³
Q1 Year (+40% Climate Change)	0.64	133-172 m ³
Q30 Year (+40% Climate Change)	1.76	102-136 m ³
Q100 Year (+40% Climate Change)	2.62	93-125 m ³

Table 5.2: Maximum allowable runoff rates and estimated attenuation volume for proposed development.

- 5.13 It is proposed that lined permeable paving could be used to construct the driveways, turning head and footpaths, should they remain private, to provide the required storage which will discharge into one of the local ditches. It is likely that an orifice plate or hydrobrake will be used to restrict the discharge to the greenfield runoff rate for all events up to and including the 100-year plus climate change event.
- 5.14 The depth and size of the paving will be confirmed at a later stage. As the levels of the ditches in Cage Lane and surrounding area are unknown, it is not known whether a

gravity connection could be achieved. If a gravity connection cannot be achieved, then a pumped outfall may be required.

- 5.15 The outfall rate will also need to be agreed which is likely to match the greenfield run off rate. As discussed, permission will need to be sought to outfall into the ditch, dependant on ownership and an outfall rate agreed.

Foul Water Strategy

- 5.16 Details of proposals for foul water system for the development site will be further defined at a later stage as part of the detailed design. A capacity check via Anglian Water may need to be undertaken.

Maintenance of Development Drainage

- 5.17 It is assumed that all elements of the proposed drainage system will remain private and the responsibility for maintenance will remain with the site owner/manager or an appointed management company.

6 Summary and Conclusion

- 6.1 EAS has been commissioned to prepare a Flood Risk Assessment (FRA) to support the promotion of land between 20 Cage Lane and Avery Hill, Great Staughton, Huntingdonshire. The existing site is undeveloped and is located on the edge of the village of Great Staughton.
- 6.2 The site is located in Flood Zone 1 on the Flood Map for Planning indicating the site is at 'low' risk meaning it has less than 1 in 1000 annual probability of flooding from rivers and the sea. The site is also shown to be at 'very low' risk of surface water flooding and is not located within an artificial flooding extent.
- 6.3 No other sources of flood risk have been identified that will require any further investigation.
- 6.4 At present, an initial site sketch is available thus this Flood Risk Assessment has provided potential options for SuDS at the site. Infiltration tests should be carried out to determine the feasibility of infiltration methods however with a geology of mudstone it is unlikely such methods will be viable. Dependant on ownership, all surrounding ditches may need to be considered as potential locations for the site to outfall. If infiltration tests prove that an infiltration strategy is not viable, and an agreement cannot be obtained to discharge to a nearby ditch then it may be necessary to explore discharging into the foul sewer in Cage Lane. At this moment in time, an attenuation and discharge approach has been explored.
- 6.5 Based upon the assumed impermeable area of 50% of the total site area (0.2 hectares) and assuming all water will be attenuated and discharged at greenfield rate, it will be necessary to provide up to 172 m³ of storage volume. It is proposed that lined permeable paving could be used on the driveways and turnings heads provided they remain private to provide adequate storage. It is then proposed to outfall to one of the local ditches via an orifice plate or hydrobrake. As levels are unknown at present, it is not known if a gravity connection can be made therefore a pumped outfall may be required.
- 6.6 We believe that the development proposals comply with the guidance provided by the NPPF and that no reason exists to object to the proposals in terms of flood risk.

7 Appendices

Appendix: A - Location Plan
Appendix: B – Initial Site Sketch
Appendix: C – Flood Map for Planning
Appendix: D – Anglian Water Sewer Records
Appendix: E – Site Sketch
Appendix: F – Greenfield Run off Rate
Appendix: G- Quick Storage Estimate



Appendix: A - Location Plan



REV	DATE	BY	DESCRIPTION	CHK	APD

DRAWING STATUS:
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Unit 23, The Maltings, Stanstead Abbots, Hertfordshire, SG12 8HG
 Tel: 01920 871777
 www.eastp.co.uk

CLIENT:

ARCHITECT:

PROJECT:
**LAND ADJACENT TO 20 CAGE LANE
 GREAT STAUGHTON**

TITLE:
LOCATION PLAN

SCALE @ A3: **1:10000** DESIGN-DRAWN: **RC** DATE: **08/01/2019**

PROJECT No: **2026** DRAWING No: **FIG02**



Appendix: B – Initial Site Sketch



SCHEDULE OF ACCOMMODATION

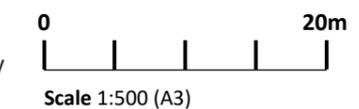
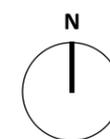
2 bed (75-80sqm) - 4no.
 3 bed (90-110sqm) - 5no.
 4 bed (120-130sqm) - 3no.

Total 12no. dwellings

Site Area: 0.39ha (subject to survey & land registry)

Subject to:

- Planning
- Highways
- Services
- Tree Survey
- Topographical Survey
- Site Investigation





Appendix: C – Flood Map for Planning

Flood map for planning

Your reference
Cage Lane

Location (easting/northing)
513386/264778

Created
18 Dec 2018 3:14

Your selected location is in flood zone 1, an area with a low probability of flooding.

This means:

- you don't need to do a flood risk assessment if your development is smaller than 1 hectare and not affected by other sources of flooding
- you may need to do a flood risk assessment if your development is larger than 1 hectare or affected by other sources of flooding or in an area with critical drainage problems

Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

The Open Government Licence sets out the terms and conditions for using government data.
<https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>

Flood map for planning

Your reference

Cage Lane

Location (easting/northing)

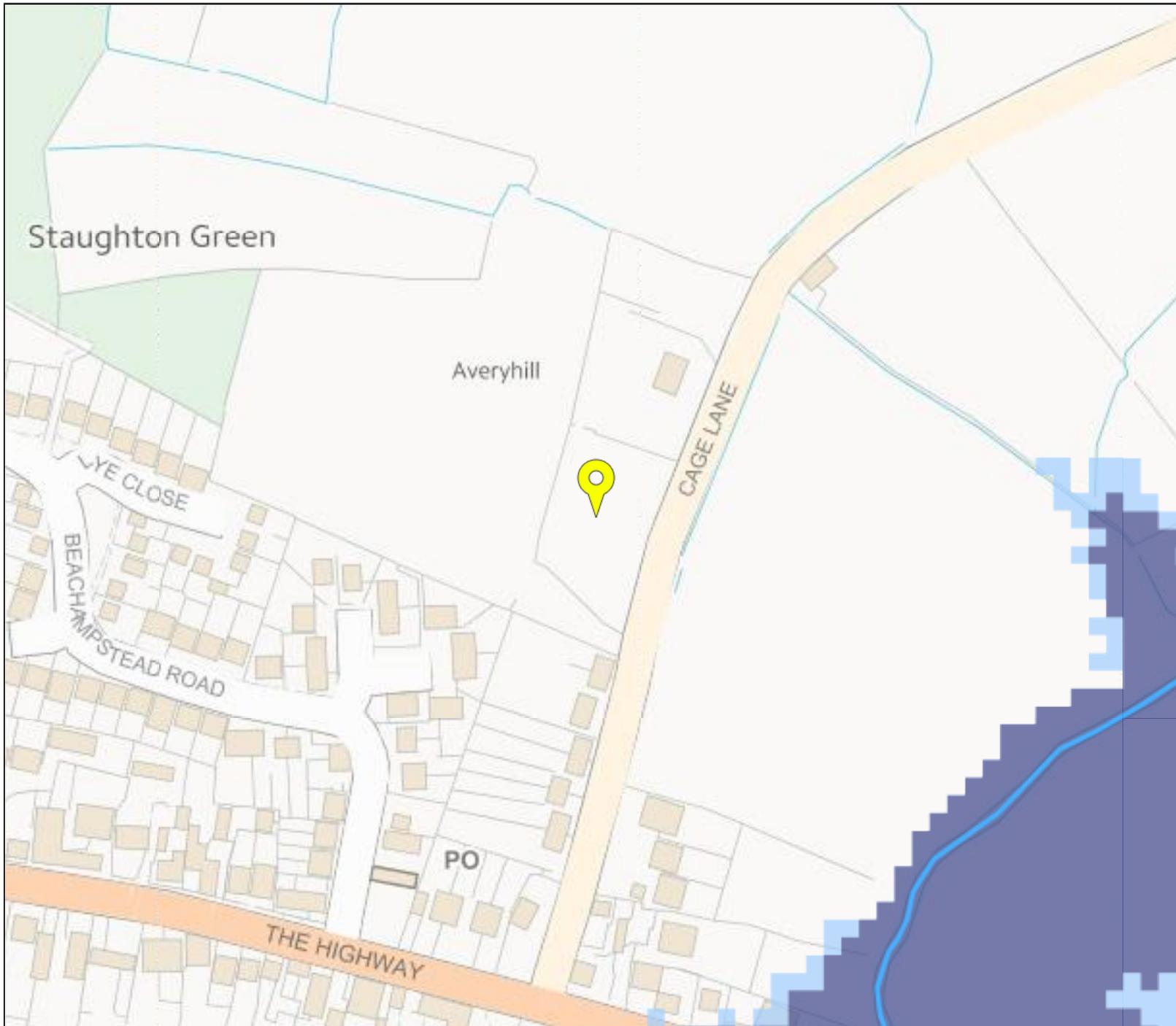
513386/264778

Scale

1:2500

Created

18 Dec 2018 3:14



-  Selected point
-  Flood zone 3
-  Flood zone 3: areas benefiting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area





Appendix: D – Anglian Water Sewer Records



(c) Crown copyright and database rights 2018 Ordnance Survey 100022432

Date: 18/12/18

Scale: 1:1250

Map Centre: 513390,264708

Data updated: 04/09/18

Our Ref: 292106 - 1

Wastewater Plan A3

This plan is provided by Anglian Water pursuant to its obligations under the Water Industry Act 1991 sections 198 or 199. It must be used in conjunction with any search results attached. The information on this plan is based on data currently recorded but position must be regarded as approximate. Service pipes, private sewers and drains are generally not shown. Users of this map are strongly advised to commission their own survey of the area shown on the plan before carrying out any works. The actual position of all apparatus MUST be established by trial holes. No liability whatsoever, including liability for negligence, is accepted by Anglian Water for any error or inaccuracy or omission, including the failure to accurately record, or record at all, the location of any water main, discharge pipe, sewer or disposal main or any item of apparatus. This information is valid for the date printed. This plan is produced by Anglian Water Services Limited (c) Crown copyright and database rights 2018 Ordnance Survey 100022432. This map is to be used for the purposes of viewing the location of Anglian Water plant only. Any other uses of the map data or further copies is not permitted. This notice is not intended to exclude or restrict liability for death or personal injury resulting from negligence.

Foul Sewer					
Surface Sewer		Outfall*		Sewage Treatment Works	
Combined Sewer				Public Pumping Station	
Final Effluent		Inlet*		Decommissioned Pumping Station	
Rising Main*					
Private Sewer*		Manhole*			
Decommissioned Sewer*					

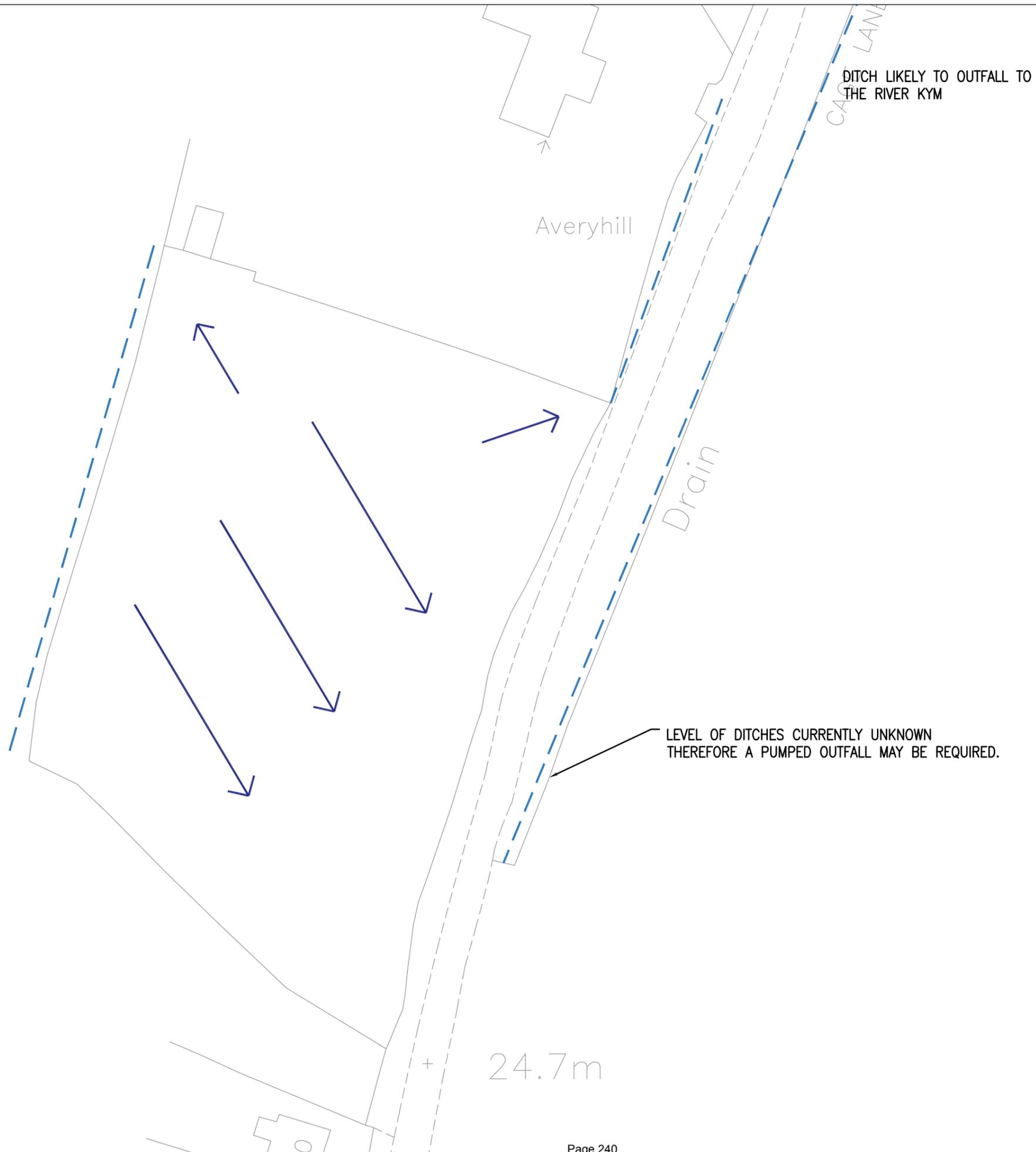
*(Colour denotes effluent type)

	Cage Lane





Appendix: E – Site Sketch



KEY

-  LIKELY SURFACE WATER FLOW PATHS BASED ON SITE VISIT OBSERVATIONS
-  DITCH

REV	DATE	BY	DESCRIPTION	CHK	APD

DRAWING STATUS:

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Unit 23, The Maltings, Stanstead Abbots, Hertfordshire, SG12 8HG
 Tel: 01920 871777
 www.eastp.co.uk

CLIENT:

ARCHITECT:

PROJECT:
**LAND NEXT TO 20 CAGE LANE
 GREAT STAUGHTON**

TITLE:
LOCATION OF DITCHES

SCALE © A3: 1:500	DESIGN-DRAWN: RC	DATE: 22/01/2019
-----------------------------	----------------------------	----------------------------

PROJECT No: 2026	DRAWING No: SK02 REV A
----------------------------	----------------------------------



Appendix: F – Greenfield Run off Rate

EAS		Page 1
Unit 108 The Maltings Stanstead Abbotts Hertfordshire SG12 8HG		
Date 08/01/2019 09:14 File	Designed by Maz Checked by	
Micro Drainage	Source Control 2013.1.1	

ICP SUDS Mean Annual Flood

Input

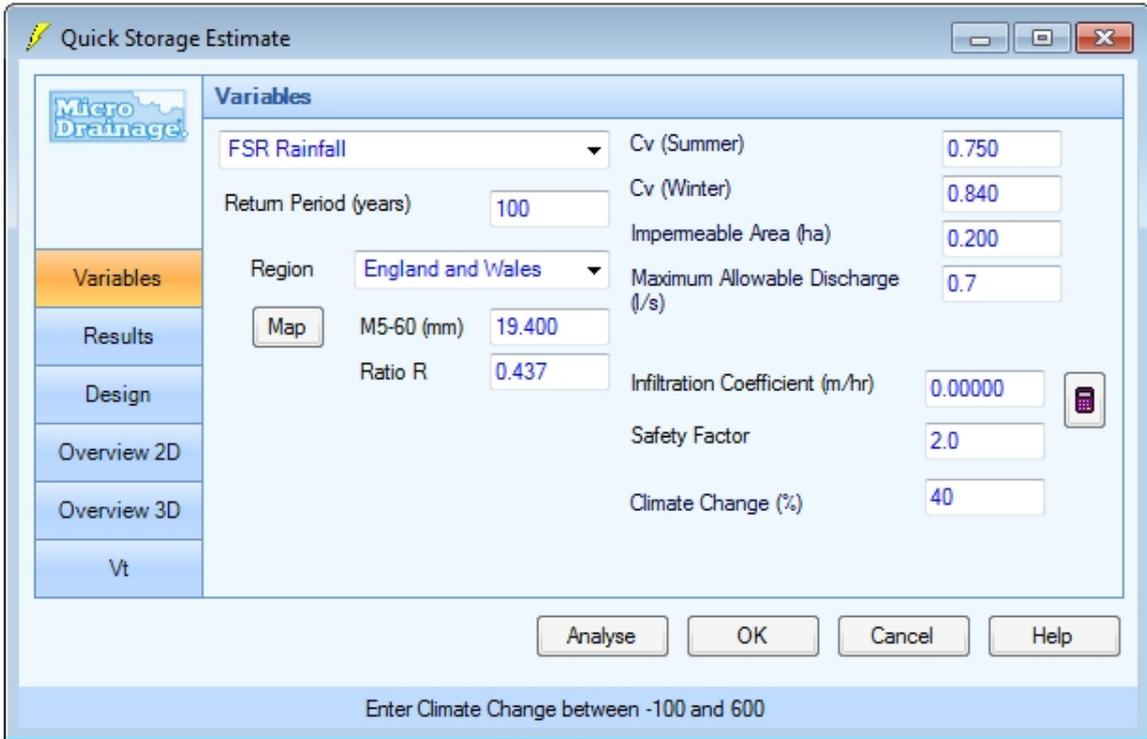
Return Period (years)	100	Soil	0.450
Area (ha)	1.000	Urban	0.000
SAAR (mm)	600	Region Number	Region 5

Results l/s

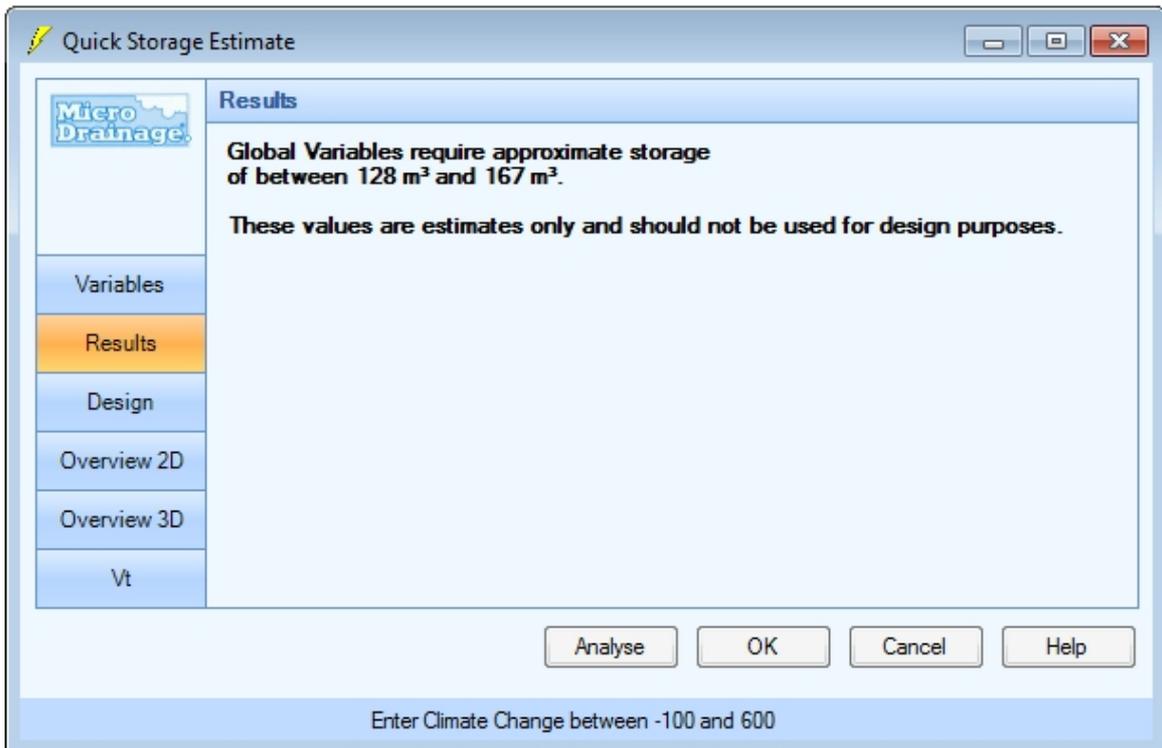
QBAR Rural	3.7
QBAR Urban	3.7
Q100 years	13.1
Q1 year	3.2
Q30 years	8.8
Q100 years	13.1



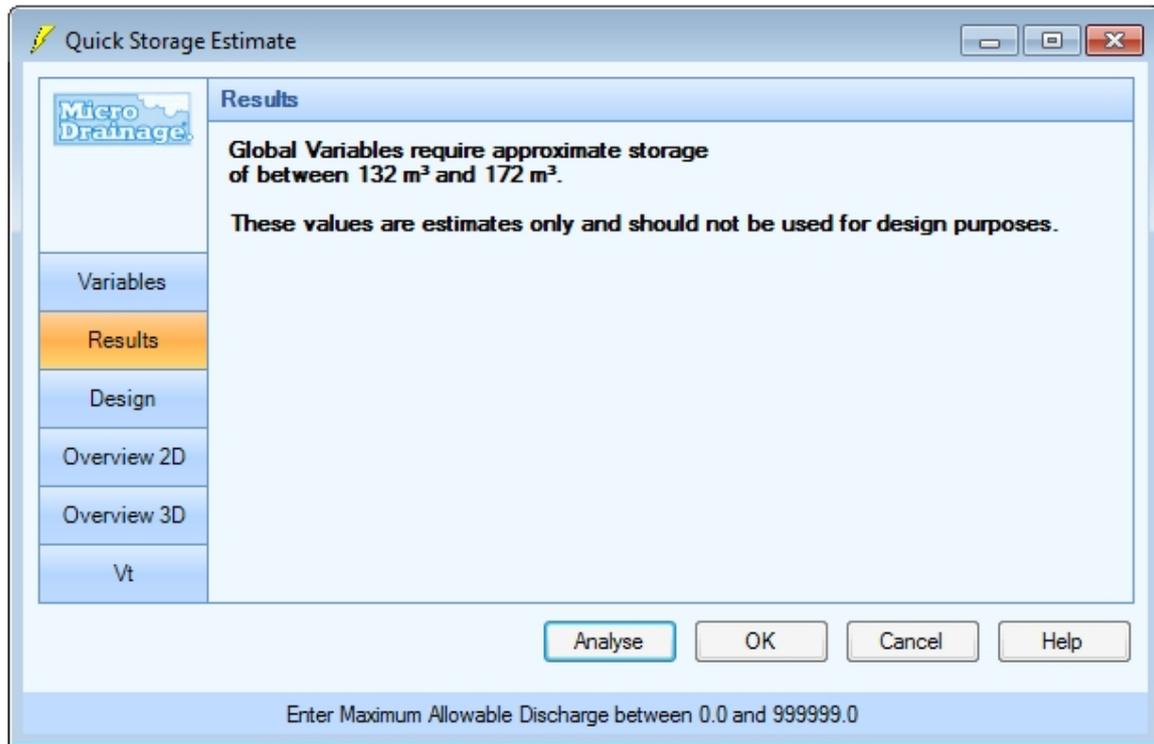
Appendix: G- Quick Storage Estimate



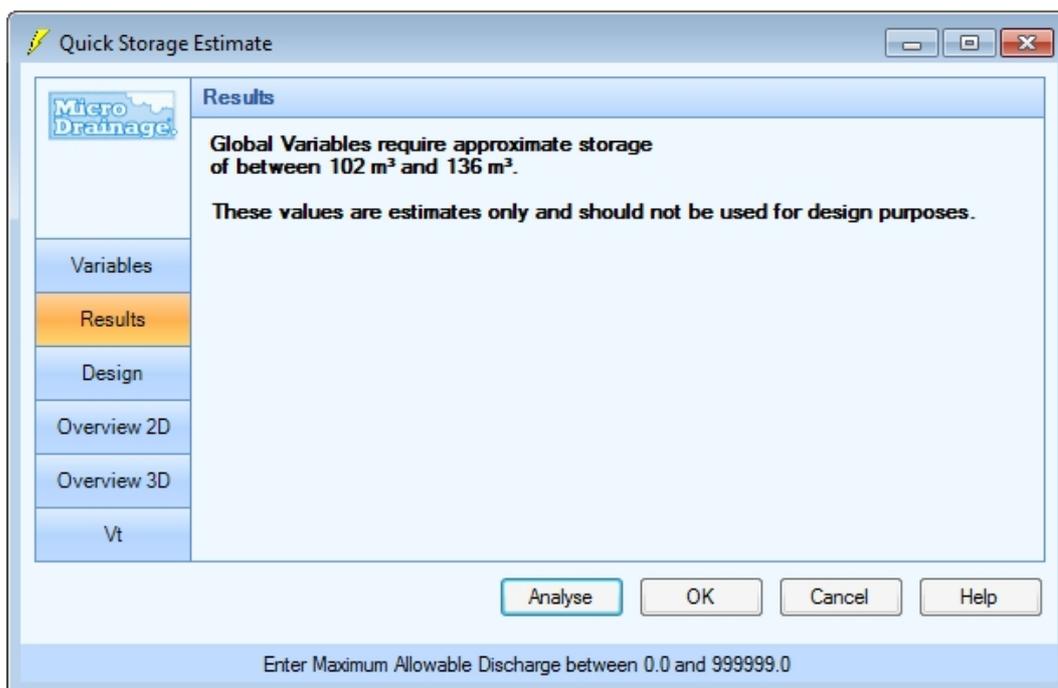
QBAR + 40% Climate Change



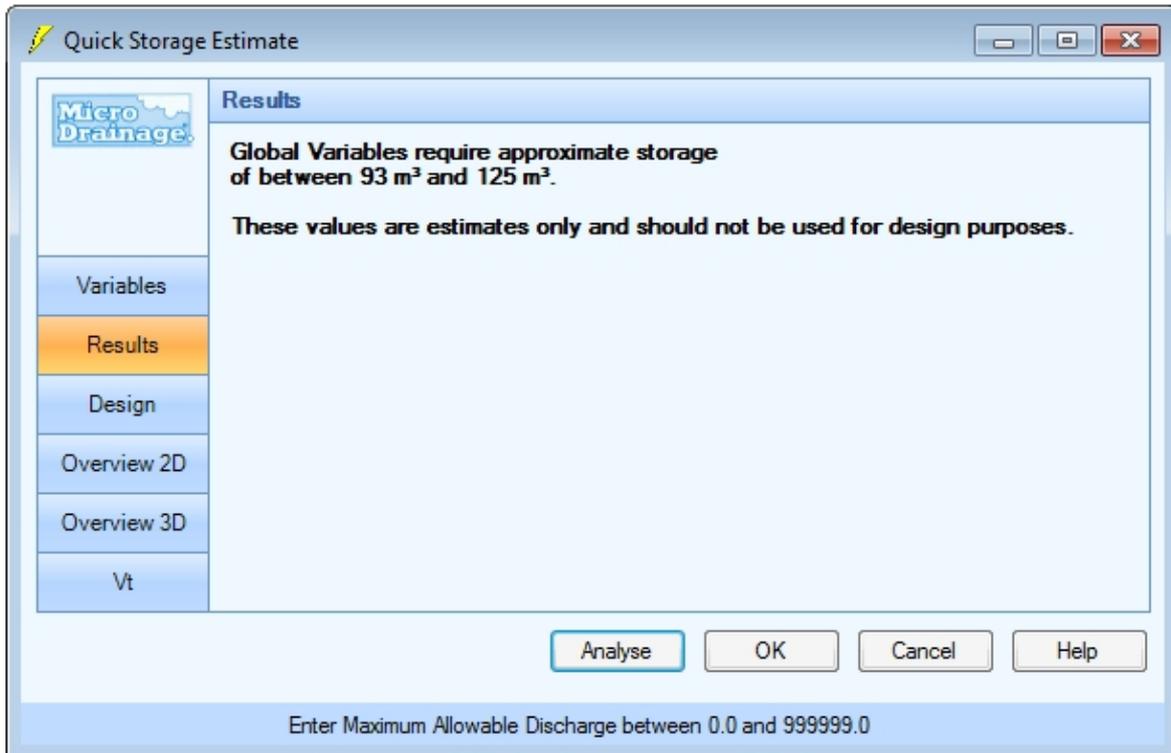
Q1 Year + 40% Climate Change



Q30 Year +40% Climate Change



Q100 Year +40% Climate Change



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 2018
Comment by	Hallam Land Management (Mr Tom Thornewill - 1118661)
Comment ID	PMM2018:60
Response Date	29/01/19 15:09
Consultation Point	Proposed Main Modification 1 (View)
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 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.

Matter 7 Statement and Paragraphs 1.3 to 1.15 of the Matter 12 Statement. In summary, there are three factors that should inform predictions about housing delivery rates at the larger strategic allocations, including Alconbury Weald, RAF Alconbury and Ermine Street, which are as follows:

- National evidence on housing delivery rates contained in the Nathaniel Lichfield & Partners research report 'Start to Finish - How Quickly do Large-Scale Housing Sites Deliver?' (November 2016) provided evidence on the speed and rate of delivery of large-scale housing developments. One of the key findings of the research report is that the average annual build rate for a scheme of 2,000+ dwellings is 161 dwellings per year.
- Cambourne new settlement in South Cambridgeshire provides evidence of housing delivery rates at an established strategic development in the local area over a number of years and points in the housing market cycle. The average annual delivery rate at Cambourne is 229 dwellings. It is unrealistic to assume that delivery rates at Alconbury Weald would be higher than those achieved at Cambourne.
- Alconbury Weald, RAF Alconbury and Ermine Street are located in close proximity to one another, which is likely to have significant implications for housing delivery because they will in effect be competing sites within the same local housing market. It is possible that development could occur at neighbouring sites at the same time but adjustments to housing delivery rates should be made. The Council has recently published the Annual Monitoring Report for 2017/18 (dated December 2018). The AMR includes the adjustments to housing delivery recommended by the Inspector. It is noted in the AMR that 115 dwellings have been delivered at Alconbury Weald during 2017/18 (48 dwellings were delivered during 2016/17). It is likely that housing delivery rates at Alconbury Weald will increase in 2018/19 as one or two more housebuilders commence development at the site, but there is no evidence to support a significant increase in housing delivery to more than 200 dwellings per annum, particularly when compared with historic delivery rates at Cambourne and the fact that development at Northstowe new settlement (in South Cambridgeshire) has also started within the last couple of years. It is acknowledged that a planning application has been submitted for part of the Ermine Street site, and a planning application is being prepared for the remainder of this site, which indicates that these sites might be available. However, the challenges to the delivery of safe pedestrian and cycle access connections across the A141 remain, the application documents state that these works are subject to detailed design. At this stage the Highway Authority has not confirmed that the proposed pedestrian and cycle access arrangements are acceptable. It is considered that even if these sites are deliverable and the transport and access constraints can be satisfactorily resolved, then adjustments to predicted delivery rates will be required to take into account the close proximity of development at Alconbury Weald. Taking into account the above, it is requested that the combined housing delivery rate for Alconbury Weald (SEL1.1) and Ermine Street (HU1) should be capped at a maximum of 250 dwellings per annum. This requested change would reduce the housing land supply position during the plan period by 650 dwellings. There remains uncertainty about the availability of some sites included within the housing trajectory, including RAF Alconbury (Policy SEL1.2) which is currently occupied by the US Air Force. It has not yet been confirmed that the USAF intend to move from the site, and there is no indication or agreed timetable for when this might occur. It is considered that no evidence was provided to the Examination to demonstrate that RAF Alconbury is actually available for development during the plan period. It is requested that RAF Alconbury is deleted from the housing land supply, which would reduce the housing land supply position by 1,600 dwellings. If RAF Alconbury is retained as an allocation then the requested housing delivery cap of a maximum of 250 dwellings per annum should apply to all three strategic sites within the Huntingdon SPA i.e. Alconbury Weald, RAF Alconbury and Ermine Street because all three sites are located within close proximity of one another. The reduction in housing delivery from the larger strategic allocations (Alconbury Weald, RAF Alconbury, Ermine Street and St Neots East) and reflected in the revised housing trajectory included in MM1 would result in the delivery of less affordable housing during the plan period. It is already proposed that the approved developments at Alconbury Weald and St Neots East will not deliver policy compliant levels of affordable housing. The approved amount of affordable housing for these developments is as follows:
- 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. 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 an 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 and 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 proportion of affordable housing from Loves Farm - St Neots East agreed by Development Management Committee 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. There is no agreement or commitment to increase affordable housing levels in later phases which are subject to the review mechanism, and 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 proportion of affordable housing that will be provided at the Ermine Street sites is not stated in the application documents or any documents submitted to the Examination, and is therefore unknown. The proportion of affordable housing that will be provide at the RAF Alconbury site is also unknown. It is clear from the above that neither Alconbury Weald nor St Neots East will deliver policy compliant levels of affordable housing. The adjustments to housing delivery rates at Alconbury Weald, RAF Alconbury, Ermine Street and St Neots East will mean that less affordable housing will be delivered from these sites. Furthermore, if as requested, more realistic housing delivery rates are applied to the Alconbury Weald and Ermine Street sites of a combined maximum of 250 dwellings per annum, and RAF Alconbury is deleted because of uncertain availability, then the delivery of affordable housing from these sites would be further reduced. It appears that the housing land supply position has been boosted by the inclusion of dwellings from prior approvals, small housing sites and rural exception sites. However, prior approvals and small sites are not required to provide affordable housing, and therefore it is clear that these sources will not increase the supply of affordable housing during the plan period or offset the under-delivery of affordable housing from Alconbury Weald and St Neots East. The affordable housing requirement during the plan period is 7,900 dwellings. An average of 316 affordable dwellings per annum are required to meet the affordable housing requirement. However, recent monitoring data demonstrates that an insufficient amount of affordable housing has been delivered so far: 129 in 2014/15; 55 in 2015/16; 128 in 2016/17; and, 142 in 2017/18. As a result, there is already a significant shortfall in the delivery of affordable housing. As set out above, an insufficient amount of affordable housing is planned to be delivered from the two strategic expansion locations of Alconbury Weald and St Neots East: the 1st Phase of Alconbury Weald will lead to a shortfall of 231 affordable dwellings; there will be an overall shortfall of 122 affordable dwellings from the Loves Farm – St Neots East site; and, the 1st Phase of Wintringham Park – St Neots East will lead to a shortfall of 75 affordable dwellings. Therefore, the position on affordable housing for PS HLP2036 is that the two strategic expansion locations will deliver an insufficient amount of affordable housing during the plan period, prior approvals and small sites are not required to provide affordable housing, and an insufficient number of other allocations have been identified to meet the affordable housing requirement (of 7,900 dwellings) during the plan period. Paragraph 47 of NPPF1 (2012) expects local plans to meet the objectively assessed needs for affordable housing, but it is clear that PS HLP2036 is unsound because of the failure to plan to meet affordable housing needs. The other authorities in Cambridgeshire are also failing to deliver sufficient quantities of affordable housing, and monitoring data shows that affordable housing targets are not being met. The Inspector for the Cambridge Local Plan Examination noted that the affordable housing need for Cambridge City during the plan period is 10,402 dwellings, but accepted that only half of that affordable housing need would actually be met (see Paragraph 37 of Inspector's Report); the affordable housing needs of approximately 5,200 households from Cambridge would remain unmet. The Inspector for the South Cambridgeshire Local Plan Examination noted that the affordable housing need for South Cambridgeshire during the plan period is 5573 dwellings, and concluded that all of those housing needs would be met (see Paragraph 36 of the Inspector's Report); the developments on the edge of Cambridge are delivering 40% affordable housing, but it has been accepted in planning permissions that 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 that affordable housing needs are not being met elsewhere in Cambridgeshire. It would be reasonable to conclude that there will be a significant shortfall in the supply of affordable housing in Cambridge, South Cambridgeshire and Huntingdonshire to meet identified needs during the plan periods, and 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. This outcome is not consistent with Paragraph 47 of NPPF1 (2012). The negative impact of Main Modification MM1 (and MM15 and MM16) on the supply of affordable housing is acknowledged in the findings of the Sustainability Appraisal. The purpose of the Sustainability Appraisal is to make the policies and allocations in PS HLP2036 more sustainable, but it is clear that in terms of affordable housing there would be a negative outcome for housing related sustainability objectives because substantially less affordable housing would be delivered. As set out below, there are realistic alternatives to increase the supply of affordable housing during the plan period, one of which is to allocate more land for housing on sites which can deliver policy compliant levels of affordable housing including land promoted on behalf of Hallam Land Management at Gifford's Park in St Ives. Gifford's Park in St Ives was promoted for a residential-led mixed use development on behalf of Hallam Land Management through representations to PS HLP2036 and in the Matter 8 Hearing Statement and subsequent hearing session. A residential-led mixed use development at Gifford's Park would deliver housing and affordable housing in St Ives, an identified location for growth but which is only expected to accommodate a limited amount of development in the proposed strategy. The proposed development would delivery policy compliant levels of affordable housing, unlike the two identified strategic expansion locations at Alconbury Weald and St Neots East. The site at Gifford's Park is accessible to the services, facilities and employment opportunities in St Ives by walking and cycling, and it is within close proximity of the Cambridge Guided Busway.. The proposed development at Gifford's Park makes provision for a primary school, supermarket, neighbourhood centre and health care facility, which would meet the needs of residents of the development and the surrounding area. In addition, the proposed development includes land for the relocation of St Ives Football Club. There are no significant constraints to development at the site. Two Statements of Common Ground were submitted to the Examination for the proposed development; one with Cambridgeshire County Council on highway and transport matters, and another with the Environment Agency and Cambridgeshire County Council as Lead Local Flood Authority on flood risk matters. At the hearing session for Matter 8 the potential transport impact of development at Gifford's Park was discussed. At the hearing session for Matter 8 the potential transport impact of development at Gifford's Park was discussed. In order to understand those potential transport impacts in more detail it was decided that a highways pre-application request should be submitted. The following statement confirms the latest position on the highway pre-application discussions: "Peter Brett Associates, on behalf of HLM, have agreed a comprehensive scope for a Transport Assessment with Cambridgeshire County Council as the Highway Authority. In accordance with this scope, a draft Transport Assessment has now been prepared and has been provided to the Highway Authority. This is being worked through between the developer and Cambridgeshire County Council with a view to identifying the development impacts and the associated mitigation package required to prevent any severe impacts. This work is ongoing. HLM commits to continue to work with the County Council prior to any submission and that subject to resolution of all technical matters Peter Brett Associates considers that the scheme can be deemed acceptable in transport terms in conjunction with a yet to be agreed set of planning conditions and obligations." The representations and the HLM representations contained a new replacement policy for Policy SI 3: Gifford's Park, which is as follows: 127.4ha of land at Gifford's Park, on land east of Somersham Road and north of Needingworth Road is allocated for a mixed use sustainable urban extension of St Ives to comprise:

- 45.9 ha of land for housing, providing approximately 1,750 homes
- 0.7 ha of land for extra care/care home
- 2.7 ha of land for employment (Class 'B')
- Up to 3.0 ha of land for primary school
- 0.4 ha for hotel
- 0.35 ha for health care
- 0.6ha for neighbourhood centre
- ha for supermarket
- land to accommodate relocation of St Ives Football Club
- allotments
- a central park
- land for sport and recreation
- land for green infrastructure

The development of the site will deliver:

- satisfactory resolution of the impact of additional traffic on the local highway network having regard to a transport assessment and travel plan;
- Policy compliant levels of Affordable Housing
- comprehensive master planning to be undertaken by the site developer with public engagement with the cooperation of the Council;
- provision of quality pedestrian and cycle improvements to the town centre and other key service destinations, including the Guided Bus;
- production and implementation of a development strategy that seeks to ensure balanced delivery of industrial and commercial development with development of homes, infrastructure, services and facilities;
- the arrangement of different uses in a manner that minimises the need to travel and includes a transport network that promotes sustainable travel modes;
- differentiated densities of development with higher densities around defined centres and the development of distinctive character areas;
- enhancement and provision for habitats in accordance with an ecological assessment and strategy
- a landscaping scheme recognising and

enhancing vistas, boundaries, and green infrastructure networks; • design codes for the appearance of development proposals; • flood risk assessment and provision of sustainable drainage systems; • production and implementation of a waste audit and a waste minimisation, re-use and recovery strategy; • agreement with the Environment Agency and Anglian Water Services that waste water flows from the proposal can be accommodated; and, • agreement with the Environment Agency that meeting the requirements of the Water Framework Directive would not be compromised.

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?

Requested Changes

It is requested that further modifications are required to the housing trajectory contained in Main Modification MM1, and that an additional main modification is required to allocate another strategic site to meet housing and affordable housing needs.

It is requested that the combined housing delivery rate for Alconbury Weald (SEL1.1) and Ermine Street (HU1) should be capped at a maximum of 250 dwellings per annum.

It is requested that RAF Alconbury (SEL1.2) is deleted from the housing land supply because there is no evidence that the site is available during the plan period.

It is requested that the full identified affordable housing needs are met during the plan period, and that additional sites which provide policy compliant levels of affordable housing are allocated.

It is requested that Policy SI 3 is modified to provide for a residential-led mixed use development at Gifford's Park in St Ives.

Summary

The proposed revised housing trajectory in MM1 is unsound for the following reasons: 1. The combined housing delivery rate of 300 dwellings per annum for Alconbury Weald, RAF Alconbury and Ermine Street is unrealistic and inconsistent with national evidence on delivery rates and examples elsewhere in Cambridgeshire. 2. There is still no evidence that RAF Alconbury is actually available for development during the plan period, and therefore it cannot be considered deliverable or developable. 3. The adjustments to housing delivery rates at the larger strategic allocations (Alconbury Weald, RAF Alconbury, Ermine Street and St Neots East) would mean that even less affordable housing will be delivered during the plan period; the approved developments at Alconbury Weald and St Neots East will not provide policy compliant levels of affordable housing, and prior approvals and small housing sites (other than rural exception sites) are not required to provide affordable housing. The impact of Main Modification MM1 (and MM15 and MM16) on the supply of affordable housing is acknowledged in the findings of the Sustainability Appraisal to be negative; separate representations are submitted on behalf of Hallam Land Management to the Sustainability Appraisal.

Family or Company Name: Homes England
Agent: AECOM (Carlisle, David)
PMM: MM1

Comment

Agent	David Carlisle (1098957)
Email Address	[REDACTED]
Company / Organisation	AECOM
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Claire Hupton (1095549)
Email Address	[REDACTED]
Company / Organisation	Homes Engalnd (formerly Homes and Communities Agency)
Address	* * *
Event Name	Proposed Main Modifications 2018
Comment by	Homes Engalnd (formerly Homes and Communities Agency) (Claire Hupton - 1095549)
Comment ID	PMM2018:76
Response Date	29/01/19 14:28
Consultation Point	Proposed Main Modification 1 (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Carlisle, AECOM for Homes England.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 **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.

RE: Huntingdonshire Local Plan to 2036: Proposed Modifications 2018 for Consultation On behalf of Homes England, the attached representations respond to all relevant main modifications pertaining to our client's landholding (Houghton Grange and the Field Site - part of allocation SI 1 St Ives West) and the wider St Ives Spatial Planning Area. Proposed Main Modification reference number: MM1; and MM9. Local Plan page: 32; and 61-62. Policy/paragraph: LP 2 Strategy for Development; and LP11 The Countryside. Homes England supports the insertion of the word 'recognise' before 'the intrinsic character and beauty of the countryside' in policy LP2 and in policy LP11 (clause b). 'Recognise' is preferable to 'protect' when read in combination with the detailed implementation guidance table that follows paragraph 4.84 (Built up Area definition). In addition, 'recognise' is internally consistent with the supporting text set out in paragraph 4.117. This modification makes the plan more effective in dealing with land that forms part of allocations in Spatial Planning Areas ('SPA') but which currently falls outside of the Built up Areas (as per the definition). The modifications in combination with the Built up Area implementation guidance table, permits development for limited and specific opportunities as provided for in other policies in the 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.

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.

[Carlisle, AECOM for Homes England.pdf](#)

Summary

Support Main Modification MM1. Insertion of the word 'recognise' is preferable when read in combination with the detailed implementation guidance table that follows paragraph 4.84 (Built up Area definition) and is internally consistent with the supporting text set out in paragraph 4.117.

29 January 2019

Annette Feeney
Local Plan Programme Officer, c/o
Huntingdonshire District Council,
Pathfinder House,
St Mary's Street,
Huntingdon,
PE29 3TN
Sent by Email

Dear Sir/Madam,

RE: Huntingdonshire Local Plan to 2036: Proposed Modifications 2018 for Consultation

On behalf of Homes England, the attached representations respond to all relevant main modifications pertaining to our client's landholding (Houghton Grange and the Field Site - part of allocation SI 1 St Ives West) and the wider St Ives Spatial Planning Area.

Yours sincerely,

David Carlisle
Associate Director
AECOM Limited, on behalf of Homes England


Proposed Main Modification reference number: MM1; and MM9.

Local Plan page: 32; and 61-62.

Policy/paragraph: LP 2 Strategy for Development; and LP11 The Countryside.

Homes England supports the insertion of the word 'recognise' before 'the intrinsic character and beauty of the countryside' in policy LP2 and in policy LP11 (clause b). 'Recognise' is preferable to 'protect' when read in combination with the detailed implementation guidance table that follows paragraph 4.84 (Built up Area definition). In addition, 'recognise' is internally consistent with the supporting text set out in paragraph 4.117. This modification makes the plan more effective in dealing with land that forms part of allocations in Spatial Planning Areas ('SPA') but which currently falls outside of the Built up Areas (as per the definition). The modifications in combination with the Built up Area implementation guidance table, permits development for limited and specific opportunities as provided for in other policies in the plan.

Proposed Main Modification reference number: MM28

Local Plan page: 205

Policy/paragraph: SI1 St Ives West paragraph 11.11

Homes England supports the removal of paragraph 11.1 from the supporting text, the deleted paragraph did not relate to any of the policy clauses within SI1. Policies LP22 and LP23 provide the policy framework for retail proposals outside of existing town centres.

Proposed Main Modification reference number: MM29; and MM5

Local Plan page: 209 – 210; and page 49.

Policy/paragraph: SI4 Former Car Showroom and paragraphs 11.20 to 11.28; and Figure 2 Key Diagram.

The removal of allocation SI4 (Former Car Showroom) from the Local Plan (MM29) leaves the St Ives SPA with only two recognised residential allocations in which to deliver circa 150 dwellings. The modification would result in an overall reduction of 50 units for the St Ives SPA to 430 units. The related modifications to Figure 2: Key Diagram (MM5) illustrate that proportionally the St Ives SPA is contributing very few new homes in comparison to the other SPAs and in light of the services available within the settlement. In this respect, Homes England disagrees with the conclusion of the 'Proposed Main Modifications 2018 Sustainability Appraisal' ('the SA') which does not explicitly address this 50 unit reduction in relation to the wider SPA and development strategy (p4): "*No change to the SA findings.*" However, the SA did find when assessing the removal of SI4 in isolation (MM29) that: "**The removal of the allocation reduces the certainty of housing provision within St Ives**".

Following the removal SI4 (Former Car Showroom), the Field site (SI 1) is St Ives principal allocation for major new housing growth. The SA reaffirms that (p87): "**This area [SI1] offers a sustainable opportunity for growing St Ives together with providing additional green infrastructure**".

Of the approximately 400 new homes allocated in SI 1 (St Ives West), planning permission is in place for 281 dwellings that make up the wider allocation. As such the Field site is the only available allocated parcel in the SPA that can make a meaningful contribution to meeting the District's housing needs over the coming plan period and is available now. The other much smaller allocation (SI 2) is contingent on alternative improved provision of pitches, whereas Homes England's land does not carry any such constraints or dependencies. This greater reliance on SI1, as a consequence of SI4's removal, intensifies the issues raised previously in Homes England's representations and hearing statements - namely the embargo on development placed on the entire eastern extent of the Field site. Homes England's view is that this makes the plan less effective and more inflexible.

The only options available to make the plan more effective at this stage of the examination would be to: (1) improve the clarity of SI1's supporting text and diagram; and (2) maintain St Ives SPA housing target at 480 units as submitted (with the 50 units from SI4 to be delivered on SI1). Critically, the

illustrative diagram that accompanies policy SI1 should either be deleted or altered (see overleaf) via minor modifications. Homes England's landscape appraisal and preliminary masterplanning exercise demonstrates that the site could comfortably provide for the 50 units lost as a result of SI4's removal and still remain in conformity with the Development Plan.

It is noted that it is outside the Inspector's remit to identify, or recommend changes to the Local Plan Policies Maps (namely the Proposals Map and Map 5). However, it is within the Inspector's gift (via the Inspector's Report) and Huntingdonshire District Council's ('HDC') remit (via the proposal of minor modifications) to help ensure the Development Plan remains internally consistent and provides clear guidance to both applicants and decision makers.

The SI1 illustrative diagram predetermines the masterplanning exercise required under SI1 (clause a) and LP14, making the plan internally inconsistent. With the removal of SI4 it is even more important that SI1 is not unnecessarily hampered by onerous supporting text or the current depiction of the illustrative diagram. Extant policy within the Houghton Wyton Neighbourhood Plan (Policy HWNP 3: Anti – Coalescence) in combination with SI1 (clause g) provides the statutory framework for informing future applications and the development management process for this site.

In the submitted Statement of Consultation (see p109-110 and p455-457), in respect of the Field Site, HDC state: 'detailed landscape negotiations' and 'further community involvement' are required. This flexibility is not reflected in policy SI 1's supporting text at present. In addition, the Local Plan was not amended following the detailed analysis provided by the Houghton and Wyton Neighbourhood Plan examiners. The two examiners both proposed modifications that removed references to a strategic gap on the Field Site and both resisted wording and maps that would place an 'embargo' on development for the Field Site. Yet the submitted SI 1 illustrative diagram *does* place an embargo on the eastern side of the site without any statutory policy hooks and contrary to the landscape evidence and SI (clause g) – this is unjustified.

How the plan can be made sound and the precise changes/wording that is being sought

MM5 should be altered and maintain the St Ives SPA housing target as 480 units (as submitted). The use of the word 'approximately' under SI1 (1) allows sufficient flexibility for the allocation to help achieve this plan period SPA target.

The plan would also benefit from minor modifications that would afford Homes England the flexibility to continue to explore development options for the most optimal use of the site, in compliance with the provisions of SI 1, LP2, LP11-LP14 and extant policy contained within the Houghton and Wyton Neighbourhood Plan (Policy HWNP3 Anti –coalescence). This will ensure the physical and visual separation of the Field Site and The Spires whilst still delivering much needed housing in St Ives. Placing an embargo on a large swathe of Homes England's landholding is not justified by the evidence (for the detailed reasons set out in our earlier Regulation 19 representations and Matter 8 Hearing Statement). Amending the illustrative diagram to provide greater flexibility would improve the effectiveness of the plan.

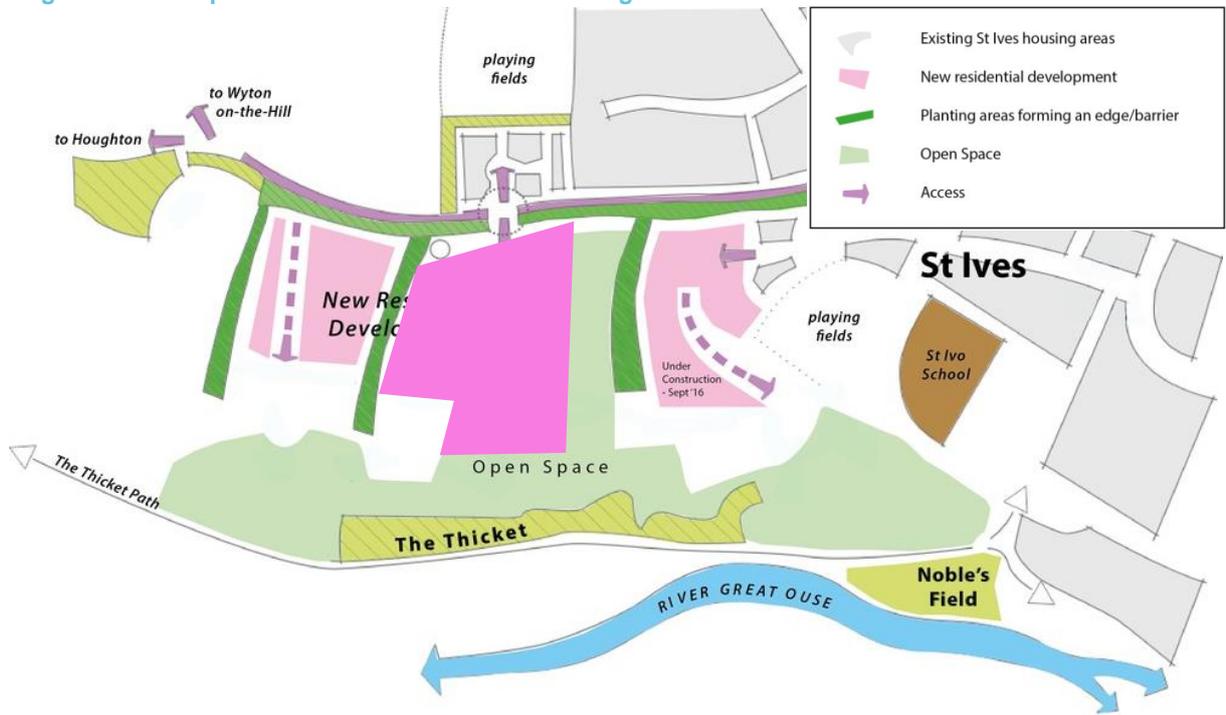
The following minor modifications to the supporting text are also recommended:

11.4 ...The indicative illustration ~~below~~ summarises ~~detailed urban design work setting out~~ how development of the area could take place. Detailed scheme designs shall be established via a masterplan and public consultation in accordance with policies SI 1 and LP 14.

11.9 ... A ~~substantial~~ band of greenspace should be retained through the portion of the ~~BBSRC field to the eastern of the derelict buildings extent of the Field site~~ and up to the western edge of residential development at 'The Spires'...

Finally, the illustrative diagram should be amended as follows (see overleaf – an enlarged 'New residential development' is proposed in compliance with SI1 clause g):

Figure 1 SI 1 Proposed amendment to Illustrated Diagram



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 2018
Comment by	Houghton & Wyton Parish Council (Miss Lois Dale - 836660)
Comment ID	PMM2018:29
Response Date	28/01/19 13:07
Consultation Point	Proposed Main Modification 1 (View)
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.

Houghton & Wyton Parish Council support the removal of this additional level of 'settlement'

Summary

Support Main Modification 1.

Family or Company Name: Larkfleet Homes
Agent: RPS Group (Ayres, Tom)
PMM: MM1

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 2018
Comment by	Larkfleet Homes (Larkfleet Homes Ltd - 34707)
Comment ID	PMM2018:75
Response Date	29/01/19 16:56
Consultation Point	Proposed Main Modification 1 (View)
Status	Processed
Submission Type	Email
Version	0.10
Files	Ayres, RPS for Larkfleet (Sibson).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
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? 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.

Note: The summary of the representation has been extracted and reproduced here, along with the recommended additional main modification. The full document is attached.

1.2 Summary of Representation

1.2.1 For the sake of brevity, the issues and matters put to the Examination are not wholly repeated here and are to be taken as duly made. Whilst commenting principally on the Modifications, Larkfleet wish to re-iterate their concerns as to the soundness and legal compliance of the Plan.

1.2.2 NPPF1 requires that to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy. The Main Modifications proposed do not give rise to a positively prepared or effective plan over its 25- year plan period.

Early Review of the Plan

1.2.3 The circumstances under which this Plan is being examined are unique. The Plan is being examined against NPPF1, but its effectiveness will be assessed against NPPF2. By planning for the minimum number of homes required (804dpa), the Plan has not been positively prepared, taking into account longer term requirements. This includes the accepted principle that housing need within Huntingdonshire and the wider region will increase significantly, through the onset of the government's local housing need assessment and the National Infrastructure Commission's finding that rates of housebuilding will need to double if the Cambridge-Milton Keynes-Oxford Arc, within which Huntingdonshire firmly sits, is to achieve its economic potential. The government has welcomed the NIC's finding that up to 1m homes will need to be built in the corridor by 2050. No allowance is made for this in the Plan. Other Authorities have prepared their plans with an early review mechanism built in to them in order commit to respond to these requirements at the earliest opportunity. If the Plan is to proceed to adoption, Huntingdonshire's Local Plan should do the same.

Insufficient Flexibility

1.2.4 The Plan and its Modifications are not sufficiently flexible to adapt to rapid change, as required by paragraph 14 of NPPF1. The housing requirement of 20,100 homes (804dpa) will almost immediately be insufficient to meet longer term requirements, with no committed mechanism to remedy this.

1.2.5 Our assertion is that the Plan, and indeed the main modifications as proposed, do not comply with paragraph 157 of the NPPF1 which states that: Crucially, Local Plans should, inter alia:

- Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- and
- Be drawn up over an appropriate timescale, preferably 15 years, take account of longer term requirements, and be kept up to date (our emphasis);

1.2.6 With regard to the delivery of housing, the ability to meet objectively assessed need with sufficient flexibility to adapt to rapid change is particularly important because the Plan's ability to maintain a five-year supply of housing will be assessed under the new definition of 'deliverable' as defined in the Glossary to NPPF2.

Five Year Land Supply Shortfall

1.2.7 Having reviewed the new trajectory within MM1, RPS would still regard this trajectory as unnecessarily reliant on unidentified sites (windfalls) and large sites that evidentially take a long time to come forward. The trajectory is consequently extremely ambitious, such that the Plan's five-year land supply position upon adoption would be very fragile, if exist at all. When judged against the new deliverability test in NPPF2, RPS do not regard there to be a five-year land supply at all.

1.2.8 Larkfleet

retain their objections to the Plan. In particular they consider there is a need for a third SEL to uplift the fragile housing land supply position and meet longer term housing requirements. However, if the Plan is to proceed to adoption, it is imperative that an appropriate early review mechanism is included within the Plan, through a new Main Modification Policy, that commits the Authority to undertaking a plan review within 4 years. The Inspector will be aware that such a mechanism has been agreed by the examining Inspectors for both the Cambridge and South Cambridgeshire Local Plans and for Plan: MK, to ensure that housing requirements, as reflected in the government's local housing need assessment and additional growth aspirations for the areas, are reflected in Local Plans at an early stage. 1.2.9 It is appropriate that these unique and transformational circumstances are appropriately planned for in Huntingdonshire's Plan. Wyton Airfield 1.2.10 Larkfleet object to the retention of the Note on Wyton Airfield within the Plan at para. 4.21 onwards, which has not been found to be deliverable, and in effect appears as a strategic reserve site by proxy. It is imperative, if an early review is to proceed fairly and taking into account all options, that this note is removed from the Plan, or if the Inspector is forcibly minded to do retain it, also include reserve sites that are demonstrably deliverable, such as Sibson Garden Village. Sustainability Appraisal 1.2.11 The Sustainability Appraisal has not been prepared in a systematic or transparent manner. Importantly, deficiencies in the Sustainability Appraisal process have prevented Larkfleet's site at Sibson Aerodrome from being given appropriate consideration as a reasonable alternative site. Sibson is a suitable, available and achievable site and has previously been supported by Huntingdonshire as an Authority. It is supported by a raft of technical evidence including a deliverable highway access solution at Appendix 3. 1.2.12 The decision not to consider Sibson as a reasonable alternative to the eventual distribution of growth strategy is considered both erroneous and unjustified. The Main Modifications do not address this fundamental concern as to the legal compliance of the Plan. 2.3.22 We recommend that, if the Inspector is minded to recommend adoption of the Plan, a new main modification is included as follows: The Council commits to undertaking an early review of the Huntingdonshire Local Plan with the submission of a draft plan for examination, containing strategic policies for the long-term growth of Huntingdonshire, no later than January 2023. The early review will establish a long-term housing need requirement based on the government's local housing need assessment and will bring the delivery of long-term requirement for transformational growth into a statutory planning policy document. The parameters and format of the review will also reflect Huntingdonshire's location within government's wider Cambridge-Milton Keynes-Oxford Growth Arc, in the context of any potential growth deal as well as any associated national infrastructure projects and the corridor wide Joint Vision Statement anticipated in Spring/Summer 2019. The review will also develop and formalise, as appropriate, joint working arrangements with neighbouring authorities within the Peterborough Cambridgeshire Combined Authority Area, which may result in the preparation of a joint strategic plan on a wider geography. If the review of the Huntingdonshire Local Plan is not submitted for examination by January 2022, the Council commits to either a) bringing forward a reserve site allocation b) working proactively with the promoters of sites which will help to deliver the Council and government's longer-term growth ambitions. 2.3.23 In addition to the above additional modification, it is clear that Wyton Airfield is not a deliverable site at this time and cannot be included as a positive allocation in the Plan. As a result, it is inappropriate to include the Note on Wyton Airfield in the Local Plan (at para 4.21 onwards). This not only unfairly prejudices the ability of other sites to come forward but appears as a *fait accompli* for Wyton without the Council having been through the process of examining and assessing potential sites as part of the early review process. It is by proxy applying reserve site status to Wyton without any evidence to support this or thorough testing of other appropriate locations for reserve sites. 2.3.24 Larkfleet do not support this principle, however, if the Inspector is forcibly minded to retain a note on potential reserve sites, it is important that other alternatives are also considered.

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?

2.3.22 We recommend that, if the Inspector is minded to recommend adoption of the Plan, a new main modification is included as follows:

The Council commits to undertaking an early review of the Huntingdonshire Local Plan with the submission of a draft plan for examination, containing strategic policies for the long-term growth of Huntingdonshire, no later than January 2023.

The early review will establish a long-term housing need requirement based on the government's local housing need assessment and will bring the delivery of long-term requirement for transformational growth into a statutory planning policy document.

The parameters and format of the review will also reflect Huntingdonshire's location within government's wider Cambridge-Milton Keynes-Oxford Growth Arc, in the context of any potential growth deal as well as any associated national infrastructure projects and the corridor wide Joint Vision Statement anticipated in Spring/Summer 2019.

The review will also develop and formalise, as appropriate, joint working arrangements with neighbouring authorities within the Peterborough Cambridgeshire Combined Authority Area, which may result in the preparation of a joint strategic plan on a wider geography.

If the review of the Huntingdonshire Local Plan is not submitted for examination by January 2022, the Council commits to either a) bringing forward a reserve site allocation b) working proactively with the promoters of sites which will help to deliver the Council and government's longer-term growth ambitions.

2.3.23 In addition to the above additional modification, it is clear that Wyton Airfield is not a deliverable site at this time and cannot be included as a positive allocation in the Plan. As a result, **it is inappropriate to include the Note on Wyton Airfield in the Local Plan (at para 4.21 onwards).** This not only unfairly prejudices the ability of other sites to come forward but appears as a fait accompli for Wyton without the Council having been through the process of examining and assessing potential sites as part of the early review process. **It is by proxy applying reserve site status to Wyton without any evidence to support this or thorough testing of other appropriate locations for reserve sites.**

Larkfleet do not support this principle, however, if the Inspector is forcibly minded to retain a note on potential reserve sites, it is important that other alternatives are also considered.

Summary

Objection based on the plan not being effective over its lifetime, having insufficient flexibility in its housing supply and the housing trajectory being unnecessarily reliant on windfalls and large sites. An additional main modification is advocated requiring an early review early review. Removal is sought of any reference to Wyton airfield or comparable addition of Sibson garden village as a reserve site. Continuing concerns expressed over the sustainability appraisal undertaken regarding consideration of reasonable alternatives.

HUNTINGDONSHIRE LOCAL PLAN TO 2036: MAIN MODIFICATIONS 2018 CONSULTATION

RPS for Larkfleet Homes

Sibson
Huntingdonshire Local Plan
To 2036: Main Modifications
2018 Consultation

29 January 2019

REPORT

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Date
1	Representation	Tom Ayres	Paul Hill	Paul Hill	January 2019

Approval for issue

Reviewed by Tamsin McSmith Date. 29 Jan 2019

Authorised by: Cameron Austin-Fell Date. 29 Jan 2019

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Prepared by:

Prepared for:

RPS

Larkfleet Homes

Tom Ayres MRTPI
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321 Bradford Street
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1 INTRODUCTION

1.1 Status of Main Modifications

- 1.1.1 These representations are submitted to the Huntingdonshire Local Plan Main Modifications consultation process. They are submitted by RPS on behalf of Larkfleet Homes. Larkfleet have several land interests in Huntingdonshire, the main one being the omission site of the proposed Garden Village at Sibson Aerodrome.
- 1.1.2 As the Inspector is aware, Larkfleet have participated throughout the Examination process, objecting to the Plan's distribution strategy, its under-assessment of the housing need requirement and the delivery rates attributed to its large draft allocation sites.
- 1.1.3 Larkfleet have also registered, through both RPS representations and legal opinion provided by No5 Chambers, their very real concerns regarding the Sustainability Appraisal and its compliance with both statute and national planning practice guidance.
- 1.1.4 This representation principally relates to MM1 and the proposed amendments to Policy LP2 Strategy for Development, including its associated explanatory text. It also relates to the accompanying Proposed Modifications 2018 Sustainability Appraisal.
- 1.1.5 Whilst the Inspector indicated a number of Main Modifications required for soundness in his note published 14 November 2018 and which now form the basis for this Main Modifications consultation, the Examination is yet to be concluded and the Inspector's final report is yet to be published. Therefore, all comments made by the Inspector are understood to be without prejudice to his final conclusions on the Plan.

1.2 Summary of Representation

- 1.2.1 For the sake of brevity, the issues and matters put to the Examination are not wholly repeated here and are to be taken as duly made. Whilst commenting principally on the Modifications, Larkfleet wish to re-iterate their concerns as to the soundness and legal compliance of the Plan.
- 1.2.2 NPPF1 requires that to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy. The Main Modifications proposed do not give rise to a positively prepared or effective plan over its 25- year plan period.

Early Review of the Plan

- 1.2.3 The circumstances under which this Plan is being examined are unique. The Plan is being examined against NPPF1, but its effectiveness will be assessed against NPPF2. By planning for the minimum number of homes required (804dpa), the Plan has not been positively prepared, taking into account longer term requirements. This includes the accepted principle that housing need within Huntingdonshire and the wider region will increase significantly, through the onset of the government's local housing need assessment and the National Infrastructure Commission's

finding¹ that rates of housebuilding will need to double if the Cambridge-Milton Keynes-Oxford Arc, within which Huntingdonshire firmly sits, is to achieve its economic potential. The government has welcomed the NIC’s finding that up to 1m homes will need to be built in the corridor by 2050. No allowance is made for this in the Plan. Other Authorities have prepared their plans with an early review mechanism built in to them in order to commit to respond to these requirements at the earliest opportunity. If the Plan is to proceed to adoption, Huntingdonshire’s Local Plan should do the same.

Insufficient Flexibility

1.2.4 The Plan and its Modifications are not sufficiently flexible to adapt to rapid change, as required by paragraph 14 of NPPF1. The housing requirement of 20,100 homes (804dpa) will almost immediately be insufficient to meet longer term requirements, with no committed mechanism to remedy this.

1.2.5 Our assertion is that the Plan, and indeed the main modifications as proposed, do not comply with paragraph 157 of the NPPF1 which states that:

Crucially, Local Plans should, inter alia:

- *Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework; and*
- *Be drawn up over an appropriate timescale, preferably 15 years, take account of longer-term requirements, and be kept up to date (our emphasis);*

1.2.6 With regard to the delivery of housing, the ability to meet objectively assessed need with sufficient flexibility to adapt to rapid change is particularly important because the Plan’s ability to maintain a five-year supply of housing will be assessed under the new definition of ‘deliverable’ as defined in the Glossary to NPPF2.

Five Year Land Supply Shortfall

1.2.7 Having reviewed the new trajectory within MM1, RPS would still regard this trajectory as unnecessarily reliant on unidentified sites (windfalls) and large sites that evidentially take a long time to come forward. The trajectory is consequently extremely ambitious, such that the Plan’s five-year land supply position upon adoption would be very fragile, if exist at all. When judged against the new deliverability test in NPPF2, RPS do not regard there to be a five-year land supply at all.

1.2.8 Larkfleet retain their objections to the Plan. In particular they consider there is a need for a third SEL to uplift the fragile housing land supply position and meet longer term housing requirements. However, if the Plan is to proceed to adoption, it is imperative that an appropriate early review mechanism is included within the Plan, through a new Main Modification Policy, that commits the Authority to undertaking a plan review within 4 years. The Inspector will be aware that such a mechanism has been agreed by the examining Inspectors for both the Cambridge and South

¹ ‘Partnering for Prosperity: a new deal for the Cambridge – Milton Keynes – Oxford Arc’, National Infrastructure Commission, November 2017

Cambridgeshire Local Plans and for Plan: MK, to ensure that housing requirements, as reflected in the government's local housing need assessment and additional growth aspirations for the areas, are reflected in Local Plans at an early stage.

- 1.2.9 It is appropriate that these unique and transformational circumstances are appropriately planned for in Huntingdonshire's Plan.

Wyton Airfield

- 1.2.10 Larkfleet object to the retention of the Note on Wyton Airfield within the Plan at para. 4.21 onwards, which has not been found to be deliverable, and in effect appears as a strategic reserve site by proxy. It is imperative, if an early review is to proceed fairly and taking into account all options, that this note is removed from the Plan, or if the Inspector is forcibly minded to do retain it, also include reserve sites that are demonstrably deliverable, such as Sibson Garden Village.

Sustainability Appraisal

- 1.2.11 The Sustainability Appraisal has not been prepared in a systematic or transparent manner. Importantly, deficiencies in the Sustainability Appraisal process have prevented Larkfleet's site at Sibson Aerodrome from being given appropriate consideration as a reasonable alternative site. Sibson is a suitable, available and achievable site and has previously been supported by Huntingdonshire as an Authority. It is supported by a raft of technical evidence including a deliverable highway access solution at **Appendix 3**.
- 1.2.12 The decision not to consider Sibson as a reasonable alternative to the eventual distribution of growth strategy is considered both erroneous and unjustified. The Main Modifications do not address this fundamental concern as to the legal compliance of the Plan.

2 MODIFICATION MM1 (STRATEGY AND HOUSING DELIVERY)

2.1 Housing Delivery

2.1.1 MM1 relates to Policy LP2 Strategy for Development and includes a new Summary Housing Trajectory. The Inspector’s note on the housing trajectory, published 14 November 2018, agrees with many respondents’ views during the Examination hearings that the Council’s delivery estimates for the Strategic Expansion Location (SELs) and major draft allocation sites were overly optimistic. Accordingly, the new trajectory has limited total annual completions from SEL1.1, SEL1.2 and HU1 to a maximum of 300 and from both parts of SEL2 to 200, meaning they will not be fully deliverable within the remaining plan period. Other proposed allocations have also been removed from the supply trajectory.

2.1.2 The revised supply trajectory is shown below:

	2018/ 19	2019/ 20	2020 /21	2021 /22	2022/ 23	2023/ 24	2024/ 25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31	2031 /32	2032 /33	2033 /34	2034 /35	2035 /36	Total 2018- 36
Sites with planning permission (PP) as at 31 March 2017* (excluding those allocated in Plan)	329	153	104	19															605
All sites allocated in Plan (with PP, subject to S106 and without PP)	727	1,085	1,326	1,409	1,304	1,133	812	710	538	520	500	500	515	515	500	500	500	500	13,594
Prior approvals	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	360
Additional sites of 10 or more dwellings with PP/subject to S106 since March 2017				48	50	75	75	75	40										363
Windfall small sites (less than 10 dwellings)				80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	1,200
Rural exception sites				35	35	35	35	35	35	35	35	35	35	35	35	35	35	35	525
Total	1,076	1,258	1,450	1,611	1,489	1,343	1,022	920	713	655	635	635	650	650	635	635	635	635	16,647
				7,151															

* including 10% discount of all small sites where not started.

Total supply in plan period	
Completions 2011/12-2017/18	4,421
Supply 2018/19-2035/36	16,647
Total supply 2011-2036	21,068

2.1.3 The revised trajectory indicates a total supply figure of 21,068 dwellings (16,647 over the remaining plan period) against a (disputed) housing requirement of 20,100 (804dpa). This comprises a supply buffer of just 968 dwellings or 104.8% supply against the requirement. Moreover, when unidentified supply (windfalls) is discounted, the supply figure falls to 18,378, comprising 4,421 completions and 13,957 (13,594 + 363) allocations or additional permissions. The Plan therefore has an identifiable supply comprising just 91.4% of the housing requirement.

2.1.4 **Appendix 1** contains analysis by SPRU. This identifies that the delivery rates within the revised trajectory remain unrealistic. The maximum delivery rate assumed for SEL1.1, SEL1.2 and HU1 combined of 300dpa and for SEL2 of 200dpa is actually being applied as an average that is expected to be sustained for the remainder of the Plan period from 2022 onwards. This would represent unprecedented rates of delivery when viewed against historical rates of supply both locally or nationally. SPRU calculate, assuming reasonable rates of delivery, that there exists a **demonstrable Plan period supply of just 14,604 dwellings**, before windfalls are discounted.

- 2.1.5 RPS has previously made representations at Reg19 stage and within its Matter 3 Statement that the Plan has an over reliance on only two strategic expansion sites in concentrated market locations, the effect of which will be elongated delivery rates and stifled supply. The revised trajectory is clearly reliant on large locational sites delivering at the maximum level over a sustained period but is also reliant on windfall sites, rural exceptions and prior approvals to meet its overall housing requirement. As a result, the MM poses significant risk and uncertainty associated with projected rates of housing delivery, particularly within the first five years following adoption. It is therefore fundamental to the soundness of the Plan that further flexibility is embedded to ensure the housing requirement is delivered in full, over the plan period. MM1 does not provide for this.
- 2.1.6 Paragraph 47 of NPPF1 requires local planning authorities to boost significantly the supply of housing and identify a supply of specific developable sites, where possible, between years 6 and 15. Windfalls do not constitute specific developable sites. The Council have not identified any small sites under 10 dwellings (other than those already allocated in the Plan) within its Brownfield Register that could constitute reliable windfalls. As such, there is no compelling evidence, as per the requirement of paragraph 48 of the NPPF1, that windfall sites under 10 dwellings will be a reliable source of supply. Equally, there is no compelling evidence to support the reliance on 20 prior approvals being delivered per year and 35 rural exceptions per year over the remainder of the Plan period. Prior approvals in the district have been reducing steadily since 2015 and the Council's evidence within Exam 41 indicates there have only been 52 affordable dwellings completed on rural exception sites in the 3 years from 2015/2016. With increased affordable housing set to come forward through allocations, it is logical to think rural exceptions will reduce rather than increase.
- 2.1.7 The Council are in contravention of paragraph 47 of the Framework, not only by failing to boost the supply of housing, but by relying on windfalls and other unidentified sources of supply within years 6-15, where it is not necessary to do so. There are a number of alternative identifiable sites, including the site at Sibson Garden Village, which are demonstrably deliverable within years 6-15 and which would serve to significantly boost the supply of housing.
- 2.1.8 Paragraph 14 of NPPF1 requires Local Plans to meet their OAN with sufficient flexibility to adapt to rapid change and paragraph 47 requires plans to plan positively and take into account longer term requirements. A buffer of 4.8% that is reliant on just two SELs to deliver most of the housing and is also reliant on unidentified sources of supply is not considered to constitute sufficient flexibility, nor is it planning positively or taking account of longer-term requirements.
- 2.1.9 The trajectory within MM1 indicates that within the 15-year time horizon following adoption, supply starts to fall dramatically after the first five years. This is because the Plan fails to provide sufficient flexibility, such as by allocating a further large-scale strategic development site that would make allowances for longer term requirements.
- 2.1.10 SPRU (Appendix 1) indicate that one implication of failing to plan positively is that there is an inability of the Plan to cope if as expected there is a delay in some sites coming forward. Tellingly, additional provision from the two SEL locations, i.e. from another outlet, is unlikely to occur due to the marketability / saturation of a single location. To illustrate the issue, even if one was to

apply the national average rate of 171dpa² from each of the SEL sites, without slippage, the overall delivery would reduce by some 2,370 dwellings and so would not deliver the selected housing requirement.

2.2 Five Year Supply

2.2.1 MM1 includes a new trajectory which significantly reduces the level of housing supply that would come forward in the first five years following adoption of the Plan. Using the new trajectory and applying the Council's 5yls methodology as contained in Exam26, the following 5yls positions are evident. Two are provided, based on either a 2018/19 5yls base date and a 2019/20 5yls base date. The 2018/19 base date is considered by RPS to be the appropriate base date given that completions are referenced at 4,421 in MM1 as up to 2017/18 and 2018/19 completion data is unknown and unlikely to be available until July 2019.

2018/19 five-year supply base date	Local Plan Target	2019/20 five-year supply base date	Local Plan Target
Start	01/04/2011	Start	01/04/2011
End	31/03/2036	End	31/03/2036
Number of Years	25	Number of Years	25
Number of Years remaining in DP	18	Number of Years remaining in DP	17
Dwelling Target	20100	Dwelling Target	20100
Target 2011-2018	5628	Target 2011-2018	6432
Annualised target	804	Annualised target	804
Completions since plan start date	4421	Completions since plan start date	5497
Shortfall on target 2011-2018	1147	Shortfall on target 2011-2018	935
5 year target + shortfall	5167	5 year target + shortfall	4995
5 year target + shortfall x 20%	6200	5 year target + shortfall x 20%	5994
Annual equivalent of target + shortfall x 20%	1240	Annual equivalent of target + shortfall x 20%	1198
5 year supply (2018/19-2022/23)	6884	5 year supply 2019/20-2023/24)	7151
% achievable supply	111%	% achievable supply	119%
Equivalent years of supply	5.55	Equivalent years of supply	5.97

2.2.2 It is evident that the new trajectory within MM1 has significantly worsened the Plan's 5yls position such that it is considerably more fragile than the 6.44 years presented by the Council within Exam26. This used a 2019/20 5yls base date and assumed a supply of 7,552 dwellings over the five years, excluding windfalls.

2.2.3 If one was to follow this approach and exclude windfalls now, as the evidence above indicates, albeit allowing for known windfalls with planning permission, the 5yls figure reduces to 6,554,

² NLP Start to Finish: How Quickly do Large Sites Deliver, November 2016

(5.28 years) using a base date of 2018/19 or 6,706 (5.6 years) using a base date of 2019/20. Using this approach, the fragility of the Plan’s supply becomes ever more apparent.

Five-year supply minus unidentified windfall allowance

2018/19 five-year supply base date	Local Plan Target	2019/20 five-year supply base date	Local Plan Target
Start	01/04/2011	Start	01/04/2011
End	31/03/2036	End	31/03/2036
5 year supply (2018/19-2022/23)	6554	5 year supply 2019/20-2023/24)	6706
% achievable supply	105.7%	% achievable supply	112%
	5.28	Equivalent years of target + shortfall + 20%	5.6

2.2.4 Whilst the Inspector needs to assess the Local Plan under NPPF1, given the fragility of the supply, the scale of the supply must be a consideration, when considering the need for additional flexibility, to ensure when the plan and 5yIs is subsequently tested against the revised definition of deliverability in NPPF2, it can still maintain a 5yIs. This is relevant in the context under NPPF2, the Plan will now only be considered recently adopted³, and therefore free from 5yIs challenge, until 31 October 2019 if adopted before 30 April 2019 or until 31 October 2020 if adopted between 01 May and 31 October 2019.

2.2.5 Annex 2 of NPPF2 now importantly states that “sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”.

2.2.6 RPS has compared the trajectory within MM1 with the trajectory as appears in Exam 26, which is accepted as the starting point. It is evident that, whilst no details of assumptions made about individual sites are provided within the revised trajectory, high completion rates are still assumed within the first five years of the plan.

SEL1.1, 1.2 and HU1

2.2.7 Particularly concerning is the continued assumption that Alconbury Weald (SEL1.1) alone will deliver over 200 and up to 260 homes a year consistently over the five-year period, prior to SEL1.2 and HU1 starting to deliver. There is no basis for assuming this rate of delivery.

2.2.8 With regards to HU1, it is noted that this site is projected to deliver 130 dwellings per year in 2022/23 and 2023/24, and therefore is regarded as deliverable within the 5 years. Given the protracted history of the site and clear acknowledged technical constraints, clear evidence does not exist to assume this site should be deliverable within the five years under NPPF2.

2.2.9 If one was discount HU1 and apply national average delivery rates of 171dpa consistently over the five years to SEL1.1 as indicated in the Lichfield Report Start to Finish, itself optimistic based on the need for further reserved matters applications, the level of supply over the five years 2018/19-2022/23 would fall by 422 homes and 2019/20-2023/24 by 515 homes. This assumes the new trajectory applies a maximum delivery rate of 300dpa as indicated in MM1.

³ NPPF2, page 21, footnote 38.

SEL2

- 2.2.10 It is noted that MM1 seeks to limit delivery from SEL2 to a maximum of 200dpa. Again, this seems unrealistic based on previous rates of delivery locally (Loves Farm) and average national delivery rates. As concerning is that SEL2 remains expected to begin delivering homes in 2019/20, despite no reserved matters consent being in place. We know that lead in times for large sites are considerably longer than is anticipated within the Council’s supply trajectory. For sites over 2,000 homes, average lead in times are 7 years⁴. If one was to reasonably assume that delivery as indicated of 65 homes in the first year occurred in 2020/21 and thereafter 171dpa over the combined site between 2021/22- 2023/24, this would result in a reduction in supply of 258 dwellings for 2018/19-2022/23 five-year period and 287 dwellings for the 2019/20-2023/24 five-year period.
- 2.2.11 Even before interrogating the remaining supply against the new definition of deliverable, it is evident that the revised trajectory is extremely vulnerable taking into account reasoned evidence regarding expected supply / national delivery rates and the new definition of deliverable. Indeed, the total reduction in supply over the five years would be 680 or 802 dwellings depending on which base date for the five-year supply calculation you used.
- 2.2.12 The table below indicates that a five-year supply can’t be demonstrated where the above is applied and removing any allowance for unidentified windfalls.

RPS Five Year Supply

2018/19 five-year supply base date	Local Plan Target	2019/20 five-year supply base date	Local Plan Target
Start	01/04/2011	Start	01/04/2011
End	31/03/2036	End	31/03/2036
5 year supply (2018/19-2022/23)	5874	5 year supply 2019/20-2023/24)	5904
% achievable supply	94.7	% achievable supply	95.2%
	4.74	Equivalent years of target + shortfall + 20%	4.93

2.3 Planning Positively for Housing Need

- 2.3.1 It is evident from the supply analysis undertaken above and by SPRU in Appendix 1 that MM1 will result in insufficient flexibility to ensure the housing requirement is delivered in full over the plan period. The situation becomes ever more critical when housing need is considered. It is appropriate in a plan led system, that any shortfall or allowance for future housing needs is addressed through the plan making process.
- 2.3.2 Paragraph 46 of the government’s consultation document ‘Planning for the Right Homes in the Right Places’ (2017) stated:
“We want to make sure that we give proper support to those ambitious authorities who want to deliver more homes”.

⁴ NLP Start to Finish: How Quickly do Large Sites Deliver, November 2016

- 2.3.3 This reflects the government's expectation, now enshrined within paragraph 11 of NPPF2, that local planning authorities should provide for objectively assessed needs as a minimum, and that support will be given to those that want to go further to boost the supply of housing, in accordance with NPPF1.
- 2.3.4 This is relevant in the context of paragraph 47 of NPPF1, which states:
“Crucially, Local Plans should, inter alia:
Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework; and
Be drawn up over an appropriate timescale, preferably 15 years, take account of longer-term requirements, and be kept up to date (our emphasis);”
- 2.3.5 Paragraph 21 of NPPF1 highlights the impact of lack of housing on the economy and states that:
“Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;”
- 2.3.6 As it stands, MM1 will result in the Plan being unable to meet even its most minimum housing requirement within the Plan period. This represents a failure of ambition to plan positively to boost the supply of housing, in accordance with national policy. In terms of taking into account longer term requirements in accordance with paragraph 47, there are a number of critical factors which Modifications to the Plan should take account of in order to ensure an effective, positively prepared document.

Local Housing Need

- 2.3.7 As has been indicated throughout our representation, and reiterated within the SPRU paper at Appendix 1, the housing requirement being taken forward is a significant under-estimation of housing need. In Huntingdonshire’s case, the standard methodology produces a requirement of 993dpa or 28,435 dwellings in total.
- 2.3.8 Furthermore, the methodology as it stands will only result in plans making provision for 266,000dpa compared to the governments objective of 300,000dpa. As a result, it is extremely unlikely given the government’s continued commitment to the 300,000 figure, that any reworking of the method will result in a reduction in the overall requirement figure or for Huntingdonshire itself.
- 2.3.9 Of course, the Plan must be considered under NPPF1, but this doesn’t remove the obligation to plan positively and take account of longer-term requirements. The Plan fails to acknowledge an increased future housing requirement, in fact, it seeks to achieve just barely enough even against a minimum housing requirement figure. Plans must be sufficiently flexible to adapt to rapid change. Even when assessed against its minimum housing requirement figure it is currently incapable of providing sufficient flexibility to render it NPPF1 compliant. It is even more important in the context of an increased future need, that this requirement is met robustly.
- 2.3.10 The vulnerability of the Plan in respect of its ability to adapt to changing economic circumstances (NPPF1 para.21) is detailed in SPRU’s analysis at Appendix 1, para.1.22. It is evident in particularly that the housing requirement figure of 804dpa fails to take into account any of the market indicators for projected employment growth such that there is a serious mismatch between anticipated employment growth and the level of housing need being planned for.

The Cambridge–Milton Keynes–Oxford Corridor

- 2.3.11 Huntingdonshire is an important constituent of the Oxford Cambridge Arc. It is the government’s stated ambition to build up to 1 million high quality homes by 2050 to maximise the economic growth of the Arc⁵. This will require “*a step change in housing delivery’ including engagement on how this can be accommodated through vibrant new and expanded settlements.*”
- 2.3.12 The National Infrastructure Commission (NIC) Report ‘Partnering for Prosperity’ November 2017 was clear that the continued success of the Arc is not guaranteed. It states that:
‘without swift and determined action to overcome the area’s housing crisis, it will fall behind its international competitors and fail to attract and retain the talent and skills it needs
Commitment to providing new strategic infrastructure must be matched with ambition and commitment at a local level to deliver major housing growth and create places in which people want, and can afford, to live and work.’
- 2.3.13 The NIC’s central finding within its 2017 report is that rates of house building will need to double if the arc is to achieve its economic potential. It explains that it is unlikely that this level or quality of development can be delivered if growth is focused exclusively on the fringes of existing towns and cities. Government and local authorities will need to plan for, and work with investors, developers and housebuilders to deliver large new settlements and major urban extensions.
- 2.3.14 In addition to this, the Housing Minister Kit Malthouse wrote to Huntingdonshire⁶ and the other Authorities within the Arc stating that realising this ambition will require additional action from central and local partners. The letter invited local authorities to bring forward ambitious proposals for transformational housing growth, including new settlements, calling for swift action.
- 2.3.15 It is of course appropriate that the planning system should be genuinely plan led. Plans should be prepared positively, taking account of longer-term requirements.
- 2.3.16 In this instance the modifications to the Plan fail to give any regard to impending transformational growth within both Huntingdonshire and the wider region. By planning for a minimum level of housing need, the Plan fails to look forward at all and is liable to immediate pressure from five-year land supply challenge which could give rise to unwanted development.
- 2.3.17 No regard is given to the implications of the Oxford Cambridge Arc. Not only does this appear to ignore the recommendations of the NIC for collective joint working to prepare sub-regional spatial strategies, including formulating the Cambridge and Peterborough Combined Authority Spatial Plan, it is also at odds with the approach of other Authorities within the Arc, many of whom have made appropriate provisions within their Plans for the future growth needs associated. This includes Plan MK and Vale of Aylesbury Local Plan.

⁵ Government response to ‘Partnering for Prosperity: a new deal for the Cambridge-Milton Keynes–Oxford Arc’

⁶ Kit Malthouse Letter Delivering ambitious housing growth in the Cambridge–Milton Keynes–Oxford Corridor dated 26 July 2018

Early Review of the Plan

- 2.3.18 There remain uncertainties about the level of housing need required in Huntingdonshire going forward however the direction of travel is clear that significant housing growth will be required if the government is to achieve its target of 300,000 homes per annum and 1 million homes in the region by 2050.
- 2.3.19 There is a clear fragility to the Plan as a result of the reduction in housing supply arising from MM1, and Larkfleet have genuine concerns that the Plan can achieve its planned delivery rates to meet its housing requirement and provide a five-year supply of housing land. Larkfleet consider that the plan is currently unsound in that it is not positively prepared or effective.
- 2.3.20 If the Inspector is minded to recommend adoption of the Plan, it is considered imperative that to address the fragility of the Plan and address uncertainties regarding longer term housing needs that **an additional main modification committing the Council to an early review of the Plan** is included. The Inspector will be aware that such a mechanism is proposed for inclusion within Plan: MK in recognition of the Oxford Cambridge Growth Arc and to reflect and enable the level of growth foreseen. An early review is also a commitment of the Cambridge City and South Cambridgeshire Local Plans, a view that was taken as the pragmatic approach to addressing uncertainties regarding the housing requirement, as is equally the case in Huntingdonshire. According to the Inspectors Report into the Cambridge City Plan, such a review should be taken *'in the context of the approach to local housing need assessment in the revised NPPF* (para.33).
- 2.3.21 It is entirely reasonable that Huntingdonshire could work with the Combined Authority for Cambridgeshire and Peterborough to establish a growth strategy for the region that could inform an early review of the Plan. The principle of an early review has been addressed by the Inspector examining the Vale of Aylesbury Local Plan with the comment that an early review must be read in the context of the statutory requirement for a review every five years (Appendix 2: VALP Examination Discussion Document D5, para.20). Therefore, such a review mechanism, as included within Huntingdonshire's Plan should reflect a maximum 4-year timescale with a draft submission for examination by January 2023 and the option to include a contingency if a draft plan is not submitted within this timescale. Such a contingency could take the form of a reserve site allocation.
- 2.3.22 We recommend that, if the Inspector is minded to recommend adoption of the Plan, a new main modification is included as follows:

The Council commits to undertaking an early review of the Huntingdonshire Local Plan with the submission of a draft plan for examination, containing strategic policies for the long-term growth of Huntingdonshire, no later than January 2023.

The early review will establish a long-term housing need requirement based on the government's local housing need assessment and will bring the delivery of long-term requirement for transformational growth into a statutory planning policy document.

The parameters and format of the review will also reflect Huntingdonshire's location within government's wider Cambridge-Milton Keynes-Oxford Growth Arc, in the context of any potential growth deal as well as any associated national infrastructure projects and the corridor wide Joint Vision Statement anticipated in Spring/Summer 2019.

The review will also develop and formalise, as appropriate, joint working arrangements with neighbouring authorities within the Peterborough Cambridgeshire Combined Authority Area, which may result in the preparation of a joint strategic plan on a wider geography.

If the review of the Huntingdonshire Local Plan is not submitted for examination by January 2022, the Council commits to either a) bringing forward a reserve site allocation b) working proactively with the promoters of sites which will help to deliver the Council and government's longer-term growth ambitions.

2.3.23 In addition to the above additional modification, it is clear that Wyton Airfield is not a deliverable site at this time and cannot be included as a positive allocation in the Plan. As a result, **it is inappropriate to include the Note on Wyton Airfield in the Local Plan (at para 4.21 onwards)**. This not only unfairly prejudices the ability of other sites to come forward but appears as a fait accompli for Wyton without the Council having been through the process of examining and assessing potential sites as part of the early review process. **It is by proxy applying reserve site status to Wyton without any evidence to support this or thorough testing of other appropriate locations for reserve sites.**

2.3.24 Larkfleet do not support this principle, however, if the Inspector is forcibly minded to retain a note on potential reserve sites, it is important that other alternatives are also considered.

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.

Sibson as a Reasonable Alternative

- 2.3.29 Despite supporting Sibson as a potential Garden Village through an Expression of Interest to the government’s garden village prospectus in 2016, the Council revealed within EXAM3 – SAEN that they did not consider Sibson to be a reasonable alternative. Legal representations made by Chris Young QC at a subsequent Sustainability Appraisal hearing session on 26 September opined that this was Wednesbury Unreasonable.
- 2.3.30 Indeed, it is difficult to see how Sibson cannot feature as a reasonable alternative to meet the growth requirements of the Plan. The Council in its SAEN point to *‘insufficient evidence on the viability and achievability of the infrastructure required to support the development, particularly the new junction onto the A1 to provide access to the site’*, albeit they provide no evidence to discount the *‘substantial supporting information’* that they acknowledge was submitted and accompanies the Sibson submission and representation. Their assessment that Sibson is not a reasonable alternative is also contrary to their own HELAA (December 2017 at page 10-13) which was generally positive about the site and within which whilst acknowledging a Transport Assessment would be required to deliver safe appropriate access can be provided, still registered the site as suitable, available and achievable.
- 2.3.31 In reality the evidence of Sibson as a reasonable alternative is regarded as undeniable when compared with other sites either included within the Plan or held in reserve proxy (Wyton). The garden village bid was accompanied by a full cost plan that demonstrated viability of the scheme and there is no evidence to demonstrate, as is suggested by the Council’s SAEN, that access can’t be achieved from the A1. In contrast, a deliverable all movements access solution onto has been devised with Highways England and is included within **Appendix 3** to demonstrate deliverability.
- 2.3.32 In reality, Sibson is ideally placed to deliver on the District’s housing and infrastructure requirements, both now and going forward. It is a site commended by the government, in single ownership and will directly address some of the key challenges in Huntingdonshire / Cambridgeshire by:
- Delivering a truly sustainable large-scale new garden settlement;
 - Improving key transport infrastructure and delivering genuine travel choice for a new community;
 - Delivering a significant proportion of the District’s housing need either now or in the future;
 - Providing a for a range of housing, including those needed for older people;
 - Making a substantial commitment to delivering high levels of housing that is truly affordable;
 - Providing a genuinely self-sufficient community with a range of services necessary to sustain it;
 - Being free from environmental constraint and with opportunities to deliver substantial areas of open space, landscape improvements and biodiversity enhancements

- 2.3.33 Importantly, Sibson will fulfil a need going forward. The market towns in Huntingdonshire are becoming saturated and will struggle to accommodate significant levels of additional growth in a district. Growth requirements in Huntingdonshire remains high yet the district is short of large settlements that can absorb high levels of growth. It is seen as inevitable that large standalone sites will be needed to deal with future growth and provide genuine market choice. Larkfleet Homes are currently preparing a planning application at the site that will deliver a truly sustainable Garden Village. Our latest Illustrative Masterplan (**Appendix 4**) gives an overview of the progress that has been made in developing the site.

APPENDIX 1 – SPRU REPRESENTATION



Strategic Planning & Research Unit

For and on behalf of
Larkfleet Homes

**Huntingdonshire Local Plan 2018
Response to main Modifications**

**Prepared by
Strategic Planning Research Unit
DLP Planning Ltd
Sheffield**

January 2019



Strategic Planning & Research Unit

Huntingdonshire Local Plan 2018
Response to Main Modifications
For and on behalf of
Larkfleet Homes

Prepared by:	Roland G Bolton
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Strategic Planning & Research Unit

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1.0 PROPOSED MODIFICATION 1

1.1 This objection is to proposed modification 1 and contains 2 elements:

- a. That the supply from the 1st April 2018 to 31st March 2036 of estimated at 16,647 dwellings is sound
- b. That a supply of 105% of OAN is a sufficient buffer to secure the flexibility required by paragraph 2014 of the Framework 2012 to meet the test of soundness on the basis of:
 - i. The OAN requires a number of assumptions to to meet in order for it not to limit economic growth and there is no flexibility should these changes not be forthcoming resulting in a higher population to meet economic growth.
 - ii. The assumed rates of lead in terms and delivery remain optimistic and there is no flexibility should these not be achieved.

a) Land supply is sound

1.2 SPRU's assessment of delivery rates and lead-in times suggest the Council are only able to demonstrate a plan period supply of 14,604 dwellings to 2036.

1.3 The changes suggested in the inspectors note on the main modifications is broadly supported, however the Summary of the housing trajectory that leads to the conclusion that there is an overall supply of 21068 (2011 – 2036) or 16647 2018/19 to 2035/6 is based upon the proposition that once these locations reach the maximum rate of delivery then they will deliver at the maximum level suggest by the council for the remainder of the plan period.

1.4 For **SEL1.1, SEL1.2 and HU1** this means from 2022 onwards these sites will deliver at the maximum of 300 dpa for the whole of the plan period. This means an average of 287 dpa. This would result in the location being the fastest delivering strategic location in England. It is a rate that is equivalent of Milton Keynes Broughton (Matter 12 SPRU appendix NLP Start to finish Appendix 1).

1.5 In this case this second highest average rate of completion recorded in England is to be maintained over a much longer build period – not the 7 years recorded for Broughton at Milton Keynes but over 18 years.

1.6 There are clear differences between these allocations and the situation at Milton Keynes most notably the number of likely active parcels as well as the number of developers (SPRU's own research highlighted a total 15 developers being engaged in the delivery of the Eastern Expansion Area (Broughton Gate and Brooklands). The NLP "Start to finish" report (page 15) describes this level of completions being achieved by;

"Serviced parcels with the roads already provided were delivered as part of the Milton Keynes model and house builders are able to proceed straight onto the site and commence delivery. This limited the upfront site works required and boosted annual build rates. Furthermore, there were multiple outlets building-out on different serviced parcels, with monitoring data from Milton Keynes Council suggesting an average of c. 12 parcels were active across the build period. This helped to optimise the build rate."

1.7 Clearly selecting a strategy based upon such an unprecedented level of delivery over such a long time period creates considerable risk to the longevity of the plan as there is a significant risk this maximum level will not be maintained from 2022 onwards and indeed even the average of 287 dpa is only marginally lower and carries with it the same

risk.

- 1.8 In respect of **SEL2** the combined completion rates of a maximum of 200 dpa has again been applied from year 2 of this proposed development resulting in an average rate of delivery of from 2020/21 for the remainder of the plan period and an average of 192 dpa.
- 1.9 Again, this is higher than the average rate of delivery of sites of this nature (171 dpa) as recorded by NLP. This is being forecast to be achieved in the same market area as achieving the very high levels at the combined location of SEL1.1, SEL1.2 and HU1.
- 1.10 In effect the “maximum” level recommended by the inspector is actually being translated of all practical purposes as an average for both sites. This we would suggests continues to overestimate the likely contribution of these sites to meeting the housing requirement in the plan period.

b) The level of proposed allocations provides sufficient flexibility

- 1.11 The Framework 2012 states:
“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change”
- 1.12 Paragraph 21 of the Framework 2012 highlights the impact of lack of housing on the economy and states that:
Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;
- 1.13 In reaching a conclusion as to the soundness of the plan, regard needs to be made to the plans flexibility to cope with change.
- 1.14 While a decrease in the level of housing might be accommodated by a slow down in the rate of development on some sites or even a delay in some sites coming forward an increase in demand would be extremely difficult to accommodate because:
- a. The assumptions regarding lead in times are very aspirational in many cases
 - b. The rates of delivery as discussed above are also at the higher end of what has been delivered in the past in areas of high demand.

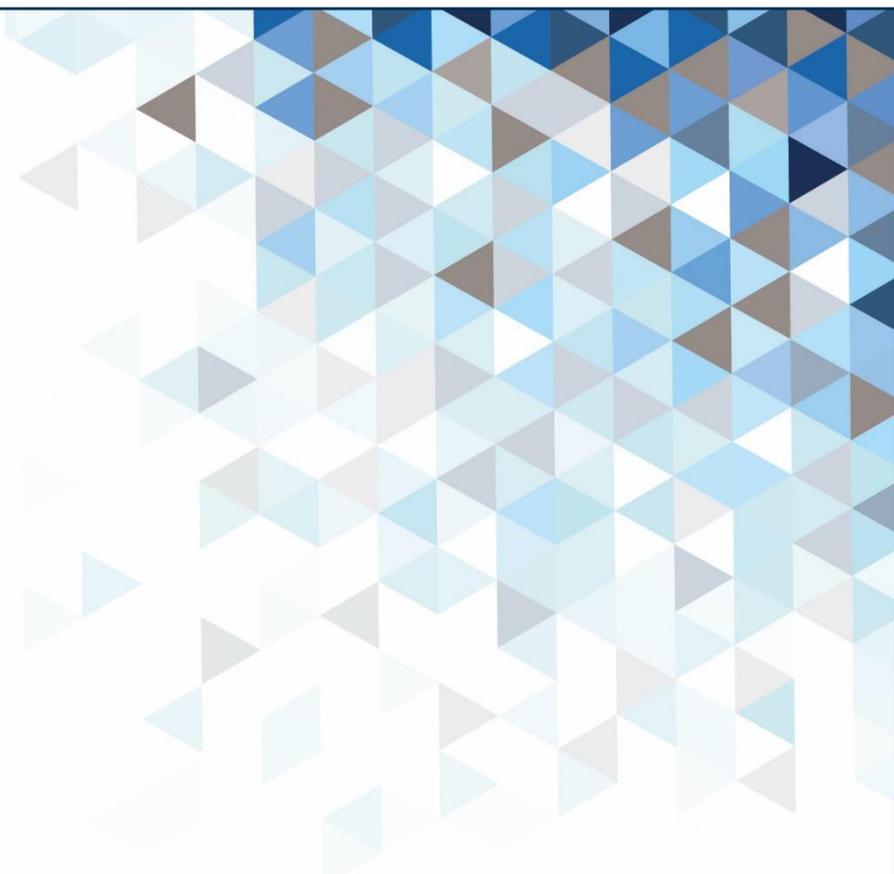
i) Clear and present risks – under delivery against assumptions

- 1.15 The selection of aspirational lead in times and rates of delivery either above average or at a level only experienced once before in the country there is a considerable risk of the plan failing to meet the proposed housing requirement.
- 1.16 Additional provision within the two strategic locations will not assist in the case of underdeliver from one or both of these allocations as the issue will be one of the practicalities and/or marketability of the location.
- 1.17 Even if these sites delivered at the average rate of 171 and there was no slippage the overall level of delivery would reduce by some 2,370 dwellings resulting in 18,335 dwellings and so would not deliver the chosen housing requirement.
- 1.18 The use of a national average is a very logical and sound basis on which to test the flexibility of a plan. The proposed approach in this plan clearly fails the test of flexibility in this respect.

ii) Clear and present risks – the housing requirement is an under estimation of future

need

- 1.19 The standard methodology (2014) produces a requirement of 993 dpa or 28,435 dwellings in total.
- 1.20 This methodology will only result in plans making provision for 266,000 dpa compared to the governments objective of 300,000 dpa.
- 1.21 It is extremely unlikely given the governments continued commitment to achieving the 300,000 dpa that any reworking of the method would result in a decrease in this projected level of housing as such the plan is incapable of accommodating any meaningful increase in the dwelling requirement.
- 1.22 In order to reach a conclusion that the proposed housing requirement will not have a negative impact on employment growth a number of the of assumptions which have been incorporated into the council's projections have to come to pass. Their approach to this issue is not a "continue with past trends". In particular the changes that will need to occur for the housing requirement to be balanced with projected employment growth are as follows:
- a. Market indicators can be fully addressed by a 5% uplift (compared to published evidence in the NHPAU requiring a 28% uplift the LPEG method suggesting a 25% uplift and the standard method resulting in a 30% uplift).
 - b. There is clearly a risk of extracting employment growth out of an integrated model and reworking the housing requirement as highlighted by the warning the EEFM web site and highlighted in our earlier submissions.
 - c. In this particular case there appears to be an obvious mismatch between employment growth of 9.1% being supported by just a 3.9% increase in the working population. This highlights that the approach taken by the councils' consultants of matching employment to population requiring higher activity rates throughout the population.
 - d. This means that 7,614 new jobs forecast will be filled by changes to current levels of unemployment, commuting, and the economic activity rate of the existing population. If these changes do not occur, or indeed occur as modelled by the SPRU Regulation 19 then there will be a mismatch of employment growth and the economy may be restrained contrary to the Framework 2012.
- 1.23 In testing for soundness in terms of flexibility, it is not required that any of the above will occur but if there is a reasonable prospect that they might occur, then the flexibility required by paragraph 14 of the Framework 2012 means that the plan could accommodate such a change. The plan as proposed to be amended clearly could not accommodate any of the above changes that increase the level of housing need, it is therefore presently unsound.
- 1.24 A greater range of sites would address these issues, whether they be allocated for development within the plan or identified as "Strategic Reserves" as is the practice in some other growth areas such as Milton Keynes. In respect of the level of flexibility that should be accommodate, we are of the opinion this should be at least 10% as this would at least go some way to provide sufficient albeit short term flexibility.



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RTPI

Chartered Town Planner

APPENDIX 2 – SA OPINION, NO5 CHAMBERS

**Re: HUNTINGDONSHIRE LOCAL PLAN TO 2035
SUSTAINABILITY APPRAISAL EXPLANATORY NOTE**

OPINION

Introduction

1. I am instructed in this matter by Paul Hill, Senior Director of RPS on behalf of Larkfleet Homes (“Larkfleet”). Larkfleet is in control of Sibson Aerodrome (“Sibson”) a site that is being promoted as a Garden Village – a new sustainable settlement for up to 2,500 homes and associated infrastructure. Larkfleet is presently working towards the submission of a planning application, and further details have been provided as part of Larkfleet’s Matter 6 Hearing Statement.

2. In July 2016, the site was the subject of a submitted expression of interest (“EoI”) to the Government by Larkfleet and the Council, but unfortunately, was not selected in the first wave Garden Village bids announced in January 2017. Gavin Barwell MP, Housing and Planning Minister at the time, recognised the potential of the site in his letter to Larkfleet in January 2017 commenting that there was much to commend the proposal in terms of vision and commitment to innovation. The Council’s letter of the 3rd January to Larkfleet did not withdraw its support for the site, but made clear that going forward, the Council’s expertise would be concentrated on the delivery of its new local plan.

3. I attended the Huntingdonshire Local Plan Examination Hearing into Matter 1 on Tuesday 17 July 2018 at which the Council’s Sustainability Appraisal was considered. RPS has previously submitted a hearing statement on behalf of Larkfleet raising concerns about the Final Sustainability Appraisal (“FSA”) CORE.07, and those submissions were expanded on at the hearing. At the end of the hearing that day, the Council said that it would provide an

explanatory addendum dealing with the issues that had been raised in respect of the FSA insofar as possible. I made representations on behalf of Larkfleet urging caution in respect of inappropriate ex post facto justification for the promoted growth distribution strategy.

4. A Sustainability Appraisal Explanatory Note (“SAEN”) has now been produced (EXAM/03) and this Opinion deals principally with the issue of Distribution of Growth at part 3 of the SAEN.
5. In summary, the SAEN does amount to inappropriate ex post facto justification of the adopted strategy for reasons that are expanded on below. The SAEN itself acknowledges at para 3.19 that:

“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 these option.”

6. The report then goes on to provide “clarification” without any apparent evidential basis other than Appendix 2 “Summary Table of Site Sustainability Appraisals” which is alleged to “summarise” the sustainability appraisal of the sites included. It does not, and in fact misrepresents the site specific SA of Sibson Aerodrome. Accordingly there remain very real concerns about the Council’s FSA and the document’s compliance with both statute and national planning practice guidance.

Opinion

7. Initial SA work was consulted on between February and March 2012 and a SA Report was prepared in late 2012. Three potential strategic expansion locations (“SEL”) were pursued at that time, and formed a key component of **all three** proposed growth distribution options, that is:

- (i) The High Concentration option;
- (ii) Growth in Large Settlements option; and
- (iii) The Dispersed Option.

8. There was not a growth option considered that didn't include three SELs. The strategy was inevitably a response to encouragement by the NPPF (2012) para 52 that:

“The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.”

9. It is a sound strategy, and one with which Larkfleet agrees. Indeed a lot of the sustainability criteria were well met by providing growth at three SELs and focusing growth in larger settlements; see in particular pp.157-158 of the FSA - reducing the need to travel, air pollution, and promotion of the quiet rural character of the district for example. The distribution of growth that was rejected as being the least sustainable option was the Dispersed option; see FSA, p.163.

10. It will be understood that as one of the three SELs, Wyton Airfield was a key component of all three options; see FSA p.152. However, crucially, as the SAEN acknowledges at para 3.12, in early 2017, Wyton Airfield was removed as a SEL. The loss of the SEL (4500 homes) meant that the approach to the distribution of development therefore had to change to respond to the hole that Wyton left.

11. That change, and what is now proposed is explained in on at page xxiv of the FSA. The following points are salient:

- (i) Wyton was removed as a result of the Strategic Transport Study that demonstrated the SEL was not deliverable at that time.
- (ii) Instead, there were to be a series of allocations in the three villages of Alconbury, Bluntisham and Great Staughton. They were proposed to be identified as an additional tier in the settlement hierarchy to be known as “local service centres. It was regarded as “a significant change” from the approach that included 3 SEL’s and growth in larger settlements.

12. On page xxvi the FSA comments that there will be some sustainability impacts because of the addition of local service centres:

“The addition of local service centres somewhat reduces the sustainability of the policy due to doing less overall to reduce the need to travel. However local service centres will help support the rural economy and will help meet local housing needs.”

13. Fundamentally, the issue is this - there was a decision made following the withdrawal of Wyton Airfield that growth had to be distributed differently. The strategy that has now been settled on, without any assessment or appraisal of reasonable alternatives, is to:

- a) Accommodate significantly more development at Alconbury;
- b) Direct significantly more growth to the key service centres (1540 as opposed to 973); and
- c) To add a new tier in the hierarchy of Local service centres.

14. It is acknowledged that at the time the distribution of growth was being amended that the OAN had been reduced to 20,100. However, it is also plain that the removal of Wyton SEL from the proposed distribution left a shortfall in housing land that had to be made up. The loss of the SEL was not only the

single most significant factor in the need to identify further land for housing, it also meant the new strategy settled on by the Council arising from that loss, was in fact less sustainable as acknowledged at p. xxvi of the FSA.

15. That fact in itself should have prompted the Council to consider whether there original preferred strategy - growth in larger settlements including three SELs – should be retained by the identification of a further SEL to replace Wyton. It didn't, and there is no evidence produced in the SAEN that it did. Further, given that the proposed strategy including Wyton was no longer deliverable, it was absolutely incumbent on the Council to properly revisit the issue of distribution of growth and consider the reasonable alternatives for delivering the growth required as against the proposed approach. There is no evidence that the Council at that stage or any stage thereafter considered **any** reasonable alternatives before settling on the final distribution of growth that is now set out in the Plan.

16. The Council points to 4 factors that are said to have influenced the changes in the preparation of the 'Final Distribution of Growth Option'; see SAEN at para. 3.15. The first two bullets have been dealt with above, but it is surprising that the Council identifies at the third bullet point the publication of the White Paper in February 2017 'Fixing our broken housing market' as influencing the change. It is said that the White Paper emphasised the re-use of previously developed land and support for small and medium sized sites and thriving rural communities. If that was a genuine influence on the change to the distribution of growth, one would expect to see some reference to it in the FSA. In truth, the NPPF sets out the policies that consider and support both of those issues. They were not new.

17. There are in fact only two references to the White Paper; see paras. 621, and 7.38. What is said about it is this:

"The White Paper 'Fixing our broken housing market' (February 2017) set out

the government's intentions to consult on options for introducing a standardised approach to assessing housing requirements. This has introduced a level of uncertainty into identifying the housing target for the Local Plan consultation draft 2017. Future consideration will be given to application of any nationally introduced methodology.”

18. There is no hint at all that the Council in its consideration of the final distribution of growth (rather than the level of growth) had any regard to the White Paper and any emphasis on or support that it might provide for growth in rural communities. Another two factors are mentioned at para. 3.17 of the SAEN for which there is no evidential basis at all. The first is reference to the consultation proposals ‘Planning for the right homes in the right places.’ The consultation, which was published in September 2017 and is listed as an “influencing factor” is not mentioned in the FSA at all. The same goes for the “concern” on over-reliance on the strategic expansion locations. There is simply no evidence that if such concern was expressed, the Council had regard to it in proposing the final distribution of growth.

19. Nowhere the FSA is there any mention that there was concern over the sustainability of the three SEL approach. It was in fact a fundamental component of all three growth distribution options considered by the Council. Nowhere in the FSA is there any analysis or conclusion that three SELs are no longer considered to be the most sustainable approach to the distribution of growth. The evidence simply is not there, and has not been provided in the SAEN. There are no memos, notes or resolutions by the Council that have been provided to support the process that is alleged to have been undertaken. The SAEN is just the sort of ex post facto justification that is entirely inappropriate in terms of a process that is meant to be systematic, transparent, and thorough in order to achieve sustainable development.

20. It is also worth mentioning that the final factor noted at para. 3.15 is that Sibson Garden Village was unsuccessful in its bid to be part of the vanguard group of locally-led Garden Villages. How that fact influenced the final distribution of growth is entirely unclear:

- (i) Sibson was not a SEL identified in the original proposed distribution;
- (ii) The Council did not consider it as a reasonable alternative for Wyton, or any other site for that matter;
- (iii) The FSA makes no reference within the body of the text to Sibson at all.

21. While it is a matter of fact, as explained above, that Sibson was not selected in the first wave of the successful Garden Village bids, there is no conceivable way that could have impacted on the Council's final distribution of growth option. Again, if it were a significant factor, the FSA would make some reference to it.

22. The Council accepts at para. 3.19 that it would have been helpful if the FSA set out the process that is now sought to be explained by the SAEN within the FSA itself. It is not "helpful" it is absolutely necessary. It is remarkable that the Council now seeks to set out three entirely new options in the SAEN when not only is there absolutely no reference to, or analysis of those options in the FSA at all, but in proposing them now, the Council has provided no evidence whatsoever to demonstrate they were considered at an earlier, and appropriate stage in the process. Not even the scantest documentary evidence has been provided in support – the paper trail is non-existent.

23. Even now, there is no detailed sustainability appraisal of the options as would be expected, and which does occur at places in the FSA in line with the stated methodology; the Council has not attempted to produce one.

24. In respect of Option 1, the Council argues that consideration was given to other new settlement proposals. Unsurprisingly given Larkfleet's representations on this particular matter, Sibson attracts a special mention, and it is said that *"there was insufficient evidence on the viability and achievability of the infrastructure required to support the development, particularly the new junction onto the A1 need to provide access to the site. So it was not considered to be a reasonable alternative."*
25. Given that the Council previously supported Larkfleet's submission of an expression of interest to deliver a Garden Village at Sibson, it is surprising that the Council now considers that there is insufficient evidence to allocate the site. If the highway issue really was a fundamental showstopper, then the Council would not have supported the EoI. Moreover, the HELAA (December 2017) at pp.10-13 is generally positive about the site. It acknowledged that a transport assessment will be required to demonstrate that safe, appropriate access can be provided from Elton Road, and in particular to the A1, but still regarded the site as suitable, achievable, and available. It is therefore wrong to consider that Sibson did not provide a reasonable alternative to the final distribution strategy. Moreover, the "outcome" box featured in Appendix 2 of the SAEN that considers Sibson as undeliverable" is entirely new, and entirely unsubstantiated. It is not an accurate reflection of the HELAA but a further cynical attempt to justify a seriously flawed FSA.
26. The Inspector will be familiar with the PPG on SEA and SA, but in essence SA is a systematic process that must be carried out during the preparation of the plan and inform the plan. Consideration of reasonable alternatives to the proposed approach is the bedrock of the process to ensure that the preferred option is the most sustainable.
27. The Guidance 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 light of the

alternatives. Para. 18 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”.

28. In respect of the original distribution of growth, the FSA records that three options were assessed. All included 3 SELs. The approach favoured was the larger settlements option. The FSA sets out a detailed appraisal of why that was the most sustainable option. Once Wyton was no longer regarded as deliverable the strategy had to change. From that point on, a distribution of growth emerged that was not tested against any reasonable alternatives at all. It was tested only against what went before (FSA, p.772) and which no longer represented a reasonable alternative because it could no longer be achieved in the absence of Wyton SEL. There is no evidence at all in the FSA, or indeed the SAEN that any other option was appraised, or systematically assessed before the Council alighted upon a strategy which not only included one less SEL, but also included an additional tier of settlement for growth that is acknowledged to have sustainability disbenefits.

29. Essentially, the distribution now promoted by the Council is far more akin to the Dispersed option of growth that was regarded as the least sustainable option in the initial appraisal of growth options. Moreover, it is worth pointing out that there are significant anomalies in the appraisal of the preferred approach (FSA, pp772-780). The Inspector is asked to look carefully at the results, but for example, the first response to the use of PDL is simply wrong, and is to be compared and contrasted with p.152 of the FSA that shows the opposite assessment is correct. Likewise, it is not clear why the proposed approach should be more positive in terms of grade 3 agricultural land than what was the current approach at that time; see p.773

30. Further, by way of example:

- (i) the approach to flood risk on p.774 and 776 is difficult to understand given that distribution of development is now proposed to be more dispersed and includes sites at risk of flooding;
- (ii) there has been an effective downgrading of the original proposed distribution when compared with the original assessment; see FSA p.154. That is the case in a number of instances, and without any explanation.
- (iii) it is not clear why there should be any difference in terms of crime or access to basic services as a result of more dispersed development; see p.776 .

31. In essence, there is very real concern that the appraisal has been amended quite disingenuously to fit the desired strategy of a more dispersed growth pattern, despite the acknowledged sustainability disbenefits.

Conclusion

32. In conclusion, the SA has not considered reasonable alternatives to the distribution of growth now proposed. There is no evidence that the options set out in the recently submitted SAEN informed the strategy carried forward into the plan, and neither have they been properly appraised in line with the methodology set out in the FSA.

33. The SA therefore fails to comply with section 19(5)(a) and 39(2) of the PCPA 2004, as well and national planning practice guidance.

THEA OSMUND-SMITH
No5 Chambers
9th September 2018

**Re: HUNTINGDONSHIRE LOCAL PLAN
TO 2035
SUSTAINABILITY APPRAISAL
EXPLANATORY NOTE**

OPINION

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APPENDIX 3 – SIBSON DELIVERABLE ACCESS SOLUTION ONTO A1



- Notes
1. Do not scale the drawing. All dimensions are in metres unless stated otherwise.
 2. The drawing has been based upon survey information provided by MK Surveys and Milestone Transport Planning cannot guarantee the accuracy of the data.

Ordnance Survey Licence number: 30057360

Drawing Revisions		
Rev.	Drawn	Date
PK	--/--/2018	Draft Issue

Client	Project
Larkfleet Homes	Sibson Aerodrome, Cambridgeshire

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Project
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Cambridgeshire

Title
Preliminary A1 Junction
Proposals - All Movements
Junction (Option 2)

Drawing Number: 17063 / 022
Scale: 1:1000 @ A1
Revision: -

APPENDIX 4 – SIBSON DRAFT ILLUSTRATIVE MASTERPLAN



Family or Company Name: Linden Homes Strategic Land
Agent: Pegasus Group (Roberts, Jamie)
PMM: MM1

Comment

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Company / Organisation	Pegasus Group
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Consultee	Linden Homes Strategic Land (1140444)
Company / Organisation	Linden Homes Strategic Land
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Linden Homes Strategic Land (Linden Homes Strategic Land - 1140444)
Comment ID	PMM2018:27
Response Date	25/01/19 16:23
Consultation Point	Proposed Main Modification 1 (View)
Status	Processed
Submission Type	Web
Version	0.5
Files	Representations - Full Text

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... . Justified
Effective

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.

In previous representations, Linden Homes raised concern that the housing trajectory was not effective and not positively prepared, with the Plan relying upon very high rates of delivery at Strategic Expansion Locations which were considered unrealistic. Linden Homes welcomes the reduction in anticipated delivery rates at the Strategic Expansion Locations (also set out within Main Modifications 15, 16, 17 and 15). Paragraph 154 of the Framework requires that Local Plans are aspirational but realistic. The proposed delivery rates are still optimistic and are reliant upon factors including favourable market conditions. The modifications do not overcome Linden Homes' wider concerns about the Plan strategy and the sustainability of the approach (including the limited apportionment of growth to the town of Huntingdon). Nonetheless, they represent a more realistic basis for the Huntingdonshire Local Plan and are consistent with delivery rates for similar-scale schemes in other authorities' Local Plans. 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 windfall, exception sites, and prior approvals. Paragraph 48 of the Framework explains that windfall allowances can count towards housing land supply where there is 'compelling evidence' to do so. It is recognised that the Council has prepared a paper (EXAM/41) which explains why this source of supply can be included. We are concerned about the inclusion of prior approvals at a steady and continuous rate of 20 dwellings per annum. The ability to deliver housing through prior approvals depends upon there being a supply of suitable existing buildings for conversion. For example, these may be redundant or dilapidated office buildings, or redundant agricultural barns of a construction suitable for conversion. As opportunities for prior approval are taken, the supply of suitable buildings will naturally reduce. As such, it is considered that a reduced rate of prior approvals should be allowed for later in the Plan period. In a similar way, rural exception sites typically come forward in response to specific opportunities. These might be where a parish has identified a specific housing need, and where there is a landowner willing to bring land forward for this purpose. For these sources of supply, it is therefore considered that the potential contribution towards the overall housing land supply may be somewhat less than is envisaged through the modifications. The limitations to these sources of supply, coupled with the overall reduction in delivery anticipated at the SELs, could have 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. Consequently, the Local Plan should offer greater flexibility in its housing land supply to compensate to ensure that it is effective. Linden Homes consider that allocation of land at Lodge Farm offers this flexibility, but moreover presents the opportunity to deliver sustainable housing development, well-related to the edge of Huntingdon and consistent with the Local Plan's spatial strategy.

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.

Representations - Full Text

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?

The Local Plan should offer greater flexibility in its housing land supply to compensate to ensure that it is effective. Linden Homes consider that allocation of land at Lodge Farm offers this flexibility, but moreover presents the opportunity to deliver sustainable housing development, well-related to the edge of Huntingdon and consistent with the Local Plan's spatial strategy.

Summary

Object to Main modification 1. Reduction in anticipated delivery rate on the strategic Expansion locations is welcomed, but still too optimistic. The included delivery rate for prior approvals should be reduced as opportunities will reduce over the plan period. Not enough growth attributed to Huntingdon. The Council will not maintain a rolling five-year supply and meet the requirements of the housing delivery test. More flexibility is needed within the housing trajectory. The Lodge Farm site offers this flexibility.

REPRESENTATIONS TO THE HUNTINGDONSHIRE LOCAL PLAN: MAIN MODIFICATIONS

LAND AT LODGE FARM, HUNTINGDON

ON BEHALF OF LINDEN HOMES STRATEGIC LAND

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED) PLANNING AND COMPULSORY PURCHASE ACT 2004

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1. Introduction

- 1.1 These representations are made by Pegasus Group on behalf of Linden Homes Strategic Land, which has interests in land at Lodge Farm, Huntingdon.
- 1.2 The site has been promoted previously through earlier stages of the Local Plan and through verbal and written submissions to the Examination in Public of the Plan.
- 1.3 For the avoidance of doubt, references to the National Planning Policy Framework (the Framework) within these representations are made in respect of the 2012 version of the document.

2. Proposed Modification 1

- 2.1 In previous representations, Linden Homes raised concern that the housing trajectory was not effective and not positively prepared, with the Plan relying upon very high rates of delivery at Strategic Expansion Locations which were considered unrealistic.
- 2.2 Linden Homes welcomes the reduction in anticipated delivery rates at the Strategic Expansion Locations (also set out within Main Modifications 15, 16, 17 and 15). Paragraph 154 of the Framework requires that Local Plans are aspirational but realistic. The proposed delivery rates are still optimistic and are reliant upon factors including favourable market conditions. The modifications do not overcome Linden Homes' wider concerns about the Plan strategy and the sustainability of the approach (including the limited apportionment of growth to the town of Huntingdon). Nonetheless, they represent a more realistic basis for the Huntingdonshire Local Plan and are consistent with delivery rates for similar-scale schemes in other authorities' Local Plans.
- 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 windfall, exception sites, and prior approvals. Paragraph 48 of the Framework explains that windfall allowances can count towards housing land supply where there is 'compelling evidence' to do so. It is recognised that the Council has prepared a paper (EXAM/41) which explains why this source of supply can be included.

- 2.4 We are concerned about the inclusion of prior approvals at a steady and continuous rate of 20 dwellings per annum. The ability to deliver housing through prior approvals depends upon there being a supply of suitable existing buildings for conversion. For example, these may be redundant or dilapidated office buildings, or redundant agricultural barns of a construction suitable for conversion. As opportunities for prior approval are taken, the supply of suitable buildings will naturally reduce. As such, it is considered that a reduced rate of prior approvals should be allowed for later in the Plan period.
- 2.5 In a similar way, rural exception sites typically come forward in response to specific opportunities. These might be where a parish has identified a specific housing need, and where there is a landowner willing to bring land forward for this purpose.
- 2.6 For these sources of supply, it is therefore considered that the potential contribution towards the overall housing land supply may be somewhat less than is envisaged through the modifications.
- 2.7 The limitations to these sources of supply, coupled with the overall reduction in delivery anticipated at the SELs, could have 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. Consequently, the Local Plan should offer greater flexibility in its housing land supply to compensate to ensure that it is effective. Linden Homes consider that allocation of land at Lodge Farm offers this flexibility, but moreover presents the opportunity to deliver sustainable housing development, well-related to the edge of Huntingdon and consistent with the Local Plan's spatial strategy.

3. 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. As explained in our response to Proposed Modification 1, additional flexibility should be allowed for within the Local Plan to ensure it is effective, with land at Lodge Farm being an appropriate option for allocation.