



Gladman Developments Ltd

Huntingdonshire Local Plan Examination

Matter 3 – Development Strategy

Issue:

Whether the Development Strategy is justified, effective and consistent with national policy

Overall Strategy

1. What is the basis for the overall strategy for development and the broad distribution of growth set out in Policy LP2? What options were discovered and why was this chosen? Is it justified?

The focal point of the strategy for development as set out in Policy LP2 remains to direct substantial growth to two strategic expansion locations. Gladman consider the proposed development strategy is overly reliant on the delivery of two large Strategic Expansion Locations (SEL's), making it vulnerable and at risk, any delay in the delivery of either of these SEL's could seriously jeopardise the delivery of the plan as a whole. It is critical that the Council have a strategy which can deliver housing throughout the course of the plan period to ensure that the plan is effective and deliverable.

The proposed submission version of the Local Plan outlines that the SEL's will deliver 10,500 dwellings during the course of the plan period; this amounts to roughly 50% of the overall housing requirement for the plan period. In the event that any of the sites which make up the SEL's do not deliver to the scale and timescale proposed this would jeopardise the delivery of the plan as a whole. The Council should avoid over reliance on these types of locations and should not use them as areas that can absorb large numbers of housing and consequently reduce the need for further housing in other areas. This is not a sound approach and if the assumptions used are unrealistic and over ambitious it would have serious implications on housing delivery and the successful implementation of the plan.

Policy LP2 also outlines that a degree of growth will be directed to the Key Service Centre (KSC), Local Service Centres (LSC) and Small Settlements. Gladman note that the growth to these tiers of settlements was previously 30% of the overall growth, however in the proposed submission version of the plan this was reduced to just 25% of the total. Gladman are unclear regarding the justification

for this scale of growth in the KSC, LSC and Small Settlements and what the rationale was for this to be reduced from the percentage proposed within the earlier iterations of the plan.

Gladman believe that a greater level of growth should be directed to the KSC, LSC and Small Settlements, commensurate with the ability of these to accommodate growth acceptably; and, the need for additional growth in order to support important services and facilities, and ultimately the long term sustainability and vitality of the settlements. There are suitable sites available on the edge of these settlements which offer realistic opportunities to deliver sustainable development in the short to medium term. The strategy as currently proposed could potentially result in these opportunities for sustainable growth being missed.

Spatial Planning Areas

2. Are the Spatial Planning Areas appropriately defined, what is the basis for them?

N/A.

3. Is the approach to the scale and type of development set out in Policies LP2 and LP7 justified?

N/A.

4. What is the scale of development actually planned (including commitments) in and is this in line with the distribution set out in Policy LP2?

As noted in our previous representations the plan provides a flexibility factor of circa 12%, when completions, commitments and allocations are taken into account. Whilst Gladman support the inclusion of a flexibility factor such as this, Gladman submit that given the heavy reliance being placed on the delivery of two SELs it would be prudent to increase the flexibility to 20%.

To ensure the delivery of the necessary scale of housing across Huntingdonshire, the Council should be over allocating to provide sufficient contingency for instances when sites do not come forward as planned. Gladman do not believe that in the context of this plan and proposed spatial strategy that 12% flexibility is sufficient.

Gladman is of the view that the Huntingdonshire Local Plan should allocate additional housing land. As long as suitable, sustainable sites are identified then there would be no harm should this result in delivering a greater number than the minimum requirement of housing. This approach would ensure that any delays experienced in the delivery of more difficult to deliver strategic sites can be supported by a wider range of sites in a wider range of locations that would have the ability to provide additional housing numbers in the short-medium term. Gladman recommend that the flexibility factor should be increased to in the region of 20% and that in combination with this Policy LP11 should provide greater flexibility for sites to come forward on the edge of settlements which lie adjacent to but outside the built up area boundaries.

5. Are the strategic expansion locations at Alconbury Weald and St Neots East justified in principle? What alternative strategies for accommodating development were considered and why was this approach preferred?

Gladman do not object in principle to large scale sites like these, but it is fundamental that the plan does not place an over reliance on delivery from these schemes and that the delivery assumptions, both lead in times and annual delivery rates, are realistic. Large scale site such as those proposed at Alconbury Weald and St. Neots East inevitably take longer to deliver than smaller scale developments and can often face significant delays and setbacks throughout the process. As outlined earlier, the Council should avoid over reliance on these types of locations and should not use them as areas that can absorb large numbers of housing and consequently reduce the need for further housing in other areas.

Key Service Centres

6. Are the Key Service Centres appropriately defined, what is the basis for them?

N/A.

7. Is the approach to the scale and type of development set out in Policies LP2 and LP8 justified?

As outlined above Gladman note that the scale of growth directed to KSC, LSC and Smaller Settlements overall has decreased since previous iterations of the plan (previously 30% of growth was directed to these settlements, this is now only 25%). Gladman remain unclear of any justification for this change in distribution.

Gladman reiterate that an increased scale of growth should be directed to the KSC and that there are suitable sites on the edge of these locations which offer sustainable opportunities for growth in the short to medium term but which have been excluded from the plan.

With regards to Policy LP8 Gladman reiterate concerns from previous submissions that the supposed flexibility provided through the second element of this policy (development proposals on land well related to the built up area) is to a certain degree counteracted by the list of policies identified in paragraph 4.98 that these sites must accord with, for example Policy LP11 'the Countryside'. Gladman do not consider that this policy is flexible enough to allow for suitable, sustainable developments to come forward on sites well related to the built up area. Gladman believe this policy needs to be revised to ensure that it is effective and provides the necessary flexibility.

8. What is the scale of development actually planned (including commitments) and is this in line with the distribution set out in Policy LP2?

See response to question 4.

Local Service Centres

9. Are the Local Service Centres appropriately defined, what is the basis for them?

Gladman have no specific comments to raise in response to this question; however do note that this was a new tier in the hierarchy included in the proposed submission version of the Local Plan.

10. Is the approach to the scale and type of development set out in Policies LP2 and LP9 justified?

As outlined above in response to questions 1 and 7, Gladman object to the reduction in scale of growth directed to this tier (along with the KSC and Small Settlements), and query the justification behind this change.

There are sustainable opportunities for growth in LCSs which may be overlooked due to this reduced scale of growth being apportioned to the locations outside of the SEL's.

11. What is the scale of development actually planned (including commitments) and is this in line with the distribution set out in Policy LP2?

See response to question 4.

Small Settlements

12. Are the small settlements appropriately defined, what is the basis for them?

N/A.

13. Is the approach to the scale and type of development set out in policies LP2 and LP10 justified?

Gladman believe that it needs to be recognised that the settlements within this tier are wide ranging in terms of facilities and services which they offer. Consequently, the policy needs to be flexible enough to allow a degree of growth in these locations if it can be demonstrated that they represent sustainable development.

In this regard, Gladman refer to Needingworth and Farcet, both of these are settlements within this tier in the hierarchy, and both have realistic, deliverable options for sustainable housing growth. Growth in this tier of settlement is required in order to meet local needs and help address increasing housing affordability issues. Furthermore, additional growth is required to help support important local services and facilities and ensure they remain viable in the future. Gladman make specific reference to land at Bluntisham Road, Needingworth, which now has the benefit of resolution to grant planning permission in relation to proposals for 120 dwellings. The policy should not unnecessarily prevent sustainable schemes such as these from being brought forwards.

14. What is the scale of development actually planned (including commitments) and is this in line with the distribution set out in Policy LP2?

See response to question 4.

Countryside and definition of built up areas

15. Is the approach to the countryside in Policy LP11 justified, effective and consistent with national policy?

As outlined in our previous submissions, Policy LP11 is effectively a countryside protection policy which resists development unless certain very specific criteria are met. Gladman object to this policy as there may be sustainable development opportunities directly adjacent to existing settlements but which would be classed as 'the countryside' and therefore would be protected through this policy approach. This approach is considered to be unnecessarily restrictive and not in line with the positive approach to growth required by the Framework.

The Local Plan should avoid blanket protect policies such as this as it may act to unnecessarily stifle sustainable growth opportunities on the edge of settlements. This is at odds with national policy which is seeking to boost significantly the supply of housing land and applying a presumption on favour of sustainable development.

16. Is the definition of built up areas appropriate and justified?

N/A.