

**HUNTINGDONSHIRE  
LOCAL PLAN  
EXAMINATION**

**MATTER 3 DEVELOPMENT  
STRATEGY**

**REP ID: 1118661**

**HEARING STATEMENT**

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## MATTER 3 – DEVELOPMENT STRATEGY

### Introduction

- 1.1 This Matter 3 Statement has been prepared by Carter Jonas LLP and Peter Brett Associates on behalf of Hallam Land Management (HLM), who are promoting land at Gifford's Park in St Ives for a residential-led mixed use development. Representations were submitted to Policy LP2 of the Proposed Submission Huntingdonshire Local Plan 2036 (PS HLP2036), which relates to the proposed development strategy – see Rep Id. 352.

### Issue

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

### Relevant Policies – LP2-LP11

### Questions

#### Overall

*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 considered and why was this chosen? Is it justified?*

- 1.2 In summary, the overall development strategy seeks to direct development to locations with good access to services and facilities, deliver two strategic expansion areas (Alconbury Weald and St Neots East), direct approximately three quarters of the housing growth to the four Spatial Planning Areas (Huntingdon, St Neots, St Ives and Ramsey), and direct the remainder of the housing growth to the key service centres, local service centres and small centres.
- 1.3 In theory, the overall development strategy appears to be appropriate, but in reality only a limited amount of development is directed to St Ives which is one of the four Spatial Planning Areas. On this basis, we have three main concerns with the proposed development strategy. Firstly, there is an over-reliance on the delivery of two strategic expansion areas where housing delivery rates and the delivery of sufficient levels of affordable housing are uncertain. The over-reliance on a few large developments at St Neots and Huntingdon represents a high risk strategy, as new and existing strategic allocations within close proximity may result in market saturation and slow delivery. Secondly, St Ives is a market town with a good range of services and facilities that are accessible by public transport including the Cambridge Guided Busway, but no strategic scale development is directed to this settlement. Moreover, there is less need for significant infrastructure improvements associated with strategic development at St Ives. Finally, the development strategy gives no consideration to existing sustainable transport infrastructure such as the Guided Bus, which offers an excellent opportunity for new development to benefit from existing sustainable infrastructure.
- 1.4 A review of the consultation documents published for earlier stages of the Huntingdonshire Local Plan process demonstrates that larger scale development at St Ives has never been identified as an option. At Issues & Options (July 2012), Draft Strategic Options (August 2012), and Draft Local Plan (May 2013) stages the three strategic expansion locations identified were Alconbury, St Neots and Wyton Airfield. Wyton Airfield was excluded at Consultation Draft Local Plan (July 2017) and Proposed Submission (December 2017) stages because of uncertainty associated with the funding and delivery of the necessary transport infrastructure; Alconbury and St Neots have remained as the proposed strategic expansion locations. The option to direct larger scale development at St Ives was not considered as an option even when it was known that Wyton Airfield would not be delivered. This outcome is not justified.
- 1.5 Furthermore, the decision to not consider the option of directing further development to St Ives is not consistent with the national guidance as contained in Paragraphs 17, 30 and 34 of the NPPF, in that development should be directed to locations which are accessible by sustainable modes of transport. St Ives is clearly a sustainable location for development in transport terms.

## Spatial Planning Areas

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?*

- 1.6 The quantum of residential development within the proposed allocations for each of the spatial planning areas is as follows:
- Huntingdon – 10,364 dwellings (including 815 dwellings in Brampton and 853 dwellings in Godmanchester);
  - St Neots – 4,049 dwellings;
  - St Ives – 480 dwellings;
  - Ramsey - 895 dwellings.
- 1.7 The development strategy in PS HLP2036 is over-reliant on a small number of strategic scale developments in only two of the Spatial Planning Areas (Huntingdon and St Neots) and on two strategic expansion areas in these locations (Alconbury Weald for 5,000 dwellings, and St Neots East for 3,820 dwellings). In addition, a number of the strategic scale developments in Huntingdon and St Neots are located in close proximity of one another i.e. Alconbury Weald, RAF Alconbury and Ermine Street in Huntingdon, and Loves Farm and Wintringham Park in St Neots East, which will have implications for housing delivery because they will in effect be competing sites and within the same local housing market.
- 1.8 In contrast to Huntingdon and St Neots, a very limited amount of development is directed to St Ives. The main allocation in St Ives, at St Ives West for 400 dwellings, mostly has planning permission and is under construction and therefore at least part of the site should be regarded as a commitment rather than an allocation; 274 dwellings have full or outline permission, 7 dwellings have a resolution to grant permission, and 224 dwellings are subject to a current planning application.
- 1.9 St Ives has a good range of services and facilities and is accessible by public transport. St Ives contains the following:
- Cambridge Guided Busway including Park & Ride facility
  - Town centre with multiple shops and services located in the Market Hill/Bridge Street/Station Road area
  - Extensive employment at the Somersham Road Industrial Area, Compass Business Park, St Ives Business Park (Parsons Green) and The Meadow Business Park
  - St Ivo Secondary School
  - Primary Schools
  - GP and Dental surgeries
  - Post Office
  - Library
  - Supermarkets and smaller convenience stores, including Waitrose, Tesco, Morrison's and Co-op
  - Indoor and Outdoor Leisure Centres
  - Other bus services
  - On road and segregated cycle routes including adjacent to Guided Busway
- 1.9 Therefore, there are sound planning reasons to amend the distribution strategy in order to direct more development to St Ives. As set out in our representations to Policy SI 3 (Rep Id. 375) and in our Matter 8 Statement, we request that land at Gifford's Park in St Ives is allocated for a residential-led mixed-use development for 1,750 dwellings.

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? (detailed issues concerning these site allocations are dealt with under Matters 6 and 7)*

- 1.10 We accept that the former Alconbury Airfield and Grange Farm site and the St Neots East site are suitable locations for development: the Alconbury Airfield and Grange Farm site has outline planning permission and development has commenced; and the St Neots East site was identified in the Core Strategy 2009 and in the St Neots Eastern Expansion Urban Design Framework 2010, and the site has a resolution to grant outline

planning permission subject to completion of a S106 Agreement. In contrast, there are no planning applications for redevelopment of the RAF Alconbury site (Policy SEL 1.2) and the availability of the site for residential development is highly uncertain, because it is currently occupied by the US Air Force and there is no confirmed release date. Even if the site is available during the plan period, then delivery must be uncertain because of the close proximity of the Alconbury Airfield and Grange Farm site which will still be delivering when the RAF Alconbury site might become available (if indeed it is released within the plan period); realistic housing delivery rates should be applied to these neighbouring sites.

- 1.11 We have three key concerns with the selected strategic expansion locations, which are: unrealistic assumptions about housing delivery rates at Alconbury Weald and St Neots East; the fact that the strategic expansion locations are not delivering policy compliant levels of affordable housing; and, the option of an additional strategic expansion location at St Ives was not considered despite it being identified as a spatial planning area (making it a potential location for growth) and that it is a sustainable location with no significant constraints to development, even when the proposed strategic development at Wyton Airfield was deleted. We comment on these issues in more detail in our Matter 6, Matter 7, Matter 8 and Matter 12 statements, and so provide a summary below.
- 1.12 We consider that unrealistic assumptions about housing delivery rates are being applied to the strategic expansion locations at Alconbury Weald and St Neots East. We commented on this in detail in our representations to PS HLP2036, and provide a summary below with updates to the housing monitoring data following the publication of the Huntingdonshire Housing Monitoring Report 2016/17 (December 2017).
- 1.13 In summary, the most recent housing land supply position highlights the following:
- It is predicted in the AMR December 2017 that 250 dwellings would be delivered per year at the Alconbury Airfield and Grange Farm site, which increases to 300 dwellings per year once established. It is unrealistic to assume annual delivery rates at Alconbury Weald which are just below the highest average recorded levels nationally (at Cranbrook in East Devon) and higher than similar developments in higher value neighbouring authority areas (at Cambourne in South Cambridgeshire). We suggest that it would be appropriate to assume a maximum of 200 dwellings per year could be delivered from this site. As a consequence we estimate that 1,270 fewer dwellings would be delivered from this site during the plan period.
  - It is predicted that development at RAF Alconbury would start in 2028/29, and would deliver between 180 to 185 dwellings per year once established. However, this site is adjacent to the Alconbury Airfield and Grange Farm site, which is predicted to deliver 300 dwellings per year at the same time that RAF Alconbury is expected to deliver. It is unrealistic to assume that a combined total of 480 dwellings per year would be delivered from these two sites. In addition, land at Ermine Street located less than 1.5 miles south of Alconbury Weald is also included within the housing land supply, and is also predicted to deliver at the same time, which must raise further concerns over the ability of each site to meet its housing delivery rates in an overcrowded market. As set out above, the availability of the RAF Alconbury site for residential development is highly uncertain because it is currently occupied by the US Air Force, and even if the site is available during the plan period then delivery must be uncertain because of the close proximity of the Alconbury Airfield and Grange Farm site which will still be delivering when the RAF Alconbury site might become available. We suggest that RAF Alconbury is deleted from the housing supply until evidence is provided that it is available and that delivery will occur during the plan period, as a consequence 1,320 fewer dwellings would be delivered.
  - Loves Farm in St Neots has historically delivered approximately 100 dwellings per year. However, it is predicted in the AMR December 2017 that up to 185 dwellings per year would be delivered from the St Neots East - Loves Farm site. There is no evidence to justify a substantial increase in annual delivery rates above historic levels. We suggest that the start date for development would be 2020/21 to enable the marketing of parcels of land, purchase by housebuilders, and submission of reserved matters. We also suggest that housing delivery rates at St Neots East – Loves Farm should be reduced to 100 dwellings per year, which still means that all of the proposed 1,020 dwellings at the site would be delivered during the plan period.
  - It is predicted that up to 250 dwellings would be delivered per year from the St Neots East - Wintringham Park site after the initial phases of the development, which is unrealistic since this level is higher than the average delivered nationally from strategic developments, it is higher than delivery rates at Cambourne in South Cambridgeshire, and higher than similar types of developments in Bedfordshire (Biggleswade East, West of Kempston and Great Denham). In addition, this site is immediately adjacent to Loves Farm and

the local housing market area would be the same for both sites. There is no evidence to justify a higher housing delivery rate for St Neots East -Wintringham Park above historic rates for Loves Farm. We suggest that the start date for development would be 2020/21 to enable the marketing of parcels of land, purchase by housebuilders, and submission of reserved matters. We also suggest that housing delivery rates at St Neots East – Wintringham Park should be reduced to 100 dwellings per year while development at St Neots East – Loves Farm is still taking place, and increased to 200 dwellings per year thereafter i.e. from 2029/30. As a consequence we estimate that 600 fewer dwellings would be delivered from the St Neots East – Wintringham Park site during the plan period.

- 1.14 Therefore, we estimate that approximately 3,190 fewer dwellings would be delivered during the plan period from the two strategic expansion locations of Alconbury Weald and St Neots East. If housing delivery rates do increase at these sites, then a subsequent upward adjustment could be made for future trajectories.
- 1.15 We note that for the development at Alconbury Airfield and Grange Farm (Ref. 12/01158/OUT) an affordable housing target of 10% has been approved for Phase 1, with future phases to be subject to a review process as specified in the S106 Agreement. The hybrid planning application at St Neots East – Wintringham Park (Ref. 17/02308/OUT) has proposed 25% affordable housing for the first 500 dwellings, with an affordable housing review mechanism set out in the S106 Agreement to reassess viability after the completion of each phase of 500 dwellings. The application at St Neots East – Loves Farm (Ref. 13/00388/OUT) has proposed an affordable housing rate of 28%, with no review mechanism in the S106 Agreement.
- 1.16 It is clear from these examples that the large strategic developments do not deliver policy compliant levels of affordable housing, at least in the early phases, and it is not clear whether affordable housing levels will increase in later phases. The inability of the strategic expansion locations to deliver policy compliant levels of affordable housing has been well known for a number of years, but no alternative options to increase the supply of affordable housing have been considered or assessed. One obvious option which should have been considered was to allocate additional small and large sites which deliver policy compliant levels of affordable housing in PS HLP2036; it is the larger strategic sites where significant items of new infrastructure are not required which are capable of delivering substantial amounts of affordable housing - such as land at Gifford's Park in St Ives.
- 1.17 There is a clear need to identify additional allocations to meet the housing land supply shortfall and under-delivery of affordable housing arising from an over-reliance on strategic developments at Huntingdon and St Neots. St Ives contains a good range of services and facilities and it is accessible by sustainable modes of transport including the Cambridge Guided Bus. It is clear that St Ives is a suitable location for additional development, and it is capable of accommodating strategic scale development. As set out in our representations to Policy SI 3 and comments on the assessment of Gifford's Park in the SA and HELAA and our associated reassessment of the site, there are no constraints to development at this site and suitable measures can be provided to mitigate any significant impacts. Critically, the identification of Gifford's Park as an additional strategic expansion location would be compliant with the existing development strategy set out in Policy LP2.

## Key Service Centres

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

- 1.18 The quantum of residential development within the proposed allocations for each of the key service centres is as follows:
- Buckden – 435 dwellings;
  - Fenstanton – 210 dwellings;
  - Kimbolton – 85 dwellings;
  - Sawtry – 375 dwellings;
  - Somersham – 330 dwellings;
  - Worboys – 260 dwellings; and
  - Yaxley – 10 dwellings.



- 1.19 It is clear from the amount of development directed to most of the key service centres is greater than or similar to that proposed in St Ives during the plan period; 480 dwellings are allocated in St Ives but the largest allocation at St Ives West mostly has planning permission and is already under construction, where 274 dwellings have full or outline permission, 7 dwellings have a resolution to grant permission, and 224 dwellings are subject to a current planning application.. However, St Ives is identified as a spatial planning area and a potential location for growth in the development strategy, and is a larger more sustainable settlement. We conclude that the scale of development directed to St Ives compared with the key service centres does not accord with the distribution strategy in Policy LP2. There are sound planning reasons to amend the distribution strategy in order to direct more development to St Ives.

## Infrastructure

*20) What are the implications/requirements for transport infrastructure and how have these been taken into account? How will improvements be delivered and funded?*

- 1.20 The Huntingdonshire Strategic Transport Model (HSTS) was used to inform the Local Plan. Four development scenarios, of which Gifford's Park was included in just one (Development Scenario 3), were assessed as part of the HSTS First Submission (first submission to the public domain). It is apparent that, of these four scenarios, the scenario that included Gifford's Park (Development Scenario 3) was deemed the preferred development mix and required the lowest level of strategic highway spending relative to the other three scenarios. However, as all scenarios were deemed by the Council to require strategic highway interventions, the HSTS concluded that none of the four original scenarios were deliverable through developer contribution alone and therefore did not recommend any of the original four development scenarios.
- 1.21 Instead of then assessing a refined range of development scenarios or engaging further with stakeholders, the HSTS went on to assess a single 'bolt on' Development Scenario 5. With no justification as to why this option was determined as the only additional scenario to be assessed.
- 1.22 The HSTS concluded (when taken in the context of the number of junctions that are predicted to perform within capacity) minimal differences between the HSTS preferred Development Scenario 5 and Development Scenario 3, yet substantial differences between housing numbers.
- 1.23 For Development Scenario 3, localised junction improvements alone, as per Mitigation Package 1, offer the potential for nil detriment at all but six junctions assessed within the HSTS – four A141 junctions, Busway crossing and A11123 / Ramsey Road. Development Scenario 5, as recommended by the HSTS, offers potential for nil detriment at all but four local junctions. i.e. only two less junctions than Development Scenario 3. It is therefore not understood why one of these development scenarios can be discounted outright, given the strategic nature of the model, but the other recommended, especially in terms of Paragraph 32 of NPPF and whether or not the impact is 'severe' for either of these development scenarios. The difference between these two development scenarios is not deemed 'severe', especially when taking into account the potential to revise the mitigation measures proposed to include more viable options and modify the development mix for certain development scenarios. It is considered that a combination of development Scenarios 3 and 5 could deliver an improved solution with additional housing capacity, however this option was never explored within the HSTS.
- 1.24 The results presented in the HSTS clearly demonstrate the need for further development packages to be tested along with further alternative development scenarios. The need for determining the deliverability of specific developments is essential for scenario formulation as localised and targeted infrastructure improvements could result in currently rejected development scenarios delivering improved solutions, superior to that proposed by Development Scenario 5.
- 1.25 Also, of the five mitigation packages tested as part of the HSTS, four (packages 2 through 5) were concluded to be undeliverable, "through developer contribution alone". It is unclear what evidence was gathered during the analysis process to reach this conclusion and the Gifford's Park promoter was not consulted on this process. In addition, this conclusion could have been foreseen and therefore considered from the outset when determining the development scenarios and mitigation strategies to be tested, therefore allowing for a much more robust set of scenarios to be developed and tested, with appropriate consultation.

- 1.26 In addition, there is a clear and significant increase in costs between Mitigation Package 1 (lowest works costs at £6.7m) and Mitigation Package 2 (second lowest works costs at £87.3m). It is therefore questioned why alternative intermediate mitigation packages were not tested from the outset. If, on the other hand, the viability of the four final mitigation packages was unknown at the outset, then it is also questioned why alternative mitigation packages were not determined and tested following this issue coming to light. Could a more achievable alternative developer funded option have been considered that bridges the significant gap in cost between Package 1 and Package 2? Could the Council have instead determined a maximum developer budget and then developed a highways solution matching the budget available?
- 1.27 Also, there is no clear evidence to suggest whether the benefits of key sustainable infrastructure, such as the Guided Busway, have been afforded appropriate weight when assessing the impacts of individual sites within each Development Scenario.

*24) Overall, what mechanisms will be in place to ensure essential/critical infrastructure will be provided and funded in a timely fashion? How will other organisations be involved in delivering infrastructure and what commitments to delivery/funding are there?*

- 1.28 By delivering viable targeted network improvements, it is considered the previously discounted development of Gifford's Park (discounted as a result of an untargeted mitigation strategy and inappropriate assessment methodology) can deliver a robust highways solution enabling the facilitation of Gifford's Park as a sustainable development of 1,750 dwellings and associated infrastructure, without the need for new strategic infrastructure.
- 1.29 The proposed mitigation strategy for Gifford's Park provides for a mitigation package, which has been determined through manual assignment based on a nil detriment highways solution. Based on the outputs of the preliminary modelling, undertaken to date for the full Gifford's Park development, it can be concluded that the impact of the full development can be mitigated through a combination of physical works and soft measures, without the need for strategic infrastructure. These measures can therefore be implemented quickly without delay (i.e. no delay generated by the requirement for strategic funding). Below is a list of interventions that will mitigate the impact of the full Gifford's Park development:
- Somersham / A1123 / Harrison Way Junction
    - Lengthen flares on all approaches to roundabout
  - Meadow Lane / Harrison Way Junction
    - Lengthen Flares on north and south approaches
  - Ramsey Road / A1123 Junction
    - Lengthen flares on three arms
  - A141 / Huntingdon Road Junction
    - Widen entry width on three arms
    - Extend flares on three arms
  - A141 / B1090 Junction
    - Two lane exits (100m merge) on northern and southern arms to allow for two ahead movements through roundabout
  - Busway / Harrison Way Junction
    - Update and optimise signal timings



- Move stop lines forward
  - Upgrade pedestrian crossing location to meet desire line and allow reduced intergreens
  - Provide two lane flared approach and exit from north and south.
- Low Road / Harrison Way Junction
  - Lengthen Flare on north and south approaches
- Hill Rise / A1123 Junction
  - Kerb realignment and signal timings optimisation
  - Widen eastern approach to allow for a 100m flare.
- Harrison Way / Parsons Green Junction
  - Change give way road markings to allow unopposed north to south route and enforce right turners within roundabout to give way
- Garner Drive / A1123 Junction
  - Signal timings updated to limit green time given to minor arms and focus existing variable signal timings on A1123

1.30 The sustainability and deliverability merits of Gifford's Park clearly demonstrate that Gifford's Park should not have been excluded from further consideration, either as a standalone or as part of a scenario that comprises development that can be delivered without strategic intervention and by developer contribution.

