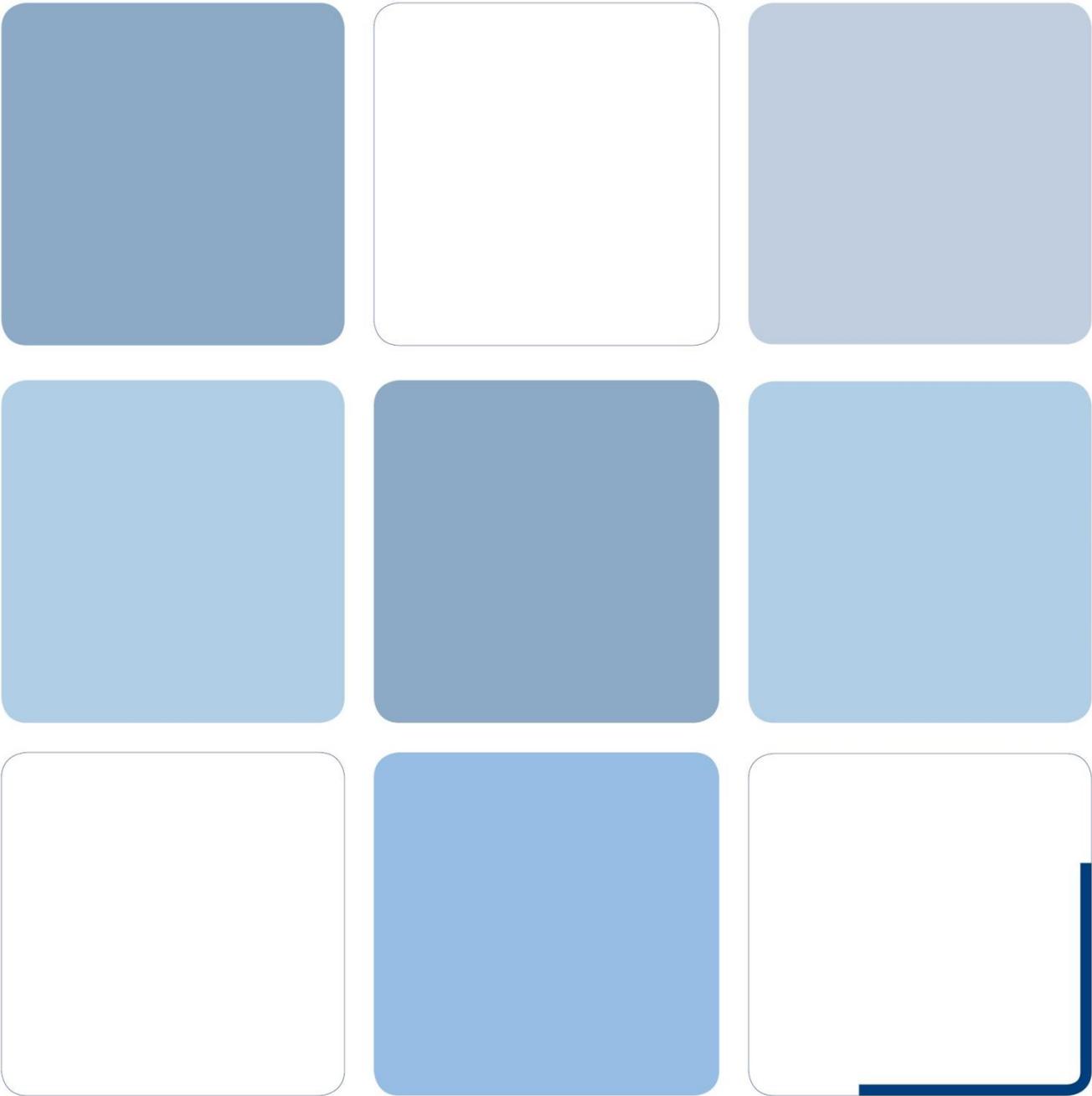




# Huntingdonshire Local Plan to 2036: Proposed Submission 2017

RPS for Larkfleet Homes



**HUNTINGDONSHIRE LOCAL PLAN TO  
2036: PROPOSED SUBMISSION 2017**

**RPS FOR LARKFLEET HOMES**

**FEBRUARY 2018**

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# 1 INTRODUCTION AND KEY ISSUES SHAPING THE PLAN

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## Introduction

- 1.1 This representation to the Proposed Submission Local Plan is made by RPS Planning and Development (RPS) on behalf of our client Larkfleet Homes (Larkfleet). Larkfleet is in control of the Sibson Aerodrome site which is being promoted as a new sustainable settlement for up to 2,500 homes and associated infrastructure (a Garden Village). The site's strategic context and location south of the A1 and east of Elton Road is illustrated at **Appendix 1**. This representation presents an overarching response to the Plan and sets out a number of reasons why the Plan is unsound. This representation should be read alongside the representations made to the Draft Consultation Plan in August 2017 (**Appendix 2**) and those made to the Housing and Economic Land Availability Assessment (HELAA) November 2017 (**Appendix 3**).
- 1.2 As you will be aware, Larkfleet partnered with Huntingdonshire District Council (the Council) to submit an Expression of Interest (EoI) to the Government in 2016 setting out the vision and deliverability of Sibson Garden Village as a way of supporting the Council's growth requirements through a comprehensively planned new settlement. The new settlement would create an exemplar village at Sibson, building on Garden Village principles to develop a truly sustainable community. The development would be led by Larkfleet Homes (an award winning medium sized housebuilder) as principal developer and would provide a choice of low carbon new homes, including affordable homes, as well as employment buildings, high street shops, an integrated public transport system and extensive green infrastructure. The Garden Village would incorporate new and modern methods of construction and innovation, including renewable technologies to boost productivity and delivery.
- 1.3 Following the EoI, whilst Sibson was not selected in the first wave of successful Garden Village bids announced in January 2017, the Government commended the proposals, offered their support to the Council to explore them further and recognised that they had the potential to be part of the solution to address the Council's housing needs. **Appendix 4** comprises the then Housing Minister Gavin Barlow's letter of commendation.
- 1.4 In addition to promoting the site as part of the government's Garden Towns and Villages agenda, RPS has promoted the site through the earlier stages of the Local Plan, previously submitting a representation to the Council's Strategic Housing and Employment Land Availability Assessment: Additional Sites Consultation (SHELAA) 2016, the Draft Consultation Local Plan (August 2017) and the HELAA (November 2017).
- 1.5 Larkfleet have taken a very active role in the Local Plan process through their representations and will continue to do so leading into the Examination in order to demonstrate the suitability of the Sibson Aerodrome site as an omission site. The information produced as part of the plan-making process will also assist in progressing any planning application. Larkfleet intend to submit a planning application in Summer 2018.

## Key Issues and Basis for Objection

- 1.6 RPS objects to the decision of the Council to continue with the preparation of the Local Plan despite clear evidence of a much higher housing requirement emerging from the Government's

September consultation ~~Planning for the right homes in the right places~~ in addition to the evidence put forward by RPS at earlier rounds of Local Plan consultation. The standard methodology for calculating Objectively Assessed Need (OAN) would see the Council's housing requirement rise from a proposed 804 dwellings per annum (dpa) currently to 1010. It is acknowledged by the Council within its report on the Local Plan to Cabinet dated 13 December 2017 (**Appendix 5**) that to meet the additional housing requirement would require significant further work, new site allocations, viability testing, consultation and further sustainability appraisal work.

1.7 RPS considers that without significant further housing allocations the key economic, social and environmental issues shaping the plan will fail to be achieved and therefore the objectives of the plan will not be realised. These include:

- A failure to achieve key transport improvements critical to support economic growth;
- A failure to secure sufficient need for jobs and growth, particularly in diversified areas of the district where jobs are in decline;
- A failure to address the demand for affordable accommodation and help address the rise in the working age and the corresponding decline in young population, particularly in more rural parts of the district;
- A failure to address the size of the requirement for housing of all types and across a mix of tenures;
- A failure to support the need for local infrastructure to support development across the district, such as education, health and social facilities.

1.8 The purpose of this consultation is to consider whether the Local Plan complies with the tests set out in paragraph 182 of the NPPF which require the Inspector to assess whether the Plan has been prepared in accordance with the Duty to Co-operate legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is ~~sound~~ sound, namely that it is:

- **Positively Prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.9 This representation responds to the publication of the Council's Proposed Submission Local Plan, setting out a number of reasons why the plan is considered to be **unsound**. It also raises issues of legal compliance in relation to the Council's Sustainability Appraisal.

1.10 In summary:

- RPS considers that the Plan is not positively prepared and will fail to meet its objectives which themselves do not include sufficient commitments to boosting the supply of market or affordable housing
- RPS considers that the Council is not presenting an appropriate appraisal of the level of housing growth required in the District and the significance of the shortfall is such that there is a need for an additional (3<sup>rd</sup>) strategic site to be delivered through the plan period, as was the Council's original intention in the 2013 Draft Local Plan. Sibson as an omission site is significantly well advanced and will deliver up to 2,500 homes. Policy LP1 is unsound.
- Currently, the Council's strategy seeks to concentrate too much development to its existing settlements, placing significant pressure on these market towns and villages. RPS has significant concerns over the ability of the Plan to deliver the housing needed from this concentrated development strategy to meet the objectives of the Plan. There is an over-reliance on two Strategic Expansion Locations (SELs) to which the Council apply overly optimistic delivery rates and there is considerable uncertainty over the ability of these SELs to deliver policy compliant levels of affordable housing. Policy LP2 is unsound.
- Limited consideration has been given to the Sibson site, which appears to have been prejudicially discounted from consideration despite its sustainability and deliverability credentials and the Council being aware of the site and it being promoted by RPS. The Sustainability Appraisal (SA) is not legally compliant.
- The Council has not sufficiently engaged in its duty to cooperate with surrounding Authorities to account for sub regional housing growth. In particular, RPS considers that Huntingdonshire has a duty to build on the Memorandum of Cooperation (MoC) signed with Peterborough and Cambridgeshire Authorities to ensure that there are not any unmet needs arising from within the HMA that will need to be met through the current Local Plan. Without evidence of such engagement, the Plan would fail to comply with the statutory Duty to Cooperate requirements of Section 33(A) of the Localism Act 2011. The Council has not complied with its legal Duty to Cooperate.
- The Council are applying wildly optimistic delivery rates to their large allocation sites. Section 7 of this representation provides a more realistic assessment of delivery rates. RPS objects to the allocation policies identified in Section 7 on the basis of the delivery rates being unrealistic and the Plan therefore not being deliverable and therefore unsound.

1.11 This representation considers these matters in more detail. It goes on to provide further evidence of the deliverability and suitability of the Sibson Aerodrome site as an omission site.

Structure of Representation

1.12 The following sections of this report are structured as follows:

- Section 2 sets out representations relating to the Duty to Co-operate;

- Section 3 sets out representations to the section of the Plan entitled '*Issues Shaping the Plan*', specifically focusing on the Objectives;
- Section 4 sets out representations to Policy LP1 Amount of Development;
- Section 5 sets out representations to Policy LP2 Development Strategy;
- Section 6 sets out representations to the Sustainability Appraisal;
- Section 7 sets out representations relating to Site Allocations;
- Section 8 sets out representations to other policies; and
- Section 9 provides a conclusion.

## 2 DUTY TO COOPERATE

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- 2.1 This section sets out RPS's objections to the Council's obligations in regard to the Duty to Cooperate. RPS **considers that the Council has not complied with the statutory Duty to Cooperate and therefore it is not considered that the plan is not legally compliant.**

### **Unmet Need from Outside the District / Duty to Cooperate**

- 2.2 The Duty to Cooperate (DtC) places a legal mandate on Local Authorities to work together to address strategic cross-boundary issues through the Local Plan process. To this effect, Huntingdonshire Council has agreed to work with other authorities in the wider Housing Market Area (HMA) as part of a common spatial approach up to 2031.
- 2.3 Huntingdonshire District is a signatory member of the Cambridgeshire and Peterborough Memorandum of Cooperation (MoC), published in May 2015. As part of the MoC it was recognised that there are strong links between Peterborough and the Cambridge authorities and to this end, it was agreed that Peterborough would accommodate 2,500 dwellings in their Local Plan from need arising from Cambridgeshire.
- 2.4 Huntingdonshire's links to Peterborough are also explored as part of the latest H-OAN 2017, which recognises the strength of the functional relationship between the two authorities. In terms of cross-boundary migration, Peterborough is indicated as the area with the second highest moves recorded in the year preceding the 2011 Census, indicating a level of fluidity between those moving between the authority areas (paragraph 25 of the H-OAN 2017). In terms of commuting, Peterborough shares the strongest links with Huntingdonshire, accounting for a significant number of moves as part of daily employment purposes. The data (paragraph 30 of the H-OAN 2017) indicates that whilst there are significant daily moves into Huntingdonshire, there is a larger proportion of cross-boundary commuting into Peterborough, which will likely offer a wider array of employment opportunities.
- 2.5 In terms of housing need arising from Peterborough, the earlier consultation draft of the Peterborough Local Plan (December 2016) identified an OAN of 25,125 over the period 2011-2036 (1,005dpa). This followed the same plan period as the Huntingdonshire Local Plan and in addition to the OAN, the plan accounted for the 2,500 from the Cambridgeshire MoC, which took the total housing requirement to 27,625.
- 2.6 In terms of the Council's supply, taking into account existing completions and commitments, the Draft Peterborough Local Plan identified housing to accommodate 30,191 dwellings (8.4% of which are windfall sites). Following publication of the Draft Peterborough Local Plan, a new SHMA update was published (March 2017) covering the Peterborough HMA and Boston Borough. This presented an updated OAN for Peterborough using more recent projections and a consideration of the LPEG formula which DLP, Larkfleet's OAN consultants, used for their assessment of Huntingdonshire's OAN (**Appendix 6**).
- 2.7 Under the LPEG methodology, included at the rear of the Peterborough 2017 SHMA, an OAN of 32,050, which rises to 34,550 when accounting for unmet need in the MoC. When set against the supply of 30,191 identified in the Draft Peterborough Local Plan, there is a shortfall of 4,359 dwellings in Peterborough, currently without a resolution to be met in the Borough. Clearly if there

is a shortfall it will have to either be met in Peterborough, or if this is not available, locations outside the administrative boundary of Peterborough which are readily accessible to Peterborough.

- 2.8 RPS is aware that Peterborough decided to delay preparation of the Local Plan for a period of 2-3 months to enable officers to fully appraise the new standardised methodology for calculating housing need. The Proposed Submission version of the Plan (January 2018) sets out at paragraph 5.16 that using the national standard method to calculate housing need, “*would reduce the Peterborough housing need to 942 dwellings per year, and also bring forward the start date of the plan to 2016*”. As the Plan now is intended to run from 2016 to 2031 (rather than from 2011-2031), the total redistribution of 2,500 additional dwellings (from Cambridgeshire) via the MoC is proposed to be reduced to 1,875 dwellings (as referenced in paragraph 5.18). Taking account of the need to meet student housing (from 2021 to 2036), an additional 600 dwellings are needed. Therefore, Peterborough City Council considers that the Local Plan requirement from 2016 to 2036 is 21,314.
- 2.9 It is important to recognise that the 2016 household projections will be published in 2018, during the Summer. Furthermore, in calculating objectively assessed need, the assessment will go up by 0.25% for every 1% affordability ratio rises above 4.
- 2.10 It is evident that HDC and Peterborough City Council are adopting polar opposite approaches to their LP preparation in response to the new standardised methodology. In Peterborough’s case the standard methodology results in a reduction of 1,673 homes over the period 2017-2036. RPS notes that this would include a reduction in transfer of homes between the Cambridge sub region HMA to Peterborough (currently agreed at 2,500 dwellings in the MoC) by 625 dwellings. The recommendation being made to Cabinet is that a strategic site at Castor and Ailsworth on the west side of Peterborough of 2,500 dwellings should be removed from the Plan.
- 2.11 The net effect of the different approaches being taken by HDC and Peterborough City Council in response to the standardised methodology is the suppression of housing delivery, rather than boosting housing delivery across the sub region. It will be noted that the standardised methodology would **significantly increase the housing requirement across the Cambridgeshire sub region** and evidence of joint working has not been updated, in the form of an updated MoC since 2013. RPS contends that there will be a legal duty on the Cambridgeshire Authorities to review the MoC under the DtC and agree how the increased level of need across the HMA will be accommodated.
- 2.12 RPS notes that removal of the site at Castor and Ailsworth from Peterborough’s Plan removes a 2,500 home strategic allocation that has the potential to meet needs arising in Peterborough and Huntingdonshire. RPS would contend that Sibson, being located in close proximity to the Castor and Ailsworth site and Peterborough itself, but within the administrative boundary of Huntingdonshire, is ideally placed to deliver the increased growth needs across the HMA and particularly in Huntingdonshire where growth needs are most significant.
- 2.13 RPS considers that it is important that Huntingdonshire builds upon the 2013 MoC to continue engagement with neighbouring authorities, such as Peterborough, to ensure that there are not any unmet needs arising from within the HMA that will need to be met through the current Local Plan. There is no evidence that this has been done at present. This would be in line with paragraph 14 of the NPPF, which requires that plans are flexible and capable of adapting to change. It is expected that evidence of engagement with Peterborough, including consideration of the site at Sibson

Aerodrome as a site with significant potential to meet need in Huntingdonshire and Peterborough, should be done as part of Huntingdonshire's legal DtC.

- 2.14 It is expected that evidence of such engagement would be needed prior to Examination and RPS would encourage Huntingdonshire to accommodate unmet need from Peterborough should this requirement arise.

### 3 ISSUES SHAPING THE PLAN / PLAN OBJECTIVES

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#### Section 3 - The Spatial Vision and Objectives

- 3.1 This section constitutes a representation to Section 3 of the Plan, which includes the Spatial Vision and Objectives.
- 3.2 The Plan is led by its Strategy and in turn its Spatial Vision and Objectives (p25-28) as set out in Section 3 of the Plan.
- 3.3 The Spatial Vision states that *“By 2036 Huntingdonshire’s physical environment will support the health and wellbeing of all its residents by:*
- *Supporting a diverse, thriving economy;*
  - *Providing sufficient infrastructure to support healthy communities;*
  - *Meeting the needs of a changing population; and*
  - *Working with our climate and landscape”.*
- 3.4 The Plan identifies a series of Objectives (p25-28) that seek to show how the Vision will be achieved including 4 key cross cutting objectives as follows:
- To maintain a good supply of suitable land for growth focused on previously developed land, offering sites of a variety of sizes and types to meet a range of market demands;
  - To promote high quality, well designed, locally distinctive, sustainable development that is adaptable to climate change and resilient to extreme weather;
  - To provide better job opportunities and more affordable homes to help create a more balanced and diverse local population and encourage more young people to stay or move here;
  - To facilitate opportunities for people to pursue a healthy lifestyle, actively participate in their community and have a high quality of life.
- 3.5 A number of other notable objectives also inform the Strategy:
- Provide a diverse and thriving rural economy;
  - Maximise funding available for required infrastructure through developer contributions;
  - Create a more balanced and diverse local population, including enabling young people to stay in the communities they grew up in;
- 3.6 RPS observes that at no point do the Plan’s Objectives refer to the need to boost the supply of housing in accordance with paragraph 47 of the NPPF. Instead, Objective 1 (page 25) is inconsistent with the NPPF by referring only to (the need to) **maintain a good supply of suitable land for growth**. In this respect the Plan is severely lacking in its commitment to address one of the key challenges identified at Section 3 (page 24) which is for **a significant requirement of**

**housing of all types.** The Plan's failure to present a satisfactory commitment to deliver the homes the District needs is reflective of the Council's historic approach to housing delivery, which has seen a persistent undersupply of housing over many years. In particular, there is an undersupply of housing generally, and an over reliance on only two strategic expansion sites (SEs).

- 3.7 This is equally the case with affordable housing which is a critical need for the District albeit objective 18 refers only to the need for a range of market and affordable homes. There are significant concerns about the level of affordable housing that is capable of being delivered from the Council's SEs. We note that the first phase of development at Alconbury Weald (Ref. 12/01158/OUT) has been approved with an affordable housing target of 10 for Phase 1, with future phases to be subject to a review process as specified in the S106 Agreement.
- 3.8 In terms of St Neots East (Ref. 13/00178/OUT . refused and subsequent appeal withdrawn) this proposed an affordable housing target of 10% at application stage but this was lowered to approximately 3% affordable housing for the appeal based on an updated viability appraisal.
- 3.9 The Council has a persistent record of undersupply of affordable housing going back many years and it is considered that there is a further need for big sites such as Sibson Aerodrome, in order to help to address this critical shortfall.
- 3.10 **RPS considers that the plan and specifically the Objectives are not positively prepared, effective or consistent with national policy.** The change sought is to ensure that needing to boost the supply of housing is specifically referenced as an Objective and that sufficient provision is made in the plan to boost housing supply and the delivery of affordable housing.

## 4 POLICY LP1 AMOUNT OF DEVELOPMENT

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- 4.1 This section constitutes a representation to Policy LP1 Amount of Development (p31). RPS considers that **Policy LP1 is unsound as it is not positively prepared, justified or effective.** The change sought is to make sure that the plan meets its full OAN, including meeting any unmet needs that arise from within the HMA;
- 4.2 Policy LP1 (page 31) sets out that *“In Huntingdonshire in the period 2011-2036, provision will be made for:*
- *at least 20,100 new homes (both market and affordable), and*
  - *approximately 14,400 additional jobs”*
- 4.3 As set out in our earlier representations to the Draft Plan, the OAN of 20,100 has been derived from the Council’s evidence paper *Huntingdonshire Objectively Assessed Housing Need April 2017* (H-OAN 2017), prepared by Cambridge County Council’s research group.
- 4.4 RPS does not consider that the Council has taken a considered or proportionate approach to defining the OAN and consequently has not identified the correct need for the District. The OAN as identified is not robust or sound for the purposes of plan making and should be reconsidered prior to submission to the Secretary of State.
- 4.5 To assist the Council in expediting the plan making process, Larkfleet Homes commissioned DLP Planning to model the OAN for Huntingdonshire (DLP 2017). This has been derived from the same starting point, but using more a more robust understanding of how to adjust the OAN to account for factors affecting local demography, market signals, employment trends and affordable housing.
- 4.6 In contrast to the Council’s OAN of 804dpa, the DLP 2017 presents evidence that the need is more likely to be around 979dpa, which is 21.8% higher than the Council’s own assessment. This equates to a shortfall of 4,375 against the Council’s OAN of 20,100.
- 4.7 The DLP 2017 evidence (**Appendix 6**) uses the 2014-based household projections, along with considerations which indicate that uplifts to the demographic starting point are necessary. The DLP 2017 evidence also takes a view on the Council’s (then) published position on OAN taken from the Cambridgeshire Strategic Housing Market Assessment 2013 (SHMA 2013).
- 4.8 A full assessment of the assumptions used in the DLP 2017 are detailed in **Appendix 6**, which identifies compliance with the PPG and also takes account of the methodology proposed in a report by the Local Plans Expert Group (LPEG).
- 4.9 Since RPS earlier representations were made, the Government has published its standardised methodology for the purposes of calculating housing need. This shows that the indicative standardised assessment of housing need is 1,010dpa, compared to the Council’s current local assessment of need of 804 dwellings. This is therefore 25.6% ( $206 / 804 * 100$ ) higher than the Council’s own assessment, and equates to a shortfall of 5,150 against the Council’s OAN of 20,100.

4.10 This is presented below alongside the figure derived in the DLP 2017 study, which identifies an OAN range of 829dpa to 1,277dpa. The LPEG figure represents an appropriate midpoint of the DLP 2017 figure at this point in time and is considered an appropriate minimum OAN.

Table 1: Summary of OAN Considerations

OAN Factor	H-OAN 2017	DLP 2017	DLP 2017 / LPEG
<b>Base population</b>	Latest 2014-based Household Projections	Latest 2014-based Household Projections	Latest 2014-based Household Projections
<b>Migration</b>	No adjustment	No adjustment	No adjustment
<b>Household Formation</b>	No adjustment	Uplift required	Uplift required
<b>Market Signals</b>	Uplift required	Uplift required	Uplift required
<b>Economic Need</b>	No adjustment	Uplift required*	NA
<b>Conclusions</b>	<b>20,100 dwellings (804dpa)</b>	<b>20,725–31,925 dwellings (829-1,277 dpa)</b>	<b>24,475 dwellings (979 dpa)</b>
* Based on a conservative view of employment growth. Further modelling required based on econometric projections.			

4.11 The DLP 2017 study was prepared at the same time the Council’s evidence on OAN was published in April 2017 and as such, the DLP evidence has undertaken a review of the SHMA 2013 which was in place at the time.

4.12 Nonetheless, a review of the Council’s latest evidence (H-OAN 2017) by RPS has been undertaken as part of these representations, summarised below:

Demographic Adjustments

4.13 Although the Council’s H-OAN 2017 uses the same baseline projections as part of the assessment of OAN, the Council’s assessment takes the view that no adjustments to the demographic profile are necessary. RPS does not agree with this assertion.

4.14 As indicated in paragraphs 3.8-3.18 of the DLP 2017 Report, there is evidence of suppression in household formation rates, which may have been led, in part, by an under-provision in the supply of housing. In particular, there has been a notable increase in households without dependent children, which has increased 36% between 2001 and 2011. A large component of this category is considered to be households where young adults opt to stay in the family home longer or stay in shared households due to affordability pressures. The growth of this section of the population is not considered to be consistent with paragraph 50 of the NPPF to increase opportunities for home ownership.

- 4.15 As a response to this the DLP 2017 report makes adjustments to the household formation rates to allow for an improvement to the 25-44 age cohorts, presenting a 6% increase on the demographic baseline. This approach is consistent with the PPG and justified for the purposes of calculating OAN.

#### Economic Considerations

- 4.16 The H-OAN 2017 takes the view that no adjustment is needed to align the demographic growth with estimates in the change of the workforce in the District. RPS does not agree here.
- 4.17 Section 5 of the DLP 2017 report has considered forecasts of labour change along with past rates of job growth in the District to present an understanding of whether the level of future workforce will meet the estimates of future jobs, or whether an increased population is needed to address the deficit.
- 4.18 The DLP 2017 report identifies that the rate of employment growth (9.1%) is more than double that of the growth in the working age population (3.9%) and adjustments to the OAN are required in order to balance jobs and growth. A conservative estimate has been made in the DLP 2017 Report which considers that between 829 and 1,277dpa are required in order to support economic growth in Huntingdonshire.
- 4.19 The Council has not correctly appraised this position through its assessment of OAN, which needs to be updated through a subsequent iteration of the OAN evidence.

#### Market Signals

- 4.20 The H-OAN 2017 recognises that market signal pressures do exist in Huntingdonshire, indicating that over the past five years the average house prices and rents in the District have exceeded the national average (paragraph 112 refers). To address this, the H-OAN 2017 proposes a 5% uplift to address these ~~modest issues~~ Whilst RPS agrees that there are evident market signal pressures in the District, the same cannot be said for distinguishing the severity of the signals and the method of uplift.
- 4.21 The DLP 2017 report considers that an uplift to market signals should take into account the severity of the issues faced and respond accordingly. The DLP 2017 report indicates that affordability in Huntingdonshire has become worse over the last 15 years and is a major issue for the District.
- 4.22 In terms of adjustments, the DLP 2017 report considers approaches taken at both a national and local level to uplift the OAN accordingly and takes the view that the proposed LPEG methodology offers an appropriate response. Taking matters of house price affordability and rental affordability into account, the LPEG formula calculates that a 20% uplift should be applied to Huntingdonshire, which would increase the demographically adjusted figure from 816dpa to 979dpa. This figure would sit as an appropriate mid-point between the range identified as part of the process to balance housing and employment growth.

#### Affordable Housing Need

- 4.23 The H-OAN 2017 identifies an affordable housing need of 7,897 dwellings over the period 2011-2035. This equates to an annual need of 316 affordable dwellings per annum.

- 4.24 Based on the current affordable housing requirement of 40%, this would require 790dpa to be completed for the affordable need to be met. Although this figure falls within the 804dpa indicated in the Council's H-OAN 2017 and the DLP 2017 figure of 979dpa, this does not account for the reality of affordable housing delivery and the scale of the shortfall in the District.
- 4.25 As part of the total 7,897 affordable housing need, there is an existing shortfall of 3,168 dwellings which has not been met through the existing housing stock. The Council recognises that the availability of affordable housing in the district is a significant problem and the latest Annual Monitoring Report for the District (December 2016) indicates that in 2015/16, only 9.7% of the total housing completions were affordable. This is far below the 40% threshold and goes some way to indicate the significance of the challenges Huntingdonshire faces to meeting the affordable housing need in full.
- 4.26 Consideration should therefore be given to what realistically can be expected from proposed development in the plan and whether there is a need to increase the OAN further, so that there is a greater chance of meeting the OAN for affordable and market housing in full.

#### Summary

- 4.27 RPS takes the view that the OAN for Huntingdonshire is higher than the figure proposed in the latest consultation Local Plan. The figure of 804dpa is too low and does not meet the PPG requirements for establishing the OAN.
- 4.28 The DLP 2017 report has taken a more thorough view of what the OAN for Huntingdonshire should be, based on a robust set of assumptions. This determines that the OAN for Huntingdonshire is a minimum of 979dpa, although this could increase further, depending on an updated view of employment growth in the District. Furthermore, the Government's standardised approach to calculating housing need shows that this would be 1,010dpa. By not adopting the standardised approach, RPS consider the Council are building up problems for the future and ignoring the true housing needs of the District.
- 4.29 RPS therefore considers that the plan is unsound, on the basis that it fails to plan for a sufficient level of housing growth. Given the persistent undersupply of housing in Huntingdonshire over many years, also evident in the Council's Annual Monitoring Report 2017, the Council should also be looking to adopt much more flexibility to ensure the level of housing delivery required can be reliably delivered.

## 5 POLICY LP2 DEVELOPMENT STRATEGY

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- 5.1 This section sets out the representation to LP2 Development Strategy. The Plan fails to establish a deliverable Development Strategy that is effective and plans flexibly in accordance with NPPF requirement, and therefore it is considered that **Policy LP2 Strategy for Development is unsound as it is not positively prepared, justified or effective or consistent with the NPPF.** The change sought is that the Council need to identify and allocate a further SEL / new freestanding settlement to address the shortfall in housing required and provide flexibility in the Plan and to relieve pressure on the planned concentrated sources of supply in the Huntingdon and St Neots Spatial Planning Areas. Therefore, the omission site comprising the Garden Village at Sibson Aerodrome should be identified in the Plan and the justification for this is set out in this section.
- 5.2 Informed by the stated Vision and Objectives, the Strategy Approach includes stating that:
- “Concentrate development in locations which provide, or have the potential to provide, the most comprehensive range of services and facilities”.***
- 5.3 The first part of Policy LP2 Strategy for Development expands on this by seeking to direct substantial new development to two strategic expansion locations (SELs) of sufficient scale to form successful, functioning communities. These two SELs are Alconbury Weald and St Neots East
- Distribution of Growth
- 5.4 The second part of Policy LP2 Distribution of Growth sets out the distribution of growth that will help to achieve the strategic approach of concentrating development in locations which provide, or have the potential to provide the greatest access to services and facilities.
- 5.5 RPS has very serious concerns with the approach. Notwithstanding our concerns over an evident and significant shortfall in the identified Full Objectively Assessed Need (FOAN) for housing, the Council’s approach to direct 75% of its growth to its traditional market towns, in particularly the level of growth being directed to Huntingdon and St Neots (which includes both SEL developments) is likely to place undue pressure on these towns, create competing development sites in concentrated areas and lead to the suppression of delivery of much needed housing in the District. Given the historic undersupply of housing in Huntingdonshire<sup>1</sup>, it is considered that the Council should be planning for every available option to boost the supply of housing, instead of employing a narrow approach which relies too heavily on existing settlements.
- 5.6 Whilst RPS supports the Council in its acknowledgement of the role of large scale developments to form new communities, the Council is seeking to accommodate both its SELs on the edge of its historic market towns at Huntingdon (Alconbury) and St Neots (St Neots East) in addition to a very large proportion of its other housing allocations. This includes the vast proportion of the housing being redistributed from the now undeliverable Wyton Airfield site (discussed below).

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<sup>1</sup> Appeal Decision APP/H0520/W/16/3159161 Land off Lucks Lane, Buckden refers to the 840dpa target having only been reached once, during 2011/2012, and missed by some margin subsequently (para13).

Too much growth in Huntingdon and St Neots

- 5.7 RPS considers that the level of growth in Huntingdon and St Neots Spatial Planning Areas will put considerable pressure on the supply emanating from sites from these areas and is regarded as a high risk strategy which RPS would say is inconsistent with NPPF paragraph 14 requiring that plans are flexible and able to adapt to rapid change. RPS has significant concerns over the delivery of housing coming forward from the Council's proposed allocations in these areas, in particularly its SEL allocations.
- 5.8 RPS considers that there is an overwhelming need for a further SEL / new freestanding settlement to address the shortfall in the identified housing requirement, provide the required flexibility in the Plan and relieve pressure on the planned concentrated sources of supply in the Huntingdon and St Neots Spatial Planning Areas. The Council's Strategic Transport Study discussed at para 5.15 onwards, indicates that there are significant highway constraints in and around Huntingdon that threaten the viability and deliverability of developments and this study has ultimately ruled out development altogether at Wyton Airfield. The Council are aware that the government's Garden Towns and Villages agenda encourages planning authorities and developers to bring forward large-scale housing development projects, many of them as freestanding Garden Towns or Villages.
- 5.9 In relation to the key service centres, the Plan proposes that *"approximately a quarter of the objectively assessed need for housing, together with a limited amount of employment growth, will be permitted on sites dispersed across the key service centres, local service centres and small settlements"* (p33)
- 5.10 The provision of some housing at rural settlements is appropriate and reflects NPPF paragraph 55 to enhance or maintain the vitality of rural settlements. However, the Council should ensure that villages within this tier of settlement that present as the most sustainable should in turn accommodate the majority of growth. RPS has concerns that the scale of housing development proposed at certain villages would not represent the most sustainable form of development. Indeed, the SA (p791) when considering LP2: Strategy for Development and *"whether it will match areas of population growth to employment growth in a manner which facilitates easy access to jobs? (SA18)"* acknowledges that *"local service centres are considered to be somewhat less sustainable due to the fact that there are limited employment opportunities"*. Also in considering whether it will reduce the need to travel (SA21) states that *"Local service centres are considered to be somewhat less sustainable due to the fact that there are limited employment opportunities which would generally add to levels of commuting"*
- 5.11 Therefore, the Council must ensure that sufficient development is directed to larger development sites to ensure that the Plan is able to deliver the significant infrastructure requirements and the huge levels of affordable housing that are necessary and key objectives of the Plan.

Distribution of Growth in conflict with the Strategy

- 5.12 The Plan's concentrated approach to growth distribution not only ignores the ability of a new freestanding Garden Village to assist with the delivery of housing, it also places unnecessary pressure on the District's already constrained market towns of Huntingdon and St Neots. The level of growth being directed to these areas is considered by RPS to be in conflict with other key pillars of the Strategy for Development in particularly:

- Protect the character of existing settlements and the surrounding countryside.

5.13 The Council recognise at paragraph 4.14 that *'not all new development can, or indeed should, go to the district's four market towns or their intrinsic character could be damaged; some development is needed elsewhere to spread the benefits of growth and sustain the more rural parts of the district'*.

5.14 Not only would a new Garden Village at Sibson relieve pressure on market towns and villages and on sites that are more difficult to deliver, it would create a truly sustainable new settlement with supportive infrastructure, including an extensive level of services and green infrastructure that would sustain a thriving rural community in its own right.

Wyton Airfield / Huntingdonshire Strategic Transport Study

5.15 The Plan includes a Note on Wyton Airfield on page 35 which confirms that *"the redundant Wyton Airfield has also been explored as a potential strategic expansion location"* This is evident from the earlier version of the Plan (the July 2013 Draft Local Plan) which proposed to include Wyton Airfield as a third Strategic Expansion Location (SEL).

5.16 Wyton Airfield is capable of accommodating approximately 4,500 homes and if delivered would provide a freestanding new settlement away from the market towns. However, a Strategic Transport Study commissioned by the Council to test the transport implications of a series of potential packages of development sites has demonstrated that the road infrastructure requirements to serve Wyton Airfield are not deliverable (paragraph 4.24). Consequently, the site has been removed from the Plan and the Council has sought to redistribute its housing numbers.

5.17 However, rather than propose a replacement SEL, the Council has proposed that the housing should be redistributed principally as additional smaller allocation sites around the District's market towns and partly in the form of an additional 1,680 homes at RAF Alconbury (SEL 1.2 RAF Alconbury, p143-146), an effective addition to the Alconbury Airfield SEL. This has resulted in more development in the District's market towns, in particularly at Huntingdon itself.

5.18 It is clear that the Council continue to support Wyton Airfield and recognise the benefits of allocating a third SEL in terms of its ability to relieve pressure on existing settlements. The Council's reasoning for allocating SELs at paragraph 4.17 (page 32) of the Plan recognises the benefits of diverting growth from the market towns, referring to their importance in being *'large enough to accommodate a new community with sufficient services and facilities to form attractive places to live and work whilst contributing to maintaining the character of the district's existing settlements by diverting pressure for growth which might otherwise be added to their outskirts'*

5.19 Larkfleet's Highways consultant (*Milestone Transport Planning*) has reviewed Wyton Airfield. This site was assessed as part of the Huntingdonshire Strategic Transport Study noting that those scenarios where this site was considered concluded that the delivery of the development would not be viable, primarily due to the significant cost associated with providing the necessary highway improvements to support development.

5.20 The significant highway infrastructure required to mitigate the impact of the developments located away from the Ermine Street / A141 corridor such as Wyton would be dependent on the delivery of a third river crossing over the River Great Ouse in addition to improvements to the A141 corridor

which would include carriageway dualling between Kings Ripton Road and Spittals Interchange and between the B1090 and the B1514.

- 5.21 These schemes would require significant investment. The Strategic Transport Study has estimated the costs for the third river crossing to be in the order of £78 million assuming a single lane crossing and over £130 million for a dual lane crossing, and the cost for the A141 upgrade would be approximately £80 million.
- 5.22 A likely source for funding would be through Central Government Funding however, the substantial costs in order to realise the improvement works would seem unlikely and leave little funding available to deliver other key infrastructure required to ensure development is viable.
- 5.23 The Environmental Capacity Study: Strategic Expansion Locations acknowledges that highway capacity will be a major constraint on the site for Wyton Airfield.
- 5.24 The Strategic Transport Study also indicates that if any further development were to come forward in the future, additional mitigation works will be required, not just to local junctions but to strategic corridors e.g. A141. A threshold will be reached, if it has not already, that significant infrastructure works will be required to improve on the strategic highway to support forthcoming development in the Huntingdon area.
- 5.25 Given that Wyton's removal from the Plan relates to deliverability issues rather than any conflict with the Strategy, it is unclear why the Council has not considered other freestanding settlements / SELs such as Sibson Airfield as an alternative but instead have looked to heap more growth on Huntingdon in particular.
- 5.26 The Council's strategy for redirecting this housing will not only place even greater pressure on the District's market towns but will also directly inhibit the ability of housing to come forward during the early part of the Plan period. This is because as acknowledged in the Plan (paragraph 9.5), RAF Alconbury will not be available for development until 2023. RPS is therefore objecting to the Strategy for Development on the basis that it conflicts with the Strategy aims to protect the character of existing settlements and will directly inhibit the supply of housing.

#### Contribution of Sites to Meeting Need within the Plan Period . Over Reliance on Two SELs

- 5.27 By removing Wyton Airfield from the Plan, the Council is now relying on just two SELs to deliver its substantive growth requirements. This growth is being met in Huntingdon and St Neots, which the Council is also proposing to take on significant levels of growth through non-strategic allocations. Relying on just two SELs means the Council is effectively putting all of its eggs into one basket and is dependent on these coming forward at the rates predicted. RPS has significant concerns with this approach and considers that the evidence does not support this occurring.
- 5.28 It is also evident from the Council's housing trajectory that the Council is anticipating delivery rates from its SELs which are consistently higher than that which have previously been achieved locally. Furthermore, the rates the Council are predicting are also substantially higher than what has been delivered nationally on similar sized sites. Applying national assumptions or actual local delivery rates would result in a significant reduction in the number of dwellings anticipated to come forward during the Plan period. This is considered in more detail later on in these representations.

Alconbury Weald SEL and St Neots East SEL

- 5.29 It is clear from the Council's Infrastructure Delivery Plan (IDP) as well as the Council's Infrastructure Delivery Plan Addendum Report (December 2017) that there is a significant amount of infrastructure required both within the District and anticipated from the Council's SELs at Alconbury Weald and St Neots East. RPS observes that many of the costs for infrastructure for these two SELs are unknown and without any identified funding as is shown in Table 31 Alconbury Weald SEL infrastructure requirement and Table 32 St Neots SEL Infrastructure Requirements, as can be seen in the IDP addendum report. Furthermore, there remains a lot of uncertainty over the timescales for the delivery of this infrastructure which is likely to have a knock on effect in terms of housing delivery. The IDP needs to set out a robust demonstration of the costs and the timescales for the delivery of infrastructure. At present it is not evident how the required infrastructure is going to be delivered within the timescales required to support the Council's anticipated delivery rates for these SELs.
- 5.30 Local Plans are required to be evidence based and both local and national evidence suggests that the Council's predicted rates of delivery for the SELs are too high. In conjunction with the pressure that the Council's concentrated distribution strategy will place on established settlements, RPS would regard the Council's anticipated delivery rates as unrealistic. RPS observes that significant infrastructure delivery is required from the identified SELs, including major transport works, education, community facilities, etc. and the Council will need to be satisfied that such infrastructure is both viable and deliverable in conjunction with anticipated delivery rates.
- 5.31 The NPPF at paragraph 14 states that:
- 'Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change'*
- 5.32 RPS would regard the Council's approach of only allocating two SELs as high risk, and places a lot of pressure on delivery from these sites. RPS has significant concerns with the Council's anticipated delivery rates likely to arise from these SELs and the amount of infrastructure required to support them. The approach is not considered to be sufficiently flexible and greater flexibility is required. RPS is aware of other EIPs, including Stratford District Council, where the Inspector has insisted on a buffer of 20% on top of OAN to address potential shortfalls in delivery rates arising from large sites in addition to other matters of uncertainty such as that arising from potential duty to cooperate requirements. RPS considers that a similar approach should be taken by the Council here.

### **The Solution - Overview of Sibson Aerodrome (Omission Site)**

- 5.33 The site at Sibson Aerodrome provides a genuine opportunity to deliver a Garden Village as a freestanding new settlement in Huntingdonshire. Sibson can provide up to 2,500 new homes and associated infrastructure, helping to create a thriving and successful community. It has the backing of a single landowner who is committed to creating an exemplar village with sustainability at its heart. Sibson is ideally placed to deliver on the Local Plan's housing and infrastructure requirements, being suitable, available and achievable. Furthermore, it is ideally placed to deliver on the key objectives of the Local Plan and would support the key aim of the Development Strategy which is to provide a deliverable, sustainable pattern of future development and ensure choice and diversity in the market.

#### **Available**

##### Larkfleet Homes

- 5.34 Sibson Aerodrome is under full control of a local housebuilder Larkfleet Homes and therefore is entirely available without being constrained by any fragmented ownership that is common with strategic sites. Larkfleet are fully committed to delivering an exemplar development at Sibson at the earliest opportunity. Having regard to the technical work that has already been completed at the site, it is entirely possible that an accelerated housing delivery trajectory could be enabled to allow for a mix of new homes and social infrastructure to be delivered from 2021/22 onwards.
- 5.35 Continued work is being undertaken to explore how housing can be brought forward at the earliest opportunity. It is anticipated that the village will be led by Larkfleet Homes in conjunction with three other independent housebuilders, in addition to Swift Homes, Larkfleet's own affordable housing registered provider. The early phases of Sibson delivery will be accelerated by use of innovative construction methods including the potential for modular housing. This is part of a program of innovative solutions that will assist in bringing homes forward quickly in the most sustainable way, without compromising quality. In this respect the proposal will partner with Lark Energy to deliver solutions for renewable energy.

Figure 1 – Sibson Garden Village Trajectory

Development Period	Year	Phase	Build Rate	Cumulative Total
1	2021 / 2022 <sup>2</sup>	Phase 1	75	75
2	2022 / 2023	Phase 1	150	225
3	2023 / 2024	Phase 1	200	425
4	2024 / 2025	Phase 2	200	625
5	2025 / 2026	Phase 2	200	825
6	2026 / 2027	Phase 2 / 3	200	1,025
7	2027 / 2028	Phase 3	200	1,225
8	2028 / 2029	Phase 3	200	1,425
9	2029 / 2030	Phase 3 / 4	200	1,625
10	2030 / 2031	Phase 4	200	1,825
11	2031 / 2032	Phase 4	200	2,025
12	2032 / 2033	Phase 4	200	2,225
13	2033 / 2034	Phase 4	200	2,425

## Suitable

### National Context

5.36 Sibson Aerodrome is being promoted to the Council in the context of a national housing crisis. The government has set out its ambition to provide one million new homes by 2020. To drive this forward, the government is encouraging new housing to come forward as freestanding new settlements in the form of Garden Villages. The Council has formerly partnered with Larkfleet Homes to explore the prospect of Sibson coming forward as a Garden Village to assist in meeting the District's housing and infrastructure needs, culminating in the submission of an Expression of Interest (EoI). Whilst Sibson was not initially selected as one of the government's first successful Garden Village bids, this was mainly due to the stage at which other bids, many of which had already been accelerated through the Local Plan allocation process, had reached in comparison.

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<sup>2</sup> Trajectory has been revised cf to Appendix 6 Delivery Document to reflect revised timetable for submission of application

The Sibson Eol was well received and was offered significant financial incentive to explore further. The Housing Minister at the time Gavin Barwell commented:

*'I recognise that the expression of interest in Sibson had much to recommend it in terms of vision and commitment to innovations'*

- 5.37 RPS understands that there remains support at a national level for Sibson and therefore there remains the potential for HCA and government financial support to the Council for delivering growth and infrastructure at this location.

#### Site Context and Proposal

- 5.38 The Sibson Aerodrome site is identified at **Appendix 1**. The site covers around 122 hectares and is located within Huntingdonshire District, Cambridgeshire but on the western periphery of Peterborough. It is located between the Nene Valley Railway (NVR) to the north, the Great North Road to the east and Elton Road to the west. It is an ideal location to create an exemplary Garden Village, set within the impressive landscape setting of the Nene Valley but with direct access onto the A1 and with a link to Peterborough via the Nene Valley Railway.
- 5.39 The Council is aware of the extensive work that has been produced to demonstrate both the vision and the deliverability of the site at Sibson. The Vision Statement and Deliverability Document submitted with the Eol are enclosed with this representation at **Appendix 7** and **Appendix 8** respectively.
- 5.40 Sibson Garden Village will provide approximately 2,500 new homes and associated infrastructure. This will include up to 1,000 new affordable homes, prioritising a proportion of these for young people who want to stay in the area. The new village will also provide the necessary infrastructure to support a self-sufficient thriving community, including a new school, a high street, market square, civic spaces, community facilities, employment space, sporting facilities and multi-functional green infrastructure. The Concept Masterplan is attached at **Appendix 9**.
- 5.41 The new village will be adjacent to the A1 strategic highway, to which it will link via a new junction which can be provided within land entirely within control of Larkfleet Homes. The deliverability of Sibson, as discussed further below, and in particular its ability to link to existing road and rail infrastructure with very little stress of nearby communities, is a key benefit of the scheme particularly in the context of a large scale development scheme.
- 5.42 The Vision Statement sets out the vision for a new community within a rural garden setting, incorporating beautifully designed energy efficient new homes whilst embracing the rural heritage and traditions of the District. There would be a focus on community led development and stewardship, supporting local people to shape their own environment with a strong link to nature and the local environment through footpaths, cycleways and open space corridors.

#### Meeting the Challenges and Objectives of the Proposed Submission Local Plan

- 5.43 It is evident from the Proposed Submission Local Plan that the Council is not planning sufficiently to meet its housing need and, particularly in the context of Wyton Airfield no longer being deliverable, Sibson stands out as a viable and attractive Strategic Expansion Location (SEL) alternative with a genuine ability to form a functioning new community with the principles of

sustainability at its heart. Sibson will directly address some of the key challenges of the Plan as identified on page 24 by:

- Improving key transport infrastructure and delivering genuine travel choice for a new community;
- Delivering a significant proportion of the District's housing need;
- 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

5.44 It is evident also that there is a significant level of synergy between the Objectives of the Plan and those identified for Sibson Garden Village. In particular, Sibson will directly address key objectives by:

- Providing high quality, well designed and locally distinctive development;
- Providing a balanced and inclusive community to support a diverse population and encourage young people to stay;
- Facilitate opportunities for people to pursue healthy lifestyles and actively participate in their communities by providing a locally led and stewarded development;
- Providing sufficient infrastructure to support healthy communities by providing a range of services and facilities and providing for suitable access and sustainable travel opportunities;
- Providing for a quantity and quality of housing growth to support the aspirations of the District whilst contributing to sustainable patterns of development;
- Utilising sustainable and energy efficient design principles to minimise impacts on the environment, manage waste and avoid adverse impact on the local environment.

#### Compliance with Policy LP2 . Strategy for Development

5.45 RPS considers that the current Strategy for Development is unsound. This is because the development strategy has an absence of a third SEL as a necessary requirement and the distribution of growth the Council are proposing directs too much growth to existing centres. Despite this, it is evident that the proposals at Sibson would fundamentally support the key thrust of this policy which seeks to provide a deliverable and sustainable pattern of future development. It can be seen from the table below that Sibson will directly assist with delivering the Council's Strategy for Development.

Figure 2 – Sibson – Meeting the Plan’s Objectives

<b>Proposed Submission Local Plan – Objectives and Strategy</b>	<b>Sibson Garden Village</b>
<p>Concentrate development in locations which provide, or have the potential to provide, the most comprehensive range of services and facilities;</p>	<p>Sibson will be a truly sustainable self-sufficient community supported by a range of services and facilities. The development will put the new school and social infrastructure at the heart of the community through the development of a Community Hub. This will also include job opportunities and employment space for the local community, village shops, sports and recreation facilities and care services.</p>
<p>Provide opportunities for communities to achieve local development aspirations for housing, employment, commercial or community related schemes;</p>	<p>At the core of the Sibson project is a social opportunity to generate strong community leadership, ownership, stewardship and responsibility. In addition to engagement throughout the design process, this will partly be facilitated by development of the Sibson Garden Village Community Trust (SGVCT) which will be established to manage open space and community facilities.</p>
<p>Support a thriving rural economy;</p>	<p>Sibson will support much needed new homes to support the local economy, generating significant job creation throughout the build process. It is estimated that Sibson will generate up to £0.5m of GVA during the first year of construction rising up to £18m in 2030. It will also deliver components of employment within the village such as live work units, light industrial premises, small offices, village shops and services, accommodation / B&amp;B premises, sports and recreation services etc. The Concept Masterplan, (Appendix 9) demonstrates how this employment space can be incorporated.</p>
<p>Protect the character of existing settlements and the intrinsic character and beauty of the surrounding countryside</p>	<p>One of the key tenets for Sibson’s suitability is its ability to direct a proportion of new growth away from Huntingdonshire’s established settlements. This is of acknowledged importance in the Plan and Sibson provides an opportunity to incorporate exemplary sustainability credentials away from the District’s market towns within the context of a freestanding settlement.</p> <p>As identified in the Delivery Document (page 14), a key principle is the idea of extending the garden village into the countryside to ensure there is a seamless integration of countryside and village life.</p>
<p>Provide complementary green infrastructure enhancement and provision to balance recreational and biodiversity needs and to support climate change adaptation</p>	<p>With the context of a large freestanding development proposal there is a corresponding opportunity to provide a significant amount of complementary green infrastructure where other more urbanised development proposals may struggle to achieve.</p> <p>Sibson will establish the Nene Valley Nature Improvement area (NIA) which will help generate new areas of habitat creation and strengthen wildlife corridors.</p> <p>The Concept Masterplan has been prepared to retain the vast majority of existing hedgerows, trees and ditches within an enhanced GI framework. Existing retained vegetation will be</p>

	supplemented through the creation of tree belts, woodland copses, orchards and spinneys, species rich grassland meadow, wetland habitats, and field ponds, to provide significant overall net gains for biodiversity and landscape improvements.
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## Achievable

### Deliverability

- 5.46 The deliverability of Sibson Garden Village as a development proposal is firmly established within the Delivery Document accompanying the EoI (**Appendix 8**). Since production of this document further technical work has been undertaken to demonstrate the suitability of the site in terms of an emerging vehicular access strategy.

### Technical Appendix – Emerging Access Strategy July 2017

- 5.47 A Technical Appendix prepared by Milestone Transport Planning in July 2017 demonstrates that proposed improvements to the A1 Trunk Road and its sub-standard junction with the Old North Road will deliver a direct vehicular access between Sibson Aerodrome and the Strategic Road Network (SRN) that is operational in safety terms but will also deliver a range of positive benefits to the wider community. The Technical Appendix is enclosed at **Appendix 10**.
- 5.48 This Technical Appendix identifies two different options (Option 1 and Option 2) which are currently being reviewed by Highways England. Each option demonstrates a deliverable solution that would address the current sub-standard nature of the slip from the Old Great North Road to the A1(T) at Wansford station. Each would either remove or dramatically reduce any reliance on local roads emanating from car borne traffic from the development by delivering a package of highway infrastructure improvement works, facilitating direct access onto the A1.
- 5.49 The proposed improvements to the A1 / Old Great North Road junction are a key thread of a wider, far-ranging vision for an integrated transport solution for Sibson that will sustain quality of life and well-being for all the community. Known as Sibson Connect it is defined as:
- “An integrated Strategy that delivers efficient, reliable and legible travel connections to existing settlements and transport hubs, encourages sustainable travel choices and removes physical and psychological barriers to movement.”*
- 5.50 In addition to being able to provide direct access onto the A1, Sibson goes further by offering a range of sustainable travel choices including:
- Community led travel options such as a fleet of electric/hybrid buses and an electric car pool for bespoke local travel and commuter needs;
  - Additional connections to the existing bus/guided bus network;
  - Nene Valley Railway / Transport Corridor
  - Nene Valley / Hereward Way pedestrian and cycle routes

5.51 Of note is the potential for Sibson to utilise the Nene Valley Railway (NVR) to provide an upgraded rail service between Sibson and Peterborough city centre. There is a unique opportunity to provide a direct rail link into a principal city within 20 minutes travel time. Such a provision offers a significant sustainability arm to the development that goes right to the heart of the objectives of the development.

5.52 In terms of the suitability of the site, it is evident in the light of the Technical Appendix that Sibson is able to provide a safe and deliverable means of access onto the A1 thereby minimising impact on the local road network. This capacity means that in RPS view the site is significantly advanced and highly suitable in relation to other Strategic Expansion Locations (SELs), most notably Wyton Airfield.

Affordable Housing

5.53 One of the key challenges to the Plan is the need to bring forward more housing that is truly affordable. Delivering affordable housing is an identifiable problem for the Council, as set out in paragraph 1.10 of the Annual Monitoring Report 2017 which states that *“the availability of housing that is affordable is a major issue in the District, with a growing gap between average earnings and housing costs”*. The H-OAN 2017 identifies an affordable housing need of 7,897 dwellings over the period 2011-2035. This equates to an annual need of 316 affordable dwellings per annum.

5.54 As part of the total 7,897 affordable housing need, there is an existing shortfall of 3,168 dwellings which has not been met through the existing housing stock. The latest Annual Monitoring Report for the District (December 2017) indicates (at paragraph 1.10) that in 2016/17, only *“128 new affordable homes were completed, amounting to 16.2% of all new dwellings completed”*. Indeed, the table below at **Figure 3** indicates that affordable housing delivery over the period 2011 /12 to 2015 / 16 has been drastically short of the 40% required, averaging out at just 10.15% over that period itself of course evidence of a persistent undersupply of housing generally.

5.55 The 10.15% figure is far below the 40% threshold and goes some way to indicate the significance of the challenges Huntingdonshire faces to meeting the affordable housing need in full.

*Figure 3 – Affordable Housing completions in Huntingdonshire 2011-2016*

Year	Total Housing Completions (from AMR 2016 / 2017 & DCLG)	AH Completions (from DCLG tables)	% of AH	Planning Permissions for AH (from DCLG tables)
2011/12	847	66	7.79%	1
2012/13	412	16	3.88%	125
2013/14	686	29	4.23%	63
2014/15	516	141	27.33%	56
2015/16	535	52	9.72%	232
<b>Total</b>	<b>2996</b>	<b>304</b>	<b>10.15%</b>	<b>477</b>

5.56 Consideration should therefore be given to what realistically can be expected from proposed development in the Plan and whether there is a need to increase the OAN still further so that there

is a greater chance of meeting the OAN for affordable and market housing in full. RPS notes that this is the recommendation given within the H-OAN albeit the Council has not chosen to heed this advice in preparation of its Plan.

- 5.57 The Council will recognise that larger sites have an important role to play in addressing housing and infrastructure needs. The *development* at Sibson provides an ideal opportunity for addressing affordable housing need quickly and substantially. Sibson will provide an opportunity to deliver up to 1,000 affordable homes, with priority given to those in need, including young people that wish to stay in the area. This will directly address two of the key objectives of the Plan.

#### Other Elements of Deliverability

- 5.58 Larkfleet and their technical team have undertaken technical assessments of the site in conjunction with the Council as part of the EOI. The Council will be aware that there are no significant obstacles that would prevent development coming forward at this location. In summary:

#### *Drainage*

- The site is not affected by the floodplain associated with the River Nene. Retained ditches along with features such as swales and ponds can form part of a natural Sustainable Drainage Strategy (SUDs).

#### *Landscape and Visual*

- The site is not subject to any landscape quality designation. Consequently the area is largely devoid of significant vegetation cover or other features of intrinsic landscape value. A new Garden Village in this location will provide multi-functional areas of green infrastructure to maximise environmental enhancements. The LVIA indicates that the development will have a positive impact on the landscape.

#### *Ecology*

- There are no statutory designations at an International or National level covering the site. A Garden Village at this location therefore provides significant opportunities to build strong ecological corridors through the village and enhance wildlife connectivity to the River Nene and Nene Valley Railway (NVR).

#### *Heritage and Archaeology*

- The site is free from known heritage constraints. Whilst there are buildings/features of heritage importance in the vicinity of the site, including Sibson House Hotel, no significant constraints exist that cannot be suitably mitigated and there are opportunities to create landscape buffers/retain open space adjacent them as part of a comprehensive Green Infrastructure strategy.

#### *Land Contamination*

- Limited contamination exists from existing fuel storage tanks and farm storage and operations however it is not considered that any of these would significantly affect the viability of bringing forward the Garden Village

### *Utilities*

- The site is largely free from constraints in respect of utilities. A CLH Pipeline crosses the aerodrome requiring a 3m wide easement either side of the pipeline and road crossings to be kept to a minimum. No other utilities present a constraint to bringing forward a garden village at the site.

### *Noise*

- The only locations that may require some form of noise mitigation (such as a landscape bund) are located adjacent to the A1.

### *Air Quality*

- The current air quality within the site is deemed good within the vicinity of the site and it is not expected that there would be any exceedances of relevant air quality objectives.

### Summary of Sibson

- 5.59 In summary, Sibson provides a genuine opportunity to deliver a Garden Village as a freestanding new settlement in Huntingdonshire. The site is suitable, available and achievable and its delivery is not constrained by any significant technical issue. An Emerging Access Strategy (**Appendix 8**) has demonstrated the deliverability of a new access point directly onto the A1, minimising the impact from car borne traffic on local roads.
- 5.60 Inclusion of the site as an additional Strategic Expansion Location (SEL) in the Local Plan is supported by the government both in principle as an opportunity to contribute to its ambitious Garden Towns and Villages Agenda but also in practice, by virtue of its response to the Council's EoL which encouraged the site to be explored further.
- 5.61 In addition to national support, development of the site would demonstrably contribute to meeting the key challenges of the Local Plan, in particular by providing significant levels of housing of all types, including affordable housing of which there is an urgent need, and providing access to key services / infrastructure for the rural area through development of a new self-sufficient community.
- 5.62 Sibson as an omission site would be entirely compliant with the Development Strategy for the Plan, which includes a number of key elements identified as bullets on page 31 within Policy LP2 Strategy for Development. In particular, the site will concentrate development in a location with access to services by ensuring that a suitable array of supporting facilities is at the heart of the development. By directing growth to a freestanding settlement, it will also ensure that the character of existing settlements and the surrounding countryside is protected.
- 5.63 The site is under the control of a single developer housebuilder in Larkfleet Homes, minimising any potential delays arising from third party or fragmented ownership common to strategic sites. Larkfleet are committed to using every innovation to bring forward this site as quickly as possible without compromising the quality of the development.

### **Summary of Comments to Policy LP2: Development Strategy**

- 5.64 RPS objects to the Development Strategy identified in the Local Plan. The strategy ignores previous evidence which supported the introduction of a third SEL to support the Council's growth needs. In light of the need to remove Wyton Airfield from the Plan, the Council should have considered the possibility of a replacement SEL at Sibson Aerodrome as a reasonable alternative option. This option would be best placed to deliver on the other elements of the development strategy, which includes the need to protect the character of existing settlements and is entirely deliverable.
- 5.65 Furthermore, the decision to redirect growth to existing market towns and villages will, in part directly inhibit the supply of housing in the case of RAF Alconbury but will also generate huge pressure on the District's existing settlements. The Council themselves acknowledge that 75% of growth is being directed to the spatial planning areas.
- 5.66 RPS has significant concerns with the supply of housing coming forward from the Council's proposed allocations. Plans are required to be evidence based and both local and national evidence suggests that the Council's predicted rates of delivery are too high.
- 5.67 RPS considers that there is an overwhelming need for a further large scale settlement / SEL to be allocated in the Plan. The Local Plan fails to consider how the Plan can adequately deliver on its growth requirements by ignoring the reality that this is best achieved by planning for a new settlement.
- 5.68 With regard to policy LP2 Strategy for Development, RPS considers that the plan is not **positively prepared, justified or effective or consistent with the NPPF, for the reasons identified.**

## 6 SUSTAINABILITY APPRAISAL

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### Introduction

- 6.1 RPS sets out its representations to the Sustainability Appraisal in this section. The Council considers that the Sustainability Appraisal is not legally compliant in terms of the Council's approach in selecting strategic sites for development and its approach to its distribution strategy. It is not compliant with the requirement of the Strategic Environmental Assessment Directive or that of the Environmental Assessment of Plans and Programmes Regulations 2004. The selection of the two Strategic Expansion Locations (SEL) at Alconbury Airfield and St Neots Eastern Expansion without comparable assessment of reasonable alternatives is an omission from the Council's lawful requirement.
- 6.2 Similarly the plans removal of Wyton Airfield as one of 3 SELs following its previous identification under Policy 1 (Strategy and Principles for Development) and subsequent redistribution of the growth to the market towns and key service centres has been undertaken without comparable assessment of reasonable alternatives is an omission from the Council's lawful requirement.
- 6.3 RPS has attended various Local Plan Examinations and provided evidence which has been accepted by Inspector's relating to Sustainability Appraisal (SA) issues and in particular pointed out deficiencies in the SA process, relating to the consideration of reasonable alternatives. It is hoped that the representations submitted here will be fully considered by the Council to avoid similar situations arising.
- 6.4 A key objective (as set out on p25 of the Proposed Submission plan) is *"to maintain a good supply of suitable land for growth in sustainable locations and focusing on previously developed land, offering sites of a variety of size and types to meet a range of market demands"*. However, RPS considers that the Plan fails to provide sufficient opportunity to do this by ignoring the possibility that the supply of new homes could be delivered through a Garden Village / new settlement at Sibson Airfield. Paragraph 52 of the NPPF states 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"*
- 6.5 The Local Plan fails to recognise this and specifically, the Plan's Sustainability Appraisal / SEA process has failed to consider Sibson as a reasonable alternative to accommodate its growth options, particularly in the context of seeking to redistribute growth from Wyton Airfield.

### Basis of Objection

- 6.6 It is long established that all reasonable alternatives should be considered within the development plan and SEA/SA process, and that failure to do so is a matter of serious concern which can deem a Plan unlawful. It was stated in the earlier (Draft Final) SA (page 36/565) that Stage C (Preparing the SA Report) is to present the predicted effects of the plan, including alternatives, in a form suitable for public consultation and use by decision maker.
- 6.7 In considering reasonable alternatives in the context of the SEA Directive, it has been established in law that the Council's assessment should be fair, equitable and via public scrutiny. It is also a

requirement under Article 5(1)(h) of the SEA Directive in reference to ANNEX I that authorities outline in their Environmental Assessment all the reasonable alternatives that have been considered and the reasons for discounting them. Given this is a statutory requirement, RPS would have expected that the Council follow this and provide evidence of such. It has not.

- 6.8 RPS provides the evidence below of how land at Sibson Aerodrome has failed to be appropriately considered by the Council in the preparation of its Plan and how the Council has overly focused upon narrow options for development of new SELs and expansion of existing settlements and in turn failed to adequately appraise the options for other reasonable alternatives and in particular Sibson Aerodrome itself. While the strategic options are important to the strategy of the Plan, there consideration does not abdicate the Council of having regard to its responsibility to consider site specific alternatives that are within the geographical scope of the Plan.
- 6.9 RPS does not advocate appraising unreasonable alternatives, however where reasonable alternatives do exist, it is incumbent on the authority to appraise them appropriately and lawfully.

#### Appraisal of Options

- 6.10 The Council has specifically focused its assessment of sites which had already been subject to public consultation and considered through the HELAA process. It has not looked at reasonable alternatives beyond those sites.
- 6.11 This position was recently confirmed in the joint letter issued by the Head of Development and Executive Member for Growth dated 24 February 2017. This letter to all Councillors was outlining to members the approach the Council was undertaking in following the removal of Wyton Airfield from the Local Plan as follows:
- “...To ensure that the Local Plan can meet the currently identified need without relying on Wyton Airfield, work continues on assessing the impacts of packages of potential sites. This goes beyond the 4 scenarios originally considered (and set out in the report to the Cabinet meeting on 17 March 2016), but continues to be focused on potential sites that have already been subject to public consultation.”*
- 6.12 The Council’s approach of restricting the SA to currently identified sites is unlawful in the context of what paragraph 67 of Mr Justice Ouseley’s February 2012 Judgement in the Broadland District, South Norfolk District and Norwich City Councils case. In this, it is clear that the Council is required to appraise options that may arise once a chosen strategic course has been established where optional forms of implementation arise, i.e. the choice of sites to deliver its preferred approach. This requires a detailed assessment of site specific options to be undertaken as part of the Council’s development plan in addition to Alconbury Airfield and St Neots Eastern Expansion and also as a further result of the redistribution of housing growth following the removal of previous new settlement proposals for Wyton Airfield.
- 6.13 At the earlier stage of plan making it was concluded therefore that the strategic approach to alternatives had identified a preferred approach informed by SA and had outlined the reasons for not selecting the alternatives to it. However, this is where the Council’s SA process halted and no assessment was undertaken of the narrower site specific alternatives that arose within the Council’s preferred strategy. It is stated in the earlier (Draft Final) 2017 SA (page XXii) that new sites put forward during consultations were included in the HELAA (2016/17). However, in respect of Sibson that did not include any a comparative assessment as a reasonable alternative.

- 6.14 Given the lack of assessment and consultation on reasonable alternatives the Council had not yet established and explained how the plan making process had identified its preferred options and the reasons for discounting options for the purpose of Article 5(Annex I(h)) of the SEA Directive.
- 6.15 It is therefore unclear as to how the Council can identify the allocations included within the Proposed Submission document as allocations when they have not firstly been subject of an SA Report prepared that outlines what alternatives have been appraised and the reasons for selecting the preferred sites against the reasonable alternatives that exist. Article 5(Annex I(h)) of the SEA Directive specifically requires this information to be published.
- 6.16 It is noted that since RPS made its earlier representations, the Council has since produced an updated Housing & Economic Land Availability Assessment (HELAA), December 2017. The HELAA states (on page 1) that this includes a formal sustainability appraisal of each site. The HELAA has assessed the Sibson Aerodrome (201) site on pages 10-13. The HELAA recognises that the site is available and is also achievable. With regard to suitability, it is recognised that a mixed development on a site of this scale would need to not only provide housing but also the full range of other uses, including employment, retail, community facilities and services, transport infrastructure, open space and sports provision in order to maximise the sustainability credentials of the garden village.
- 6.17 The Environmental Assessment of Plans and Programmes and Regulations 2004 sets out the requirements for the Environment Report under Schedule 1. In accordance with Article 5(1) of the SA Directive and regulation 212(2) of the SEA Regulations, the environmental report must identify, describe and evaluate the likely significant effects of the reasonable alternatives to the plan taking into account the objectives and geographical scope of the plan.
- 6.18 Schedule 2 information for Environmental Reports refers to likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, etc. While these requirements are referenced in Annex I (p1041) of the Final SA Report (December 2017), it is considered that the Final SA Report does not fully address the SEA Directive as it does not, for example, consider short, medium and long-term effects when appraising policies.

Land at Sibson Aerodrome as a Reasonable Alternative

- 6.19 The SEA Directive clearly states that:
- “Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I” Article 5(1).”***
- 6.20 Drawing from this, RPS expects that all reasonable alternatives within the geographical scope of the Huntingdonshire Local Plan should have been clearly appraised within the Council’s SEA/SA process. In this context:

***“the geographical scope’ of the Local Plan is to identify allocations within the four spatial planning areas for residential development and therefore all reasonable alternatives should be appraised equally, fairly and by public scrutiny.”***

- 6.21 In this context, a reasonable alternative, consistent with the geographical scope of the plan would comprise a development site capable of accommodating residential development at strategic scale comparable with the original three Strategic Expansion Locations considered within the SA consistent with the Plan’s spatial strategy.
- 6.22 Given that land at Sibson Aerodrome site fulfils this criteria it should have been appraised to the same level as the preferred option, publically consulted on for comment as a reasonable alternative to the preferred option. This has not taken place. The Final SA report does not make any mention of Sibson and has not provided any reasons for not selecting it as the preferred approach to be clearly articulated within the final Environmental Statement / SA Report. Therefore, it is considered that the SA / SEA report is not legally compliant.
- 6.23 The Council is fully aware of the Sibson Site and Larkfleet Homes proposals.
- 6.24 In July 2016 Huntingdonshire District Council (HDC), submitted an Expression of Interest (EoI), in partnership with Larkfleet Homes, for the development of a Garden Village at Sibson Aerodrome, south of Wansford. Although the EoI was well received by Government and significant financial support offered to HDC for further work on the proposal, HDC decided not to proactively take the project forward, preferring instead to concentrate its capacity and expertise on its then planned developments and the delivery of its new Local Plan. Through the EoI submission made by the Council and the supporting documentation associated with the site, the potential for the site to come forward, backed by Larkfleet Homes has clearly been established. This and the further submission made by RPS on 7 November 2016 to the council’s SHELAA consultation provides detailed and compelling evidence that the Council was fully aware of the site and why it should have been assessed and consulted on as a reasonable alternative within the SA to the Strategic Expansion Locations and further allocations being considered.
- 6.25 The position is further evidenced in light of the changed circumstances created by the removal of the site at RAF Wyton from the Local Plan, as a result of which HDC is required to explore and find other locations for development at various locations across the District. In this context, the Council should consider re-exploring further the idea of a sustainable new community at Sibson as a real alternative to development across other locations in the District. As a new settlement with the ability to be delivered to garden village principles, Sibson has the scale to offer opportunities that cannot be delivered through further extensions to existing communities. In addition, it can take pressure off existing settlements and infrastructure in the south of the district.
- 6.26 Both Larkfleet Homes and the landowners at Sibson are equally committed to the creation of an exemplary new settlement, adhering to the principles outlined in the Government’s Garden Village Prospectus, which will deliver many benefits to its residents and to the wider community. Further and more detailed explanation of the new settlement proposals for Sibson are contained in the supporting representations, however, briefly, Sibson offers the following advantages
- Approximately 2,500 new homes including up to 1,000 new affordable homes, including prioritising a proportion of these for local young people that wish to stay in the area;

- Reducing the need to spreading growth to communities around the District and expanding existing settlements;
- Avoids further development along the A14 and A141 Corridors;
- The potential for further HCA and Government financial support to HDC for delivering growth and infrastructure; and
- Concentrates deliverable sustainable transport infrastructure including a new A1 junction and the potential to develop rail links using the track of the Nene Valley Railway;

6.27 Sibson could provide for new local employment, training and schooling needs within an attractive development around a traditional village high street, village green and market square allowing people to live independently. The environment would comprise avenues of trees, ponds, meadows, orchards and areas of wildlife that are difficult to achieve on traditional extensions to urban areas.

6.28 In accordance with RPS's position on SA/SEA, and the requirement to update the SEA/SA Report with a full and detailed appraisal of strategic scale sites at Huntingdonshire, RPS has previously prepared an SEA/SA evidence base and submitted it alongside its previously made representations.

#### Sustainability Appraisal of Sibson

6.29 The Council will be aware that as part of RPS's 2016 SHELAA submission Larkfleet undertook and provided an assessment of the site against the Council's Sustainability Appraisal (SA) process for the Council to consider. This was repeated in response to the Council's 2017 HELAA consultation, when RPS undertook a further assessment of Sibson against the Council's SA criteria (**Appendix 11**). The assessments contained the following:

- Part A: An assessment of the potential of a Garden Village in principle to meet the strategic objectives of the Council's SA process from a strategic perspective; and
- Part B: An assessment of Sibson Garden Village against the Council's SA Objectives for site specific criteria.

6.30 The assessment provided to the Council in 2016 was undertaken in the context of the Garden Village Prospectus documents published in 2016. As stated in these representations whilst the Garden Village bid process was not successful, Larkfleet's new settlement proposals for Sibson still conforms to many of the aspirations and principles established by the Government for Garden Villages. In particular the Prospectus states that Garden Villages should be free-standing settlement in the region of 1,500 to 10,000 new dwellings, and offer big opportunities for transformational long-term housing growth.

6.31 Additionally, the 2015 Policy Exchange 'Garden Villages' report states that the new settlements will need to function as identifiable communities that are to a greater or lesser degree self-sustaining. The SA already provided to the Council remains appropriate and was again re-submitted, with modest revisions and appended to these representations.

## Summary . Sustainability Appraisal

- 6.32 In reviewing the evidence therefore, up to the publication of the Submission Local Plan, the Council has:
- failed to publish a SA Report that outlined the reasons for selecting the alternatives dealt with at the Strategic Expansion Locations in accordance with Article 5 of the SEA/Directive, particularly Annex I(h);
  - and failed to publish a SA Report that outlined the reasons for selecting the alternatives dealt following the redistribution of housing growth from Wyton Airfield to the market towns and key service centres.
- 6.33 The SEA Directive is clear that Environmental Assessment is a process and that this includes carrying out of consultations and taking into account consultations in the preparation of an Environment report (Article 2(b) of the SEA Directive refers).
- 6.34 In the context of the above, the Council published its Local Plan in which it identifies its Development Strategy and those sites that it intends to allocate to deliver its strategy. It is also accompanied by a SA Report which it states sets out the manner in which the authority has met the SEA Directive. In this therefore, RPS would expect the authority to have demonstrated how it has selected its preferred sites, what alternatives have been considered and how those alternatives have been appraised and considered in the context of the preferred sites. RPS would expect this to be categorically clear. Unfortunately this is not the case.
- 6.35 To meet the SEA Directive requirement, RPS would expect to see a clear conformity with Article 5 (Annex I(h)) of the Directive in clearly setting out its approach to reasonable alternatives both to the development strategy and also to the sites selected. This requires the Environmental Assessment to identify the likely significant effects of implementing the plan and reasonable alternatives as well as the reasons for selecting the alternatives dealt with. Equally, as has been established in UK case law the assessment must consider all those reasonable alternatives to an equal level of assessment and appraisal to that of the preferred option(s). In the case of Sibson, this simply has not taken place.
- 6.36 RPS/Larkfleet Homes has previously worked with the Council as part of its Garden Village Eol submission and has made further submissions in 2016 to the SHLEELA. The site and proposals are therefore both well established and well known by the Council. Given the failures in the SA process to date, re-appended to this submission is an SA of the site to assist the Council in assessment of Sibson as a reasonable alternative to its current preferred option sites.
- 6.37 The site is **suitable**, situated on the Sibson Aerodrome, not constrained by flooding or other significant constraint, or is it designated under any landscape or environmental designation. The site is **available**, in single ownership and can be delivered comprehensively. There are no restrictive covenants on the land that would preclude its development. The site is **achievable** and can be delivered with new homes as early in the plan making process. It is predicted that development rates of up to 200 units could be delivered per annum after the initial couple of years of delivering the early phases and infrastructure.
- 6.38 Whilst the Council has considered the merits of Sibson through further SA work, as set out earlier it is not considered that the SA / SEA complies fully with the requirements of the SEA Directive.

Furthermore, whilst it may be appropriate to provide conclusions from the SA process within the HELAA document, the assessment of Sibson should actually have been contained within the Environmental Report, which is the SA incorporating the SEA.

#### Proposed Resolution of the Situation

- 6.39 RPS refers the authority to the Forest Heath Judgement (2011) in proposing a solution to the current position. This clarifies that consultees should be able to find, in the Final SA Report, clear explanation of the reasonable alternatives considered within the preparation of a Plan, and the reason for their inclusion or exclusion from the proposals. It states (paragraph 15 refers) that the Environmental Report may rely on earlier material published, but must bring it together so that it is identifiable in that report and that those affected should not have to read all previous reports to ascertain the current position.
- 6.40 This is further clarified in paragraph 40 of the Forest Heath Judgement that states in the that case %~~h~~ was not possible for the consultees to know from it what were the reasons for rejecting any alternatives to the urban development where it was proposed or to know why the increase in the residential development made no difference. The previous reports did not properly give the necessary explanations and reasons and in any event were not sufficiently summarised nor were the relevant passages identified in the final report. There was thus a failure to comply with the requirements of the Directive and so relief must be given to the claimants+.
- 6.41 In *Calverton Parish Council v Nottingham City Council* [2015] EWHC 1078 (Admin) at [67], Jay J summarised the principles regarding the application of Regulation 12 and the requirement to assess reasonable alternatives. In a similar view to that made in the Forest Heath Judgement, he set out that %~~h~~e earlier documents must be organised and presented in such a way that it may be readily be ascertained, without any paper chase being required, what options were considered and why they had been rejected+.
- 6.42 The deficiencies in the SEA can be addressed by demonstrating how the reasonable alternatives have been considered for the distribution of growth and site selection, through an additional public consultation on to the current development strategy and individual site selection process accompanied by a full SA/SEA Report. This importantly cannot be applied retrospectively and must be conducted fairly, equitably and by public scrutiny through a further stage of consultation. As it current stands, the SA / SEA is not currently considered to be legally compliant.

## 7 SITE ALLOCATIONS

- 7.1 Section D: Allocations in the Proposed Submission Local Plan sets out the Council's proposed allocations. A housing trajectory has been prepared by the Council to demonstrate the anticipated housing delivery for each year up to 2036, and this is set out in the Council's Annual Monitoring Report 2017. Table 7.1 Plan period and housing requirement Local Plan to 2036 (p50) shows that 20,100 houses are required over the 19 year remaining period.
- 7.2 Table 7.2 Housing completions and commitments against Local Plan to 2036 requirement as at 31 March 2017, which is set out in the AMR 2017 (p51) provides a breakdown of commitments as set out below

Requirement 2011-2036	Net dwellings completed 2011-2017	Commitments				Total commitments	Total completions plus commitments
		Outline planning permission	Under construction	Full/Reserved Matters permission, not started	Existing allocations (in LPA 2002 & HWAAP)		
20,100	3,675	5,733	508	1,992	1,127	9,360	13,035

- 7.3 RPS commissioned the Strategic Planning Research Unit (SPRU) of DLP Planning Limited, November 2017 (**Appendix 12**) to consider the deliverability of potential new settlement sites in Huntingdonshire. The report has been produced in response to the public consultation that was undertaken by Huntingdonshire District Council on the Housing Land Availability Assessment (HELAA, November 2017). DLP had earlier undertaken an assessment of the Council's five year land supply position which included a review of the deliverability of the Council's strategic allocation sites.

### Past rates of delivery

- 7.4 SPRU have considered the level of housing completions over the last 5 and 10 years. As set out at paragraph 3.22, *"In the last 5 years there has been a substantial level of undersupply with just under 78% of the requirement being delivered. If just the last 3 years are considered then this equates to just under 75% of the emerging OAHN being delivered"*.

### Local Market Evidence re: past delivery

- 7.5 SPRU have considered a number of local case studies to understand past delivery. One such site is Loves Farm, which is a large site (1,438 units) still under construction. The Outline application was lodged in July 2001 and decision notice issued in April 2006 (para 3.36). Reserved Matters for the first residential units were submitted in 2006 (paragraph 3.37). There are a total of 8 developers / (9 if Charles Church is counted as a second outlet for Persimmon Homes) (paragraph 3.38). The AMR 2017 stated that as of March 2017, there have been 1,435 completions (page 62). Completions are assumed to have taken place in 2007, as building control applications were approved in 2007, i.e. 6 years within submission of the outline completion (para 3.47), so this evidence suggests **an average annual build rate of 144 dwellings a year** so less than 20 dwellings a year per developer.
- 7.6 Land at Riverside Mill is an application, which includes provision for 426 mixed residential units. The full application (03/02792FUL) was made in October 2003 and approved in October 2005. A further application (09/01203S73) was made in September 2009 and granted in 2010 for a

substitution of house types and increased the capacity of the site to 442 dwellings. Site was developed out by three developers. By 2016, some 352 dwellings had been completed, so assuming a full year of completions from March 2011 onwards, this represents **an average annual build rate of 70 dwellings a year** (para 3.45) or around 23 dwellings a year per developer.

Deliverability of other Potential New Settlements and spatial planning areas

7.7 This has been considered under section 5 of SPRU's report.

- West of A1 from Buckden to Brampton (208) (p18-21 in the HELAA)
- Abbotsley Squash Club and Cromwell Golf Club (051) (p22-25 in the HELAA)
- Abbotsley Golf Course (052) (p26-29 in the HELAA)
- Lodge Farm, Huntington (141) (p144-147 in the HELAA)
- East of Romans Edge, Godmanchester (123) (p164-168 in the HELAA)
- East of Alconbury Weald, Abbots Ripton (151) (p816-819) in the HELAA

7.8 The findings in the report by SPRU demonstrated that Sibson's Aerodrome (201) is the most deliverable site when compared against these other sites (paragraph 1.5)

Delivery Assumptions in the AMR

7.9 Appendix 1 of the AMR 2017 provides the housing trajectory data for the Local Plan up to 2036. The table below has been produced by RPS using this information. At this stage, RPS has focused on considering lead in times and delivery rates for some of the larger proposed allocations.

Sources of supply	Within 5 years	Within Plan period to 2036
Extant planning permission on allocated sites (p62-p64)	181	246
Extant planning permission on unallocated sites of 10+ dwellings (p64-p71)	3805	8447
Extant 'Prior Approval' Conversions to C3 residential use under GPDO (p71-p77)	124	127
Extant planning permissions on small sites (under 10 dwellings – aggregate figures) (p77-79)	681	1824
Sites with a resolution for approval subject to the prior completion of a s106 agreement (p79-p80)	21	21
Draft Local Plan to 2036: proposed allocations (p80 – p93)	1320	6485
<b>Total</b>	<b>6132</b>	<b>17150</b>

- 7.10 Typically it is good practice to consider lead in times and delivery rates at a local level using data produced by the Council. However, this information has not readily been made available.
- 7.11 As well as the information contained in the SPRU report at **Appendix 12**, RPS have utilised information from other reports which look into the delivery rates of sites throughout the UK and how long on average a site takes from validation to first completion for example. The SPRU report in section 3 states *“evidence from the various studies considered indicated that the larger the site, the longer it will take for development to commence. Typically 6 to 7 years for sites over 2000 dwellings”* (paragraph 3.15)
- 7.12 Based on research undertaken by Nathaniel Lichfield and Partners (NLP)<sup>3</sup>, this has shown that the average planning approval period and delivery of first dwelling is 6.9 years for sites over 2000 dwellings (p8).
- 7.13 The recommendations of the NLP report are pertinent for this Local Plan, which is reliant on a small cache of sites to underpin the strategy. Allocating an additional strategic site will, therefore, reduce the risk which is embedded in the Council’s current approach. Another report into the delivery of large sites was undertaken in 2014 by Hourigan Connolly. Titled *Report into the Delivery of Urban Extensions* this report considered the lead in times associated with a number of example large sites of 500+ dwellings. This report determined that from application to first completion, sites took an average of 9 years to complete, which is higher than the range identified in the NLP report (5.3-6.9 years).
- 7.14 There is clear and compelling evidence here that delivery rates should be an important consideration in framing the deliverability of growth proposals and the Local Plan should also consider alternative ways to meet the requirement for housing, taking these matters on board.

#### Supply of Sites

The Housing Trajectory in the Annual Monitoring Report 2017 is believed to be overly optimistic. RPS has chosen not to scrutinise the delivery of all sites in the trajectory but has chosen initially to focus on considering the deliverability of a number of the larger proposed allocated sites. RPS has considered past delivery rates achieved from Loves Farm (20 dwellings per annum per developer) and Land at Riverside Mill (23 dwellings per annum per developer) as a proxy for potential delivery from these allocations but has cautiously used a higher delivery rate where appropriate based on national rates.

#### Policy SEL2 - St Neots East, Wintringham

- 7.15 St Neots East . Wintringham, has a live hybrid application of 17/02308/OUT for 2,800 dwellings validated on 01/11/2017. According to the trajectory, the Council is expecting the first 25 dwellings to be delivered in 2018/19, 150 dwellings in 2019/20 and 250 dwellings for the next two years totalling to 675 by 2021/2022.
- 7.16 The Council mentioned that this application is in its initial stages and has not been included in the forward plan for planning committee. Furthermore, the Council would need to determine any subsequent reserved matters applications.

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<sup>3</sup> Start to Finish . How Quickly do Large-Scale Housing Sites Deliver? November 2016

7.17 The following table shows the Council's assessment of deliverability for this site compared with the assessment by RPS. RPS have utilised the information from the NLP report in producing this table, i.e. average planning approval period and delivery of first dwellings is 6.9 years.

St Neots East Wintringham	Extant	No of Units in Years 1-5	17/18 (Yr 1)	18/19 (Yr 2)	19/20 (Yr 3)	20/21 (Yr 4)	21/22 (Yr 5)	22/23 (Yr 6)	23/24 (Yr 7)
Council's assessment	2800	675	0	25	150	250	250	250	250
RPS assessment	2,800	0	0	0	0	0	0	0	25

7.18 As can be seen from the above table, whilst the Council consider 675 units will be delivered within Years 1-5, RPS consider that 0 units will be delivered and delivery will not commence until 2023/24. Therefore, 675 units should be removed from the Council's 5 year land supply.

Policy SEL2 - St Neots East, Loves Farm

7.19 St. Neots East . Loves Farm East, also has a live outline permission submitted and validated on 20 Mar 2013 for 1,020 dwellings. Although the council is expecting 330 dwellings in the 5 year supply (comprising 30 dwellings by 2019/2020, 115 dwellings in 2020/21 and 185 dwellings in 2021/2022), according to the case officer, no date has yet been set for when this application will be determined. Furthermore, the Council would need to determine any subsequent reserved matters applications.

7.20 At present, the council is only aware of one developer being involved in this current application. The following table shows the Council's assessment of deliverability for this site compared with the assessment by RPS. Again, RPS have utilised the information from the NLP report in producing this table, i.e. average planning approval period and delivery of first dwellings is 6.9 years. RPS has also assumed that the developer will build a maximum of 30 units per year.

St Neots East . Love Farm	Extant	No of Units in Years 1-5	17/18 (Yr 1)	18/19 (Yr 2)	19/20 (Yr 3)	20/21 (Yr 4)	21/22 (Yr 5)
Council's assessment	1020	330	0	0	30	115	185
RPS assessment	1020	45	0	0	0	15	30

- 7.21 As can be seen from the above table, whilst the Council consider 330 units will be delivered within Years 1-5, RPS consider that a maximum of 30 units will be delivered. Therefore, 285 units (330 - 45) should be removed from the Council's 5 year land supply.
- 7.22 It is RPS view that the housing delivery rates anticipated by the Council in relation to St Neots East and Loves Farm are unrealistic. Historically, Loves Farm has delivered approximately 100 dwellings a year. The two allocations are immediately adjacent each other and yet the Council are predicting that both sites will deliver upwards of 400 dwellings per year. This is higher than the highest annual delivery rate achieved from a single strategic site nationally (Cranbrook in East Devon) and is considered to be entirely unrealistic.
- 7.23 RPS also holds significant concerns about the level of affordable housing that can be delivered from these sites. It is of note that St Neots East, in addition to other large sites in Huntingdon, are currently unable to deliver policy compliant levels of affordable housing.

Policy HU19 - Bearscroft Farm

- 7.24 Bearscroft Farm benefits from outline permission (12/00685/OUT) for up to 753 dwellings, which was approved on 06 Aug 2014. According to the trajectory, the council is expecting 475 of these dwellings to come forward within the 5 year supply period, with 95 dwellings coming forward every year from 17/18-22/23. The site benefits from a number of reserved matters approvals, suggesting that development will take place during the 5 year period.
- 7.25 It is considered that the Council have overestimated the number of dwellings this site will deliver in the 5 year period. The most recent reserved matters applications were approved from June to December 2017. Based on the assumption of 27 months from approval to first completion (Lichfield, 2016), it is unrealistic to assume that development for these approvals will happen before 2020. Bearscroft Farm has an approved reserved matters application (1401813REM) from July 2015 for 223 dwellings. The Housing Trajectory Data shows that 87 units have already been built on site, therefore it is assumed that the rest of the 223 will be built out during the 5 year period with 87 in year 1 and 49 in year 2. RPS has assumed that the remaining reserved matters applications will come through at a similar rate, starting from year 4. Based on the table below, RPS is of the opinion that 165 dwellings should be removed from the Council's 5 year supply.

Bearscroft Farm	Extant	Units Built	No of Units in Years 1-5	17/18 (Yr 1)	18/19 (Yr 2)	19/20 (Yr 3)	20/21 (Yr 4)	21/22 (Yr 5)
Council's assessment	666	87	475	95	95	95	95	95
RPS assessment	666		310	87	49	0	87	87

Policy RA8 - RAF Upwood

7.26 RAF Upwood benefits from outline permission (1201274OUT) for no more than 160 dwellings, which was approved in June 2017. The application was made in August 2012, meaning that it took nearly 5 years to issue the decision notice. Before that, another outline application was made in April 2009, which was dismissed at appeal. There are currently no reserved matters applications for the site. The SPRU report (**Appendix 12**) demonstrates that the site remains derelict and that the site has a long history of unimplemented applications due to objections. RPS therefore assumes that this site is unavailable for development and that the 90 dwellings this site is expected to deliver should be removed from the 5 Year Housing Land Supply.

Policy HU13 - Brampton Park

7.27 Brampton Park benefits from two outline applications (15/00368/OUT & 15/00643/OUT) and a full application (16/00751/FUL), which gives a capacity of around 600 dwellings. Reserved matters applications have been approved, pursuant to both outlines. The housing trajectory data from August 2017 suggests that there are no units built on site.

7.28 RPS considers that the Council have overestimated the site's capability of delivering close to its full capacity within the 5 year period. The reserved matters and full applications were all approved between October-December 2016. In accordance with NLP's research into lead-in times, it is unlikely that this development will come forward before year 2. The Site has three housebuilders on board, including an affordable housing provider. RPS has based the delivery on 30 dwellings per annum, per house builder.

7.29 Based on the table below, RPS is of the opinion that 213 dwellings should be removed from the Council's 5 year supply.

Brampton Park	Extant	Units Built	No of Units in Years 1-5	17/18 (Yr 1)	18/19 (Yr 2)	19/20 (Yr 3)	20/21 (Yr 4)	21/22 (Yr 5)
Council's assessment	603	0	573	52	224	117	84	96
RPS assessment	603		360	0	90	90	90	90

Policy SEL1.1 - Alconbury Weald and RAF Alconbury

7.30 Alconbury Weald benefits from outline permission for up to 5,000 dwellings, which was approved in October 2014 (1201158OUT). Since then, numerous reserved matters applications have been given approval. A reserved matters application for 128 (15/01117/REM) was approved in December 2015. It is assumed that this development is likely to be fully built out during years 1 and 2. Reserved matters application 16/01329/REM for 165 was approved in October 2016, it is assumed that this development will come forward in year 2, based on NLP's research on Lead-in

times. The remaining two reserved matters applications were approved in 2017, it is therefore assumed that these will come through from year 3.

7.31 The trajectory data included in the 5 year housing land supply documents shows that there were 48 completions on site as of August 2017. RPS has therefore assumed around 50 dwellings per annum for each respective housebuilder, of which there are four.

7.32 Based on the table below, RPS is of the opinion that 620 dwellings should be removed from the Council's 5 year supply.

Alconbury Weald	Extant	Units Built	No of Units in Years 1-5	17/18 (Yr 1)	18/19 (Yr 2)	19/20 (Yr 3)	20/21 (Yr 4)	21/22 (Yr 5)
Council's assessment	4952	48	1087	102	220	260	260	245
RPS assessment 7.33	4952		467	50	80	137	100	100

7.34 The Local Plan acknowledges that the proposed 1,680 dwellings at RAF Alconbury may not come forward at all because of uncertainty about whether the US Air Force will vacate the site. Assumptions made about the delivery of this site should be discounted until confirmation is obtained that this site is available. Further, RPS contends that even if RAF Alconbury is available for development at all, it is unlikely that it will come forward during the plan period.

Policy HU1: Ermine Street, Huntingdon

7.35 Policy HU1: Ermine Street is allocated for approximately 1,440 homes. The site was allocated in the 2002 Local Plan but has not been delivered. There are various challenges to the delivery of development at this site, including uncertainty about the delivery timetable for new highway links and access arrangements and the delivery of safe connections for pedestrians and cyclists. We understand that there are landownership constraints to the delivery of the anticipated pedestrian and cycle link; the land required to deliver a foot / cyclebridge is not controlled by the developer or local authorities. In addition, there is no evidence that the site could actually accommodate the proposed 1,440 dwellings alongside the other proposed uses, infrastructure, open space and recreation, and strategic landscaping. The previous masterplans for development at the site indicate a capacity of approximately 1,050 dwellings.

7.36 There is no evidence that land at Ermine Street is developable during the plan period, and in fact there is a significant amount of uncertainty about the delivery of infrastructure required for the successful implementation of development at the site.

7.37 Larkfleet's highways consultant (Milestone Transport Planning) has also considered Ermine Street.

- 7.38 The Huntingdonshire Strategic Transport Study undertaken by Mott MacDonald in May 2017, supplemented by an addendum in December 2017 by CCC, assessed the highway network implications of six development scenarios in Huntingdon to consider the impact of a number of potential residential developments.
- 7.39 It was concluded that the delivery of Alconbury Weald, RAF Alconbury and Ermine Street would be the only feasible scenario considering the infrastructure costs required to mitigate the local highway network triggered by development-related traffic.
- 7.40 The study however suggested an investment of c.£5 million to undertake the works at Ermine Street are required which would be achieved through developer contributions. However, the study does not detail whether the required junction improvements are realistically deliverable within the highway boundary or whether third party ownerships would need to be consulted questioning the deliverability of development.
- 7.41 Importantly, the analysis highlighted that the mitigation works proposed do not solve the existing congestion problem in and around Huntingdon. The mitigation works as analysed, returns the operation of the junctions back to baseline which, in the majority of cases, are already operating well above capacity.
- 7.42 Therefore, the existing problems on the network are not addressed resulting in no improvement above existing conditions. The local junctions that require mitigation, and yet once mitigation works are complete, would only return the operational capacity to baseline conditions which are already above or close to capacity include:
- 7.43 Furthermore, the junction improvements suggested, include junctions on to the A141 corridor however, any improvement required on the already congested A141 is not acknowledged or considered as part of the mitigation proposals for the development scenario. Even though the mitigation works include junctions along the A141 they would not necessarily result in an improvement on the A141 carriageway itself.
- 7.44 As such, even if Ermine Street were to come forward, significant improvements would still be required on the A141 to improve existing capacity issues. Therefore, the cost of the infrastructure works would be significantly more than the c.£5 million quantified which, again, questions the deliverability of development. The Strategic Transport Study has estimated the costs for the A141 upgrades alone would be approximately £80 million.
- 7.45 It can be said that any further development in addition to Ermine Street, RAF Alconbury and Alconbury Weald within Huntingdon will likely require additional mitigation works carrying a significant cost.
- 7.46 Notwithstanding the outlying highway capacity issues, it should be acknowledged that the locations of the suggested developments are on the edge of existing settlements and as such would require significant investment to provide suitable public transport, pedestrian and cycle connectivity to Huntingdon.
- 7.47 It is acknowledged within the Environmental Capacity Study: Huntingdonshire Spatial Planning Area that Ermine Street has poor sustainable accessibility. For example, there would be a requirement to significantly upgrade existing bus services in the area, which are currently limited.

The cost of sustainable infrastructure needs to be considered in conjunction with the highway capacity costs in terms of deliverability.

- 7.48 In summary, the deliverability of Ermine Street as an alternative site within the plan period has to be called into question given that the potential contributions towards off-site highway mitigation and sustainable transport interventions may render the proposals unviable
- 7.49 RPS consider that Ermine Street as a site that can be delivered within the plan period has to be called into question given that the potential contributions towards off-site highway mitigation and sustainable transport interventions may render the proposals unviable.

#### Zones of competition

- 7.50 The Peter Brett Associate report for Birmingham City Council %Sutton Coldfield Green Belt Sites Phase 2 Report of Study (June 2014) considered the impact of competition between sites which is also an issue with all sites with the exception of Sibson Aerodrome+ (paragraph 3.16). This report considered that the impact of competition is to change prices and that this would be *“likely to make developers cautious rather than optimistic in terms their planned rate of delivery”* (paragraph 3.18).
- 7.51 Given that the majority of sites under consideration with the exception of Sibson Aerodrome are within close proximity to each other, it is likely to have an effect of supressing delivery (paragraph 3.18). RPS has significant concerns about the concentration of development allocations proposed the Council and the aforementioned issues with infrastructure delivery. There is very little flexibility established in the Plan and the trajectory in the AMR 2017 is considered to be overly optimistic.

#### Supply Summary

- 7.52 Whilst at this stage, RPS have chosen to analyse delivery of just a number of site allocations, the implications for delivery are stark. RPS considers that the Council have overestimated the supply of housing delivery and that the plan is therefore unsound in this respect. The change sought is that the Council should provide a more robust and realistic assessment of the delivery of the following sites as these are currently considered unsound as the delivery rates are not appropriate or justified:
- Policy SEL 2 -St Neots East . Wintringham
  - Policy SEL 2 -St Neots East . Loves Farm
  - Policy HU19 - Bearscroft Farm
  - Policy RA8 . RAF Upwood
  - Policy HU13 - Brampton Park
  - Policy SEL1.1 and SEL1.2 - Alconbury Weald and RAF Alconbury
  - Policy HU1 - Ermine Street, Huntingdon

## 8 REPRESENTATIONS TO OTHER POLICIES

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8.1 This section includes representations to other policies in the Plan.

### **Policy LP4: Contributing to Infrastructure Delivery**

8.2 The supporting text to the policy states, in paragraph 4.63, that *“the Council will seek to ensure that adequate provision (of infrastructure) is in place before development is occupied or comes into use”*.

8.3 Whilst RPS recognise that the Council will be flexible regarding timing and delivery of infrastructure and will take site specific considerations including viability into account, RPS is concerned about up front infrastructure costs. With larger developments in particular, there can be significant up-front infrastructure costs to bring sites forward. This can have major implications for developers cash flow. We consider that to expect developers to incur additional capital expenditure at the start of a project could deter developers from bringing forward sites, which could impact on the ability of the Council to significantly boost the supply of housing.

8.4 The policy is therefore not considered to be justified.

### **Policy LP17: Sustainable Travel**

8.5 The supporting text to the policy (paragraph 5.49) states that *“The need for a Transport Assessment, Transport Statement, or Travel Plan will be determined on a case by case basis”*. RPS considers that thresholds should be incorporated in policy in order to provide clarification.

8.6 RPS considers that sustainable transport is an important consideration, though the Council should look to apply this policy more flexibly, which can consider how proposals can support new transport initiatives and what other projects of national and sub-national significance are likely to occur during the plan period which would assist in delivering the aims of the policy.

8.7 The policy is therefore not considered to be justified.

### **Policy LP25: Affordable Housing Provision**

8.8 As currently drafted, this policy requires that 40% of all new developments greater than 11 dwellings are delivered as affordable housing. The supporting text states that *“Where it can be demonstrated that the target is not viable due to specific site conditions or other material conditions affecting development of the site an alternative dwelling or tenure mix or a lower level of provision may be supported...A development viability assessment may be required to support an alternative mix or level of affordable housing provision”*.

8.9 This requires each applicant to provide supporting financial information to inform proposals, which can be a costly and time consuming exercise. It should be the preserve of the Local Plan to set the affordable housing threshold, based on up to date and robust information to largely avoid these types of negotiations.

8.10 As such, the Council’s approach set out in this policy is flawed and will lead to unnecessary delays in the application process. The Council needs to give a greater degree of certainty for applications to be assessed against the Local Plan which is currently absent from the policy.

- 8.11 Additionally, if the Council expects that viability assessments are to become a part of the decision making process, the policy needs to be sufficiently flexible to accommodate evidence submitted and respond to proposals should they not meet the Council's proposed threshold. On this basis, it would be more appropriate to suggest that schemes should propose *up to 40% affordable housing, unless other factors, which could include viability, dictate otherwise*".
- 8.12 The policy as currently worded is therefore not considered to be justified, effective or consistent with national policy

## 9 CONCLUSION

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- 9.1 RPS considers that the **Council has failed in its duty to produce a sound plan on a number of counts.**
- 9.2 The Plan and specifically the objectives do not refer to the need to boost the supply of housing in accordance with paragraph 47 of the NPPF. Therefore, the objectives are not considered to be positively prepared, effective or consistent with national policy.
- 9.3 The Plan fails to identify its FOAN for new homes. The evidence that is used to inform the Plan is not up to date, does not take into account PPG requirements and consequently is not based on robust assumptions. Evidence produced by DLP, enclosed at Appendix 6 determines that the OAN for Huntingdonshire is a minimum of 979dpa, an uplift of 21.8% or 4,375 dwellings against the Council's OAN figure of 20,100 homes. The indicative standardised assessment of housing need is even higher at 1,010dpa. The plan and specifically **Policy LP1 Amount of Development is therefore considered to be unsound, as it is not positively prepared, justified, effective or consistent with national policy** ,
- 9.4 The Plan fails to comply with the Statutory Duty to Cooperate. Huntingdonshire is a signatory member of the Cambridgeshire and Peterborough Memorandum of Cooperation (MoC), published in May 2015. The MoC acknowledges the strong links between Peterborough and the Cambridge Authorities. It is expected that evidence of engagement with Peterborough, including consideration of the site at Sibson Aerodrome as a site with significant potential to meet need in Peterborough, should be done as part of Huntingdonshire's legal Duty to Cooperate. A review and update to the 2013 Memorandum of Cooperation (MoC) is required. **The Plan is therefore not considered to be legally compliant with regard to the Duty to Cooperate.**
- 9.5 The Council has failed to establish a deliverable Development Strategy that is effective and plans flexibly to boost the supply of housing. This is despite the significant requirement for housing of all types being identified as a key challenge in the Plan and a record of persistent under delivery of housing in the District. The Strategy chooses to concentrate significant levels of housing to existing settlements, particularly Huntingdon and St Neots. This includes housing redirected from a previously identified but now undeliverable SEL at Wyton Airfield. This will not only suppress the delivery of housing but will threaten the character of existing settlements, in direct contravention with another key requirement of the Strategy to protect existing settlements. The Plan and specifically **Policy LP2 Strategy for Development is considered to be unsound as it is not justified or effective.**
- 9.6 The Strategy is also at odds with its evidence base including the earlier version of the Plan (2013) which indicated that housing would be best delivered by a third SEL (at Wyton Airfield). The Council has failed to justify why it has not allocated another SEL in the light of Wyton being undeliverable. RPS has promoted the site at Sibson Aerodrome as a suitable and deliverable omission site in the form of a Garden Village which the Council have previously supported. However, the Council has failed to meet the statutory requirement of the SEA/SA in that it has failed to fairly, equitably and publically appraise and present the site at Sibson Aerodrome within its appraisal process for the Local Plan and make clear the reason for its omission. **The Plan is therefore considered not to be legally compliant.**

- 9.7 RPS has significant concerns relating to the Council's housing trajectory, which identifies delivery rates from SELs and other major allocation sites that are considerably higher than that which have previously been achieved locally and are substantially higher than which has been delivered nationally on similar sized sites. Applying national assumptions for delivery rates would result in a significant reduction in the number of dwellings anticipated to come forward during the Plan period. In the case of one of the Council's allocations at RAF Alconbury, this allocation will directly inhibit the supply of housing due to the site not being available until 2023 at the earliest. **RPS therefore objects to the Council's allocation policies as follows on the basis of the delivery rates being unrealistic and the Plan therefore not being deliverable and therefore unsound.**
- Policy SEL 2 -St Neots East . Wintringham
  - Policy SEL 2 -St Neots East . Loves Farm
  - Policy HU19 - Bearscroft Farm
  - Policy RA8 . RAF Upwood
  - Policy HU13 - Brampton Park
  - Policy SEL1.1 and SEL1.2 - Alconbury Weald and RAF Alconbury
  - Policy HU1 - Ermine Street, Huntingdon
- 9.8 In conjunction with the significant infrastructure requirements, RPS considers that the SELs and major allocations will not deliver at the rates anticipated and consequently that the Plan should be changed to allow for greater flexibility by allocating more sites for development. Given the concentration of development in existing settlements, this is best achieved by a further SEL/freestanding settlement.
- 9.9 As this representation and the extensive evidence available to the Council demonstrates that Sibson is a suitable, achievable and deliverable omission site. Technical evidence submitted with this representation (**Appendix 10**) demonstrates that a suitable access can be delivered onto the A1 that will ensure that development traffic is not diverted to local roads.
- 9.10 Having an experienced developer at the outset of the process will help speed the delivery of Sibson Aerodrome as a strategic site. In order to help meet the housing requirements of the Plan, it is advantageous to have a single developer co-ordinating infrastructure and the orderly release of sites. This is a key advantage of the Sibson Aerodrome, which is under full control of a local housebuilder Larkfleet Homes and is entirely available without being constrained by any fragmented ownership.
- 9.11 RPS considers that a new SEL/strategic site is required to support the growth needs of the Local Plan, and Sibson is ideally placed as an omission site to deliver on the Plan's Development Strategy. As set out above, RPS considers that there are significant failings in the Plan's proposals and that the Plan is unsound on a number of counts.
- 9.12 As well as the above soundness issues, RPS considers that the plan is unsound, specifically in relation to the following policies:

- “ Policy LP4: Contributing to Infrastructure Delivery which is not considered sound as it is not justified*
- “ Policy LP17: Sustainable Travel, which is not considered sound as it is not justified.*
- “ Policy LP25: Affordable Housing Provision, which is not considered sound as it is not justified, effective or consistent with national policy.*

## APPENDIX

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APPENDIX 1 . SITE LOCATION PLAN / STRATEGIC CONTEXT PLAN . SIBSON AERODROME

APPENDIX 2 . RPS REPRESENTATION TO DRAFT LOCAL PLAN - AUGUST 2017

APPENDIX 3 . RPS REPRESENTATION TO HELAA - NOVEMBER 2017

APPENDIX 4 . GAVIN BARLOW LETTER IN RESPONSE TO SIBSON EoI . JANUARY 2017

APPENDIX 5 . HDC REPORT TO CABINET ON LOCAL PLAN . DECEMBER 2017

APPENDIX 6 . DLP REPORT ON OAN FOR HUNTINGDONSHIRE . APRIL 2017

APPENDIX 7 . VISION STATEMENT . SIBSON GARDEN VILLAGE

APPENDIX 8 . DELIVERY DOCUMENT - SIBSON GARDEN VILLAGE

APPENDIX 9 - CONCEPT MASTERPLAN - SIBSON GARDEN VILLAGE

APPENDIX 10 - TECHNICAL APPENDIX . EMERGING ACCESS STRATEGY- SIBSON GARDEN VILLAGE -

APPENDIX 11 . HDC AND RPS SUSTAINABILITY APPRAISAL - SIBSON GARDEN VILLAGE

APPENDIX 12 . DLP REPORT ON DELIVERABILITY OF POTENTIAL NEW SETTLEMENT SITES .  
NOVEMBER 2017

APPENDIX 13 . DLP 5 YEAR LAND SUPPLY REPORT, HUNTINGDONSHIRE . MARCH 2017