

For and on behalf of
Bedfordia Developments Ltd

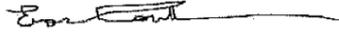
Huntingdonshire Local Plan 2018
Response to Inspector's Questions

MATTER 7 – PROPOSED SITE ALLOCATIONS – ST NEOTS SPATIAL PLANNING AREA

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1.0 INTRODUCTION

- 1.1 This representation has been prepared by DLP Planning Ltd (DLP) on behalf of Bedfordia Developments Ltd in response to the Inspector's Matter 7 Proposed Site Allocations – St Neots Spatial Planning Area. Our client has interests at Land East of Eaton Socon, West of River Ouse, St Neots. This submission considers if the proposed allocations have been 'positively prepared', 'justified', 'effective', 'consistent with national policy' in accordance with the National Planning Policy Framework.

2.0 Matter 7 – Proposed Site Allocations – St Neots Spatial Planning Area

Issue

Whether the proposed site allocations for the St Neots Spatial Planning Area are justified, effective and consistent with national policy.

Relevant policies – SEL2 and SN1-SN6

Questions

Taking each of the following proposed site allocations individually:

Strategic Expansion Location: St Neots East

-SEL.2 – St Neots East

St Neots

-SN1- St Mary's Urban Village

-SN2- Loves Farm Reserved Site

-SN3- Cromwell Road North

-SN4- Cromwell Road Car Park

-SN5- Former Youth Centre, Priory Road

Little Paxton

-SN6- North of St James Road

STRATEGIC EXPANSION LOCATION: ST NEOTS EAST SEL.2 – St Neots East

1) What is the background to the site allocation? How was it identified and which options were considered?

Planning Allocations		
Allocation	Reference	Status
SEL2 St Neots East	1300388OUT	Pending.
SEL2 St Neots East	1300178OUT	Refused. Appeal in progress.

- 2.1 The Council's Huntingdonshire's Local Plan to 2036, Sustainability Appraisal (SAR), (2017) assesses SEL.2 St Neots East at Section 4 of the report. Housing and Economic Land Availability Assessment 2017 (HELAA) (July 2017) assesses the sites at pages 241 – 243.
- 2.2 The majority of the growth in St Neots Spatial Planning Area will arise from site SEL2. The Council's approach, which is to rely largely on the existing/pending consents has weakened the evidence base that has informed the site selection process. The approach to deliver the majority of housing growth in St Neots Spatial Planning Area (SPA) via sites already in the pipeline means that the assessment of alternatives is either very light touch or missing entirely. There is no evidence of attempts to fully investigate a future sustainable growth strategy based on the assessment of reasonable alternatives.
- 2.3 An example of this is shown where the SAR failed to undertake an assessment of options, such as our client's Land at East of Brook Road, Land East of Eaton Socon (Council Ref: 165) which lies within the St Neots SPA settlement boundary. This implies that the Council has adopted a position of accepting existing growth further to (1300388OUT) and (1300178OUT) as a fait accompli as opposed to looking for sustainable opportunities for planning for new growth.
- 2.4 There are new housing figures which were released in July 2017 which supersede elements of Council's the Strategic Housing Market Assessment (2011 – 2031) for the housing market area. (See the Strategic Research Planning Unit's Response to Matter 4, 2018). If available, the most up to date information informing the SHMA / OAN should be applied in the Submitted Local Plan. Council's should seek to "*boost significantly the supply of housing*" in accordance with paragraph 47 of the National Planning Policy Framework (the Framework). The Council's lack of assessment of alternative strategic growth options significantly reduces their flexibility in the event a higher OAN needs to be met.

2) What is the scale and type/mix of uses proposed?

2.5 The St Neots SPA is estimated to deliver 4,049 dwellings in total up to 2036. SEL2 St Neots East will provide the majority of this. It is anticipated to deliver 3,820 units.

3) What is the basis for this and is it justified?

2.6 The Submission Local Plan's allocation SEL2 St Neots East is not considered to be 'justified' under paragraph 182 of the Framework.

2.7 As noted above adequate alternatives were not assessed to SEL2 St Neots East (including the omission of (165) Land at East of Brook Road). Consideration of reasonable alternatives is a legal requirement under the Environmental Assessment of Plans and Programmes Regulations 2004 which implement the requirements of the European Directive 2001/42/EC (the 'Strategic Environmental Assessment Directive').

4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

Planning Consents			
Allocation	Reference	Application	Status
SEL2 St Neots East	1300388OUT	Outline application for the development of up to 1020 dwellings, up to 7.6has of mixed uses including a nursery/crèche (Use Class D1), public house (Use Class A4), hotel (Class C1), care accommodation (use Class C2) and employment uses (Use Class B1), connections with Loves Farm, on-site roads and pedestrian/cycle routes, open space and other related infrastructure.	Submitted (2013). Pending Decision.
SEL2 St Neots East	1300178OUT	Development of mixed use urban extension to include; residential development of up to 2,800 dwellings, up to 63,500 sqm of employment development, District Centre including shops, services, community and health uses, Local Centre, Two Primary Schools, open space, play areas, recreation facilities and landscaping, strategic access improvements including 4 new access points and associated infrastructure.	Submitted (2013). Refused. Appeal in progress.

- 2.8 The rate of delivery of the above sites has been extremely slow to date. As shown from the table above, the SEL2 applications were submitted in 2013. Huntingdonshire's Housing Land Supply Position August (2017) sets out that SEL2 St Neots East will deliver 1005 units years 1 -5. This is followed by approximately 365 units each year up to 30/31.
- 2.9 The Council's Annual Monitoring Report (AMR) (2017) outlines that as of March 2017, there have been 1,435 completions, the first completions are assumed to have taken place in 2007 as it is noted that the first building control applications were approved in 2007. This evidence suggests an average annual build rate is a lot lower. The proposed delivery rates for the St Neots SPA are unrealistic (see DLP's Response, Matter 12).
- 2.10 The Framework paragraph 154 sets out that "*Local Plans should be aspirational but realistic*". There is a heavy reliance on the delivery of SEL2 St Neots East to deliver the overall growth targets of the plan. The majority of the growth for this site (2,800 dwellings 1300178OUT) was refused by the Council and it is currently in the process of an Appeal. In practical terms it may be many years before this site comes forward and delivers at the rates the Council expects. On the basis of the above, the plan is not considered to be 'positively prepared' under paragraph 182 of the Framework.

5) What are the benefits that the proposed development would bring?

- 2.11 The applications 1300388OUT and 1300178OUT at SEL2 St Neots East will make a contribution towards the Council's housing supply however there may be concerns that they are not yet consented.
- 2.12 Additionally, there may be a missed opportunity for the Council to adopt a 'plan-led' approach to take forward additional strategic growth in St Neots SPA a boroughwide focal point for future development.
- 2.13 This would involve a review of the evidence base, primarily the HELAA and SA, with a particular focus on the new locations which came through in the Call for Sites, August (2017) including site (165) East of Brook Road in the HELAA.
- 2.14 The Council's current SAR and HELAA process as they presently stand are more for 'information only' as the 'planning decision' has either been made or it is due to be determined at an Appeal.

6) What are the potential adverse impacts of developing the site? How could they be mitigated?

Allocation Key Constraints	
Allocation	Key Constraints
SEL2 St Neots East	Flood Risk Listed Building

- 2.15 SEL2 St Neots East has a number of constraints including flood risk, listed buildings. The SAR (2017) assesses St Neots East as generally positive against the Flood Risk Objective SA3 with one minor negative. The HELAA (2017) however scores St Neots East more negatively against the criteria to 'Manage and Minimise Flood Risk (Taking into Account Climate Change)'. Here the site is shown that the site also has Flood Risk Zone 3b.
- 2.16 The HELAA assessed (165) Brook Road more negatively than SEL2. It is difficult to justify why given that half the site is in Flood Risk Zone 1. None of the proposed development would be in an area of Flood Risk.

7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

- 2.17 The application 1300388OUT is supported by a Flood Risk Assessment (2013). The scheme 1300178OUT is also supported by a Flood Risk Assessment (2013). The evidence being used to determine these applications is out of date.

8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 2.18 The Council have prepared the Huntingdon Infrastructure Delivery Plan (IDP) (2017). The IDP (2017). Appendix B of the IDP (2017) sets out the total number of C3 (dwellings) expected on site by 2036. These are summarised below.

Location	Site Allocations	Dwellings
Spatial Planning Area	Location	Number
St Neots	Eaton Court	29
St Neots	Huntingdon Street	64
St Neots	Former Youth Centre	14
St Neots	St Mary's Urban Village	38
St Neots	Loves Farm Reserved Site	41
St Neots	Cromwell (Cornwell) Rd North	80
St Neots	Cromwell (Cornwell) Rd Car Park	21
St Neots	Nelson Road	104
St Neots	Riverside, Little Paxton	240
Total		567

- 2.19 The IDP sets out that the growth projected in St Neots SPA is 567. A key omission appears to be the strategic growth site (3,820 units) SEL2 St Neots East which has been pending a decision since 2013. If this additional work has not been carried out, the supporting infrastructure requirements will fall very short of the proposed level of growth. Moreover, there is no flexibility built into the IDP to allow for a higher OAN. The Framework in paragraph 47 outlines that local planning authorities should: “...illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.” It appears that Council has insufficient evidence on the level and extent of the infrastructure required to support SEL2 and how this will be funded.

9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

- 2.20 The HELAA (2017) identified that waste treatment capacity is a matter that does need to be resolved for the allocations. The IDP (2017) section 13.2 deals with wastewater treatment and sewage. This involved a review of the existing waste water infrastructure and evidence in partnership with stakeholders including Anglian Water and the Environmental Agency.
- 2.21 The IDP modelling does not include SEL2 St Neots East. Paragraph 162 of the Framework states that “Local planning authorities should work with other authorities and providers to: assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands.” The Submission Local Plan is not deemed ‘effective’ or ‘consistent with national policy’ in regard to its infrastructure provision for waste water.

10) Is the site realistically viable and deliverable?

- 2.22 No comment.

11) What is the expected timescale and rate of development and is this realistic?

- 2.23 See Question 4 above. No further comment.

12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?

2.24 This SEL2 St Neots East allocation which is coming through the planning application process which started in 2013. Evidence of the assessment of alternatives i.e. alternative site boundary options and extents have not been provided. The strategy for growth is a reactive approach to pending applications as opposed to the SA and HELAA process.

13) Are the detailed policy requirements effective, justified and consistent with national policy?

SEL2 St Neots East

- 2.25 The Council's evidence base contains significant gaps. It does not demonstrate how the allocation SEL2 St Neots East is the most appropriate strategy when considered against reasonable alternatives (such as (165) Land at East of Brook Road) or how the supporting infrastructure will be put in place to underpin it.
- 2.26 The Council's strategy for growth is reliant on two pending applications. The principle of development for housing is one conceded from a developer's interest rather than a 'plan-led' drive for sustainable development. It is our view that the site (165) Land at East of Brook Road would represent a much sustainable option.
- 2.27 It is not considered that SEL2 has been 'positively prepared', 'justified', 'effective', or 'consistent with national policy' in accordance with the policies in the Framework paragraph 182.

SN1- ST MARY'S URBAN VILLAGE

1) What is the background to the site allocation? How was it identified and which options were considered?

Planning Allocations		
Allocation	Reference	Status
SN1 St Mary's Urban Village	09/00411/FUL	24 Units. Granted.
SN1 St Mary's Urban Village	18/00986/NMA	3 Units. Pending

- 2.28 The site was originally identified in the Huntingdonshire Environmental Capacity Study (2013). The SAR assesses St Mary's Urban Village at Section 4, Section B under St Neots Sites. Housing and Economic Land Availability Assessment 2017 (HELAA) (July 2017) assesses the site at pages 241 – 243. The material benefit of including this site as a Local Plan allocation is not clear. Two applications have been submitted for a total of 27 units (much of the allocation) (see Question 4 below).

2) What is the scale and type/mix of uses proposed?

- 2.29 SN1 St Mary's Urban Village (40 units). No further comments.

3) What is the basis for this and is it justified?

- 2.30 Arguably the plan retrofits a growth strategy around planning applications which came through as a result of market forces dating back to 2009 rather than looking for future opportunities for growth.

4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

Planning Consents			
Allocation	Reference	Application	Status
SN1 St Mary's Urban Village	09/00411/FUL	Mixed use development comprising 21 houses, 3 flats, 1 retained retail unit, 2 workshops.	Submitted (2009) Approved (2014)
SN1 St Mary's Urban Village (The Old Forge And 22 High Street)	18/00986/NMA	Internal reconfigurations to units 1-3 to provide one 1 x Bed Flat, one 2 x Bed Flat and one 4 x Bed Town House.	Submitted (2018) Pending decision.

2.31 The Council's Housing Land Supply Position August (2017) sets out that SN1 St Mary's Urban Village will deliver 16 units in years 1 – 5. The remaining units are anticipated to come forward in years 17/18 – 21/22. Given the application was approved in 2014 this may be achieved however the rate of delivery is exceptionally slow as the application was submitted 9 years ago and it is of relatively small scale.

5) What are the benefits that the proposed development would bring?

2.32 The development will only make a small contribution towards the overall housing supply. This site would come forward even if the Submission Local Plan is not adopted, by virtue of the consent which has already been granted. Therefore, the benefit of the policy SN1 is not immediately apparent as it will only support a nominal number of additional units comparable to what is already in the pipeline.

6) What are the potential adverse impacts of developing the site? How could they be mitigated?

Allocation Key Constraints	
Allocation	Key Constraints
SN1 St Mary's Urban Village	Flood Risk Listed Buildings Conservation Area St Neots Air Quality Management Area

2.33 There are a number of constraints such as Flood Risk Zone 2, listed buildings, conservation area, and air quality on this site. However, it is recognised that the principle of housing on this land has been established through the development process and therefore these constraints are not insurmountable.

7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

2.34 This site is supported by a FRA (2009) by Buro Happold. There is some light touch sequential testing at section 5 of the report. However, the justification for this site's suitability for development relies upon the Councils FRA (2008) and HELAA (2005). The data is out of date and doesn't scrutinise alternative potential locations.

8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Location	Site Allocations	Dwellings
Spatial Planning Area	Location	Number
St Neots	St Mary's Urban Village	38

2.35 Appendix B of the IDP (2017) sets out the total number of C3 (dwellings) expected on site by 2036 (see above.)

2.36 The level of growth anticipated to come forward on this site is slightly under what is referenced in the Council's IDP (2017).

2.37 However cumulatively, taking into account that the St Neots SPA as a whole aims, to bring forward 4,049 dwellings up to 2036 and that 567 units are planned for, a significant shortfall of infrastructure is anticipated to the detriment of the soundness of this plan. The shortfall in terms of dwellings considered is 3,482 units. The Council's infrastructure strategy is therefore not viewed as 'effective', against the Framework paragraph 182.

9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

2.38 See question 8. No further comment.

10) Is the site realistically viable and deliverable?

2.39 No comment.

11) What is the expected timescale and rate of development and is this realistic?

2.40 See Question 4 above. No further comment.

12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?

2.41 The site boundary has been defined by the existing planning permissions on the site. There is no evidence of the assessment of alternatives to this.

13) Are the detailed policy requirements effective, justified and consistent with national policy?

2.42 Given that SN1 is already a granted consented in 2014, the allocation does not show how the plan has been 'positively prepared' under the Framework paragraph 182 with the view to identify a plan-led land supply for future development.

SN2- LOVES FARM RESERVED SITE

1) What is the background to the site allocation? How was it identified and which options were considered?

Planning Allocations		
Allocation	Reference	Status
SN2 Loves Farm Reserved Site	13/00389/OUT	41 units. Granted.

2.43 SN2 Loves Farm Reserved Site was identified in the Huntingdonshire Environmental Capacity Study 2013. The SAR assesses this site at Section 4, Section B under St Neots Sites. Housing and Economic Land Availability Assessment 2017 (HELAA) (July 2017) assesses the site at pages 241 – 243.

2) What is the scale and type/mix of uses proposed?

2.44 SN2 Loves Farm Reserved Site (40 units). No further comment.

3) What is the basis for this and is it justified?

2.45 Permission has already been granted for the full quantum of growth (41 units) in 2017. Given that the principle of the development has been established and implemented, the value of the allocation is questionable.

4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

Planning Consents			
Allocation	Reference	Application	Status
SN2 Loves Farm Reserved Site	13/00389/OUT	Erection of 41 dwellings accessed from existing access on Dramsell Rise.	Submitted (2013) Approved (2017)

2.46 No further comment.

5) What are the benefits that the proposed development would bring?

2.47 No comment.

6) What are the potential adverse impacts of developing the site? How could they be mitigated?

Allocation Key Constraints	
Allocation	Key Constraints
SN2 Loves Farm Reserved Site	Flood Risk

2.48 No further comment.

7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

2.49 No comment.

8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

2.50 The IDP (2017) identifies SN2 Loves Farm Reserved Site with Appendix B. There are concerns on the cumulative demand for infrastructure which has not been factored in for St Neots SPA as a whole.

9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved? 10) Is the site realistically viable and deliverable?

2.51 No comment.

11) What is the expected timescale and rate of development and is this realistic?

2.52 See Question 4 above. No further comment.

12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?

2.53 No comment.

13) Are the detailed policy requirements effective, justified and consistent with national policy?

2.54 No comment.

SN3- CROMWELL ROAD NORTH

1) What is the background to the site allocation? How was it identified and which options were considered?

- 2.55 SN3 Cornwell Road North was identified as suitable for development in the Huntingdonshire Environmental Capacity Study back in 2013. This site which has the estimated capacity of 80 units has now also been carried forward to the Proposed Submission Huntingdon Local Plan to 2036 (Submitted Local Plan).

2) What is the scale and type/mix of uses proposed?

- 2.56 SN3 Cornwell Road North (80 units). No further comment.

3) What is the basis for this and is it justified?

- 2.57 The SAR assesses this site at Section 4, Section B under St Neots Sites. Housing and Economic Land Availability Assessment 2017 (HELAA) (July 2017) assesses the site at pages 241 – 243. This site is very historic. Arguably, there is very little evidence of new sites that have come forward for example arising from the Council's Call for Sites (2017).

4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

- 2.58 There are no planning applications registered on this site at present.

5) What are the benefits that the proposed development would bring?

- 2.59 No comment.

6) What are the potential adverse impacts of developing the site? How could they be mitigated?

- 2.60 This allocation has been chosen despite the fact that more than half of the site is located within flood zone 3a while additional parts are within flood zone 2.
- 2.61 Our client's site (165) East of Brook Road scores the same in the HELAA (2017) as SN3 however it does not have significant flood risk issues. This demonstrates a clear inconsistency in the HELAA and SAR process.

7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

2.62 The HELAA states that more than half of the site is located within Flood Zone 3a while parts are within Flood Zone 2. It is not clear how this site could be chosen over our client's site (165) East of Brook Road where we have shown that all development would take place in Flood Zone 1.

8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

2.63 Whilst the level of growth of this allocation is correct in the IDP, there are concerns over the IDP's under estimation of the total growth in the St Neots Spatial Planning Area which will have adverse impacts on the operational phases of all of the allocations.

Location	Site Allocations	Dwellings
Spatial Planning Area	Location	Number
St Neots	Cromwell (Cornwell) Rd North	80

9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

2.64 See Question 8. No further comments.

10) Is the site realistically viable and deliverable?

2.65 Huntingdonshire's Housing Land Supply Position August (2017) sets out that SN3 Cornwell Road North will deliver 30 units in years 1 – 5 and the remaining 50 units years 22/23. This site has been identified for development since 2013 and it has not come forward. Unless the issues which have rendered this site undeliverable up until now are resolved (including Flood Risk), we do not see how it can be 'achievable' now. On the basis of the above, the plan is not considered to be 'effective' under paragraph 182 of the Framework.

11) What is the expected timescale and rate of development and is this realistic?

2.66 See Question 4 above. No further comment.

12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?

2.67 No comment.

13) Are the detailed policy requirements effective, justified and consistent with national policy?

- 2.68 This site was initially identified in 2013. The Council should provide evidence to justify why this site is both ‘available’ and ‘achievable’ now given its failure to support growth to date. The HELAA (2017) does not clearly evidence this. The reliance on sites that can’t deliver, restricts other suitable sites such as our client’s land - East of Brook Road (165) from coming forward over the plan period.
- 2.69 The allocation of a site of this scale which has not come forward over a prolonged period of time is not considered to reflect a ‘positively prepared’, ‘justified’, or ‘effective’ plan in accordance with the policies in the Framework paragraph 182.

SN4- CROMWELL ROAD CAR PARK

1) What is the background to the site allocation? How was it identified and which options were considered?

Planning Allocations		
Allocation	Reference	Status
SN4 Cornwell Road Car Park	9001288OUT	21 units. Pending.

- 2.70 The planning history for this site dates back to 2009. This site was identified through the Environmental Capacity Study (2013).
- 2.71 For the purposes of procedure Council assesses the site in the Housing and Economic Land Availability Assessment 2017 (HELAA) (July 2017) at pages 241 – 243. The SAR assesses this site at Section 4, Section B under St Neots Sites.

2) What is the scale and type/mix of uses proposed?

- 2.72 No further comments.

3) What is the basis for this and is it justified?

- 2.73 This allocation appears to reflect an acceptance that it will be brought forward via a planning consent. It has been pending a decision for 9 years. This site would be implemented irrespective of the Submission Local Plan. The requirement for this allocation is not clear.

3) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

Planning Consents			
Allocation	Reference	Application	Status
SN4 Cornwell Road Car Park	901288OUT	Outline application for residential development of up to 21 dwellings	Submitted (2009) Pending decision.

2.74 According to the Council's website, this allocation is still pending a decision.

5) What are the benefits that the proposed development would bring?

2.75 No comment.

6) What are the potential adverse impacts of developing the site? How could they be mitigated?

2.76 No comment.

7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

2.77 No comment.

8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

2.78 No comment.

9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

2.79 No comment.

10) Is the site realistically viable and deliverable?

2.80 No comment.

11) What is the expected timescale and rate of development and is this realistic?

2.81 Huntingdonshire's Housing Land Supply Position August (2017) sets out that SN4 Cornwell Road is anticipated to deliver 21 units over years 1 – 5. Given that the application was submitted in 2009 there would need to be a step-change in the delivery

of this site for it to come forward in the first 5 years of the plan. We would question the significant delay in this consent being granted. This would imply that there are a number of issues and problems with this permission inhibiting it coming forward.

12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?

2.82 Evidence of the assessment of alternatives i.e. site boundary options are not available for this site option. No further comment.

13) Are the detailed policy requirements effective, justified and consistent with national policy?

2.83 The allocation of a site which has been in the system for in excess of 9 years, does not show an effective proactive approach to meeting the Council's OAN, but rather a fall-back position on historic applications that may be 'conceded'. It is our view that policy SN3 will come forward without this allocation. On these grounds, policy SN3 is not demonstrative of a 'positively prepared' plan in line with the Framework paragraph 182.

SN5- FORMER YOUTH CENTRE, PRIORY ROAD

1) What is the background to the site allocation? How was it identified and which options were considered?

Planning Allocations		
Allocation	Reference	Status
SN5 Former Youth Centre	15/00634/FUL	14 units. Pending.

2.84 SN5 Former Youth Centre was initially identified in the Environmental Capacity Study (2013). Housing and Economic Land Availability Assessment 2017 (HELAA) (July 2017) assesses the site at pages 241 – 243. The SAR assesses this site at Section 4, Section B under St Neots Sites.

2) What is the scale and type/mix of uses proposed?

2.85 SN5 Former Youth Centre, Priory Road (14 units). No further comments.

3) What is the basis for this and is it justified?

2.86 No comment.

4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

2.87 The application for 14 units is noted on the Council's website as pending although it was submitted in 2014.

Planning Consents			
Allocation	Reference	Application	Status
SN5 Former Youth Centre	15/00634/FUL	Proposed 14 residential dwellings at site previously occupied by the Youth Club Centre.	Submitted (2014) Pending decision.

5) What are the benefits that the proposed development would bring?

2.88 No comment.

6) What are the potential adverse impacts of developing the site? How could they be mitigated?

Allocation Key Constraints	
Allocation	Key Constraints
SN5 Former Youth Centre	Flood Risk Conservation Area

2.89 More than half of the site is in Flood Zone 3a with small parts in Zone 3b Functional Floodplain. This reflects a significant development constraint and further serves to highlight the fact that more suitable alternatives have not been adequately considered.

7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

2.90 It is an inconsistent planning judgement to allocate sites with severe Flood Risk over and above suitable, available and achievable sites such as (165) East of Brook Road which would be wholly developed in Flood Zone 1.

8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

2.91 No comment.

9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

2.92 No comment.

10) Is the site realistically viable and deliverable?

2.93 No comment.

11) What is the expected timescale and rate of development and is this realistic?

2.94 The Council's Housing Land Supply Position August (2017) sets out that SN5 Former Youth Centre will deliver 14 units in years 1 – 5. This is ambitions when you consider the past rates of delivery in the AMR (2017).

12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?

2.95 Evidence of the assessment of alternatives i.e. site boundary options is not available for this site option. No further comment.

13) Are the detailed policy requirements effective, justified and consistent with national policy?

2.96 The focus of the allocation policies in SPA in St Neots should be to identify a future land supply as opposed to allocation of extant permissions or pending applications. The plan is not considered to be 'positively prepared' plan in line with the Framework paragraph 182 as the value of SN5 is limited as a driver for future growth. As a result of this approach 'suitable', 'available' and 'achievable' sites such as (165) East of Brook Road have been overlooked in the development plan process.

SN6- NORTH OF ST JAMES ROAD, LITTLE PAXTON

1) What is the background to the site allocation? How was it identified and which options were considered?

2.97 The only site in the St Neots SPA that has been identified from the Council's Call for Sites process in August (2017) is SN6 North of St James Road with the capacity of 35 units. Housing and Economic Land Availability Assessment 2017 (HELAA) (July 2017) assesses this site at pages 241 – 243. The SAR assesses this site at Section 4, Section B under St Neots Sites.

2) What is the scale and type/mix of uses proposed?

2.98 SN6 North of St James Road, Little Paxton (35 units). No further comments.

3) What is the basis for this and is it justified?

2.99 No comment.

4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

2.100 The Council's Huntingdonshire's Housing Land Supply Position August (2017) does not set out a rate of delivery for SN6 North of St James Road, Little Paxton. No further

comment.

5) What are the benefits that the proposed development would bring?

2.101 No comment.

6) What are the potential adverse impacts of developing the site? How could they be mitigated?

2.102 No comment.

7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

2.103 No comment.

8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

2.104 Appendix B of the IDP (2017) omits reference to SN6 North of St James Road. It is therefore difficult to evidence how it can be 'justified' under paragraph 182 given the impacts and requirement for supporting infrastructure have not been taken into account.

9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved? 10) Is the site realistically viable and deliverable?

2.105 No comment.

11) What is the expected timescale and rate of development and is this realistic?

2.106 No comment.

12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?

2.107 Evidence of the assessment of alternatives i.e. site boundary options is not available for this site option. No further comment.

13) Are the detailed policy requirements effective, justified and consistent with national policy?

2.108 The omission of the site SN6 in the IDP should be rectified to evidence how the infrastructure requirements will be met in the plan period in order to comply with paragraph 128 of the Framework.

CONCLUSION

- 2.109 The conclusion drawn, further to the consideration of questions raised under Matter 7 is that the Submission Local Plan as a whole, falls short of achieving paragraph 182. A case in point is paragraph 157 requires that “Local Plans should plan positively for the development and infrastructure required in the area.” The IDP does not provide an adequate basis to support future growth. It can be seen that the delivery rates for this site are not realistic in line with paragraph 154.
- 2.110 Our client’s objection to the soundness of the Submission Local Plan as it relates to this Matter is also on the grounds that as a result of the higher OAN (being prosed under Matter 4) of **974 dwellings per annum**, additional sites will require to be allocated and that these should include additional sites within the St Neots SPA. In addition to our concern, we consider that the Submission Local Plan does not represent the most suitable strategy based upon the available evidence and that it should propose a greater proportion of the allocation to the St Neots SPA. This renders the plan to be less sustainable than a more equalised distribution which recognises the sustainability advantages of St Neots SPA in general as well as the higher levels of demand.
- 2.111 Furthermore, the SAR has failed to consider all reasonable alternatives within the St Neots SPA and as such a higher proportion of the housing requirement could be included in this sustainable location if these reasonable alternatives are considered in light of the need to achieve the most appropriate strategy. The treatment of reasonable alternatives is both a legal and policy objection.
- 2.112 Assessing all reasonable alternatives in the same way would in our opinion result in a different pattern of development but would also be able accommodate a higher proportion of the dwelling requirement in this sustainable location.
- 2.113 Moreover, we do not consider that the proposed allocation SN3 -Cromwell Road North (see paragraphs 2.60 – 2.74 above) is presently developable and therefore its inclusion in the plan renders the plan unsound in terms of: being effective and the most appropriate given the evidence base that clearly suggests that there are more sustainable and sustainable sites.

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