
Huntingdonshire Local Plan Examination

Hearing Statement for Matter 7:
'Proposed site allocations – St Neots Spatial
Planning Area'

On behalf of Gallagher Estates (ID:1151163)

1. Introduction

- 1.1. This Statement has been prepared on behalf of Gallagher Estates, who have previously made representations to the Local Plan (respondent reference ID: 1151163). In these, Gallagher Estates supported the Local Plan on the basis that the plan generally provided a sound basis for allocating land in the St Neots Spatial Area for development.
- 1.2. Gallagher Estates are the Applicant for an application for outline planning permission for the development of land at Loves Farm East, which forms part of the 'Strategic Expansion Location: St Neots East', referred to in Policy SEL.2 of the Huntingdonshire Local Plan to 2036.
- 1.3. The planning application (HDC ref 1300388OUT) was submitted to HDC, in 2013, for development (now) described as:

"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"

- 1.4. A copy of the masterplan for the proposed development is provided as Appendix 1 to this Statement.
- 1.5. This application site is currently identified for development in the Adopted Huntingdonshire Local Development Framework Core Strategy (2009) and the St Neots Eastern Expansion Urban Design Framework (2010).
- 1.6. At its meeting, on 16 April 2018, the Council's Development Management Panel resolved to grant planning permission for the planning application, subject to the completion of a S106 Agreement and planning conditions. Provided as Appendix 2 to this Statement is a copy of the report to the April 2018 Development Management Panel (including copies of the previous 2014 and 2017 meetings where the application was considered) and the associated minutes of that meeting.
- 1.7. Land to the south of Cambridge Road, known as 'Wintringham Park', also forms part of the SEL.2 area. A 'hybrid' planning application (HDC ref 17/02308/OUT) has also been submitted for development, including outline planning permission for up to 2,800 dwellings; up to 63,500 sqm of employment development; District Centre including shops, services, community and health uses; Local Centre; temporary Primary School; two permanent Primary Schools; open spaces, play areas, recreation facilities and landscaping; and strategic access improvements including new access points from Cambridge Road & A428. The full component of that application is for the construction of new roads, hard & soft landscaping, creation of SUDS and all associated infrastructure and engineering works including creation of haul routes.

- 1.8. At its meeting on 19 March 2018, the Council's Development Management Panel resolved to grant planning permission for that planning application, subject to the completion of a S106 Agreement and planning conditions.
- 1.9. Together these planning applications seek to deliver the Council's aspirations for the development of the Strategic Expansion Location: St Neots East, referred to in Policy SEL.2. In the case of both applications, the Council has considered the policies of the emerging Local Plan (particularly SEL.2) as a material consideration in the assessment and ultimate resolution to approve these earlier this year.
- 1.10. The purpose of these further representations is to address Matter 7 '*Proposed site allocations – St Neots Spatial Planning Area*' and in respect of Policy SEL2 and the Loves Farm East site, where the following issues are identified by the Inspector and against which there are 13 further questions:

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

2. Matter 7 – questions and responses:

2.1. This section will address each of the Inspector's questions, identified in Matter 7, with specific reference to the allocation and development of the site, at Loves Farm East (part of SEL.2 - St Neots East) for Gallagher Estates.

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

2.2. The expansion of St Neots, to the east of the railway, was identified as a direction for growth in the Core Strategy (adopted 2009). In finding the Core Strategy sound the Inspector's Report (8 July 2009) noted that:

"St Neots is the largest of the market towns and there is opportunity for relatively unconstrained development to the east with a limited number of landowners. Although there is concern that there might be too much housing in one place in terms of marketability, I consider that it is because of its scale that a highly sustainable urban extension could be provided, with homes, employment, a district centre and other infrastructure advantages. It also has potential for future growth" (Para 3.48)

2.3. The adopted Core Strategy establishes the strategic spatial planning framework for the development of the District to 2026. Policy CS2 (Strategic Housing Development') of the Core Strategy states that *"In the St. Neots Spatial Planning Area... at least 2650 homes will be provided...about 2500 will be on greenfield land and about 1060 will be affordable. Provision will be...in the first phase of a significant mixed use urban extension on greenfield land to the east of the town"*.

2.4. Policy CS7 ('Employment Land') identifies that *"In the St Neots Spatial Planning Area...about 25ha of land, all of which is greenfield land, will be provided... in a significant mixed use urban extension for B1, B2 and B8 uses on greenfield land to the east of St. Neots"*. Policy CS8 ('Retail and Town Centre Uses') identifies 9,000sqm of comparison floorspace will be located in St. Neots with priority given to proposals in the town centre but with *"complementary and appropriate development"* to be *"located as part of a significant mixed use urban extension to the east of the town"*.

2.5. In February 2011 the Council formally adopted the 'St. Neots Urban Design Framework' (UDF) as Supplementary Planning Guidance and as a material consideration in the planning decision-making process. The UDF was subject of public and stakeholder consultation, being developed by the District Council in partnership with the main landowning and developer interests. The UDF identified that the sustainable urban extension to St Neots has the capacity to provide land for the development of some 3,500 new dwellings and associated community facilities and services, schools, shops, recreation areas, open space and some 25ha new employment land.

2.6. The vision for the St Neots Eastern Expansion is described as:

"...to create a distinctive new urban extension to the town to meet a range of needs for the St Neots area, including additional housing close to the railway station, employment opportunities, and

improved access to the countryside. The extension will incorporate open space to serve the residents of the new development.

The eastern expansion will be a sustainable and vibrant new community that is inclusive and diverse with its own distinctive local identity which is founded upon best practice urban design principles, drawing on the traditions of market towns, which encourages the high quality traditions and innovation that are characteristic of the Cambridge Sub-Region.”

- 2.7. The Council has undertaken a Sustainability Appraisal (Final Sustainability Appraisal Report, published December 2018) of the Local Plan. The Land East of St Neots is referred to as 'Area D: East of St Neots' in that report which has been submitted as part of the evidence base for examination. Further sustainability appraisal of potential development sites is contained in the Council's Housing and Economic Land Availability Assessment.

2) What is the scale and type/mix of uses proposed? & 3) What is the basis for this and is it justified?

- 2.8. SEL.2 describes the scale and type/ mix of uses in criteria 1-9. The quantum of development provided by HDC reflects the planning applications which have been submitted for the development of these sites. In turn, this reflects the extensive work which has been undertaken in the preparation of acceptable forms of development, responding particularly to the principles for development explained in the UDF and the various site and technical constraints to delivering an appropriate mix of development as part of the creation of the new community in this location.
- 2.9. The Loves Farm East planning application will deliver 1020 homes (as proposed) which constitutes a significant proportion of the planned housing for this area. The planning application has been amended (in 2014), to reduce the number of homes (from 'up to 1200' to 'up to 1020') and with other changes to the mix of uses in the 'mixed use area' proposed as part of the Masterplan. Amendments were also made to increase the amount of B1 space to 5.52ha, provide for a care home and to separate out the proposed Primary School from the mixed-use area.
- 2.10. The amendments to the planning application have been made on the basis of a constructive and positive approach to the decision-making process, taking account the advice and comments of stakeholders and consultees (to meet the needs of the future residents on education provision, for example) during the consideration of the planning application. The scale and type of mix of uses proposed is justified and deliverable.

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

- 2.11. At its meeting, on 16 April 2018, the Council's Development Management Panel resolved to grant planning permission for Gallagher Estates' Loves Farm East planning application, subject to the completion of a S106 Agreement and planning conditions. Provided as Appendix 2 to this Statement is a copy of the report to the April 2018 Development Management Panel and the associated minute.

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

- 2.12. The proposed development at Loves Farm East provides a key element of the planned strategic growth of St Neots, which has been identified in the adopted Core Strategy (Policy CS2) and on which the Council has subsequently provided comprehensive further planning and urban design guidance (UDF).
- 2.13. The realisation of development to the east of St Neots is a key element of the Council's established planned housing strategy. The outline planning application, submitted by Gallagher Estates in 2013, addresses the issues identified in the Core Strategy and UDF and the Local Plan has been positively prepared supported by the evidence of the planning applications for development in this area. The Loves Farm East planning application has been well-received by the Council and together with the development of the 'Wintringham Park' site will deliver nearly 4000 new homes, making a very significant contribution to the planned housing needs of the District.
- 2.14. The benefits are delivered by the Loves Farm East development, include:
- Up to 1020 new homes, including up to 286 affordable homes
 - A Primary School and Nursery (estimated employment generation 70 FTE employees)
 - 5.52ha for B1 office space (estimated employment generation 1766 FTE employees)
 - 1.1ha for care accommodation c120 beds (estimated employment generation 120 FTE employees)
 - 0.4ha for public house (estimated employment generation 16 FTE employees)
 - 13.77 ha of public open space (including parks and gardens, natural and semi natural space, amenity green space, play space/ MUGAs and allotments)
 - 3.91ha of sports pitches
 - S106 contributions for the delivery of community and healthcare facilities (to be delivered in conjunction with the Wintringham Park development)
 - Off-site highways works (to be delivered in conjunction with the Wintringham Park development)
 - Community Infrastructure Levy contributions (including £85 per sqm index-linked for residential development), including a 25% of this being provided to St Neots Town Council, which has an adopted Neighbourhood Plan.

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

- 2.15. The Environmental Statement prepared and submitted as part of the outline planning application for the development of the Loves Farm East site has comprehensively addressed the potential environmental effects of the proposed development. The EIA process has been used in an iterative basis to inform necessary and appropriate mitigation which has informed the scheme design. Where necessary, the Council will use planning conditions to require additional information to be provided for approval, as part of or in anticipation of reserved matters being approved. For example, a site-side drainage strategy followed by detailed drainage strategy for each phase of the development.
- 2.16. The Council considered the 'planning balance' in relation to the proposed development, taking into account Para 14 of the NPPF and the presumption in favour of sustainable development. In the

conclusions to the Committee Report (Appendix 2, Paras 7.64-7.66), this only identified 'moderate harm' to the 'character and appearance of the area' and concludes that

“Overall, the harm identified is not considered to significantly and demonstrably outweigh the scheme’s benefits when assessed against the policies in the NPPF taken as a whole. Having regard to national and local planning policies, the ES and all comments received, it is considered that the amount of development and proposed uses are acceptable in principle, the amount of proposed development can be satisfactorily accommodated on the site and the development can deliver a sustainable extension to St Neots.”

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 Council has undertaken a sequential test for flood risk ('Huntingdonshire Local Plan to 2036: Sequential Test for Flood Risk'). In relation to the SEL.2 site, 88% of the site is identified in FZ1 and the sequential test notes that: *“Use of the Sequential Approach means, given the size of the site, development can be placed away from Flood Zones 2 and 3, with the area affected by flooding left undeveloped. Approximately 198 hectares of land is available outside of the Flood Zones.”* The 'exception test' does not apply to the site.
- 2.18. In respect of the development of the Loves farm East site, the planning application (including Environmental Statement, addressing Flood Risk, Water Quality/Waste Water and Water Resources) sets out the approach to surface water drainage and flood risk, following consultation with the EA.
- 2.19. Fox Brook, where it runs to the north of the balancing pond (to the first phase of the Loves Farm development) is in EA flood zone 3 (SFRA 1:100). The remainder of Fox Brook is not within a designed flood zone. The EA consider the Outline Drainage Strategy will be a significant benefit for the existing downstream development areas. The FRA has also demonstrated, via watercourse modelling and the drainage strategy, that the development itself will not be at risk of flooding and will not cause or exacerbate flood risk elsewhere. A SuDs system is proposed to manage surface water run-off and the EA has advised minimum floor levels throughout the site. The EA recommend conditions relating to surface water drainage matters. Detailed design for foul and surface water drainage will need to be agreed prior to commencement of the development and it is proposed that this be on a site-wide basis, following by details for each phase of development.

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

- 2.20. The cost of infrastructure has been clearly assessed and this has informed the approach to development in the Loves Farm East planning application. There are no physical or other constraints to the development and it is anticipated that the development can proceed relatively swiftly, following the grant of outline planning permission.
- 2.21. Gallagher Estates are working closely with HDC, CCC and Urban and Civic to ensure certain infrastructure aspects of the SEL2 site are delivered in a comprehensive and timely manner.

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

- 2.22. Criteria u of SEL.2 provides that the “*successful development of the site will require...agreement with the Environment Agency and Anglian Water Services that waste water flows from the proposal can be accommodated*”
- 2.23. Anglian Water’s consultation response to the Loves Farm East planning application (dated 20 May 2013) stated: “*Section 2 – Wastewater Treatment 2.1 The foul drainage from this development is in the catchment of St Neots STW that at present has available capacity for these flows.*”
- 2.24. Suggested planning conditions for the development of the Loves Farm East site includes, a ‘site-wide’ foul water drainage strategy, to be followed by detailed water drainage strategy for each phase of the development.

10) Is the site realistically viable and deliverable?

- 2.25. The Loves Farm East site is being promoted by Gallagher Estates who have made the outline planning application for the development of this site and have been actively engaged in working with the Council in the preparation of relevant planning guidance accordingly. The outcome of this and working with the Council in the course of the consideration of the planning application has been the resolution by the Council to approve outline planning permission for the development of this part of the SEL.2 site.
- 2.26. Following extensive consideration of viability, throughout the planning application process to inform the terms of the S106 Agreement, the Loves Farm East site is considered viable and deliverable.

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

- 2.27. The Loves Farm East site has the benefit of a resolution to grant outline planning permission and Gallagher Estates are close to finalising the S106 Agreement so that the outline planning permission can be drawn down. Once this milestone is reached, Gallagher Estates expects to commence development of the site expeditiously through the construction of key infrastructure, which will allow it to sell serviced parcels of land on the open market. The early servicing of the site will provide housebuilders with greater certainty and allow them to build out at a fast rate.
- 2.28. Realistically, Gallagher Estates estimate that they are about one year behind the anticipated programme set out in the Council’s AMR. Once development commences, Gallagher Estates believes that the rate of development, as set out in the AMR, is achievable.

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

- 2.29. Insofar as this relates to Loves Farm East (and the current outline planning application), the boundary of the SEL.2 site is appropriate to enable the delivery of the Loves Farm East development as part of the wider SEL.2 site.
- 2.30. It is, however, appropriate to highlight that Gallagher Estates also has an interest in the land immediately abutting the south east of the Loves Farm East Site, at Tithe Farm, located north of the A428 close to the junction with Cambridge Road. This land has previously been identified to the Council as part of its call for sites and 'Housing and Economic Land Availability Assessment (HEELA) June 2017' (p222-224), but not taken forward.
- 2.31. This site (shown in red on the plan at Appendix 3) extends to approximately 7.5ha, comprising part previously-developed land and greenfield areas. It is located immediately adjacent to the Strategic Expansion Location of St Neots East and is therefore in a very sustainable location for future development
- 2.32. The land around Tithe Farm and Barns is partly previously developed as it is occupied by the range of existing buildings (some of which are GII listed) and yards, the remainder being greenfield. It is not Grade 1 agricultural land; it does not flood; it is not within an SSSI, SPA, SAC or Ramsar; nor is it within 400m of a waste water treatment facility.
- 2.33. It has previously been promoted that, given the site is sustainably located on the edge of the Loves Farm SEL, with access and frontage to the primary road network it is ideal for residential and/or employment and commercial uses. It benefits from existing farm buildings which can be utilised to form the focus of a new development area to accommodate mixed-uses.

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

- 2.34. Overall and in the context of the Council's resolution to approve the outline planning permission for the development of Loves Farm East, Gallagher Estates considers that the policy requirements set out in SEL.2 are soundly based and for that reason the Inspector should be able to find this element of the Local Plan to be sound.

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Appendix 1
Loves Farm East Illustrative Masterplan Rev G

Appendix 2
HDC Development Management Panel Report & Minute

Appendix 3 Tithe Farm Site Plan

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