

**HUNTINGDONSHIRE
LOCAL PLAN
EXAMINATION**

**MATTER 8 ALLOCATIONS
– ST IVES SPA**

REP ID: 1118661

HEARING STATEMENT

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MATTER 8 – PROPOSED SITE ALLOCATIONS – ST IVES SPATIAL PLANNING AREA

Introduction

- 1.1 This Matter 8 Statement has been prepared by Carter Jonas LLP on behalf of Hallam Land Management (HLM), who are promoting land at Gifford's Park in St Ives for a residential-led mixed use development. The HLM representations to the Proposed Submission Huntingdonshire Local Plan 2036 (PS HLP2036) commented on the following matters relevant to the St Ives SPA:
- Paragraph D.2 Housing and Economic Land Availability Assessment December 2017 (HELAA 2017), and specifically the assessment of land at Gifford's Park (Rep Id. 364);
 - Policy SI 1: St Ives West (Rep Id. 371);
 - Policy SI 2: St Ives Football Club (Rep Id. 372); and
 - Policy SI 3: Gifford's Farm (Rep Id. 376).
- 1.2 It is demonstrated in HLM's Matter 3 Statement that only a limited amount of development is directed to St Ives, despite it being identified as one of the four spatial planning areas and a suitable and sustainable location for growth. It is also demonstrated in HLM's Matter 4 Statement that the assessed housing target in Policy LP1 is not robust, in part because it takes no account of the housing needed to support economic growth, and as a result the objectively assessed housing need figure should be higher. It is further demonstrated in HLM's statements for Matters 6, 7 and 12 that housing delivery rates at the strategic expansion locations are unrealistic, the availability and suitability of some of the larger allocations is uncertain, and the strategic expansion locations do not deliver policy compliant levels of affordable housing, and as a result additional strategic allocations are needed to meet the expected housing land supply shortfall and to meet affordable housing needs.
- 1.3 The main allocation in St Ives, at St Ives West (Policy SI 1) for 400 dwellings, mostly has planning permission and is under construction and therefore the majority of the site should be regarded as a commitment rather than an allocation. In addition, the limited number of dwellings anticipated in St Ives during the plan period means that the current and future affordable housing needs of the town will not be met. It is considered that the St Ives Football Club site (Policy SI 2) provides an opportunity for the future expansion of St Ivo School rather than for residential development as proposed. It is considered that the assessment of the Gifford's Park site in the HELAA 2017 is not robust, but has informed the decision not to allocate this site for a residential-led mixed use development.
- 1.4 In summary, it was requested in the HLM representations that land at Gifford's Park is allocated for a mixed use sustainable urban extension to St Ives for approximately 1,750 dwellings. As set out in the HLM representations and below, a new Policy SI 3 for Gifford's Park is proposed.

Issue

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

Relevant policies – SI1-SI4

Questions

Taking each of the following proposed site allocations individually:

St Ives

SI1- St Ives West

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

- 1.5 The main allocation in St Ives, at St Ives West for 400 dwellings, very largely has planning permission and is under construction and therefore at least part of the site should be regarded as a commitment rather than an allocation; 274 dwellings have full or outline permission, 7 dwellings have a resolution to grant permission, and 224 dwellings are subject to a current planning application.
- 1.6 The fact that the largest allocation in St Ives already mostly has planning permission, and as such is likely to be completed within the short term, clearly indicates that St Ives is expected to only play a minor role in the development strategy in comparison with Huntingdon, St Neots, and Ramsey and with some of the Key Service Centres. St Ives contains a good range of services and facilities that are accessible by public transport including the Cambridge Guided Busway, but no strategic scale development is directed to this settlement.

SI2- St Ives Football Club

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

- 1.7 There have been a number of attempts to obtain planning permission for residential development at this site. In August 2016 an outline application (Ref. 16/01485/OUT) for up to 30 dwellings was submitted. The application is still pending. The Council provided an update on progress with the application in March 2018, which confirmed that viability appraisal work for the proposed development is ongoing. It appears from the consultation responses to the application that there are still concerns about site capacity, vehicular access, noise impacts and the ability to deliver affordable housing; it is proposed that no affordable housing would be provided.
- 1.8 Land for the football club to re-locate to is provided within the proposed residential-led mixed use development at Gifford's Park – see requested amendments to Policy SI 3.

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

- 1.9 It would be a negative outcome if the proposed development does not deliver policy compliant levels of affordable housing.
- 1.10 It is noted in the HLM representations to Policy SI 2 that this site is adjacent to St Ivo School and it represents a clear (indeed, the only obvious) opportunity to provide land to enable the school to expand during the plan period. The use of land adjacent to St Ivo School would be one solution to allow capacity to be increased in St Ives, but if this site is used for housing, the opportunity to use it for the expansion of the school will be lost forever. Cambridgeshire County Council officers have acknowledged that the option to expand St Ivo School onto the St Ives Football Club site has merit, in that it would offer more flexibility and greater capacity compared to other options which rely on intensifying the use of the school's existing site.

10) *Is the site realistically viable and deliverable?*

- 1.11 The applicant for this site is currently undertaking viability appraisal work for the proposed development. It is likely that if the proposed development is not viable then the amount of affordable housing to be provided will be reduced as a result, potentially to nil.

SI3- Giffords Farm

- 1.12 The Gifford's Farm site is allocated in PS HLP2036 for all Class B uses except Class B1a (offices) and Class B8 (storage and distribution).
- 1.13 The proposed development promoted by HLM at Gifford's Park relates to a larger site than currently allocated in Policy SI3, including employment land for Class B uses. In the HLM representations employment

development at Gifford's Park is delivered as part of a residential-led mixed use development. As set out in the HLM representations and the Matter 3 Statement, the proposed residential-led mixed use development would comply with the development strategy contained in Policy LP2, which identifies St Ives as a growth location.

- 1.14 If the request for a residential-led mixed use development at Gifford's Park is not accepted then HLM would seek to implement the proposed employment allocation.

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

- 1.15 The proposed residential-led mixed use development at Gifford's Park has been subject to screening and scoping opinions for EIA development (Refs. 17/70261/SCRE dated 19th January 2018 and 18/70112/SCOP dated 17th June 2018). As part of the EIA process consultation has been undertaken with statutory consultees. The proposed development has also been discussed with the Education and Highways Teams at Cambridgeshire County Council, and with St Ives Town Council and Holywell-cum-Needlingworth Parish Council. A planning application has not been submitted for the proposed development.
- 1.16 The northern part of the site has planning permissions for football pitches and associated facilities, to enable St Ives FC to relocate from their current site. The proposed site for the football club is shown on the Illustrative Masterplan submitted with the HLM representations. The planning applications for the football club site were granted permission on October 2015, and the details are as follows:
- 13/00354/OUT - Outline planning permission for the erection of a clubhouse and construction of car park in association with football club and with all matters reserved.
 - 13/00553/FUL - Proposed football pitches, erection of flood lights and re-profiling of land.

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

- 1.17 The proposed residential-led mixed use development at Gifford's Park would deliver housing and affordable housing in a location expressly identified by the Council for growth, but which is expected to accommodate only a very limited amount of development in the proposed development strategy set out in PS HLP2036. The proposed development would deliver policy compliant levels of affordable housing, unlike the two identified strategic expansion locations at Alconbury Weald and St Neots East. The site at Gifford's Park is accessible to the services, facilities and employment opportunities in St Ives by walking and cycling, and it is within close proximity of the Cambridge Guided Busway providing access to Cambridge and Huntingdon. The proposed development at Gifford's Park makes provision for a primary school, supermarket, neighbourhood centre and health care facility, which would meet the needs of residents of the development and the surrounding area. In addition, the proposed development includes land for the relocation of St Ives Football Club.

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

- 1.18 The proposed residential-led mixed use development at Gifford's Park was assessed in the HELAA 2017 - see pg. 341 to 344. The HLM representations to Paragraph D.2 commented on the findings in the HELAA 2017 for the site (Rep Id. 364). In summary, the HELAA 2017 findings and SA objectives where amendments to the score are required are highlighted in those representations, and the proposed development should score 'green' for the following objectives (in addition to those objectives which already score 'green'):
- ability to accommodate higher density development.
 - accessibility to open and natural green space.
 - biodiversity.
 - waste
 - crime prevention and reduction
 - accessibility to services and facilities.
 - accessibility by sustainable modes of transport

1.19 The HLM representations disagree with some of the commentary on Gifford's Park which has led to the decision not to allocate the site and proposed development in PS HLP2036, and in particular the conclusions that flood risk and transport infrastructure are significant constraints to development at the site.

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?

1.20 Most of the site is within Flood Zone 1 but there are areas within Flood Zone 3a. The Illustrative Masterplan (submitted with HLM's representations) for the proposed residential-led mixed use development at Gifford's Park does not locate built development within areas at risk of flooding. The proposed layout includes a large central park, areas of open space, and attenuation areas. Therefore, flooding and drainage has informed the proposed layout of development at Gifford's Park, and this is not a constraint to development at the site. PBA have undertaken significant work with the Environment Agency, Lead Local Flood Authority and the Drainage Engineer to agree an acceptable drainage solution and flood mitigation strategy on the site. The proposed strategy for development at the site seeks to avoid areas at higher risk of flooding and to direct development towards those parts of lower risk is supported by those organisations.

10) Is the site realistically viable and deliverable?

1.21 The site is controlled by HLM who are an experienced promoter that has delivered large scale mixed use urban extensions similar to the proposed development at Gifford's Park. The proposed development is viable and deliverable.

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

1.22 The scoping opinion submitted for the proposed development included assumptions about the timetable for the proposed development, which is as follows:

- Submission of Outline Planning Application – Q3 2018;
- Determination of Outline Planning Application – Q3 2019 (12 months);
- Complete Site Marketing/Sale of Land Parcels – Q2 2020 (6 months);
- Complete Discharge of Conditions – Q2 2021 (12 months)
- Project Start – Q2 2021 (6 months);
- First Completions – Q4 2021;
- Delivery over 10 years (at approximately 175 dwellings/year)
- Project Completion - 2031

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

1.23 It is requested that the site boundary is amended to accommodate the proposed residential-led mixed use development at Gifford's Park – see site boundary defined on Illustrative Masterplan (submitted with HLM representations).

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

1.24 The HLM representations and hearing statements for Matters 2, 4, 6, 7 and 12 raise objections to the proposed housing target in Policy LP1, the housing delivery assumptions for the strategic expansion locations, the availability of other larger allocations, and the level of affordable housing delivered at Alconbury Weald and St Neots East. It is considered that additional suitable and deliverable sites, including a residential-led mixed use development at Gifford's Park, need to be identified to address these objections and soundness issues

1.25 The HLM representations contained a new replacement policy for development at Gifford's Park, which is as follows:

Requested Change – New Policy SI 3: Gifford’s Park

127.4ha of land at Gifford’s Park, on land east of Somersham Road and north of Needingworth Road is allocated for a mixed use sustainable urban extension of St Ives to comprise:

- 45.9 ha of land for housing, providing approximately 1,750 homes
- 0.7 ha of land for extra care/care home
- 2.7 ha of land for employment (Class 'B')
- Up to 3.0 ha of land for primary school
- 0.4 ha for hotel
- 0.35 ha for health care
- 0.6ha for neighbourhood centre
- ha for supermarket
- land to accommodate relocation of St Ives Football Club
- allotments
- a central park
- land for sport and recreation
- land for green infrastructure

The development of the site will deliver:

- satisfactory resolution of the impact of additional traffic on the local highway network having regard to a transport assessment and travel plan;
- comprehensive master planning to be undertaken by the site developer with public engagement with the cooperation of the Council;
- provision of quality pedestrian and cycle improvements to the town centre and other key service destinations, including the Guided Bus;
- production and implementation of a development strategy that seeks to ensure balanced delivery of industrial and commercial development with development of homes, infrastructure, services and facilities;
- the arrangement of different uses in a manner that minimises the need to travel and includes a transport network that promotes sustainable travel modes;
- differentiated densities of development with higher densities around defined centres and the development of distinctive character areas;
- enhancement and provision for habitats in accordance with an ecological assessment and strategy
- a landscaping scheme recognising and enhancing vistas, boundaries, and green infrastructure networks;
- design codes for the appearance of development proposals;
- flood risk assessment and provision of sustainable drainage systems;
- production and implementation of a waste audit and a waste minimisation, re-use and recovery strategy;
- agreement with the Environment Agency and Anglian Water Services that waste water flows from the proposal can be accommodated; and,
- agreement with the Environment Agency that meeting the requirements of the Water Framework Directive would not be compromised.

