

CORE/04

Statement of Representations March 2018

Huntingdonshire District Council | Statement of Representations March 2018

1 Document Information

This version was produced on 26th March 2018.

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1 Introduction

- 1.1** This document sets out a summary of the issues raised in representations on the Huntingdonshire Local Plan to 2036: Proposed Submission and the Council's response to those issues⁽¹⁾.
- 1.2** Chapter 2 presents a summary of the most significant main issues raised on the Huntingdonshire Local Plan to 2036: Proposed Submission and provides initial responses to them.
- 1.3** The following sections gives a more detailed presentation of representations on each chapter, commencing with the main issues raised with responses to these. These are followed by detailed summaries of all representations submitted. They are arranged as shown in below.

Chapter	Local Plan Section	Local Plan Chapters
3	Section A	1, 2 and 3
4	Section B	4
5	Section C	5, 6, 7 and 8
6	Section D	9,10, 11, 12, 13 and 14
7	Appendices	Appendix A, B and C and Glossary

- 1.4** This document also sets out full details of the representations received, as follows:
- Appendix 1: Statement of Representations procedure for Proposed Submission consultation
 - Appendix 2: Representations in Plan Order - This lists all representations in the order that the paragraph/ policy/ table, that is the subject of the representation, appears in the Local Plan
 - Appendix 3: List of Representors - This lists all representors arranged in alphabetical order, either by family name or by organisation/ company name if there is no named individual
- 1.5** For information about public engagement during the production of the Local Plan, prior to publication of the Huntingdonshire Local Plan to 2036: Proposed Submission document, please refer to the Statement of Consultation: Proposed Submission 2017.

About the Representations Period

- 1.6** The representations period for the Huntingdonshire Local Plan to 2036: Proposed Submission started at 9:00 on 18 December 2017 and closed at 5:00 on 5 February 2018.
- 1.7** During the representations period printed copies of the Local Plan were available to view at:
- 1.8** The Council's main offices at Pathfinder House, St Mary's Street, Huntingdon, PE29 3TN
- 1.9** Public libraries in Huntingdonshire
- 1.10** During the representations period representations on the content of the draft local plan could be made:
- Online through the Council's planning consultation portal at http://consult.huntingdonshire.gov.uk/portal/pp/hlp2036/lp2036_pro_sub
 - By email to local.plan@huntingdonshire.gov.uk
 - In writing to Mr A Moffat, Planning Services, Huntingdonshire District Council, Pathfinder House, St Mary's Street, Huntingdon, Cambridgeshire, PE29 3TN

¹ It therefore fulfils the requirements of Regulation 22(1)(c)(v-vi) relating to the formal representations procedure following publication of the plan.

1 Introduction

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About the Representations Received

- 1.11** A total of 886 representations were received from 253 representors. Of these 196 were representations of support and 696 were representations of objection. Of the representations of objection three were submitted by groups. One comprised a standard letter prepared by Bluntisham Parish Council signed by 123 people, The second was a standard letter prepared by Colne Road Action Group signed by 102 people. The third was an e-petition arranged by Colne Road Action Group signed by 294 people.
- 1.12** Representations were received from residents, statutory consultees, special interest groups, developers, landowners and from businesses.

2 Main issues raised

2.1 This section sets out the most significant issues raised within each section of the Local Plan and responses provided. More detailed main issues which were raised on each chapter are set out within their respective sections.

Summary of the Main Issues raised on Section A: Introduction

(Chapter 1: Introduction, Chapter 2: Huntingdonshire District and Chapter 3: Issues Shaping the Local Plan)

Table 1

Issue raised	Response to issue
<p>The Duty to Cooperate was a main focus for representations on Chapter 1 with expressions of support for the cooperation undertaken between Huntingdonshire and various neighbouring councils. However, concern was expressed over how this was documented through the Statement of Consultation with regards to St Neots and the relationship with large scale growth proposals in Bedfordshire.</p>	<p>The Council's engagement with neighbouring authorities is detailed in a separate document so that it can be easily considered as a whole. Representations made by relevant parties are also reflected in the Statement of Consultation.</p>
<p>Concern was expressed over designation of all allocations as strategic due to this potentially removing flexibility,</p>	<p>All allocations are considered necessary to cumulatively allow for the development strategy to be delivered. Flexibility is provided through the development strategy policies which allow for further development in specified circumstances.</p>
<p>Broad support was received for the approach of meeting the objectively assessed need figure in full within the district and for taking a positive approach to sustainable development.</p>	<p>Noted.</p>
<p>Support was received for the level of consultation carried out in the preparation of the Local Plan but concerns were raised over the introduction of a new category in the settlement hierarchy of 'Local Service Centres' including allocations within these settlements without an additional round of non-statutory consultation.</p>	<p>Support noted. The volume of concern over lack of consultation specifically on introduction of the 'Local Service Centres's category is acknowledged. Consultation was conducted through the HELAA (October 2017) on additional potential sites grouped into several categories which included sites in small settlements.</p>
<p>Natural England generally found the Local Plan to be sound and legally compliant but expressed concern that a more detailed and strategic approach was required to assessing the effects of recreational pressure of proposed site allocations.</p>	<p>The effects of recreational pressure arising from proposed site allocations on sites of nature conservation value are assessed through the Habitats Regulations Assessment. It is considered that this took a proportionate approach to this.</p>
<p>The approach to viability testing and recognition of the need to negotiate was broadly supported but open book viability assessments were sought if non-policy compliant levels of provision were to be proposed.</p>	<p>Open book viability assessments are sought through paragraph 7.11.</p>

2 Main issues raised

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Issue raised	Response to issue
Chapter 2 was broadly supported with no main issues raised.	Noted
In Chapter 3 requirements for improvements to key transport infrastructure were raised in terms of how important they are to facilitating economic growth and the beneficial impact improvements would have on people's daily lives.	Significant transport infrastructure improvements are currently being implemented in the district or are intended to commence within the next three years. The Council will continue to work cooperatively with the Cambridgeshire and Peterborough combined authority, Cambridgeshire County Council, Highways England and Network Rail to facilitate transport infrastructure improvements within the district.
The objectives were broadly supported with minor amendments proposed.	Noted

Main issues raised on Section B: The Strategy

(Chapter 4: The Development Strategy)

Table 2

Issue raised	Response to issue
On Policy LP1: Amount of development a significant number of challenges to the objectively assessed need figure of 20,100 were received. The majority cited the figures arising from the government's consultation draft standardised methodology asserting the figure of 25,250 dwellings would be a more appropriate target and reflect the direction of travel of government housing development aspirations. Several alternative calculations were submitted.	Policy LP1 is based on the Huntingdonshire Objectively Assessed Housing Need report prepared by Cambridgeshire County Council's Research Group. The standardised methodology has not yet been finalised or introduced. The strategy set out within the proposed submission plan allows for delivery of approximately 22,500 homes through completions since 2011, on existing commitments and proposed site allocations. Additional windfall sites may increase this further. Together these are considered to provide sufficient flexibility and to recognise the government's aspirations to increase house building.
The methodology used in preparing the Huntingdonshire Objectively Assessed Housing Needs Report was challenged, particularly focusing on the appropriate level of market signals uplift to improve affordability.	Policy LP1 is based on the Huntingdonshire Objectively Assessed Housing Need report prepared by Cambridgeshire County Council's Research Group. This is informed by a variety of forecasting models and strong knowledge of local housing markets. The methodology is consistent with that applied to other authorities within the housing market area.
On Policy LP2: Strategy for Development the most frequently expressed objection focused on the ability of the two strategic expansion locations to deliver their anticipated housing trajectories and the likely timing of delivery of homes in these locations. Challenges were put forward suggesting that the housing delivery	The Alconbury Weald strategic expansion location is based around an enterprise zone designated in 2011. The first homes to support this were completed in 2016. Urban&Civic have brought development forward at Alconbury Weald significantly

Main issues raised 2

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Issue raised	Response to issue
<p>trajectories were unrealistic and did not accord with national delivery trends. Concerns were expressed that the strategy would result in a significant shortfall in delivery.</p>	<p>faster than the average calculated by Nathaniel Lichfield and partners presented by several respondents. Alconbury Weald has been commenced with a planning approval period of exactly 4 years and first completions following in 0.8 year.</p> <p>Four housebuilders were on site by the end of 2017 and delivery rates are expected to increase rapidly now that the initial lead-in time for construction of necessary infrastructure has been overcome.</p>
<p>Two additional strategic expansion locations were promoted: Gifford's Park, St Ives for mixed use development including 1,750 dwellings and Sibson Garden Village for mixed use development forming a new settlement including up to 2,500 dwellings; an additional strategic site for approximately 1,000 dwellings was put forward southeast of Godmanchester.</p>	<p>The NPPF sets out the government's policy on the provision of housing and these sites are all in the open countryside at present. They are not required to meet the Council's identified objectively assessed need. In the event the Inspector feels the Council's need is higher than 20,100 homes alternative sites can be discussed at the Examination.</p>
<p>A selection of alternative potential site allocations were promoted across all categories of settlement indicating that they could provide greater flexibility in the housing market, improve delivery rates and reduce reliance on the strategic expansion locations. It was also suggested that reserve sites should be allocated to allow for contingencies.</p>	<p>The alternative sites put forward vary in scale significantly and some might be considered appropriate through development strategy policies LP7-LP10 or as rural exceptions sites encouraged through policy LP30.</p>
<p>On Policy LP4: Delivering infrastructure concern was expressed over the availability and identification of funding for infrastructure provision and the importance of aligning infrastructure and development delivery.</p>	<p>The Infrastructure Delivery Plan 2017 and its Addendum (November 2017) provide details of identified infrastructure needs and sets out anticipated costings and funding streams where known. The council will continue to work proactively with delivery partners to facilitate the alignment of infrastructure and development delivery.</p>
<p>On Policy LP9: Local Service Centres substantial opposition was received to the reclassification of Bluntisham into this newly presented category.</p>	<p>The new Local Service Centres category was created to try to facilitate wider choice in the housing market and to respond to the national priority of supporting rural communities. The level of services in larger villages was assessed in autumn 2017 through the HELAA process. A small group of villages in which sites were put forward contained all five of the following services: primary school, doctor's surgery, public hall, public house and convenience shop. Together these</p>

2 Main issues raised

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Issue raised	Response to issue
	provide a greater level of sustainability to meet day to day needs. This led to Alconbury, Bluntisham and Great Staughton being reclassified as Local Service Centres.

Main issues raised on Section C: Development Management

(Chapter 5: Requiring Good Design, Chapter 6: Building a Strong, Competitive Economy, Chapter 7: Strengthening Communities and Chapter 8: Conserving and Enhancing the Environment)

Table 3

Issue raised	Response to issue
In policy LP12: Design context the design context led approach was generally supported although limited concerns were raised over flexibility.	Noted
Concern was expressed about the deliverability of the level of affordable housing needed to meet the overall target. It was noted that 40% has not been achieved on some strategic scale developments and the suggestion was made that a higher overall housing target or different development strategy would be required to achieve the amount of affordable housing needed given achievement of a lower percentage on these sites.	Policy LP25 allows for flexibility with regard to viability to ensure sites can be delivered. It is not the only mechanism for delivering affordable housing within the district. LP30: Rural exceptions is expected to contribute to the overall amount of affordable housing achieved.

Main issues raised on Section D: Allocations

(Chapter 9: Huntingdon Spatial Planning Area, Chapter 10: St Neots Spatial Planning Area, Chapter 11: St Ives Spatial Planning Area, Chapter 12: Ramsey Spatial Planning Area, Chapter 13: Key Service Centres and Chapter 14: Local Service Centres)

Table 4

Issue raised	Response to issue
The deliverability of the anticipated housing trajectory at Alconbury Weald was strongly challenged. It was considered unachievable due to the capacity of housebuilders to build and sell so many properties in one location coupled with concerns over the funding and delivery of supporting infrastructure.	It is not unreasonable that delivery will be marginally slower at the very start, allowing for the implementation of infrastructure. The trajectory submitted is that of the applicant who is confident that the trajectory can be delivered. Since the grant of planning permission the applicant has been working closely with the LPA and stakeholders and delivered the necessary infrastructure and there have been no delays to the project as a result of funding to deliver housing, employment and infrastructure. For these reasons the Council supports the deliverability of Alconbury as set out in the annual monitoring report 2017.

Main issues raised 2

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Issue raised	Response to issue
<p>The availability of SEL1.2 RAF Alconbury was challenged and its removal from the plan sought due to uncertainty</p>	<p>The Defence Infrastructure Organisation supported its allocation and confirmed its availability from around 2024.</p>
<p>The market for new homes in Huntingdon in close proximity to the Alconbury Weald SEL was challenged at HU1 Ermine Street although the site's promoters sought an increase to 1,600 dwellings.</p>	<p>The Council has a need to identify sustainable locations to deliver new homes to meet the Council's Objectively Assesses Need of 20,100 homes to 2036. Having regard to the NPPF HU1 Ermine Street is considered to be in a very sustainable location being within the Huntingdon Spatial Planning Area. It would not be reasonable to not allocate this land on the grounds of market competition with Alconbury Weald.</p>
<p>The principle of insufficient sites being allocated within St Neots was raised as part of a concern that the plan should look to allocate higher housing numbers overall.</p>	<p>The Council's Objectively Assessed need is 20,100 homes, 3,800 of which are in St. Neots (allocation SEL2) but as set out at paragraph 4.10 , in total housing completions since 2011, commitments as at 1st April 2017 and allocations in the plan account for approximately 22,500 new homes, equivalent to 112% of the identified need.</p>
<p>The proposed development of S11 St Ives West generated issues regarding its level of remaining capacity for housing and the quantity, location and nature of open space provision.</p>	<p>This site is a complex site in a sensitive location on the outskirts of St. Ives and requires a sensitive approach to development given Houghton Grange is a Grade 2 listed building, there are a number of trees subject of a tree preservation order and immediately south of the Grange is a county wildlife site designated for its grassland value. The eastern most part of the site is a former golf course which has planning permission for 180 dwellings that is currently being built out. In order to ensure that this site responds to local constraints it is considered that approximately 400 dwellings is a reasonable quantum that can be achieved on site.</p>
<p>In Ramsey no individual sites gave rise to significant objections but the ability of the local road network to accommodate additional traffic arising from new development was a significant cause for concern.</p>	<p>All allocations in Ramsey were considered as part of the HSTS. Site specific concerns will be considered in greater detail during the course of planning applications.</p>
<p>The proposed development of SM5 East of Robert Avenue, Somersham generated substantial local opposition. main issues of concern were: impact on the adjoining nature reserve including disturbance and loss of habitat; lack of capacity on the local road network; increased risk to pedestrians and cyclists particularly on Robert Avenue; lack of headroom at Somersham waste water treatment works; increased surface water flood</p>	<p>This site is included in the HSTS which forms part of the evidence base for the Local Plan. Allocation SM5 specifically identifies that an ecological assessment will be required along with a transport assessment. Any application will also need to have agreement with the EA and Anglian Water that waste water flows from the proposal can be accommodated. Site specific concerns will be considered in greater detail during the course of a planning application.</p>

2 Main issues raised

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Issue raised	Response to issue
<p>risk; and the lack of capacity within local services to accommodate the needs of additional residents.</p>	
<p>The proposed development of AL1 North of School Lane generated substantial objections to the principle of its proposal for residential development. Main issues of concern were: lack of capacity on the local road network including the historic bridge in the village centre; increased parking congestion; the impact on the character of the village and lack of need for additional housing given the scale of development at nearby Alconbury Weald; impact on biodiversity and in principle protection of greenfield land; loss of land used for informal recreation; loss of views and privacy due to the sloping nature of the site; the lack of capacity within local services to accommodate the needs of additional residents; increased flood risk; and noise impacts due to proximity to the A1(M).</p>	<p>The strategy follows the requirements of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need.</p> <p>This site is included in the HSTS which forms part of the evidence base for the Local Plan. Allocation AL1 specifically sets out a number of requirements that would need to be addressed as part of any future application including a suitable means of access, a noise assessment and mitigation from the A1 and an ecological assessment and enhancement scheme. Site specific concerns will be considered in greater detail during the course of any future planning application</p>
<p>The designation of Bluntisham as a local service centre and proposed allocation BL1 West of Longacres generated substantial objections to the principle of designation and residential development with a lesser number directed at BL2 North of 10 Station Road. Main issues of concern were: the lack of community services and facilities to accommodate the demand arising from the proposed development, in particular the part-time nature of the GP surgery provision; impact on the character of Bluntisham and potential coalescence with Colne; loss of valuable agricultural land; impact on wildlife and biodiversity; poor access to employment and public transport services; and increased flood risk and sewage capacity concerns.</p>	<p>The strategy follows the requirements of the NPPF and legislation. The settlement has a range of services and facilities greater than that of a Smaller Settlement but less than that of a Key Service Centre including a primary school, public hall, public house, convenience and a part-time GP surgery. Allocation B1, West of Longacres, Bluntisham is grade 2 agricultural land and allocation BL2 is primarily grade 2 land, with the southern tip being grade 3. The site was assessed as part of the HELAA 2017. Other matters raised would be site specific considerations as part of planning applications.</p>

3 Section A: Introduction

3.1 Section A which forms the introductory and context material to the Local Plan attracted the following representations.

Table 5

Number of Representations		
Total	Objection	Support
53	27	26

Chapter 1: What is this Plan and what does it do?

Number of Representations		
Total	Objection	Support
33	19	14

Main issues raised on Chapter 1

Table 6

Issue raised	Response to issue
The Duty to Cooperate was a main focus for representations on Chapter 1 with expressions of support for the cooperation undertaken between Huntingdonshire and various neighbouring councils. However, concern was expressed over how this was documented through the Statement of Consultation with regards to St Neots and the relationship with large scale growth proposals in Bedfordshire.	The Council's engagement with neighbouring authorities is detailed in a separate document so that it can be easily considered as a whole. Representations made by relevant parties are also reflected in the Statement of Consultation.
Concern was expressed over designation of all allocations as strategic due to this potentially removing flexibility,	All allocations are considered necessary to cumulatively allow for the development strategy to be delivered. Flexibility is provided through the development strategy policies which allow for further development in specified circumstances.
Broad support was received for the approach of meeting the objectively assessed need figure in full within the district and for taking a positive approach to sustainable development.	Noted.
Support was received for the level of consultation carried out in the preparation of the Local Plan but concerns were raised over the introduction of a new category in the settlement hierarchy of 'Local Service Centres' including allocations within these settlements without an additional round of non-statutory consultation.	Support noted. The volume of concern over lack of consultation specifically on introduction of the 'Local Service Centres's category is acknowledged. Consultation was conducted through the HELAA (October 2017) on additional potential sites grouped into several categories which included sites in small settlements.

3 Section A: Introduction

Issue raised	Response to issue
<p>Natural England generally found the Local Plan to be sound and legally compliant but expressed concern that a more detailed and strategic approach was required to assessing the effects of recreational pressure of proposed site allocations.</p>	<p>The effects of recreational pressure arising from proposed site allocations on sites of nature conservation value are assessed through the Habitats Regulations Assessment. It is considered that this took a proportionate approach to this.</p>
<p>The approach to viability testing and recognition of the need to negotiate was broadly supported but open book viability assessments were sought if non-policy compliant levels of provision were to be proposed.</p>	<p>Open book viability assessments are sought through paragraph 7.11.</p>

Summary of issues raised

Table 7

Issue raised
<p>Correction sought to the policies map to show Elton Park as a historic park and garden.</p>
<p>Support for positive approach towards the presumption in favour of sustainable development, however this should be stated as a policy.</p>
<p>Paragraphs 4.39 to 4.54 highlight that the Council will work with partners to take a flexible and responsive approach in delivering the strategy. These sections are helpful but could be better placed to support the relevant policies within the Local Plan, or alongside a 'delivering the strategy'/ implementation policy.</p>
<p>Concern that all allocations are considered strategic; only Alconbury Weald and St Neots East should be designated as strategic. Designation as strategic removes flexibility new OAN methodology enhances importance of flexibility to change, reprioritise or move allocations. Defining a 'strategic' all of the allocations is too restrictive and over bearing when it comes to allowing Neighbourhood Plans to shape and deliver development at a local level.</p>
<p>Strategic policies should be grouped together (with the exception of site allocations) within a 'Section B: The Development Strategy' to increase usability and coherence. Design Context and Affordable Housing policies should not be classed as strategic.</p>
<p>Support for the level of consultation carried out but for towns/parishes which have been allocated new sites for development or have had a change in settlement hierarchy status a full re-consultation exercise should be carried out.</p>
<p>Comparative scores for sites in the sustainability appraisal incorporated into the HELAA challenged, in particular Paxton Road Farm, Offord d'Arcy, Gifford's Park, St Ives and land East of Old Ramsey Road, St Ives. All seek allocation as omission sites.</p>
<p>Issues with A1 traffic reports used, No more development should be allowed without a modern standard upgrade to this major route.</p>
<p>Concern expressed over lack of evidence in the Statement of Consultation to demonstrate that the requirements of the Duty to Cooperate have been complied with in respect of delivering the strategic priorities which cross administrative boundaries. Two particular concerns are: 1. The proposed housing target contained in Policy LP1 is lower than that previously agreed through the Cambridgeshire & Peterborough Memorandum of Co-operation (May 2013). 2. The proposed strategic expansion location at St Neots East will have cross boundary</p>

Section A: Introduction 3

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Issue raised
<p>implications for housing delivery and transport infrastructure, which are related to the potential new settlement at Tempsford Airfield New Market Town in Central Bedfordshire. The implications for housing delivery, the delivery of affordable housing, and highway capacity of all these strategic developments could be significant and should have led to detailed discussions between neighbouring authorities through the Duty to Cooperate process.</p>
<p>North Northamptonshire Joint Planning & Delivery Unit have engaged positively with Huntingdonshire District Council in the preparation of the Plan and consider that the requirements of the Duty to Cooperate have been met. We have no comments on the Submission Plan, but would wish to be kept informed on the progress of the Plan to adoption.</p>
<p>Fenland District Council note the approach to redevelopment of Wyton Airfield and the OAN target of 20,100 and raises no objections to the plan on this basis.</p>
<p>Central Bedfordshire Council is supportive of the Local Plan as it seeks to ensure the deliverability of sustainable levels of growth, meeting the identified housing and economic needs of Huntingdonshire within the district.</p>
<p>Central Bedfordshire Council and HDC have a good working relationship at both an Officer and Elected Member level in line with the requirements of the Duty to Cooperate. Fully supportive of both the timeframe and timetable of the Huntingdonshire Local Plan and the certainty it provides for Central Bedfordshire's plan preparation.</p>
<p>Peterborough City Council note the intention to plan for the district's full Objectively Assessed Need (OAN) for housing and job growth. Only modest growth is proposed near to Peterborough in Yaxley. There appear to be no 'strategic matters' as defined in legislation nor does there appear to be any non-strategic cross-boundary matters that would meet the definition of a 'strategic matter' from the Peterborough City Council perspective. As a result, PCC is satisfied that there is no requirement for any joint plan preparation or associated activities between Peterborough City Council and Huntingdonshire District Council. PCC notes that changes have been made to Policy LP1 (Amount of Development) which now states that the OAN target is 20,100 dwellings.</p>
<p>SHMA 2013 and Memorandum of Cooperation indicated good cooperation at this time. Variable Local Plan progress since has led to more fragmented consideration of housing needs. Lack of updated OAN for Fenland and St Edmundsbury is a significant cause for concerns as it becomes impossible to consider whether the needs of the HMA are being met in full. Updated Memorandum of Cooperation should be provided.</p>
<p>Welcomes OAN Update and the proposals to exceed the OAN. Acknowledgement of good access to A1 and provision of favourable conditions for a range of economic sectors. Considers there may be opportunities for collaboration of economic issues and related land requirements. The London Stansted Cambridge corridor also provides a potential context for collaboration; working jointly with partners to promote strategic infrastructure priorities.</p>
<p>Hemingford Abbots Parish Council supports the submission and comments made by Godmanchester Town Council.</p>
<p>Concerns that the SA has not been informed by the findings and recommendations of the HRA. The effect of increased recreational pressure on the green infrastructure network including designated sites is not sufficiently addressed. A more detailed and strategic approach to assessing the effects of recreational pressure should be taken to demonstrate no adverse effect to designated sites.</p>
<p>Natural England welcome inclusion of a number of amendments to address concerns raised previously. Natural England generally finds the Local Plan to be sound and legally compliant. NE have no specific issues to raise regarding the Council's 'Duty to Cooperate'. A more detailed and strategic approach to the assessment of the effects of increased recreational pressure should have been taken through the Sustainability Appraisal (SA)</p>

3 Section A: Introduction

Issue raised
and Habitats Regulations Assessment (HRA). It is not clear that the combined/cumulative effects of the allocations have been considered, particularly with regard to increased recreational pressure. Pleased that clear references to 'net gain' for biodiversity are included and would like to work cooperatively to consider an appropriate mechanism for delivering this. Welcome reference the Site Improvement Plans (SIPs) for European sites in accordance with our previous advice.
Open book viability assessments must be provided where reduced contributions are sought.
Local planning authorities are required to take account of changes in market conditions over time It is unacceptable to require developers to meet the cost of the verification of viability.
Supports the approach to viability testing and recognition of the need to negotiate in certain circumstances to reach an economically viable solution.

Chapter 2: Huntingdonshire District

Number of Representations		
Total	Objection	Support
6	2	4

Main issues raised on Chapter 2

3.2 The chapter was broadly supported with no main issues raised.

Summary of issues raised

Table 8

Issue raised
Major highway routes are only 'good' when the traffic flows perfectly and people can get in and out of villages; this is rare around Southoe, Diddington and Buckden. Urgent improvement works are needed on the A1 corridor before more development is approved.
Supports the assessment of the settlement pattern and agrees that outside the towns many settlements offer a range of services for residents of nearby smaller villages and countryside.
Historic England welcome the amendments to paragraph 2.7 highlighting the distinctiveness and character of these settlements.
Figure 1- District Map - would benefit from having a key, particularly to highlight the new A14 and the different types of main roads.
The maps and photographs in the settlement portraits are clear. Note that Godmanchester is in the list of 'largest villages' despite having been acknowledged as a town earlier in the Plan.

Chapter 3: Issues Shaping the Local Plan

Number of Representations		
Total	Objection	Support
14	6	8

Main issues raised on Chapter 3

Table 9

Issue raised	Response to issue
Requirements for improvements to key transport infrastructure were raised in terms of how important they are to facilitating economic growth and the beneficial impact improvements would have on people's daily lives.	Significant transport infrastructure improvements are currently being implemented in the district or are intended to commence within the next three years. The Council will continue to work cooperatively with the Cambridgeshire and Peterborough combined authority, Cambridgeshire County Council, Highways England and Network Rail to facilitate transport infrastructure improvements within the district.
The objectives were broadly supported with minor amendments proposed.	Noted.

Summary of issues raised

Table 10

Issue raised
Improvements to the A1 are required but financial constraints have impeded this. The traffic volumes make living near the A1 dangerous and worsens health impacts between Buckden and Southoe.
Support for the recognition that improvements to key transport infrastructure are critical to support economic growth, including improvements to the A14, A1, A428 corridor and East Coast mainline railway.
The opportunities should recognise the potential of the strategic expansion locations.
Support for the recognition of the importance of the Alconbury enterprise zone in providing jobs and economic diversification.
Approach to housing should aim to do more to provide homes nearer to where people will work to avoid the risk of dormitory settlements.
Developers should be encouraged to build properties suitable for older and less mobile people.
Historic England welcome the addition of the historic environment as a key issue.
The spatial vision and objectives are supported in principle and agrees the focus on meeting a variety market housing demands is critical but considers there is a mismatch between the objectives and the spatial strategy intended to implement them.
Urban&Civic strongly support objectives 1, 3, 6, 7, 13, 17 and 18.

3 Section A: Introduction

Huntingdonshire District Council | Statement of Representations March 2018

Issue raised
Fully supports the vision and objectives; would like Objective 7 supplemented with reference to maximise the benefit of Huntingdonshire's strategic location and recognise inward and outward commuting.
Objective 14 seeks to give priority to sustainable travel modes but the development strategy will not achieve this without development at Gifford's Park, St Ives.
Objectives 17 and 18 relate to housing growth and the delivery of market and affordable housing. The housing target be increased to 23,375 dwellings between 2011 and 2036 to support jobs growth in Huntingdonshire and at Alconbury Weald in particular. Gifford's park at St Ives should be allocated to ensure housing target is met.
Historic England welcome the addition of the term heritage to the Vision and the use of the term historic environment in Objective 21.
Natural England are generally supportive of the objectives. Objective 25 should include the West Cambridgeshire Hundreds in the list of strategic green infrastructure projects.

4 Section B: The Strategy

The Strategy

4.1 Section B which sets out the Strategy attracted the following representations.

Number of Representations		
Total	Objection	Support
223	196	27

Main issues raised on Section B: The Strategy

(Chapter 4: The Development Strategy)

Table 11

Issue raised	Response to issue
On Policy LP1: Amount of development a significant number of challenges to the objectively assessed need figure of 20,100 were received. The majority cited the figures arising from the government's consultation draft standardised methodology asserting the figure of 25,250 dwellings would be a more appropriate target and reflect the direction of travel of government housing development aspirations. Several alternative calculations were submitted.	Policy LP1 is based on the Huntingdonshire Objectively Assessed Housing Need report prepared by Cambridgeshire County Council's Research Group. The standardised methodology has not yet been finalised or introduced. The strategy set out within the proposed submission plan allows for delivery of approximately 22,500 homes through completions since 2011, on existing commitments and proposed site allocations. Additional windfall sites may increase this further. Together these are considered to provide sufficient flexibility and to recognise the government's aspirations to increase house building.
The methodology used in preparing the Huntingdonshire Objectively Assessed Housing Needs Report was challenged, particularly focusing on the appropriate level of market signals uplift to improve affordability.	Policy LP1 is based on the Huntingdonshire Objectively Assessed Housing Need report prepared by Cambridgeshire County Council's Research Group. This is informed by a variety of forecasting models and strong knowledge of local housing markets. The methodology is consistent with that applied to other authorities within the housing market area.
On Policy LP2: Strategy for Development the most frequently expressed objection focused on the ability of the two strategic expansion locations to deliver their anticipated housing trajectories and the likely timing of delivery of homes in these locations. Challenges were put forward suggesting that the housing delivery trajectories were unrealistic and did not accord with national delivery trends. Concerns were expressed that the strategy would result in a significant shortfall in delivery.	The Alconbury Weald strategic expansion location is based around an enterprise zone designated in 2011. The first homes to support this were completed in 2016. Urban&Civic have brought development forward at Alconbury Weald significantly faster than the average calculated by Nathaniel Lichfield and partners presented by several respondents. Alconbury Weald has been commenced with a planning approval period of exactly 4 years and first completions following in 0.8 year.

4 Section B: The Strategy

Huntingdonshire District Council | Statement of Representations March 2018

Issue raised	Response to issue
	Four housebuilders were on site by the end of 2017 and delivery rates are expected to increase rapidly now that the initial lead-in time for construction of necessary infrastructure has been overcome.
The level of flexibility within the plan's allocations was challenged. Some supported the level of over-allocation included, others sought higher levels to address the perceived challenges to be faced by delivery at the strategic expansion locations.	Respondents put forward contrasting views on this issue. The level of flexibility provided in the strategy is considered to provide an appropriate response which recognises the reality of delivery challenges.
Two additional strategic expansion locations were promoted: Gifford's Park, St Ives for mixed use development including 1,750 dwellings and Sibson Garden Village for mixed use development forming a new settlement including up to 2,500 dwellings; an additional strategic site for approximately 1,000 dwellings was put forward southeast of Godmanchester.	The NPPF sets out the government's policy on the provision of housing and these sites are all in the open countryside at present. They are not required to meet the Council's identified objectively assessed need. In the event the Inspector feels the Council's need is higher than 20,100 homes alternative sites can be discussed at the Examination.
A selection of alternative potential site allocations were promoted across all categories of settlement indicating that they could provide greater flexibility in the housing market, improve delivery rates and reduce reliance on the strategic expansion locations. It was also suggested that reserve sites should be allocated to allow for contingencies.	The alternative sites put forward vary in scale significantly and some might be considered appropriate through development strategy policies LP7-LP10 or as rural exceptions sites encouraged through policy LP30.
On the Delivering the Strategy section the principle of a housing delivery test was supported but concern was expressed that the proposed mechanism would be ineffective.	A national housing delivery test is scheduled to be introduced later in 2018.
On Policy LP4: Delivering infrastructure concern was expressed over the availability and identification of funding for infrastructure provision and the importance of aligning infrastructure and development delivery.	The Infrastructure Delivery Plan 2017 and its Addendum (November 2017) provide details of identified infrastructure needs and sets out anticipated costings and funding streams where known. The council will continue to work proactively with delivery partners to facilitate the alignment of infrastructure and development delivery.
On Policy LP9: Local Service Centres substantial opposition was received to the reclassification of Bluntisham into this newly presented category.	The new Local Service Centres category was created to try to facilitate wider choice in the housing market and to respond to the national priority of supporting rural communities. The level of services in larger villages was assessed in autumn 2017 through the HELAA process. A small group of villages in which sites were put forward

Issue raised	Response to issue
	contained all five of the following services: primary school, doctor's surgery, public hall, public house and convenience shop. Together these provide a greater level of sustainability to meet day to day needs. This led to Alconbury, Bluntisham and Great Staughton being reclassified as Local Service Centres.
On LP10: Small Settlements the most frequently expressed concern was over the flexibility to allow for more development in Small Settlements to support existing services and sustain the vitality of rural communities.	A minimum threshold of 10 dwellings has been used for site allocations. The policy is intended to support proposals for non-allocated development within Small Settlements and on land well-related to them in specified circumstances. Other policies allow for growth through rural exceptions sites which may include 40% market housing to help support the growth and vitality of rural communities.

Chapter 4: The Development Strategy

General issues on Chapter 4

Number of Representations		
Total	Objection	Support
2	2	0

Main issues

- 4.2** The development strategy is overly dependent on strategic expansion locations in Huntingdon and St Neots spatial planning areas. The objectively assessed housing need should be increased to 24,475 dwellings. Reserve sites should be allocated to allow for contingencies.

Summary of issues raised

Table 12

Issue raised
No allowance is made over and above the identified OAN figure to provide flexibility and achieve the expected level of development in the District. A buffer should be provided to allow for failure to deliver on larger allocations. The OAN for Huntingdonshire should be a minimum of 979dpa, a figure 21.8% higher equating to a minimum uplift of 4,375 dwellings on the Council's figure of 20,100. Contends that HDC could not demonstrate a 5 year housing land supply as at March 2017 and a backlog is likely to exist.
The development strategy depends on overly optimistic high delivery rates at two strategic expansion locations. Cites Nathaniel Lichfield and partners 2016 research 'Start to Finish'. Possible 'reserve' sites for development should be allocated to provide a contingency allowance.
The development strategy is overly dependent on Huntingdon and St Neots spatial planning areas. More development should be dispersed around the other spatial planning areas and key service centres.

4 Section B: The Strategy

Amount of development (LP1)

Number of Representations		
Total	Objection	Support
32	30	2

Main issues

- 4.3** A significant number of challenges to the objectively assessed need figure of 20,100 were received. The majority cited the figures arising from the government's consultation draft standardised methodology asserting the figure of 25,250 dwellings would be a more appropriate target and reflect the direction of travel of government housing development aspirations. Several alternative calculations were submitted suggesting the objectively assessed housing need figure should be 22,000, 23,375, in a range between 20,725 and 31,925 and in a range between 22,825 and 31,475. Some challenged the methodology used in preparing the Huntingdonshire Objectively Assessed Housing Needs Report, particularly focusing on the appropriate level of market signals uplift to improve affordability. It was contended that Huntingdonshire is clearly an unaffordable District and market signals should be adjusted accordingly.
- 4.4** Use of the transition arrangements were challenged regarding the short lifespan of the ensuing plan and need for it to be reviewed soon after adoption to incorporate whatever revised target will arise from any finalised standardised methodology.
- 4.5** The total amount of housing that would be delivered by the strategy was of concern, particularly the focus on the strategic expansion locations. A number of sites were put forward for potential inclusion as allocations to boost the housing supply.
- 4.6** A few expressions of support were received for the 20,100 dwellings figure, in particular the acknowledgement that that target was for 'at least' this figure.

Summary of issues raised

Table 13

Issue raised
Residents are already experiencing pressure on infrastructure and services. HDC should ensure development in services and infrastructure will keep pace, especially with regards to the increase in traffic.
Welcome inclusion of the objectively assessed need in a formal policy.
Objects to the reduction to 20,100 from the previous 21,000 target. An uplift of 5% does not go far enough in terms of taking appropriate account of market signals. A further increase in housing numbers above 20,100 is required to reduce the current disparities between house prices and the incomes.
Draft standardised methodology generates an annual housing requirement for Huntingdonshire of 1,010, equivalent to 25,250 dwellings over the plan period. A more flexible approach to meeting the District's housing requirement would provide a more positive framework for planned growth. The growth of Cambridgeshire must not be held back. To ensure the Local Plan is sufficiently flexible, additional locations for housing growth should be identified within the plan which are able to deliver additional dwellings if/when the housing requirement increases.
A step change in housing delivery is required; this will not achieve it.

Section B: The Strategy 4

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Issue raised
<p>The Huntingdonshire Objectively Assessed Housing Need report (April 2017) identifies the overall target of 21,000 homes which is more than the OAN and is what is agreed in the Memorandum of Cooperation. GL Hearn 'Review of Objectively-Assessed Housing Need in Huntingdonshire' Report (August 2017) suggests that 23,375 dwellings are required for 2011-36.</p>
<p>Transitional arrangements are proposed for plans submitted before the end of March 2018, or the publication of the new Framework (whichever is later). The Plan will be examined under these transitional arrangements. This approach is problematic as the Council's current housing requirement of 804 dwellings per annum will be superseded in a matter of months so the plan will have a lifespan of no more than five years before the replacement Local Plan will need to account for the new standardised calculation. This could result in a 'planning by appeal' scenario at odds with the plan-led system.</p>
<p>It is clear that the OAN for Huntingdonshire is on an upward trajectory. The plan should provide a policy mechanism for a review of the housing requirement early post the adoption of the plan.</p>
<p>The proposed standardised OAN calculation is significantly greater than even the previous Consultation Draft targets and so the direction of travel required is abundantly clear. The Council is negating its responsibility for significantly boosting the supply of housing.</p>
<p>It is short-sighted not to address the anticipated change of 25% increase from the proposed standardised methodology. The OAN should be seen as a minimum not a target.</p>
<p>The 20,100 housing requirement is a reduction of 900 from the regulation 18 consultation which set the housing requirement at 21,000 homes. The Council are under estimating its housing needs. HDC cannot be considered to be taking a proactive approach when seeking reductions in targets from previous iterations of its own emerging Plan.</p>
<p>The Huntingdonshire Objectively Assessed Housing Needs April 2017 Report fails to appropriately assess housing need in the Housing Market Area (HMA) in accordance with both the NPPF and NPPG. Consequently, the proposed OAN for the District is too low, and the Council has not identified sufficient housing sites in the Plan to meet its needs.</p>
<p>Since the SHMA 2013 and publication of the Memorandum of Understanding the pace of plan delivery has varied across the HMA which has led to the housing needs across the area being considered on a more fragmented basis rather than considering the needs of the HMA as a whole. This is concerning as it is not possible to know whether the needs of the HMA are being met in full.</p>
<p>The Local Plan will not deliver enough housing to meet its needs and should allocate additional housing sites in the following locations as omission sites: 1) Land west of College Farm, Somersham, 2) land north of Ermine Street, Huntingdon as an extension to HU1, 3) Riversfield, Little Paxton, 4) land north of Meadow lane, St Ives, 5) land south of Stokes Drive and Bluegate, Godmanchester</p>
<p>Policy LP1 provides insufficient housing in order to meet the housing needs of the District.</p>
<p>The consultation on the standardised methodology set out the need to significantly increase housing delivery from 804 dwelling/year to 1010 dwellings/year a rise of some 25%. Irrespective of whether this is brought forward it is contended the government's expectation is that housing delivery in Huntingdonshire should far exceed that proposed in the Local Plan. The standardised methodology would boost housing land supply to reverse the chronic and historical shortfall in Huntingdonshire District Council and other authorities of the county.</p>

4 Section B: The Strategy

Issue raised
<p>Detailed analysis of housing need by DLP concludes that 804 dpa is inadequate and that an appropriate OAN figure for Huntingdonshire is 979 dpa. An uplift of 20% should be applied based on affordability ratios seen. The OAN should be higher as there is evidence of suppression in household formation rates and adjustments to the OAN are required in order to balance jobs and growth. Policy LP1 would lead to an undersupply of at least 4,375 dwellings over the period 2011-2036.</p>
<p>The approach is inflexible. Annual delivery rates for SELs unrealistic based on Nathaniel Lichfield and Partners' research.</p>
<p>OAN Report 2017 is not a full objective assessment of housing need as it does not integrate the employment policy or sufficiently address market signals and so forms an inadequate response to the requirements of the NPPF. There is evidence a 20% uplift should be applied due to high affordability ratios.</p>
<p>Welcome the use of the 2014 DCLG household projections as the baseline coupled with use of 2011 Census data to convert the baseline household projections into dwellings. Disagree that some of the market signals for Huntingdonshire could be considered to be very modest.</p>
<p>To improve affordability a higher uplift is necessary. The proposed standardised methodology requires an uplift of 25% where median house prices are 8 times work place incomes, giving the clearest indication to date as to what the Government considers to be an appropriate uplift. The Council should be considering an uplift in the region 15% to take account of market signals. OAN should be calculated by uplifting the dwellings required to meet the 2014 based household projections (766 dpa) by 15% to take account of market signals. This would mean an OAN of 880 dwellings.</p>
<p>The 5% market signals uplift applied in the Huntingdonshire OAN Report is incorrect as national trends have significantly worsened and cannot be considered 'modest' in the context of affordability. Huntingdonshire is clearly an unaffordable District and market signals should be adjusted accordingly.</p>
<p>In the light of the proposed standardised OAN methodology, past delivery rates and continued reliance on two strategic expansion locations further land should be allocated. A minimum 10% buffer should be applied.</p>
<p>A SHMA should be prepared to establish detailed housing needs and a SHLAA to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. Concerned that projected delivery rates cannot be supported based on past delivery rates and performance.</p>
<p>Supports the principle of Policy LP1 identifying the proposed housing requirement as a minimum and recognises the SHMA 2013 and HELAA December 2017 as the evidence base for the housing target. Consider it imperative that housing figures are set as a minimum requirement and not a ceiling or cap to development. However concern is raised whether the OAN is enough. Suggests that the Council should be addressing any additional need as part of this process here and now, in order to avoid any potential future backlog.</p>
<p>Central Bedfordshire Council supports this policy and the delivery of at least 20,100 new homes and approximately 14,400 new jobs within Huntingdonshire.</p>
<p>There is no evidence to add the words 'at least' to the housing target of 20,100 homes. The NPPF specifies that the full objectively assessed needs must be met, but does not go beyond this; the only variance is where conditions allow for lower figures to avoid adverse impacts. The OAN report 2017 has used the most up to date information and taken the highest of these projections building in a further adding a 5% growth factor on previous estimates. There is no evidence put forward to justify a higher target and it is in danger of exaggerating the need. The housing figure results in an above-trend increase in the workplace population.</p>

Section B: The Strategy 4

Issue raised
<p>Support the overall development needs of 20,100 homes and 14,400 jobs. The Council has produced the evidence required to justify these figures through the Cambridge Sub-Region Housing Market Area (HMA), Objectively Assessed Housing Need published in April 2017, Huntingdonshire District Council's Housing Economic Land Availability Assessment (HELAA) (December 2017) and the Annual Monitoring Report (AMR) (December 2017). The AMR identifies that the current housing land supply position for the District is 5.78 years, equating to 22,068 dwellings up to 2036. Acknowledges the consultation on the proposed standardised methodology would increase the target.</p>
<p>Affordable housing need from Huntingdonshire's OAN report is 7,897 dwellings (316dpa). Given the reality of affordable housing delivery and the existing shortfall this is a significant problem; the OAN should be increased so there is a greater chance of meeting the OAN for affordable and market housing in full.</p>
<p>Support inclusion of new policy LP1 stipulating quantum of overarching growth in the form 'at least 20,100 homes'. Development at Alconbury Weald (5,000 homes) and Wintringham Park (2,800 homes) will make a significant contribution to meeting this. However, accompanying text and other references in the local plan should state clearly that this is the minimum number of new homes to be provided in 2011-2036 especially given the reduction from the earlier 21,000 figure.</p>
<p>Gladman do not consider the Council's housing need evidence is robust and believe it is an underestimation of housing need. It relies on use of the East of England Forecasting Model; economic forecasts are volatile and at least 3 should be used. There is no interrogation on the assumptions applied with regards to double-jobbing, commuting and population growth. There is no explanation of the 4% uplift to support economic growth and only 5% is applied for market signals.</p>

Strategy for Development (LP2)

Number of Representations		
Total	Objection	Support
55	45	10

Main issues

- 4.7** The most frequently expressed objection focused on the ability of the two strategic expansion locations to deliver their anticipated housing trajectories and the likely timing of delivery of homes in these locations. Challenges were put forward suggesting that the housing delivery trajectories were unrealistic and did not accord with national delivery trends. Concerns were expressed that the strategy would result in a significant shortfall in delivery.
- 4.8** The level of flexibility within the plan's allocations was challenged. Some supported the level of over-allocation included, others sought higher levels to address the perceived challenges to be faced by delivery at the strategic expansion locations.
- 4.9** The principle of acknowledging the potential of Wyton Airfield for redevelopment was supported as a positive approach to take in the circumstances in which an allocation of the site is not proposed. Early delivery of some housing on the site was promoted accompanying reinstatement of the site as a strategic expansion location.

4 Section B: The Strategy

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- 4.10** Two additional strategic expansion locations were promoted: Gifford's Park, St Ives for mixed use development including 1,750 dwellings and Sibson Garden Village for mixed use development forming a new settlement including up to 2,500 dwellings; an additional strategic site for approximately 1,000 dwellings was put forward southeast of Godmanchester.
- 4.11** The approach to directing approximately a quarter of overall housing growth to the lower tiers of the settlement hierarchy was broadly supported. However, additional scope within key service centres, local service centres and small settlements was sought with suggestions of additional settlements to be designated within the key service and local service centre categories. Allocations within and adjacent to small settlements were sought to support social and economic sustainability of these communities.
- 4.12** A selection of alternative potential site allocations were promoted across all categories of settlement indicating that they could provide greater flexibility in the housing market, improve delivery rates and reduce reliance on the strategic expansion locations.
- 4.13** The transport infrastructure and environmental challenges of delivering redevelopment at Wyton airfield were acknowledged and concerns expressed over its potential impact should it ever come forward.

Summary of issues raised

Table 14

Issue raised
Reassured that HDC have recognised that development needs to be concentrated in locations that provide a 'comprehensive range of services and facilities' with three quarters around the four spatial planning areas.
Natural England welcome that the development strategy for Huntingdonshire seeks to 'Provide complementary green infrastructure enhancement and provision to balance recreational and biodiversity needs and to support climate change adaptation'.
Historic England welcome the reference to the historic environment.
The strategy relies heavily on a small number of large sites being able to deliver a large amount of homes over the plan period on large strategic sites. These will have long lead-in times and the delivery rates anticipated are unrealistic. Huntingdonshire is ignoring the supply contribution that can be made from smaller sites coming forward in sustainable locations on the edge of villages. Additional allocations within the smaller settlements should be considered to boost the supply of land and the flexibility within the plan.
Support the focusing of growth in locations with good access to the upgraded route of the A14 to maximise the local benefits of this investment.
Supports the principle of the spatial planning areas approach but extension well beyond their main settlement masks the fact that Huntingdon is to receive a relatively limited allocation despite its clear sustainability credentials. The plan fails to maximise the potential of Huntingdon's sustainability.
Greater prominence should be given to the overarching contribution the strategic expansion locations can make to the growth targets within Huntingdonshire. There is a need for greater alignment between the SELs and strategic transport infrastructure improvements. The policy should reference the Council's designation of 'Established Employment Areas' including the Alconbury Weald Enterprise Zone.
Support the approach of meeting the OAN by balancing a deliverable, sustainable pattern of future development whilst ensuring choice and diversity in the market. Unclear how the 75:25% split is justified but it broadly supports the growth and vitality of the rural settlements to ensure diversity in the housing supply.

Section B: The Strategy 4

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Issue raised
<p>HBF wish to stress the importance of having realistic delivery expectations within any allocations to ensure the deliverability of the plan across its lifetime. This is particularly important where there is a reliance on strategic sites to deliver the majority of new homes. Delays to the delivery of strategic sites could lead to the LPA not being able to meet its housing requirement in full. Recommend a cautious assessment of delivery on strategic sites including consideration of extending them beyond the plan period and offsetting any undersupply with the allocation of small and medium sites. Support recognition of need to address backlog within 5 years and application of a 20% buffer to recognise persistent under-delivery.</p>
<p>The anticipated delivery numbers at Alconbury Weald and RAF Alconbury and at St Neots East strategic expansion locations are unrealistic. If delivery rates for each SEL were reduced to 300dpa they would deliver 1,895 fewer dwellings, equivalent of 2.35 years' worth of supply. There will be a significant housing land supply shortfall because the small number of large scale sites identified in the plan will not be able to deliver at the assumed rates. Additional sites are therefore required to provide a more balanced housing strategy that can deliver the identified housing need for the District.</p>
<p>There is an over-reliance on the delivery of two strategic expansion areas where housing delivery rates and the delivery of sufficient levels of affordable housing is uncertain. The over-reliance on a few large developments at St Neots and Huntingdon represents a high risk strategy. St Ives is a market town with a good range of services and facilities that are accessible by public transport including the Cambridge Guided Busway, but no strategic scale development is directed to this settlement. There is less need for significant infrastructure improvements associated with strategic development at St Ives. The strategy has competing development sites in close proximity; the impact on housing delivery rates and the delivery of affordable housing, including from schemes outside the district should be considered.</p>
<p>Concerned with the Council's strategy to deliver a large proportion of their anticipated housing numbers in the strategic expansion areas. Urban extensions only realistically come forward at the mid to back end of the plan period (if at all).</p>
<p>Supports the strategy approach to deliver development needs through concentrating development in locations which provide, or have the potential to provide, the greatest access to services and facilities as well as encouraging limited development for rural communities to support social and economic sustainability. The distribution of growth is considered to be appropriate. Supportive of growth to the east of St Neots and seeking to be included within future discussions about how this growth is planned and delivered.</p>
<p>Welcome the approach of providing for approximately 22,500 new homes which is considered prudent.</p>
<p>USAF may not release RAF Alconbury negatively impacting on delivery towards the end of the plan period.</p>
<p>Nathaniel Lichfield and partners 'Start to finish' report provides evidence on delivery rates. There is no evidence to justify a substantial increase in delivery rates locally above those achieved historically. The Council should be concerned about the potential risk to the successful delivery of two strategic expansion areas because they are reliant on a single developer. A reduction in anticipated delivery rates strongly suggests that there will be a housing land supply shortfall and additional strategic sites will need to be identified.</p>
<p>HDC are relying on rapid but highly unrealistic assumed rates of delivery from the new strategic allocations which are unrepresentative of the above reported trends and commercial reality encountered elsewhere.</p>
<p>Concerned about delivery assumptions on the strategic sites and relying on so few developers which could disproportionately affect housing delivery. Fall-back position is not outlined should these strategic sites fail to deliver as predicted. Insufficiently robust evidence provided to justify delivery assumptions.</p>

4 Section B: The Strategy

Issue raised
<p>The current spatial strategy is not fit for purpose as it is highly polarised and so will not meet even the currently proposed lower dwelling targets. The spatial strategy is predicated on a small number of large urban extensions, with long lead in times and likely abnormal site issues. At the other end of the scale it proposes a large number of dwellings from a myriad of very small sites, which are unlikely to be attractive to mainstream developers. 907 dwellings will be delivered across 28 sites of 50 dwellings or less. The costs incurred by smaller sites are disproportionate and less cost effective for mainstream house builders than intermediate scale sites of between 300 - 500 dwellings. The plan should not seek to allocate sites of 50 dwellings or less.</p>
<p>With an unjustified housing trajectory the plan is inflexible, not positively prepared and restricts the Council's ability to maintain a deliverable supply at all points during the plan period.</p>
<p>Concerned about delivery assumptions on the strategic sites and relying on so few developers which could disproportionately affect housing delivery. Fall-back position is not outlined should these strategic sites fail to deliver as predicted. Insufficiently robust evidence provided to justify delivery assumptions. The strategy will fail to boost housing land supply significantly. Further small to moderate size sites should be allocated within/adjacent to the key service centres.</p>
<p>Gladman strongly object to the proposed approach to reviewing allocations if under-delivery is identified as this would delay commencing a Local Plan review. Clear triggers, timeframes and consequences for not achieving delivery should be set out. Gladman consider that a full or partial review of the Local Plan should be commenced within 3 months of the trigger event occurring.</p>
<p>Parish Councils should be added where appropriate to the list of Responsible Agencies in the Implementation and Monitoring sections, and to include the use of Neighbourhood Plans to many more of the Delivery Mechanism sections.</p>
<p>Support the spatial strategy for Huntingdonshire. Satisfied with the focus on Huntingdon as a location for growth reflecting its strengths as a market town that can accommodate further expansion. Confirms the site South of Ermine Street (part of proposed allocation HU 1) is deliverable within the plan period.</p>
<p>The development strategy of the four spatial planning areas is supported as these are the most sustainable settlements. St Neots is capable of taking higher levels of growth as it is strategically located by the A1/ A428/ A421. It also has good range of shops, services, and facilities so it is appropriate that a significant proportion of growth is focused here. St Neots' position along to Cambridge to Oxford Expressway corridor should be recognised.</p>
<p>The figures used in the Transport documents/predictions have already far exceeded the expected volumes on the A1, Local communities (like Southoe and Diddington and Buckden) struggle to deal with the traffic volumes already. The A1 needs to be brought up to modern standards before major development is proceeded with.</p>
<p>A 10% lapse rate should be applied to provide headroom and flexibility in the supply. This would see the plan having to allocate sites to deliver a minimum of 23,100 dwellings which it does not.</p>
<p>Support inclusion of 12% flexibility but it would be beneficial if this were increased to 20% given heavy reliance on SELs. Over-allocations are required for contingency. As long as suitable, sustainable sites are identified then there would be no harm should this result in delivering a greater number than the minimum requirement of housing. To maximise housing supply and delivery the widest possible range of sites, by size and market locations are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products.</p>
<p>Note the 12% over-provision that additional provision is anticipated through rural exceptions, small and windfall sites. Therefore allocations in Godmanchester, particularly RGE Engineering could be reduced.</p>

Section B: The Strategy 4

Issue raised
<p>LP2 should recognise that a greater number of medium sized sites (i.e. up to 500 dwellings) will be required in the short to medium term to maintain a 5 year housing land supply.</p>
<p>St Ives' housing allocation likely to delivery within the next few years which could result in no additional housing for 15 years; this is unsustainable. Public meeting expressed support for additional housing. Concern that the housing need assessment considered the district as a whole and not individual parts.</p>
<p>Insufficient provision made to achieve the district's economic growth strategy, specifically for the St Ives SPA. 78% of employment allocations are at Alconbury Weald. Additional employment land should be allocated in St Ives SPA to enable economic growth and provide a range and choice of sites.</p>
<p>The strategy in LP2 remains essentially unchanged to that in the Core Strategy (2009). Contends there has been persistent under-delivery and a step-change is needed. To meet this a range and choice of housing sites in a range of settlements including the lower order settlements should be identified. The current strategy favours the large volume house builders. The uncertainties associated with planning are likely to put off smaller developers from moderate sized developments.</p>
<p>The objective of delivering 40% affordable housing is unlikely to be achieved due to levels expected on the strategic expansion locations. Growth in the wider area will be stifled due to a lack of affordable housing. Additional land should be allocated within the four spatial planning areas</p>
<p>St Neots' position on the A428 corridor should be recognised; forthcoming infrastructure proposals will consolidate St Neots' position as a key transport node and strategic location for growth to help support the buoyant economy. The strategy should be expanded to ensure a consistent supply of new homes are delivered over the plan period.</p>
<p>The principle of acknowledging the potential of Wyton Airfield for redevelopment was supported as a positive approach to take in the circumstances in which an allocation of the site is not proposed. Wyton Airfield is a government owned brownfield site located in a highly sustainable location adjacent to the existing settlement of Wyton-on-the-Hill and RAF Wyton. Crest have acknowledged the Council's reasoning for discounting Wyton Airfield as a strategic expansion allocation, and have revised their development strategy to focus on delivery of an first phase.</p>
<p>Reinstatement of Wyton Airfield as a strategic expansion location was promoted and early delivery of some housing on the site put forward with a phase 1 scheme of 1,000 dwellings suggested, with the remainder of the site safeguarded for development, within this plan period and beyond, in the event that the road infrastructure constraints enabling development beyond 1,000 units are resolved. The first phase, which is sustainable in its own right, can support the growth and needs of the existing RAF Wyton and Wyton-on-the-Hill communities.</p>
<p>St Ives is a suitable location for additional development, and it is capable of accommodating strategic scale development.</p>
<p>St Ives spatial planning area should include Hemingford Grey. It is more sustainable than the local service centres identified.</p>
<p>Housing allocations in St Ives should be increased as it has a larger population and more services than Ramsey SPA but lower allocations.</p>

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Issue raised
<p>Over 5,400 homes are affected by some form of flood risk (fluvial or surface water) across 19 draft allocations, when otherwise sustainable alternatives could be reasonably available wholly within Flood Zone 1. There is little evidence to support the deliverability of the proposed allocations. For example, flood risk is a clear challenge to site deliverability (affecting viability, marketing, insurance and sales) but is not addressed in the Council's evidence.</p>
<p>The plan conflicts with the sequential test at the heart of the NPPF to direct development to areas with the lowest risk of flooding. The Sustainability Appraisal (SA) does not justify why sites with a greater risk of flooding are to be allocated when there are reasonably available sites in Flood Zone 1. There is no justification as to the weight afforded to 'non-flooding' factors and why these outweigh the sequential test.</p>
<p>The plan proposes sites to meet all of the objectively assessed housing need in the district. Overall its draft policies and proposals are considered to be an appropriate response to the planning challenges affecting Huntingdonshire insofar as it affects South Cambridgeshire. The plan is also considered to be consistent with the agreed duty to cooperate documents relating to the Cambridgeshire and Peterborough area.</p>
<p>Further small to moderate size sites should be allocated within/adjacent to the key service centres.</p>
<p>A quarter of all the housing required is to be delivered across Key Service Centres, Local Service Centres and Small Settlements. There is no clarity or certainty about how this will be delivered.</p>
<p>Object to the reduction in the scale of growth from 30% to 25% proposed for the Key Service Centres, Local Service Centres and Small Settlements.</p>
<p>Generally support the proposed settlement hierarchy and the identification and designation of Sawtry as a 'Key Service Centre'. Welcome the recognition that 'Key Service Centres' along with the identified 'Local Service Centres' should provide appropriate levels of growth to support the 'Centres' capacities to meet their own needs, reflect their roles, support the provision of services and help meet local needs.</p>
<p>Additional growth should be directed to the Key Service Centres, Local Service Centres and Smaller Settlements. There are further sustainable growth opportunities which should be allocated to mitigate risk of over-reliance on delivery in the SELs.</p>
<p>A different settlement hierarchy is proposed than in than previous consultation drafts given the identification of three Local Service Centres. Uncertain over the extent of the evidence base justifying these. No indication of weight given to different services or any up to date assessment of all settlements in the district. Objects to the omission of Elton as a Local Service Centre or a Key Service Centre.</p>
<p>Inclusion of small settlements in the group with key service centres and local service centres to take approximately 25% of total growth is new thinking by HDC. Provision in new planning policy to expand Small Settlements despite making clear in previous drafts that this would not be supported. Previous drafts concentrated development in spatial planning areas and key service centres, not expanding small settlements resulting in more journeys to access services and facilities.</p>
<p>The failure to allocate any sites within the Small Settlements will serve to undermine the social and economic sustainability of these communities negatively affecting their sustainability over time. The population aged over 65 has risen significantly and a lack of suitable and affordable alternatives means that many of these retirement age households remain in their homes, occupying housing that would otherwise be suitable for younger working people and families perpetuating a demographic imbalance and reducing the school age population of a settlement. New housing can help to rebalance communities by attracting younger people and working families</p>
<p>Stilton and Needingworth should be added to the Local Service Centres category given their similarity to the settlements identified.</p>

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Issue raised
<p>The number of local service centres should be extended to include settlements that have the key services apart from a surgery</p>
<p>Concerned that introduction of the Local Service Centres category without due consultation renders the plan legally non-compliant opening up a development 'free for all' due to local plan delays.</p>
<p>Further small to moderate size sites should be allocated within/adjacent to the key service centres and within local service centres.</p>
<p>Support inclusion of reference to a quarter of the OAN for housing being dispersed across key service centres, local service centres and small settlements. In particular, smaller settlements should be considered as locations for sustainable development, capable of providing a supply of readily deliverable small sites.</p>
<p>The strategy is not sufficiently flexible. The provision of some housing at rural settlements is appropriate but concerned that the scale of housing development proposed at certain villages would not represent the most sustainable form of development.</p>
<p>Failure to identify growth in other settlements will act as a constraint leaving reliance only on rural exceptions housing. Smaller site allocations would provide a variety of delivery without the constraints encountered by large strategic sites. Support acknowledgement that villages can grow organically. Reducing household size will necessitate additional housing stock to maintain services. The proposed strategy conflicts with supporting and growing the rural economy.</p>
<p>The blanket protection of the countryside is inconsistent with the NPPF. Concentration of approximately 75% of growth to the spatial planning areas potentially inhibits growth and does not provide a sufficiently flexible approach to encourage other sites to come forward. Greater allowance should be made for additional small and windfall sites.</p>
<p>There should be a larger recognition and allocation of sites in some of the small settlements such as Hilton to support the need for some natural growth in rural areas. The strategy does not provide sufficient flexibility and diversity of supply as policies place limitations on developments which do not contain significant portions of affordable housing. Development should not be excluded from a settlement where it could help support services in another settlement</p>
<p>Needingworth is identified as a small settlement and is capable of accommodating residential development allocations.</p>
<p>Support the identification and designation of Holme as a 'Small Settlement'. No allocations are proposed within the Local Plan below that of 'Local Service Centres'. The Local Plan fails to positively plan for growth and should be amended to identify development sites at 'Small Settlements'.</p>
<p>Object to the approach identified for the distribution of growth in the local centres and small settlements as it ignores the potential where there are groups of smaller settlements for development in one village to support services in a village nearby. This is the case in Offord d'Arcy.</p>
<p>The plan needs 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.</p>
<p>Welcome the non-identification of Sibson Aerodrome as an allocation for housing as it is not in a location supported by local residents and would not be capable of utilising existing infrastructure in the way development at existing settlements can.</p>

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Issue raised
<p>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. Sibson Garden Village would provide an alternative SEL rather than heaping more growth onto Huntingdon. The strategy is high risk and places a lot of pressure on delivery from these sites.</p>
<p>The pursuit of RAF Wyton over the last 4 years to become a strategic expansion area has been to the detriment of the Local Plan process and the quality of the outcome. The extent of buildings, runway and hard standing covers a relatively small area compared to its overall size so most should not be deemed previously developed land.</p>
<p>Wyton Airfield is on the wrong side of the river for access to the A14 and the major employment draw of Cambridge and to the major expansion in housing and employment that will occur along the proposed Oxford to Cambridge corridor. The environmental constraints imposed by crossing the Ouse Valley make this unsustainable.</p>
<p>Note RAF Wyton is not included due to transport infrastructure challenges. Trust this means that a new road across the Ouse Valley and down Cow Lane in Godmanchester is no longer necessary as this would damage the landscape and the environment. Instead, other options for dealing with the traffic generated should continue to be explored.</p>
<p>Redevelopment of RAF Wyton is not deliverable due to funding requirements of transport infrastructure. The environmental constraints to the delivery of any transport solution are also very challenging. Whilst RAF Wyton may remain an opportunistic site for some sort of development potential, the evidence thus far shows development of RAF Wyton does not meet the test of sustainable housing development on the scale envisaged whilst likewise there is evidence to suggest that there are other locations that could meet the OAN and should be assessed alongside.</p>
<p>Natural England is working with the Wildlife Trust to promote and develop the work of the Ouse Valley Living Landscape and we would welcome assurance that future transport studies for RAF Wyton development will take full consideration of the need to protect and enhance this.</p>
<p>Omission site Lodge Farm, Huntingdon - Discounting of development sites around Huntingdon such as Lodge Farm by reason of traffic impact is flawed. Sustainable development can and should come forward at Huntingdon.</p>
<p>Omission site East and south east of Romans' Edge, Godmanchester - is put forward as a sustainable urban extension for allocation for approximately 1,000 dwellings.</p>
<p>Omission site Dexter's Farm, Godmanchester - Bellway Homes' site has been consistently promoted as a deliverable and developable opportunity. It is wholly within Flood Zone 1, is within the Huntingdon Spatial Planning Area and adjacent to draft allocation HU19 Bearscroft Farm) and should be allocated for up to 370 dwellings.</p>
<p>Omission site Land south of Hermitage Woods, Alconbury - this should be allocated now for 1,000 dwellings as a logical extension to Alconbury Weald. The site is unconstrained, available, suitable, achievable with a realistic prospect that housing will be delivered within 5 years and viable.</p>
<p>Omission site Land between the East Coast mainline railway, the A428 and Potton Road, St Neots - a 3.9 hectare site is put forward for development of 79 dwellings contending that this will help to boost significantly the supply of housing and assist in provision of a 5 year housing land supply as it is readily available.</p>
<p>Omission site Land to the east of the A428, St Neots - two additional large scale strategic sites are put forward contending a good relationship to the potential upgrade route for the A428.</p>

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Issue raised
<p>Omission site Land east of Little Paxton - a 3ha site formerly operated by Lafarge Aggregates Limited is put forward for development with 40-50 dwellings.</p>
<p>Omission site Land to the north of Houghton Road, St Ives - land adjacent to the western edge of St. Ives is promoted for allocation for 370 dwellings.</p>
<p>Omission site Wyton Airfield - reinstatement as a potential strategic expansion location is sought for Wyton airfield contending that a first phase for 1,000 dwellings could be delivered within the scope of mitigation of the existing road network and with additional promotion of the guided Busway.</p>
<p>Omission site Gifford's Park, St Ives (Within Holywell-cum-Needingworth parish) - contends that development at Gifford's Park would focus development in a location which is sustainable in transport terms given its accessibility to St Ives town centre by walking and cycling and proximity to the guided bus.</p>
<p>Omission site Land north of Meadow Lane, St Ives - 2.6ha of lakeside land is put forward for residential development and open space contending it accords with the development strategy as it is within a short walk of services and facilities including the guided bus.</p>
<p>Omission site Land at Galley Hill, Fenstanton - is promoted for employment and road related development to meet economic growth of St Ives and Fenstanton.</p>
<p>Omission site Sibson Garden Village, Sibson Aerodrome - the proposed garden village should be identified in the Plan; this can provide up to 2,500 new homes and associated infrastructure 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.</p>
<p>Omission site Mill Road, Buckden - 11.7ha is promoted for up to 270 dwellings</p>
<p>Omission site East and West of Glatton Road, Sawtry - 11ha of land should be allocated for development as Sawtry offers a range of local services and facilities.</p>
<p>Omission site Dews Coaches, Chatteris Road, Somersham - allocation of land currently used by Dews Coaches is sought.</p>
<p>Omission site Ramsey Road, Warboys - 11.6ha is promoted for up to 230 dwellings, employment, local shop and community uses.</p>
<p>Omission site East of North Street, Stilton - 4ha of land is put forward for allocation for residential development contending it forms a logical extension to the settlement.</p>
<p>Omission site Meeting Lane, Needingworth - the land should be allocated for residential development of up to 50 dwellings as it is well-related to the village and is a sustainable location.</p>
<p>Omission site South of Long Drove, Holme - (described in submission as south of Station Road) 8ha of land are put forward for development supporting the contention that sufficient growth should be allowed to ensure Holme maintains its role as a Small Settlement.</p>
<p>Omission site South of Glatton Lane/Station Road, Holme - 34ha of land are put forward for development supporting the contention that sufficient growth should be allowed to ensure Holme maintains its role as a Small Settlement.</p>
<p>Omission site Western end of Valley Road, Perry - is proposed for allocation for residential development of approximately 30 houses to support the vitality of the community and local services.</p>

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Issue raised
<p>Omission site Land north of Haddon and west of Peterborough (north of the A605) - this would represent a good opportunity for commercial and employment uses and assist in delivering the Council's economic strategy. This could assist Peterborough Council in meeting their future economic needs and also assist Huntingdonshire in delivering additional employment sites and support sustainability of Great Haddon.</p>
<p>Omission site north of RAF Wyton - Ag Reserves also own 280ha north of RAF Wyton and would welcome the opportunity to discuss how the land could assist in meeting the medium and long term development needs of the district.</p>

Green Infrastructure (LP3)

Number of Representations		
Total	Objection	Support
8	8	0

Main issues

- 4.14** The issues raised related to details rather than the overall principle of the policy which received several qualified expressions of support.

Summary of issues raised

Table 15

Issue raised
<p>Natural England and the Wildlife Trust are generally fully supportive but consider that West Cambridgeshire Hundreds should be included within the Green Infrastructure Priority Areas.</p>
<p>Reference should be made to the Dark Sky designation of Great Fen with a requirement for neighbouring development proposals to consider and mitigate impacts.</p>
<p>The Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) requires more detailed assessment on the effects of proposed development on designated sites, alone and in-combination, through increased recreational pressure; in the interim this could be easily addressed through a policy requirement for developer contributions towards delivery of the objectives of the Cambridgeshire Green Infrastructure Strategy (or subsequent revision).</p>
<p>Agrees that it is important to protect local green spaces but the policy requires a review mechanism as Green Infrastructure designations should be monitored and land may need to be re-evaluated and potentially released for development should growth on allocated sites not deliver the needs.</p>
<p>The boundary of the Green Infrastructure Priority Area, and specifically that for the Great Ouse Valley, covers extensive tracts of land of varying visual, ecological or historic merit. The requirement for replacement provision of informal underused pastureland with no noted ecological value is considered to be overly restrictive.</p>
<p>Anglian Water welcomes the references made to the regional significance of Grafham Water Reservoir. There is no guidance on how Anglian Water would demonstrate that there is a need for development relating to Grafham Water Reservoir, its treatment works and associated networks which could result in a barrier water supply investment and operation. The policy should be amended to remove this requirement.</p>

Issue raised
Urban&Civic support the principle of the policy but consider it should be more positively worded in relation to the provision and creation of new, multifunctional green infrastructure.
Reference to green infrastructure priority areas having 'potential to consolidate and link important habitats and facilitate improvements' is deemed to produce additional burden and expectation on the nature of development opportunities that maybe acceptable within such areas. Redevelopment opportunities in Little Paxton itself would have very little impact on the Ouse Valley and the aspirations within the policy are not considered justified in this instance. An end use with financial gain is required in order to fund and incentivise the cleaning up of this area, to the wider benefit of the landscape and proximate ecological designations.

Delivering the Strategy

Number of Representations		
Total	Objection	Support
5	5	0

Main issues

- 4.15** Most concerns over delivering the strategy were incorporated into representations on policy LP2 'Strategy for Development'. The principle of a housing delivery test was supported but concern was expressed that the proposed mechanism would be ineffective and any replacement should be set out in a formal policy.

Summary of issues raised

Table 16

Issue raised
Gladman strongly object to the proposed approach to reviewing allocations if under-delivery is identified as this would delay commencing a Local Plan review. Clear triggers, time-frames and consequences for not achieving delivery should be set out. Gladman consider that a full or partial review of the Local Plan should be commenced within 3 months of the trigger event occurring. Cites NW Leicestershire Local Plan (2017) as an example of an effective and implementable review policy.
Accepts the intentions of a housing delivery test to boost the supply of housing but the proposed local housing delivery test will be ineffective; any housing shortfall will probably be addressed through the appeals process before the housing delivery test would apply.
The housing trajectory is ambitious with annual delivery of 1,265 expected in 2018/19. If this is not achieved Council must positively prepare and be in a position to adopt a robust strategy of seeking to address any shortfall.
The 2 major strategic development opportunities should be monitored in detail given that they are a significant proportion of the identified housing provision so the fall-back position is implemented if needed.
More allocations should be secured to ensure the housing target is delivered.
The A1 clogs up; until it is sorted out extra development must be delayed.

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Delivering Infrastructure (LP4)

Number of Representations		
Total	Objection	Support
11	9	2

Main issues

- 4.16** Concern was expressed over the availability and identification of funding for infrastructure provision and the importance of aligning infrastructure and development delivery. Use of both CIL and S106 planning obligations gave rise to some confusion and the suggestion was made that use of the Developer Contributions SPD should cease.

Summary of issues raised

Table 17

Issue raised
Concern with lack of funding shown for essential and critical schemes. It should be clear for at least the first 5 years how the infrastructure will be funded to assist with development management decisions. If delivery is essential and cannot be funded, the Plan should state the consequences of this and have alternative contingency plans. Key infrastructure needed should be set out in the Local Plan itself.
Policy LP4 should align more with LP2 and more clearly set out so that the delivery of infrastructure should be phased to match development, rather than the current wording which states that delivery of development may need to be phased, and review mechanisms will be used to ensure necessary infrastructure is provided to meet needs.
Large development sites such as Alconbury Weald and Wintringham Park require a flexible, phased approach to infrastructure delivery to ensure that infrastructure is provided in a cohesive, well-planned way that matches the needs of the new and growing community.
Viability must not be threatened by excessive obligations and policy burdens. Consideration of nil CIL on some sites should be considered where bespoke S106 agreements apply.
HDC has adopted CIL and to rely for other contributions on an SPD that was adopted prior to the introduction of the NPPF is not considered acceptable. It should only be using CIL. Developer contributions must only be used for specific requirements consistent with the CIL regulations and relevant paragraphs of Planning Practice Guidance. Reference to the SPD developer contributions should be deleted.
HDC must not fund infrastructure from CIL and planning obligations together. The policy must make clear how it will avoid double-counting. Further clarification is needed to explain how HDC will deal with pooled developer contributions which may not be compliant with the CIL regulations.
There should be more emphasis on promoting brownfield land and given higher costs of re-using brownfield land, there is a need for increasing its viability through consideration of the level of planning obligations and provision of infrastructure. Sites at Houghton Grange and the BBSRC Field (S11) should be permitted a larger developable area and reduced greenspace with a higher number of housing units than is currently stated.

Issue raised
The assumptions made in the Infrastructure Delivery Plan should be made consistent with the projections of the Objectively Assessed Housing Needs on which the entire Local Plan is predicated. Differing household sizes are quoted in the two documents. There is a need for infrastructure to keep pace with housing growth.
The potential to secure highway infrastructure improvements which were considered essential to support new development was supported.
Recognition of the need for phased development to ensure water and water recycling infrastructure keeps pace with development was supported.
Concern expressed over education funding and the use of temporary structures within schools.

Flood Risk (LP5)

Number of Representations		
Total	Objection	Support
4	4	0

Main issues

4.17 Greater emphasis is sought on achieving flood risk reduction through development.

Summary of issues raised

Table 18

Issue raised
Policy LP5 includes a welcome reference to taking all reasonable opportunities to reduce overall flood risk. However, there is no policy consideration of how and where this will be achieved, and is therefore not sufficient to ensure flood risk reduction through development.
Inadequate emphasis is placed on using opportunities offered by development to reduce the causes and impacts of flooding and in avoiding flood increases elsewhere. Cambridgeshire County Council, as Lead Local Flood Authority has identified modifications which would demonstrate that the Local Plan is taking specific opportunities offered by new development to reduce the causes and impacts of flooding.
Draft Policy LP5 is predicated on the Council wrongly applying the sequential test across the District in relation to housing developments. The Council's proposed allocations include new housing developments within Flood Zone 3. This enables the conclusion to be formed that there is insufficient land within Flood Zones 1 and 2 within the District in order to deliver the overall housing need. The policy therefore requires amending to remove housing developments from being subject to the sequential and exception tests.
The policy would inhibit new infill sustainable development in town centres such as St Ives and should be amended to allow infill development but not major new sites where flood defences are in place.

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Waste Water Management (LP6)

Number of Representations		
Total	Objection	Support
4	3	1

Main issues

- 4.18** Issues related to details rather than the principle of the policy which received several qualified expressions of support although concern was expressed over the availability of capacity for waste water treatment, particularly at Oldhurst, and the role of Internal Drainage Boards.

Summary of issues raised

Table 19

Issue raised
Anglian Water is supportive of Policy LP6
Urban&Civic support the purpose of the policy to ensure that waste water capacity is maintained throughout the plan period. The policy would benefit from setting out how development will reduce the usage of water and it should additionally set out and refer to solutions for waste water treatment capacity within Huntingdonshire up to 2036. Such an approach could be linked to Policy LP4 and the provision of infrastructure to support development.
The supporting text to the policy should set out how the Council, together with delivery partners the Environment Agency, Anglian Water Services and the Middle Level Commissioners will work jointly to set out how capacity will be improved to support development needs of Huntingdonshire.
Criteria f. requires Middle Level Commissioners or other internal drainage board approval. In our experience the Commissioners are often unwilling to support schemes as they prefer all planning condition type works/information to be provided with the planning application.
The Huntingdonshire Stage 2 Detailed Water Cycle Study (WCS) 2014 prepared by URS appears to be at odds with the assessment in paragraph 4.76. which states that the Oldhurst Water Treatment Works has no available headroom. Policy LP 6 should take a more bespoke approach requiring upgrades to capacity only where this is necessary having regard to the scale, timing, and location of the development. Parts e. and f. of Policy LP4 should clarify the extent of their locational applicability as clearly in the case of the Oldhurst catchment and Warboys specifically, the technical evidence indicates that there would be no compromise of the Water Framework Directive.

The Key Diagram

Number of Representations		
Total	Objection	Support
5	5	0

Main issues

- 4.19** The key diagram should better reflect the strategic and spatial growth objectives for Huntingdonshire alongside infrastructure provision. It should also show the extent of the spatial planning areas and main allocations (including proposed additions).

Summary of issues raised

Table 20

Issue raised
The Key Diagram would be better aligned alongside Policy LP2 'Strategy for Development'. The Key Diagram should be amended to better reflect diagrammatically the strategic and spatial growth objectives for Huntingdonshire alongside infrastructure provision.
The Key Diagram should depict the actual extent of the SPAs as stated in the corresponding definition and draft Policy LP 7 'Spatial Planning Areas'. The areas do not correspond with the boundaries of a number of strategic allocations with Section D of the Plan.
It fails to represent a clear picture of the key elements of the strategy and should depict the actual extent of the SPAs. An alternative is show a separate key for other locations which will deliver significant housing over the plan period, such the HU1: land at Ermine Street, Huntingdon. There is no consistency.
Broadly support the key diagram shown at Figure 2. However, given previous comments regarding a minimum 10% buffer on top of the current OAN, it is stressed that given Godmanchester's position within the Huntingdon Spatial Planning Area, land south east of Romans' Edge should be allocated for development.
The Key Diagram fails to show the West Cambridgeshire Hundreds area. This is a landscape-scale component of the local ecological network. It is mainly in the neighbouring district of South Cambridgeshire, but extends into Huntingdonshire. It should be properly recognised and mapped in this Local Plan, in accordance with national policy.

Built-up Areas definition

Number of Representations		
Total	Objection	Support
3	3	0

Main issues

- 4.20** A possible conflict was identified with LP10 'Small Settlements', LP11 'The Countryside' and LP30 'Rural Exceptions Housing'. Concerns were expressed that the policy was both too rigid and too open to interpretation.

4 Section B: The Strategy

Summary of issues raised

Table 21

Issue raised
Built Up Area Definition itself does not contain a criterion based policy upon which a judgement can be made as to whether land can be regarded as lying with the built-up area or not.
The New Local Plan is heavily reliant on windfall development coming forward. To restrict development in the built-up area to small or minor scale developments would prejudice the achievement of even the modest housing requirement set out in Policy LP1.
The definition is not needed and would conflict with other policies in the Plan such as the open countryside and the rural exception housing policy. It does not provide flexibility but creates uncertainty and will restrict delivery. The assessment would be left to the consideration of individual planning applications and interpretation of the definition by an individual officer. This could be avoided by allocating sites within the various villages that will support the current household growth along with some growth to boost the housing supply in the villages.
Objects to the use of the words 'minor scale' and 'small' .
The reference to 30 or more homes is somewhat arbitrary and does not appear to be based on any substantive evidence.
The proposed definition is considered to be rigid and in lacking a degree of flexibility. Conflict is likely with achieving development in accordance with Policy LP10.

Spatial Planning Areas (LP7)

Number of Representations		
Total	Objection	Support
17	14	3

Main issues

- 4.21** Issues related to details rather than the principle of the policy. Greater flexibility was sought in particular with regard to allowing development outside the built-up area to facilitate additional development. The retail impact assessment threshold was considered too low by one retailer.

Summary of issues raised

Table 22

Issue raised
The approach set out within Policy LP7, identifying four key spatial planning areas is supported.
Greater support should be given to development proposals for residential development that fall within the four Spatial Planning Areas.
Each specific Spatial Planning Area should be directly referenced within Policy LP7.

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Issue raised
Locations of strategic expansion should be given greater prominence with the Spatial Planning Area definition due to the scale of growth that is being delivered in these locations.
Should be more flexible and recognise that development outside of the built-up area could be considered acceptable where there is an evidenced need.
Support is provided for the identification of Spatial Planning Areas and the identification of these areas to accommodate growth; specifically St Neots SPA which should be expanded.
The definition for the Huntingdon Spatial Planning Area is misleading and incomplete.
Concerns raised regarding the inclusion of some land within St Ives Spatial Planning Area. Concerns raised regarding ambiguity within the description of St Ives Spatial Planning Area.
Spatial Planning Area for St Ives should include the whole of the built-up area of Hemingford Grey.
The deliverability of the strategy is questioned given that volume of housing supply that is due to come forward on a few large strategic sites.
A greater degree of flexibility in terms of the scale and range of sites allocated is required. More small and medium allocations in sustainable locations should be identified in order to maintain flexibility of supply and help ensure a continuous supply of sites to deliver a 5 year supply of housing land early in the plan period.
Concerns are raised that Policy LP7 only seeks to guide the scale and nature of planning applications for non-allocated potential development.
Concerns raised regarding the use of built-up-area boundaries to restrict growth as these may preclude otherwise sustainable development from coming forward.
The threshold of 600 square metres for requiring a retail impact assessment is significantly less than set out within the NPPF which it should be amended to reflect. This does not follow the 'like affects like' principle. There is a need for additional choice and competition within towns to reduce the need for residents to travel elsewhere to satisfy their food shopping needs.

Key Service Centres (LP8)

Number of Representations		
Total	Objection	Support
10	6	4

Main issues

- 4.22** Issues related to details rather than the principle of the policy which received several qualified expressions of support although some concerns were expressed over the implications and interpretation of development on land well related to the built-up area. Classification of Stilton as a key service centre was sought.

4 Section B: The Strategy

Summary of issues raised

Table 23

Issue raised
Support provided for the Council's approach and the identification of Key Service Centres within Policy LP 8.
Settlements should only be identified as Key Service Centres if residents are able to access services whatever their mode of transport.
The approach to support development proposals on land well-related to the built-up area is supported.
Fenstanton is identified as a key service centre. The policy states that development on land well-related to the built-up area may be supported. There is no definition to set out what 'well-related' means.
Identification of Sawtry as a Key Service Centre is supported. There is opportunity for sustainable development in Key Service Centres to contribute to the social and economic sustainability of these settlements and support rural economies. Additional site 'Land north of Sawtry, east and west of Glatton Road' put forward for development.
The classification of Warboys as a Key Service Centre is supported. Warboys has a range of facilities and services which can support housing growth which in turn will deliver local amenities including affordable housing and public open space. The identification of smaller development sites that can deliver housing and support the larger strategic allocations is a sound approach and enables a balanced housing strategy to be delivered.
The identification of Yaxley as a Key Service Centre is supported, with the facilities and services provided in Yaxley serving other nearby villages. Farcet should be included within this. Concern that insufficient growth is allocated to contribute towards meeting future development needs in the rural area. Consideration should be given to development in neighbouring villages, specifically Farcet, to support local services and deliver growth. Additional site west of Peterborough Road, Farcet submitted.
Objects to the use of built up area boundaries to unnecessarily restrict growth on the edge of settlements. Key Service Centres should be directed a greater scale of growth to help ensure delivery over the plan period. Additional sites submitted at Ramsey Road Warboys and Mill Road Buckden.
Concern over the definition of a village hall, with regard to Fenstanton not having one.
Stilton should be identified as a Key Service Centre. The development strategy has been shaped by the fundamental principles of sustainability, equating sustainability to the number of existing services and facilities within each settlement. This single approach is a crude measure. The presence and frequency of public transport links should also be taken into account, as these contribute to accessibility. An additional site at North Street, Stilton is submitted.

Local Service Centres (LP9)

Number of Representations		
Total	Objection	Support
33	30	3

Main issues

- 4.23** Substantial opposition was received to the reclassification of Bluntisham as a local service centre. The lack of consultation prior to its inclusion in the proposed submission version of the local plan was of particular concern. The assessment of services was challenged, particularly relating to the part-time nature of the GP surgery service in Bluntisham.
- 4.24** Some support was expressed for the introduction of the additional category within the settlement hierarchy and suggestions were put forward of additional villages which could be included, including Earith, Great Gransden, Offord d'Arcy and Stilton.
- 4.25** It should be noted that many issues were also raised against the proposed site allocations, particularly in Alconbury and Bluntisham, These are addressed under the respective site proposals later in this document.

Summary of issues raised

Table 24

Issue raised
The identification of Local Service Centres and the villages identified is supported as they have reasonable infrastructure and services. Additional housing will add to vitality of these settlements.
Many concerns raised regarding the lack of consultation prior to identification of Local Service Centres and the process undertaken to classify these settlements, specifically relating to Bluntisham.
Concerns are raised regarding the reclassification of Bluntisham as a Local Service Centre. This classification has only taken account of the presence/ absence of services; not their quality. In addition, this classification facilitates a greater level of growth in Local Service Centres than in Key Service Centres. Throughout Huntingdonshire there must be additional settlements which have the services specified, such to be classified as a Local Service Centre. These settlements should also be classified as Local Service Centres; for examples Earith.
Bluntisham does not meet the relevant criteria to be a Local Service Centre, as it does not have a doctors surgery; simply a facility within the Village Hall. This facility does not have capacity to accommodate planned growth. Other Local Service Centres (Alconbury and Great Staughton) have full time doctors surgeries, unlike Bluntisham. Bluntisham should not therefore be in the same category as Alconbury or Great Staughton.
Concern regarding the adequacy of existing services to meet current or future needs of residents.
The scale of growth identified is not proportionate to the village of Bluntisham. Concerns expressed about long-term future of the public house and shop and recent reductions to the bus service.
The classification of Bluntisham as a Local Service Centre is supported and reflects the presence of a number of local amenities and services in Bluntisham.
Concerns raised about the reclassification of Bluntisham as a Local Service Centre and in particular the allocation of Land West of Longacres, as the site is not limited development, nor the development of land which relates wholly to existing buildings. Sites that could be redeveloped should be considered before greenfield sites are allocated.
The approach taken to identifying Local Service Centres does not weight services or analyse other key indicators of sustainability, such as the ability to travel by means other than by private car to reach employment, leisure and social facilities, or the interrelationship between settlements. There are other settlements which could be identified which take account of these factors.

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Issue raised
Objects to the use of built-up area boundaries to unnecessarily restrict growth on the edge of settlements. Considers that there are sustainable growth opportunities available in these locations.
Support the stance taken in Policy LP 9 to identify Local Service Centres, however concerns are raised regarding the process used to distinguish the classification of settlements. The nature of services that have been identified for assessment is overly restrictive and should be widened to acknowledge the presence of other services and facilities.
The introduction of Local Service Centres is supported. Great Gransden should be identified as Local Service Centre as it satisfies the relevant criteria.
Offord D'Arcy should be reclassified as a Local Service Centre; an additional site 'Land to the West of Graveley Road, Offord D'Arcy' is promoted.
Stilton should be reclassified as a Local Service Centre. The development strategy has been shaped by the fundamental principles of sustainability, equating sustainability to the number of existing services and facilities within each settlement. This single approach is a crude measure to determine the most appropriate development strategy and does not provide a comprehensive understanding of whether a settlement is sustainable. The presence and frequency of public transport links should also be taken into account, as these contribute to accessibility. An additional site at North Street, Stilton is submitted.

Small Settlements (LP10)

Number of Representations		
Total	Objection	Support
27	25	2

Main issues

- 4.26** The most frequently expressed concern was over the flexibility to allow for more development in Small Settlements to support existing services and sustain the vitality of rural communities. Concern was expressed over the application of the built-up area and whether it would form a constraint to development of land well-related to the built-up area and how this would relate with other policies of the plan. Suggestions were made for reclassification of several small settlements to a higher tier and a number of sites were put forward as potential housing allocations.
- 4.27** Concern was also expressed that the policy was more lenient than previous drafts and villages might be subjected to inappropriate development.

Summary of issues raised

Table 25

Issue raised
Policy LP10 does not make provision for new housing in smaller settlements and this is contrary to the guidance in the NPPF. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.

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Issue raised
<p>The Council's overarching approach to small settlements is supported. The supporting text to LP10 should additionally reference Policy LP2 'Strategy for Development', and the contribution that windfall development on small sites could make towards expected housing growth to 2036. Reference to 'scale and nature' should be replicated within the policy itself, in addition to reference to level of service and infrastructure provision within the settlement.</p>
<p>The new version of this policy indicates a change in tone and appears to acknowledge housing development in small settlements may be beneficial. There is a softening in the guidance in respect to Small Settlements which indicates HDC are prepared to support development under certain, much more subjective, conditions. Considering this change of tone together with the recent HELAA it is hard not to come to the conclusion that in order for CCC/HDC to meet its national housing targets it is casting the net wider for suitable sites which now includes Small Settlements. This would be a mistake.</p>
<p>In the Consultation Draft 2017 Small Settlements were clearly defined however, in this document the term 'Small Settlements' is open to interpretation. This means that there is a danger that rural villages could be subjected to inappropriate development.</p>
<p>The policy should state that acceptability of development should also take into account the availability of service and infrastructure provision within the wider local surrounding area, not just the settlement itself.</p>
<p>Small Settlements require comprehensive review. Larger, more sustainable settlements should be re-categorised into a higher band and have appropriate allocations, distinguishing them from the smaller, less sustainable ones. The policy does not allow for sufficient growth necessary to help maintain the vitality, viability and sustainability of these communities.</p>
<p>Policy LP10 is sound in that it proposes a flexible approach to development associated with Small Settlement. It is considered that this policy could be effective in allowing housing land to come forward and reflects the approach to development contained in national policy.</p>
<p>National policy permits development in villages that are in proximity of other centres providing amenities. Villages were sustainable in the past; policy should be formulated to seek to make them more sustainable, not let them decline further. As a catalyst to increasing the sustainability, limited, but significant development should be permitted, especially development that delivers increased amenities.</p>
<p>Should be amended to provide for allocations in the larger and more sustainable Small Settlements or identify these as additional Local Service Centres. It is currently overly restrictive. It is highly unlikely that the figure of 2000 dwellings across the Key and Local Service Centres and Small Settlements in LP2 could be reached within the built up area alone.</p>
<p>By failing to propose any residential allocations in the Small Settlements the plan fails to facilitate what it purports to and does not take account of other relevant material planning considerations in the planning balance.</p>
<p>The policy ignores that some sites outside the built-up area may be sustainable locations for additional growth and does not plan positively to identify opportunities for villages to thrive.</p>
<p>Object to the use of built-up area boundaries to unnecessarily restrict growth on the edge of settlements. There are sustainable growth opportunities available in these locations which can help ensure delivery over the course of the plan period.</p>
<p>The approach to land 'well related to the built-up area' should be consistently referenced across the Local Plan and the policy should set out instances where proposals for development on land well-related to the built-up area will be supported</p>

4 Section B: The Strategy

Issue raised
<p>Support this policy in that it allows for development proposals 'within the built-up area' of a Small Settlement and also on 'land well-related to the built-up area'.</p>
<p>Concern that affordable housing associated with new residential development is unlikely to be delivered in sufficient quantity.</p>
<p>The policy is not sufficiently clear about the type of housing that would be supported on 'Land well-related to the Built-up Area' of Smaller Settlements and whether this would be limited to Community Planning Proposals and Rural Exceptions Housing.</p>
<p>Land which is well-related to the built-up area can play an equally valuable role in the sustainable growth of villages to that which is within the built up area. The policy should be amended so that it can be applied to development proposals both within the built-up area and on land well-related to the built-up area.</p>
<p>There is limited contingency for the possibility of large and complex strategic sites experiencing slower than expected delivery rates. Small sites adjacent to the built-up areas of small settlements are capable of making a valuable contribution to the supply of housing in the short term.</p>
<p>Further clarification as to what would be defined as 'well related' needs to be added as this policy will be overly restrictive by only allowing schemes to come forward which accord with the Community Planning Proposals or Rural Exceptions Site policies.</p>
<p>Significant changes since previous version to try to allow the council to make arbitrary changes to the already quite specific policies, especially for the definition for "Small Settlements", of which Hilton is defined by HDC.</p>
<p>The opportunity for new housing development to be realised through the policy is likely to be limited. It is unlikely that in a settlement such as Elton any reasonable scale of new development to meet the intentions set out in paragraph 4.106 & 4.107 will be achieved. Sites should be identified and allocated adjacent to the built up area to meet the development intentions set out in those paragraphs. A concentration on infill sites only within Elton village would risk impacting on the open spaces within the village.</p>
<p>Supports the acknowledgement within this definition that there is variation in the size of settlement and availability of services and therefore variation in the level of development that could be sustained. If Elton Village remains defined as a small settlement these acknowledged variations should permit development to be considered at Elton.</p>
<p>The wording of the second part of LP10 is too restrictive, and should be clearer and more flexible to allow small sustainable sites on the outskirts of small settlements like Great Gidding to be considered.</p>
<p>To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Colne has some facilities, including a public house, a church, village hall and school and a good bus service that operates through the village. Site submitted at Rear of 27 & 29 East Street and off Earith Road, Colne.</p>
<p>Land at Peterborough Road, Farcet should be included as a residential allocation within the Local Plan. A development brief has been supplied for 180 dwellings.</p>
<p>Great Gransden should be re-classified as a Local Service Centre and suitable sites allocated for new residential development. The only facility that Great Gransden lacks which would prevent it from falling into the 'Local Service Centres' category is a doctor's surgery. Great Gransden hosts a scale of existing and accessible employment which is not present in either Bluntisham or Great Staughton, which are both proposed as local</p>

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Issue raised
service centres. It would be appropriate and consistent with wider sustainability objectives as well as the evidence base to make allocations for a proportionate number of dwellings in Great Gransden. Site submitted at West Street, Great Gransden.
Where a range of appropriate services and facilities are available and there is capacity to support a suitable amount of growth, as is the case at Great Gransden, then the local Plan should positively identify sites that are suitable, available and achievable for sustainable growth. Details are supplied for a site at Sand Road, Great Gransden which is a suitable location for residential development and should be allocated for residential development of up to 40 dwellings.
Disappointed that Hilton is simply classified as a 'Small Settlement' it is in an extremely sustainable location which will benefit from the significant infrastructure investments in both the A14 and A428. It is served by a local shop and post office, a public house and a thriving community run village hall. Details of 2 sites submitted; at Land at Church End, Hilton and East of Potton Road, Hilton.
Support the recognition of Holme as a 'Small Settlement'. The Local Plan should allocate development sites at 'Small Settlements' to support the vitality of these communities and provide for flexibility and diversity in the housing supply. Details submitted of two sites for consideration; a larger parcel to the south of Glatton Lane, Holme and a smaller parcel to the south of Station Road, Holme
Land at Bluntisham Road, Needingworth should be included as a residential allocation within the Local Plan for 120 dwellings. The suite of supporting documents submitted with the planning application on the site have been supplied
Stilton should not be regarded as a Small Settlement. Stilton has a larger population than some of the Key Service Centres and has a larger population than all of the Local Service Centres. Stilton has shops, employment, services and facilities, community meeting facilities and a modern sports centre, a primary school, a church and an excellent bus service. The Local Plan should be amended to include Stilton as a Key Service Centre or a Local Service Centre and development limits should be defined.
Objects as Wyton-on-the-Hill is included as a Small Settlement instead of being identified as a potential Local Service Centre. Its identification as a Small Settlement does not reflect the role it could play in servicing the community if an allocation for the redevelopment of Wyton Airfield is secured.

The Countryside (LP11)

Number of Representations		
Total	Objection	Support
7	7	0

Main issues

- 4.28** The main issue raised was the desirability to protect all agricultural land classified as grade 2. BL1 'West of Longacres, Bluntisham' should not be allocated because of its agricultural and wildlife value.
- 4.29** The policy was also considered to be overly restrictive towards development outside built-up areas.

4 Section B: The Strategy

Summary of issues raised

Table 26

Issue raised
If the objective was to truly protect the countryside and the rural economy the expectation would be that all productive agricultural land would be protected from development. The expression 'where possible' is vague and open to differing interpretations.
Objects to the policy seeking to protect the intrinsic character and beauty of the countryside. The policy is too restrictive and effectively a countryside protection policy.
This does not allow for development to be located outside of built-up areas. Use of the term 'countryside' implies that all land located outside of existing built-up areas has the characteristics and features of open countryside. In fact some land outside settlements is, instead, more representative of urban fringe with limited characteristics that reflect the countryside. It therefore remains unclear on what evidence base this policy is founded and justified.
The policy fails to recognise that there are suitable sites for development particularly in agricultural land grade 3a. A number of sites being allocated by the Council are best and most versatile agricultural land comprising Grade 2 to 3a
HDC's own HELAA assessment for West of Longacres BL1 identifies that the proposed development would take place on grade 2 arable land and thus contravenes LP11. Allocating this land for development will give rise to the irreversible loss of agricultural land when brownfield alternative sites in the district such as Wyton airfield are not being developed.
The site West of Longacres BL1 is outside of the existing built form of the village of Bluntisham and therefore constitutes development in the countryside. This is grade 2 agricultural land and contrary to this policy. It is also an important natural habitat which will be obliterated.

5 Section C: Development Management

5.1 Section C which sets out all the development management policies attracted the following representations.

Table 27

Number of Representations		
Total	Objection	Support
144	89	55

Development Management (Introductory text to Section C)

Number of Representations		
Total	Objection	Support
0	0	0

Main issues

5.2 No representations were made on the introductory text to 'Section C; Development Management'.

Chapter 5: Requiring Good Design

Number of Representations		
Total	Objection	Support
47	89	55

Main issues raised on Chapter 5

Table 28

Issue raised	Response to issue
In policy LP12: Design context the design context led approach was generally supported although limited concerns were raised over flexibility.	Support noted.
In policy LP16: Surface water the use of SuDS and consistency with national policy was challenged.	The supporting text notes that guidance in the Cambridgeshire Flood and Water Supplementary Planning Document should be followed.
Concern was also expressed over flood increases into the Middle Level Commissioner's system.	No objections were received from the Middle level Commissioners.
In policy LP18: Parking provision and vehicle movement the requirement to provide 1 cycle space per bedroom for new homes was considered excessive.	This level of provision is considered an appropriate measure to encourage use of cycling as a sustainable mode of transport and as a healthy leisure pursuit.

5 Section C: Development Management

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General issues raised on Chapter 5

Number of Representations		
Total	Objection	Support
2	0	2

5.3 Issues related to details rather than the principle of requiring good design.

Summary of issues raised

Table 29

Issue raised
Both expressed support in principle but concerned that not enough thought is being given to the infrastructure requirements of new developments and traffic problems will arise in small settlements.

Design Context (LP12)

Number of Representations		
Total	Objection	Support
8	3	5

Main issues

5.4 The design context led approach was generally supported. Limited concerns were raised over flexibility.

Summary of issues raised

Table 30

Issue raised
Supports the principle that proposals should draw inspiration from the key characteristics of the site's surrounding. This policy is considered not too onerous and allows for flexibility whilst specific design parameters are covered in Huntingdonshire Design Guide SPD.
Support Policy LP12 and LP13 that all development will be expected to be of high standard of design. Support too for context driven design within development which is informed by positive site specific characteristics
Support for a context led approach where site characteristics are used to inform design however a more robust wording should be considered. The wording should be strengthened to 'a proposal should/will demonstrate that it responds positively'. Policies should set out the quality of development that will be expected for the area.
The policy could provide a more Huntingdonshire-specific approach to local design guidance, utilising guidance contained within the Huntingdonshire Design Guide SPD 2017 rather than just providing a cross-reference to the SPD. It is unclear why Policy LP12 Design Context is separate from Policy LP13. Combining the two policies would enable a more coherent and concise approach to achieving high standards of design.

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Issue raised
Design policies should not be overly prescriptive and need flexibility so that schemes can respond to site specifics and the character of the local area.
Refers to Huntingdonshire Design Guide SPD (2017), the Huntingdonshire Landscape and Town Assessment SPD (2007) and applicable conservation area character assessments and considers they should not be referred to in the policy wording itself as it provides for inflexibility and does not take into account site specific considerations
An Illustrative Masterplan is supplied for proposed development at Gifford's Park, St Ives with a detailed rationale contending how the masterplan accords with the requirements of this policy.

Design Implementation (LP13)

Number of Representations		
Total	Objection	Support
6	2	4

Main issues

- 5.5** The policy was broadly supported with issues raised relating to matters of detail although concerns were raised that the criteria are not sufficiently locally specific and the policy could be merged with LP12 preceding.

Summary of issues raised

Table 31

Issue raised
Support of the optional building regulation water efficiency standard of 110 litres per person per day, given that the Environment Agency 2013 reported Huntingdonshire as an area of serious water stress.
Supports the overarching principle, however the policy does not set out 'design implementation' but rather articulates generic design principles that do not specifically relate to the Huntingdonshire context. Design implementation relates more to procedure and process, for example in terms of masterplanning.
This policy could beneficially be combined into a single design policy that reflects greater local distinctiveness specific to Huntingdonshire, as set out in the Huntingdonshire Design Guide SPD 2017. The policy should additionally recognise 'in the correct context' the potential for innovative modern architecture that doesn't necessarily replicate the surrounding vernacular. Should policies LP12 and LP13 be carried forward as separate policies, the initial 'response to context' section of the policy is considered to be better placed within Policy LP12 Design Context.
Support Policy LP12 and LP13 that all development will be expected to be of high standard of design. Support too for context driven design within development which is informed by positive site specific characteristics. LP13 sets out a list of design principles which are considered fairly generic and can be applied to all new development.
Concerns raised over the ambiguity of some of the criteria. Gladman are unconvinced that this policy will be applied in a consistent manner through the development management process.

5 Section C: Development Management

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Issue raised
Support for systematic understanding of site context to support good design. Proposals for Land to the North of Houghton Road will accord with the requirements of this policy.

Placemaking (LP14)

Number of Representations		
Total	Objection	Support
8	2	6

Main issues

- 5.6** Broad support was expressed for the requirements for masterplanning and use of design codes although there were some concerns over the thresholds at which they should be required and the rigour with which they are implemented.

Summary of issues raised

Table 32

Issue raised
Do not object to the requirement for design codes on these large scale major development but it is important that any prior approvals or review process for this design code does not slow down housing delivery. A clear process is needed.
Support for master planning process, including the use of design codes, that is proportionate to the scale and complexity of the site and development proposed. It helps to maintain a high standard of design and consistency in approach for projects like Alconbury Weald and Wintringham Park that are delivered over a long timescale.
Support for master planning process and the use of design codes to establish vibrant design principles and high quality design. Support of key design principles to shape development as part of a design code for land North of Houghton Road, St Ives
Objection to 50 units triggering the need for the master planning process, this should be increased to 150 dwellings. Whilst sites should take account of constraints and opportunities it is unnecessary for sites of this size to look at different design options. Further objection to sites of 200 dwellings requiring a design code. Larger scale sites in the region of 500 or more dwellings should be considered for Design Codes.
Reference to design review raises concern. Further information is required to understand how a design review would work and whether the process would be proportionate to the scale and type of development proposed. There should not be a blanket requirement for all sites over a certain size/number of dwellings to go through this process.
Demonstrating the design process through the master planning and design code approach is supported. However, SI 1 (1) and (2) appear to be internally inconsistent with LP 14 due to the disproportionate requirement for green space and the underestimated capacity of the Field site.
Support for the policy. An illustrative Masterplan has been submitted for Gifford's Park and Policy SI 3.

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Issue raised

Once agreed, master plans and design codes should be adopted as commitments from the developer and not as a series of aspirations or guides to be ignored at their whim. Concern over the implementation of the masterplan during the build out of development. For example the spread of informal or formal open space and the landuse swapping in mixed use sites. Only in exceptional circumstances should allocated employment land be swapped for higher value residential development.

Amenity (LP15)

Number of Representations		
Total	Objection	Support
3	2	1

Main issues

5.7 Issues related to details rather than the principle of the policy.

Summary of issues raised

Table 33

Issue raised
Support Policy LP15 to ensure that the physical environment created by new development protects and promotes a standard of amenity for future occupiers and users, and surrounding uses.
Draft Policy LP15 seeks to provide high standard of amenity. This is not consistent with the 4th bullet point of paragraph 17 of the NPPF which refers to a good standard.
Object to the criteria in relation to the provision of superfast broadband as this is outside of the control of the individual developers.

Surface Water (LP16)

Number of Representations		
Total	Objection	Support
4	3	1

Main issues

5.8 The use of SuDS and consistency with national policy was challenged. Concern was also expressed over flood increases into the Middle Level Commissioner' system.

5 Section C: Development Management

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Summary of issues raised

Table 34

Issue raised
Supports the use of SuDS as this would help to reduce the risk of surface water and sewer flooding.
Paragraph 5.34 is not an accurate reflection of the strength of national policy; SuDS are required for major development
Paragraph 5.39 is contrary to the NPPF as it is likely to result in flood risk increases. Concern at the wording that would appear to allow unregulated/unrestricted flow into the Middle Level Commissioner' system. The LLFA differentiate between the scale of the MLC network and other water bodies. Uncontrolled surface water discharge is highly likely to impact on flood risk at source as well as downstream where the MLC system discharges to Main River.

Sustainable Travel (LP17)

Number of Representations		
Total	Objection	Support
10	7	3

Main issues

- 5.9** The principle of the policy were broadly supported although amendments to reduce the need to travel were advocated. Concerns were expressed relating to issues of detail such as the availability and viability of public transport in small settlements and transport interventions required. Two additional sites were advocated as being in locations with good access to public transport.

Summary of issues raised

Table 35

Issue raised
This policy should set out the key transport infrastructure interventions required to support the spatial distribution of growth proposed. The policy should reference and support overarching strategic transport schemes to be implemented. The supporting text should reference the Council's Infrastructure Delivery Plan November 2017 Update (December) and highlight the identified transport improvements needed within the district. This revision would enable a more cohesive and strategic approach to supporting growth in Huntingdonshire.
Policy L17 should be amended to set out the Council's overarching approach to reducing the need to travel in the first instance.
Support for large scale development to provide mixed uses which provide opportunities to undertake day-to-day activities on site, including the location of key facilities within walking distance of most residential properties.
Support for the expectation that new development will contribute to an enhanced transport network that supports an increasing proportion of journeys by sustainable transport modes.

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Issue raised
Natural England advises that this policy could be further strengthened to ensure sustainable connections to the wider countryside and visitor centres to encourage non-car visits to these sites. Eg Little Paxton Pits, Country Parks, Great Fen and Fenstanton Gravel Pits, Ouse Fen amongst others.
The aspirations of these policies are supported but must recognise that in wet, cold and windy conditions fewer people walk and cycle. Provision must be made for buses and cars, including new bus stops and adequate parking. Developments in Godmanchester over the last 10 years have poorly designed highways and inadequate parking which results in over parking of pavements and limits access by emergency vehicles and buses. The policy wording should be changed to clarify that in areas which already suffer from severe congestion, including Godmanchester and Huntingdon during the rush hours, there should be no residual cumulative impacts.
Object to the policy as worded with particular reference to part e). Reference to the word cumulative should be removed as this lies outside sphere of influence. This could include developments that are not within an applicants control and whilst Transport Assessments and surveys will consider other developments within a certain distance it should be the site specific conclusions that are used to determine an application. This is reflective of the severe impact test contained within paragraph 32 of the NPPF. Furthermore, clarity is sought by the statement "new development will be expected to contribute to an enhanced transport network...". Query whether this is suggesting a financial contribution?
Support for sustainable location and modes of transport but a number of sites that are proposed for allocation will require significant infrastructure to be installed to ensure that they are suitably connected. Land North of Houghton Road, St Ives is considered a sustainable location with good transport links and connectivity and evidence is provided.
Support policy. Concern that an opportunity has been missed to direct development at Gifford's Park, St Ives, a location which has clear benefits in terms of access to sustainable modes of transport.
Buses travel through Southoe and Midloe parish every 2 hours but don't stop because of dangerous conditions. There is a need for public transport and sustainable travel opportunities but the A1 needs sorting out.
Concern over availability and viability of public transport services in smaller settlements. The many small sites in rural areas will lead to high car usage and congestion coming into towns. Should focus on fewer bigger sites capable of supporting regular public transport services.

Parking Provision and Vehicle Movement (LP18)

Number of Representations		
Total	Objection	Support
6	6	0

Main issues

- 5.10** The main issue raised on this was policy was objections against the requirement to provide 1 cycle space per bedroom for new homes.

5 Section C: Development Management

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Summary of issues raised

Table 36

Issue raised
The requirement for 1 secure cycle space per bedroom for all homes is excessive. Concerned at the need to provide one secure cycle space per bedroom as it is considered inappropriate and impractical for 4 or 5 bedroom dwellings. Provision of this kind would have a significant impact on design efficiency and potential viability. An acceptable rate would be 1 cycle space per dwelling.
The policy is unclear as it does not give guidance on what is likely to be permitted. The policy as worded in relation to parking adds little value as there is no standard to underpin this policy. In setting local parking standards the following should be taken into account: a) Accessibility of the development; b) The type, mix and use of development, c) The availability of and opportunities for public transport, d) Local car ownership levels; and e) An overall need to reduce the use of high-emission vehicles Support for Paragraph 5.54.
Reliance on private cars is likely to continue, it is wrong to move ahead with a plan that assumes that everyone has access to a car. The plan is very clear about the rural, isolated and small villages in Huntingdonshire but is not at all clear about a sustainable plan to allow equal transport access to facilities. This is especially poor when you consider that the existing public transport in Huntingdonshire is dependent upon CCC budgets and is not within HDC control.
There is only brief mention for electric charging points and no mention of appropriate provision for motorcycles. Furthermore 1 charging point for every 50 spaces seems very low given government policy and the desire to move towards a low carbon approach through NPPF paraS 17, 29 and 40 over the time span of this of this plan.

Chapter 6: Building a Strong, Competitive Economy

Number of Representations		
Total	Objection	Support
19	9	10

Main issues raised on Chapter 6

Table 37

Issue raised	Response to issue
In policy LP20: Rural economy greater flexibility regarding extensions onto nearby land to support the rural economy were sought.	The policy provides greater flexibility than is currently offered and is considered to provide an appropriate balance between flexibility and protection of the open countryside.
In policy LP22: Town centre vitality and viability a challenge to the 600m ² local threshold for requiring a retail impact assessment was submitted by one supermarket provider.	The threshold reflects locally derived evidence based on retail shop sizes within the district's market towns.

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Established Employment Areas (LP19)

Number of Representations		
Total	Objection	Support
5	4	1

Main issues

- 5.11** Only one issue was raised relating to the principles of this policy which was one representation seeking a much broader definition of uses to be supported.

Summary of issues raised

Table 38

Issue raised
This policy is overly prescriptive in favouring business development, defined as uses falling within Class 'B'. The preference for business development (Class 'B' Uses) within Established Employment Areas does not accord with the core principles of the NPPF which seeks to support 'sustainable economic development' of a much broader definition; including public and community uses and main town centre uses.
The policy should be cross-referenced with Policy LP2 and the overarching strategy for development and distribution of growth. The designated 'Established Employment areas' should put into a hierarchy according to their importance in terms of achieving growth targets set out in Policy LP1.
The approved employment allocations at Romans' Edge (formerly known as the Bearscroft development) should be identified as Established Employment Areas.
The policy should extend protection to all statutorily designated sites, not just European sites.
A location plan is provided suggesting expansion of the Black Horse Industrial Area, albeit that the site is not immediately adjacent, to enable growing companies to relocate locally and expand.

Rural Economy (LP20)

Number of Representations		
Total	Objection	Support
6	1	5

Main issues

- 5.12** The policy was broadly supported with no main issues raised although two representations sought greater flexibility regarding extensions onto nearby land.

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Summary of issues raised

Table 39

Issue raised
The policy is supported in principle but should be more flexible to provide support for expansion of well serviced commercial developments including onto nearby land even when not physically contiguous.
The policy should be more flexible to provide support for expansion to adjacent land even when not physically contiguous.
The protection of agricultural land including Best and Most Versatile land is supported, including the requirement for proposals to prioritise development on lower quality agricultural land in preference to higher quality land.
Support provided for farm diversification but this should not be to the detriment of the community. Long term plans for agricultural areas would assist.
The criteria relating to the reuse of buildings should seek to protected buildings of historic or architectural value.
No mention is made of valued soils.

Homes for Rural Workers (LP21)

Number of Representations		
Total	Objection	Support
1	1	0

Main issues

5.13 No main issues were raised.

Summary of issues raised

Table 40

Issue raised
The policy should be amended to require development to have regard to the historic environment and its setting.

Town Centre Vitality and Viability (LP22)

Number of Representations		
Total	Objection	Support
4	3	1

Main issues

5.14 One respondent raised an issue of principle which was a challenge to the 600m² local threshold for requiring a retail impact assessment.

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Summary of issues raised

Table 41

Issue raised
The rationale for the threshold of 600 square metres for requiring a retail impact assessment is significantly less than set out within the NPPF. The rationale for this threshold is based on the average size of town centre units and does not follow the 'like affects like' principle as set out in Planning Practice Guidance. The NPPF sets a threshold of 2500 square metres for requiring a full retail impact assessment, as this has greatest potential for a wider retail 'impact'. The threshold should be reflect the national threshold within the NPPF.
There is no safeguard to ensure that a range of A1 premises are maintained in town centres.
The policy should reference the role the historic environment can play in contributing to this vitality and distinctiveness resulting in high quality places where people choose to live, work and visit.
Supported - great consideration has gone into the proposals for retail development at both Alconbury Weald and Wintringham Park to ensure they are complementary to and do not impact the vitality and viability of Huntingdon and St Neots' town centres.

Local Services and Community Facilities (LP23)

Number of Representations		
Total	Objection	Support
2	0	2

Main issues

5.15 The policy was supported; issues raised related to details of potential additions.

Summary of issues raised

Table 42

Issue raised
Policy LP23 should protect local amenities such as cricket and football pitches and community nurseries for future generations.
An assessment should be undertaken on the area needed for cemeteries over the next 20 years, with land subsequently allocated for either new cemeteries or extensions to existing cemeteries where a local need is identified.

Tourism and Recreation (LP24)

Number of Representations		
Total	Objection	Support
1	0	1

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Main issues

5.16 The policy was supported.

Summary of issues raised

Table 43

Issue raised
Supportive of the requirement for proposals to demonstrate that they would have no adverse effect to designated nature conservation sites through increased visitor pressure.

Chapter 7: Strengthening Communities

Number of Representations		
Total	Objection	Support
49	41	8

Main issues raised on Chapter 7

Table 44

Main issue	Response to issue
Support was expressed for policy LP25: Affordable housing provision for the flexibility offered by the recognition of viability issues but this was coupled with concern over the cost implications of carrying out viability assessments, particularly on schemes of 25 dwellings and under.	Viability assessments are an essential tool in maximising the affordable housing contribution of sites where they do not propose a policy compliant level of affordable housing.
Concern was expressed about the deliverability of the level of affordable housing needed to meet the overall target. It was noted that 40% has not been achieved on some strategic scale developments and the suggestion was made that a higher overall housing target or different development strategy would be required to achieve the amount of affordable housing needed given achievement of a lower percentage on these sites.	Policy LP25 allows for flexibility with regard to viability to ensure sites can be delivered. It is not the only mechanism for delivering affordable housing within the district. LP30: Rural exceptions is expected to contribute to the overall amount of affordable housing achieved.
A variable approach to the percentage of affordable housing was sought based on size and/ or location of site.	Viability testing has used typical generic site types to ascertain the likely overall affordable housing level achievable. The policy allows flexibility to take individual site circumstances into account through viability testing.
In policy LP26: Housing mix both greater flexibility and greater certainty were sought on the tenure mix to be provided.	Representations put forward contrasting views; the policy is considered to provide a balanced approach.

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Main issue	Response to issue
More flexibility and a more proactive approach to self and custom build housing was advocated with the suggestion of a separate policy.	More specific guidance on self and custom build housing has been tested through the plan preparation period as set out in the Statement of Consultation - Proposed Submission 2017 but justification for this was challenged and concerns raised over deliverability, particularly within larger sites.
In policy LP27: Specialist housing the requirements for accessible and adaptable homes were challenged on grounds of the reliability of the evidence base, compliance with national guidance and viability implications.	Huntingdonshire has a high proportion of older residents and early stages of consultation
In policy LP30: Rural exceptions housing the principle of allowing development outside the built up area was broadly supported although concerns were expressed over the scale and deliverability of rural exceptions housing development.	The policy is considered to present a balanced approach between supporting addition of housing that meets local needs and protecting the open countryside.
In policy LP31: Health impact assessments the requirement for health impact assessments was considered to be an unnecessary additional burden on developers. The principle of requiring one was challenged contending that the Local Plan should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns.	HIAs are a valid tool to assist understand the health impacts of major development and design better schemes and outcomes as a consequence when used in a collaborative and positive way.

General issues raised on Chapter 7

Number of Representations		
Total	Objection	Support
1	0	1

Summary of issues

Table 45

Issue raised
Concern over decline in community involvement and loss of services for the Parish. Transport and safety concerns due to the A1 and concerns over the long-term impacts upon the community.

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Affordable Housing Provision (LP25)

Number of Representations		
Total	Objection	Support
20	16	4

Main issues

- 5.17** Support was expressed for the flexibility offered by the recognition of viability issues but this was coupled with concern over the cost implications of carrying out viability assessments, particularly on schemes of 25 dwellings and under.
- 5.18** Concern was expressed about the deliverability of the level of affordable housing needed to meet the overall target. It was noted that 40% has not been achieved on some strategic scale developments and the suggestion made that a higher overall housing target or different development strategy would be required to achieve the amount of affordable housing needed given achievement of a lower percentage on these sites.
- 5.19** A variable approach to the percentage of affordable housing was sought based on size and/ or location of site. Both greater flexibility and greater certainty were sought on the tenure mix to be provided.

Summary of issues raised

Table 46

Issue raised
Support the flexible approach to the policy as there is consideration of viability issues concerning the provision of affordable housing which resounds with Paragraph 001 of the NPPG concerning the making of Local Plans within the context of local economic conditions and market realities.
Concern raised that all qualifying residential development should achieve the target level of 40% affordable housing provision when planning permissions for strategic-scale development have not achieved this level.
Support the policy in providing a degree of flexibility for tenure mix and level of affordable housing provision in regards to its impact on viability.
Support, but seeks preference for houses to be given to people with local connections. Would expect dwelling mix for affordable housing to broadly relate to that for market housing. Support strategic planning of affordable housing as part of masterplanning of large scale developments.
Large strategic developments, at least in the early phases, do not necessarily deliver policy compliant levels of affordable housing and outcomes of review mechanisms are uncertain. Over-reliance upon strategic expansion areas may mean that affordable housing needs will not be met. Sites where significant items of new infrastructure do not need to be provided therefore need to be identified which are capable of delivering significant amounts of affordable housing e.g. land at Gifford's Park.
Gladman are concerned to note that the supporting text to this policy indicates that the two SELs may not deliver the full 40% affordable housing. Gladman believe that a different growth strategy with more of a range of sites may be more effective at delivering the 40% affordable housing requirement.

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Issue raised
<p>U&C support the provision of affordable housing and the policy requirement to provide a range of housing types, sizes and tenures. Affordable housing for the Alconbury Weald development followed viability assessment and includes a review process. The acknowledgement that Strategic Expansion Locations (SEL) have exceptional infrastructure costs that may affect the viability of a 40% target is welcomed but consider that the flexibility and specific reference to SEL should be within the policy itself and replicated in the site allocations SEL 1.1 and SEL 2 with cross reference to LP4.</p>
<p>The 'Whole Plan' cumulative assessment within the Viability Assessment suggests a cumulative affordable housing figure of 33% but the supporting text refers to the Local Plan Viability Assessment Addendum (December 2017) and concludes that an affordable housing target of 40% is viable and deliverable on the majority of types and locations of sites.</p>
<p>The Viability Assessment (2017) confirms that schemes of 25 dwellings and under typically have higher build costs as they are provided by smaller builders and often involve brownfield land which can negatively affect viability. Policy approach would lead to shortfall in affordable provision and significantly delay the delivery of acceptable housing schemes due to viability work and associated costs. Development sites of up to 25 dwellings are more than likely to be the re-use and development of brownfield sites and this policy discourages the use of brownfield sites by over burdening the smaller/medium developers with affordable housing contributions or rigorous and costly viability testing. No justification is given for the loss of the tiered approach of Core Strategy policy CS4 despite the Council's own evidence pointing towards schemes of 25 units and less not being viable for the purposes of delivering affordable housing within the intermediate value area.</p>
<p>The policy causes uncertainty as it is a 'target' figure of 40%. Smaller schemes (11-25 units) will be delayed due to the need to submit viability work which would have a damaging effect upon house builders and developers who operate within such markets. No justification is given to demonstrate that a tiered approach should not be adopted, or that a blanket approach is fully justified.</p>
<p>The flexibility to vary this policy on the basis of viability is welcomed but part c is too restrictive as it may be necessary to deliver affordable housing in a specific location and policy should not seek to restrict these locations. A more dispersed approach should be sought to the development of affordable housing on a site subject to the recognition that this will be dictated by the nature of a site and its viability.</p>
<p>OAN for affordable housing will not be realised by this policy.</p>
<p>Further sites of 50-150 dwellings should be allocated in order to deliver sufficient affordable housing.</p>
<p>Further guidance is required in the supporting text in relation to the potential inclusion of specialist housing within the mix of affordable housing. Cross reference to the Cambridgeshire and Peterborough Combined Authority's Devolution Housing Fund is needed in the supporting text.</p>
<p>There should be acknowledgment of a site's location within the District as this could be a material consideration in the site viability.</p>
<p>The tenure split of affordable housing should remain fluid to allow response to most up to date evidence and market conditions. Matters on tenure split should be negotiated on a case by case basis to secure the most appropriate outcomes for each site.</p>
<p>Affordable Housing provision should be based on most up to date evidence and policy requirements in respect of tenure split should be able to respond to the most up to date evidence and market conditions, and be negotiated on individual sites to secure the most appropriate outcome.</p>

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Issue raised
Rentplus UK Ltd provides details about their innovative model for affordable rent to buy housing and support the policy direction seeking a greater supply of affordable housing. Urge the adoption of progressive and ambitious planning policies that support the delivery of a wide range of affordable housing tenures, including affordable rent to buy. The policy has helpfully loose wording regarding approx. 30% of affordable housing to be made up of 'other affordable tenures' but consider part b of the policy should refer to other affordable tenures such as starter homes and affordable rent to buy to boost opportunities for home ownership across the district to ensure flexibility and consistency with current Government statements and the planned changes to the NPPF.
The policy fails to provide certainty on the tenure mix and associated costs. The range of affordable housing types, sizes and tenures should be clearly set out within the main policy text rather than referring back to the Housing Register, the Cambridge sub-region Strategic Housing Market Assessment and other local sources.
Policy LP25 places considerable reliance on the Cambridge sub-region Strategic Housing Market Assessment (SHMA) (2013) however the SHMA does not information in relation to dwelling mix for affordable housing and is now considered to be out-of-date.
Support for the removal of the reference in bullet point c to small clusters referring to 'about 15 dwellings' but feel that the reference to 'small clusters of dwellings' is unclear, inconsistent with the supporting text, and difficult to achieve on smaller sites
Concern raised regarding the effective delivery of affordable housing within Small Settlements. Windfall developments are likely to fall below the policy threshold and exceptions sites are highly unlikely to come forward so a reliance on windfall development would compound existing deficiencies in terms of the availability and accessibility of affordable housing.

Housing Mix (LP26)

Number of Representations		
Total	Objection	Support
11	10	1

Main issues

- 5.20** The evidence base used to calculate the requirements for accessible and adaptable homes was challenged. The principle of requiring the standards was challenged based on the suggestion that new homes were not primarily designed for or bought by older people. The viability implications of the requirements were also a cause of concern.
- 5.21** The flexibility of the housing mix was generally supported although concerns were expressed about the age of the SHMA. More flexibility and a more proactive approach to self and custom build housing was advocated with the suggestion of a separate policy.

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Summary of issues raised

Table 47

Issue raised
<p>Support the 'Accessible and adaptable homes' aspect of the policy and suggest it should be monitored through the determination of planning applications. The lack of bungalows is a concern to elderly and less mobile people and providing more affordable and market bungalows would be welcomed.</p>
<p>The requirements set out in the policy for all dwellings to be category M4(2) is not justified by the evidence cited as not all of the housing needs derived from over 65s will be met through new development. The requirement for market dwellings to be built in accordance with M4(3) is not consistent with the Guidance. This requirement should have been tested to ensure the viability and deliverability of development.</p>
<p>The enhanced standards were intended to be optional and only be needed and viable in certain local circumstances otherwise they would have been made mandatory. The policy is aspiration rather than grounded in evidence and concern expressed about robustness of evidence put forward due to reliance on national level data.</p>
<p>Part g of the policy is inconsistent with national policy so the higher level Part M4(3) to market homes should not be applied. To say all households should be built to accessible standards is not justified, the aging population is no different to other areas in the country and the Government has not made this requirement mandatory.</p>
<p>The majority of houses bought on new developments are a first time buyer product as such it is likely that these dwellings will never be occupied by those people who require this need.</p>
<p>New housing sites may not be ideal for people in wheelchair housing in terms of location. Specialist housing sites for this type of accommodation should be identified through the allocations process. Suggest the Council's estate department to consider and identify what public land is available to be used for this type of accommodation.</p>
<p>The requirement is supported in principle but the policy should acknowledge that residential and commercial developments have a need to respond to the most up to date evidence and guidance on housing mix at the time that an application is being prepared and submitted along with viability considerations.</p>
<p>Criteria f., g. and h. impose Building Regulation requirements upon new developments. This is considered to be unnecessary given that the Regulations are enforced outside of the planning system.</p>
<p>Census data suggests that over 65s are less likely to move than the rest of the population which suggests more likely to be growing demand for adaptations to existing homes than demand for accessible new homes. This policy will negatively impact upon site viability.</p>
<p>Flexibility is supported but the policy should ideally identify the scale, mix and range of tenures needed and positively plan to meet this reflecting local demand. SHMA 2013 information is out of date and should be revised. Policy wording supporting compatibility with optional Building Regulation accessibility standards are considered to be overly onerous as the additional cost of meeting these standards is significant.</p>
<p>The first part of this policy appears to be relatively flexible, allowing proposals to respond to the needs. No specific concerns in relation part f) of the policy in relation to Building Regulations M4(2) but with reference to M4(3), the Local Plan should not be requiring a proportion of market homes to meet this standard only affordable homes.</p>

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Issue raised
With reference to self-build, whilst the policy requires further detail in doing so it needs to remain flexible and have a mechanism whereby if the self-build units are not delivered within a certain timeframe they revert back to market housing as part of the wider scheme.
The delivery of self and custom build homes warrants its own specific and deliverable policy. AMR identified 23 eligible respondents on the Self and Custom Build Register 2016/17. Neighbouring authorities have much higher levels of demand reflecting HDC's lack of proactive promotion of the register. Evidence of much higher demand from other sources eg Potton Homes and BuildStore. The Council's custom-build register should not be relied on as an appropriate target for assessing the quantum of demand to inform the Local Plan. Successful delivery of self-build plots is dependent on the Council adopting a more proactive approach, such as supporting self-build developments on appropriate well related sites on the edge of settlements. Alternatively, the Council should allocate sites exclusively for self and custom build units in appropriate locations, including on the edge of settlements.

Specialist Housing (LP27)

Number of Representations		
Total	Objection	Support
0	0	0

Main issues

5.22 No representations were received on this policy.

Gypsies, Travellers and Travelling Showpeople (LP28)

Number of Representations		
Total	Objection	Support
2	2	0

Main issues

5.23 Issues raised related solely to points of detail.

Summary of issues raised

Table 48

Issue raised
Explicit reference to avoiding harm to the historic environment should be added. 'Significantly' should be removed from reference to landscape harm.
A requirement for proposals to demonstrate 'no adverse effect on the natural environment including statutorily designated sites' should be included within point b. of this policy.

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Community Planning Proposals (LP29)

Number of Representations		
Total	Objection	Support
5	4	1

Main issues

5.24 The policy was broadly supported in principle but objections were put forward on points of detail. Opposing opinions were put forward on whether schemes should be community led or could be developer led. The definition of local need and implications for the scale of a proposal were also of concern.

Summary of issues raised

Table 49

Issue raised
Broadly support this policy but would want to be sure that the community was taking the initiative and not a developer seeking to develop an unallocated site. 'Open book' viability assessments would be needed to determine the extent of housing development needed to help fund the community proposal.
Object as it is unclear and unjustified why a site promoted by a community may be considered, however if the same site is brought forward by a developer it would not be considered. If it is a sustainable site, it should be sustainable irrelevant of who is bringing it forward.
Welcome this in so far as it provides basis for local communities to address potential civic requirements and allow for market housing to help fund such needs. Criterion c) may render development not deliverable if the local need is not of a scale that would enable the delivery of the community benefits the policy seeks to deliver. It is not clear how local need is to be defined or should be assessed. Land West of Peterborough Road put forward by Hallam Land Management and Persimmon Homes could potentially help meet identified needs in Farcet.
Policy LP 29 and supporting text should have suitable scope to ensure joint ventures can still benefit from the application of this policy. For instance, landowners, statutory undertaker or the County Council may have direct involvement in seeking to deliver a community based proposal with support and assistance from the community.
The reference to 'community asset' should be removed as it is considered too similar to 'assets of community value', which is a technical and distinct term.

Rural Exceptions Housing (LP30)

Number of Representations		
Total	Objection	Support
4	4	0

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Main issues

5.25 Issues related to details rather than the principle of the policy. The principle of allowing development outside the built up area was broadly supported although concerns were expressed over the scale and deliverability of rural exceptions housing development.

Summary of issues raised

Table 50

Issue raised
Support this policy in so far as it recognises that development might be necessary outside of the built-up area to help meet the District's housing need. This provides a counter-balance to the restrictions of LP2 and LP7 but concerned about lack of clarity on what scale of development will be acceptable.
Concern expressed that the policy may not assist with the need to provide additional affordable housing within the District due to the overly restrictive criteria for eligibility. Should allocate more new housing sites to achieve 40% affordable housing provision.
The policy fails to provide a proactive drive to address affordable housing need in rural areas. Disappointing that rural exceptions sites are still not being allocated. It is not acceptable to draft a policy which means that the provision of sites is reliant on philanthropy; it is unlikely that targets will be met, given the likely financial return for landowners. Allocations in less sustainable locations would provide landowners with some certainty.
The onerous requirement for a housing needs survey places an additional barrier to delivery.
Any development over 10 properties will attract the 60% net requirement for affordable housing, this could result in lots of small 'private' sites being developed and no provision for much needed affordable properties.
Historic England request that part d point iii is amended to include reference to the historic environment.

Health Impact Assessment (LP31)

Number of Representations		
Total	Objection	Support
6	5	1

Main issues

5.26 The requirement for health impact assessments was considered to be an unnecessary additional burden on developers. the principle of requiring one was challenged contending that the Local Plan should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns.

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Summary of issues raised

Table 51

Issue raised
This would impose an additional burden at a time when there is a major effort to reduce the amount of information needed for a planning application. Where development is in line with the Local Plan a full HIA should not be necessary. This should not be a standard requirement for all major development.
The thresholds identified are unreasonable and unnecessary; if applied at they should be raised to 500-1,000 units. The Local Plan should already have considered the impact of development on the health and well-being of their communities and set out policies to address concerns.
Recognise the importance of ensuring new development supports the wider aims of local authorities and their partners to improve the health and well-being of their residents and workforce. However the requirement is unnecessary and the Local Plan should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns.
We anticipate that a residential-led mixed use development at Gifford's Park would score positively in a HIA. Brief assessment supports our request that land at Gifford's Park is identified as a strategic allocation, and is allocated as a residential-led mixed use development for 1,750 dwellings.

Chapter 8: Conserving and Enhancing the Environment

Number of Representations		
Total	Objection	Support
29	14	15

Main issues raised on Chapter 8

Table 52

Issue raised	Response to issue
Only one representation was received which raised the issue that the evidence base for policy LP34: Protection of open space is out of date. Sport England would support a 'Statement of Common Ground' being signed between HDC and Sport England, which agreed that an up to date Playing Pitch Strategy and Built Facilities Strategy will be carried out within the next twelve months.	The representation erroneously referred to use of the 'Open Space, Sport and Recreation Assessment and Audit' (2006)
Historic England suggested that the heritage strategy should be escalated to a policy.	The Heritage Strategy was presented as a policy in the Consultation Draft 2017 however it was amended to be a text box following objections that it did not constitute a policy that could be used for the determination of planning applications.

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Issue raised	Response to issue
Policy LP36: Heritage assets and their settings was considered to require additional flexibility to reflect the tests in the NPPF.	The policy is considered to provide an appropriate balance between flexibility and certainty.
Policy LP37: Renewable and low carbon energy was supported subject to careful implementation and minor changes.	Support noted.

General issues raised on Chapter 8

Number of Representations		
Total	Objection	Support
2	1	1

Main issues

5.27 Issues related to details of the introductory text to the chapter.

Summary of issues

Table 53

Issue raised
There is nothing in this section of the plan regarding policy on light pollution.
The recognition in the supporting text of the need to protect and enhance the historic environment and to the role the historic environment has to play in contributing towards the attractiveness of Huntingdonshire as a place to live and helping the local economy is welcomed.

Biodiversity and Geodiversity (LP32)

Number of Representations		
Total	Objection	Support
7	2	5

Main issues

5.28 The policy was broadly supported with no main issues raised although some minor amendments were suggested.

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Summary of issues raised

Table 54

Issue raised
The Wildlife Trust supports this policy. Suggest the second paragraph instead reads:"A proposal that is likely to have an impact, either direct or indirect, on biodiversity or geodiversity will need to be accompanied by an appropriate appraisal, such as an Ecological Impact Assessment, identifying all individual and cumulative potential impacts on biodiversity and geodiversity."
Whilst Natural England fully supports the general aim of this policy with regard to European /internationally designated sites the wording could be more consistent with the requirements of the Conservation (of Habitats and Species) Regulations 2010 (as amended). The policy needs revising to ensure that proposals for residential development provide appropriate and adequate mitigation to address the effects of increased recreational pressure, particularly at sensitive designated sites.
The Wildlife Trust supports the specific reference in paragraph 8.10 to recreational impacts now included in this paragraph. Recommends that Huntingdonshire District Council takes a a strategic approach to the assessment of the impacts of increased recreational pressure on the existing green infrastructure network.
The Wildlife Trust supports the addition of paragraph 8.13, as it makes explicit reference to net gain in biodiversity and ways of achieving it before discussion of mitigation and compensation, which is in line with national planning policy.
The Wildlife Trust supports the addition of paragraph 8.18, as it makes explicit reference to net gain in biodiversity and ways of achieving it before discussion of mitigation and compensation, which is in line with national planning policy.
Gladman note and welcome the amendment to the final section of this policy.
Floodline consider that this proposal needs to emphasise that proposals which seek to enhance a site of local and regional importance will be permitted. A site at Meadow Lane, St Ives is promoted which is situated within a Cambridgeshire Wildlife Site stating that the development will actually enhance the biodiversity of the area.

Trees, Woodland, Hedges and Hedgerows (LP33)

Number of Representations		
Total	Objection	Support
2	1	1

Main issues

- 5.29** Issues related to details rather than the principle of the policy although greater acknowledgement of ancient woodlands was sought.

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Summary of issues raised

Table 55

Issue raised
This policy should recognise that the district includes numerous ancient woodlands. Opportunities should be taken through the Local Plan and its GI Priority Areas to ensure that development delivers enhancements to extend and connect this fragmented woodland resource and deliver biodiversity net gain
Welcome the changes to Policy LP33 to leave the quantum of additional new trees for negotiation on a site by site basis.

Protection of Open Space (LP34)

Number of Representations		
Total	Objection	Support
1	1	0

Main issues

- 5.30** Only one representation was received which raised the issue that the evidence base for the policy is out of date and suggested the solution of preparation of a Statement of Common Ground committing to a review.

Summary of issues raised

Table 56

Issue raised
Sport England objects to this policy because it is not based on a robust and up to date evidence base in relation to sport and recreation facilities. The evidence base refers to the 'Open Space, Sport and Recreation Assessment and Audit' (2006). This assessment is 12 years old, therefore clearly out of date, and is based on an out of date methodology (Sport England's methodology for assessing needs for outdoor and indoor sports facilities was reviewed in 2013). As the carrying out of robust strategies to assess indoor and outdoor sports facilities would take (on average) 9-12 months, outside the time frame of this plan, Sport England would support a 'Statement of Common Ground' being signed between HDC and Sport England, which agreed that an up to date Playing Pitch Strategy and Built Facilities Strategy will be carried out within the next twelve months.

Rural Buildings (LP35)

Number of Representations		
Total	Objection	Support
2	0	2

Main issues

- 5.31** The policy was supported.

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Summary of issues raised

Table 57

Issue raised
The current approach within Policy LP35, which supports the conversion of redundant or disused buildings where they are structurally sound, is considered robust. It would maximise the contribution that this valuable resource can make, enabling the creation of new housing in a sustainable way, which would ultimately contribute towards supporting rural communities and their ability to thrive in the future.
Pleased to note the amendments to paragraph 8.31 which recognises that development is possible through 'Prior Approval' and 'Prior Notification', both being material considerations in the decision making process.

Heritage Strategy

Number of Representations		
Total	Objection	Support
1	1	0

Main issues

5.32 The only issue raised was that the heritage strategy should be escalated to a policy.

Summary of issues raised

Table 58

Issue raised
Historic England note that this is no longer a policy and would strongly suggest that it is a policy, given the issues it covers. Historic England would recommend that as a minimum a local authority has established criteria for identifying non-designated heritage assets, and ideally has a local list of assets linked to planning policies in their Local Plan.

Heritage Assets and their Settings (LP36)

Number of Representations		
Total	Objection	Support
7	6	1

Main issues

5.33 The policy was considered to require additional flexibility to reflect the tests in the NPPF. Other issues related to matters of detail.

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Summary of issues raised

Table 59

Issue raised
Policy LP36 should additionally incorporate a degree of flexibility in line with Paragraph 133 of the NPPF in the balanced consideration of substantial public benefits that may outweigh impact on heritage settings. This consideration could include that: a) The nature of the heritage asset prevents all reasonable uses of the site; b) No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; c) Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and d) The harm or loss is outweighed by the benefit of bring the site back into use.
The policy should be reworded reflect the tests in the NPPF. There is still no reference in the policy to heritage at risk.
The Plan does not contain a policy which relates to shop fronts in either this chapter or the Good Design chapter. Therefore a development management policy should be place in order to manage their change successfully.
Concerns as to the extent of the St Neots Conservation Area and whether there is robust evidence to suggest such a large area of the town should be included. Large swathes of land have been included, including client's land at Eaton Socon, which has little or no value in heritage or conservation terms. On this basis Policy LP 36 as drafted, in so far as it relates to Conservation Areas, is not sound as it is not justified by appropriate and up-to-date evidence.
Criterion g. should be amended to add the word 'unacceptably' between 'not' and 'harm'.
Intrusive field evaluations in advance of the determination of a planning application could cause issues for developers particularly who do not own the site or have the site under option.
Gladman support and welcome the changes made to this policy since the previous iteration of the plan.

Renewable and Low Carbon Energy (LP37)

Number of Representations		
Total	Objection	Support
5	1	4

Section C: Development Management 5

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Main issues

5.34 The policy was supported subject to careful implementation and minor changes.

Summary of issues raised

Table 60

Issue raised
Support the inclusion of Policy LP37 on renewable and low carbon energy in relation to wind energy development thus shaping the Local Plan for Huntingdonshire as being suitable for solar and wind renewable energy generation, helping to reduce the amount of carbon dioxide produced via energy generation.
Welcome and support for Policy LP37 to provide support for wind energy development subject to proposals complying with adopted supplementary guidance.
Recognise the need to investigate and consider all avenues for the production of energy. However, this must be done in the right location, at no time putting the safety of the local population at risk. Any development should carefully balance disruption to the local population and environmental effects with the long term gains of power production.
Policy LP37 as drafted does not outline the circumstances in which renewable proposals (not related to wind energy) on Anglian Water's land will be supported. It is therefore suggested that Policy LP37 should be redrafted to include a positive reference to renewable developments which are proposed to support Anglian Water's existing infrastructure.

Air Quality (LP38)

Number of Representations		
Total	Objection	Support
1	1	0

Main issues

5.35 One respondent challenged the threshold of 200 dwellings as being too low.

Summary of issues raised

Table 61

Issue raised
This should be considered on a site-by-site basis as such assessments are subject to their immediate surroundings and context. The threshold of 200 dwellings is extremely low and not all of these developments will require an AQA.

5 Section C: Development Management

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Ground Contamination and Groundwater Pollution (LP39)

Number of Representations		
Total	Objection	Support
0	0	0

Main issues

5.36 No representations were received on this policy.

Water Related Development (LP40)

Number of Representations		
Total	Objection	Support
1	1	0

Main issues

5.37 The only representation related to details of implementation of the policy and sought addition of an assessment of availability of facilities and community impact.

Summary of issues raised

Table 62

Issue raised
Supports more public moorings for short stays but does not support the proposal for residential mooring within a built-up area unless a full assessment demonstrates adequate facilities exist and there will be no adverse impacts on the neighbouring surroundings or community infrastructure.

6 Section D: Allocations

Number of Representations		
Total	Objection	Support
466	378	88

Main issues raised on Section D: Allocations

(Chapter 9: Huntingdon Spatial Planning Area, Chapter 10: St Neots Spatial Planning Area, Chapter 11: St Ives Spatial Planning Area, Chapter 12: Ramsey Spatial Planning Area, Chapter 13: Key Service Centres and Chapter 14: Local Service Centres)

Table 63

Issue raised	Response to issue
The deliverability of the anticipated housing trajectory at Alconbury Weald was strongly challenged. It was considered unachievable due to the capacity of housebuilders to build and sell so many properties in one location coupled with concerns over the funding and delivery of supporting infrastructure.	It is not unreasonable that delivery will be marginally slower at the very start, allowing for the implementation of infrastructure. The trajectory submitted is that of the applicant who is confident that the trajectory can be delivered. Since the grant of planning permission the applicant has been working closely with the LPA and stakeholders and delivered the necessary infrastructure and there have been no delays to the project as a result of funding to deliver housing, employment and infrastructure. For these reasons the Council supports the deliverability of Alconbury as set out in the annual monitoring report 2017.
The availability of SEL1.2 RAF Alconbury was challenged and its removal from the plan sought due to uncertainty	The Defence Infrastructure Organisation supported its allocation and confirmed its availability from around 2024.
The market for new homes in Huntingdon in close proximity to the Alconbury Weald SEL was challenged at HU1 Ermine Street although the site's promoters sought an increase to 1,600 dwellings.	The Council has a need to identify sustainable locations to deliver new homes to meet the Council's Objectively Assesses Need of 20,100 homes to 2036. Having regard to the NPPF HU1 Ermine Street is considered to be in a very sustainable location being within the Huntingdon Spatial Planning Area. It would not be reasonable to not allocate this land on the grounds of market competition with Alconbury Weald.
The principle of insufficient sites being allocated within St Neots was raised as part of a concern that the plan should look to allocate higher housing numbers overall.	The Council's Objectively Assessed need is 20,100 homes, 3,800 of which are in St. Neots (allocation SEL2) but as set out at paragraph 4.10 , in total housing completions since 2011, commitments as at 1st April 2017 and allocations in the plan account for approximately 22,500 new homes, equivalent to 112% of the identified need.

6 Section D: Allocations

Issue raised	Response to issue
<p>The proposed development of SI1 St Ives West generated issues regarding its level of remaining capacity for housing and the quantity, location and nature of open space provision.</p>	<p>This site is a complex site in a sensitive location on the outskirts of St. Ives and requires a sensitive approach to development given Houghton Grange is a Grade 2 listed building, there are a number of trees subject of a tree preservation order and immediately south of the Grange is a county wildlife site designated for its grassland value. The eastern most part of the site is a former golf course which has planning permission for 180 dwellings that is currently being built out. In order to ensure that this site responds to local constraints it is considered that approximately 400 dwellings is a reasonable quantum that can be achieved on site.</p>
<p>In Ramsey no individual sites gave rise to significant objections but the ability of the local road network to accommodate additional traffic arising from new development was a significant cause for concern.</p>	<p>All allocations in Ramsey were considered as part of the HSTS. Site specific concerns will be considered in greater detail during the course of planning applications.</p>
<p>The proposed development of SM5 East of Robert Avenue, Somersham generated substantial local opposition. main issues of concern were: impact on the adjoining nature reserve including disturbance and loss of habitat; lack of capacity on the local road network; increased risk to pedestrians and cyclists particularly on Robert Avenue; lack of headroom at Somersham waste water treatment works; increased surface water flood risk; and the lack of capacity within local services to accommodate the needs of additional residents.</p>	<p>This site is included in the HSTS which forms part of the evidence base for the Local Plan. Allocation SM5 specifically identifies that an ecological assessment will be required along with a transport assessment. Any application will also need to have agreement with the EA and Anglian Water that waste water flows from the proposal can be accommodated. Site specific concerns will be considered in greater detail during the course of a planning application.</p>
<p>The proposed development of AL1 North of School Lane generated substantial objections to the principle of its proposal for residential development. Main issues of concern were: lack of capacity on the local road network including the historic bridge in the village centre; increased parking congestion; the impact on the character of the village and lack of need for additional housing given the scale of development at nearby Alconbury Weald; impact on biodiversity and in principle protection of greenfield land; loss of land used for informal recreation; loss of views and privacy due to the sloping nature of the site; the lack of capacity within local services to accommodate the needs of additional residents; increased flood risk; and noise impacts due to proximity to the A1(M).</p>	<p>The strategy follows the requirements of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need.</p> <p>This site is included in the HSTS which forms part of the evidence base for the Local Plan. Allocation AL1 specifically sets out a number of requirements that would need to be addressed as part of any future application including a suitable means of access, a noise assessment and mitigation from the A1 and an ecological assessment and enhancement scheme. Site specific concerns will be considered in greater detail during the course of any future planning application</p>

Section D: Allocations 6

Issue raised	Response to issue
<p>The designation of Bluntisham as a local service centre and proposed allocation BL1 West of Longacres generated substantial objections to the principle of designation and residential development with a lesser number directed at BL2 North of 10 Station Road. Main issues of concern were: the lack of community services and facilities to accommodate the demand arising from the proposed development, in particular the part-time nature of the GP surgery provision; impact on the character of Bluntisham and potential coalescence with Colne; loss of valuable agricultural land; impact on wildlife and biodiversity; poor access to employment and public transport services; and increased flood risk and sewage capacity concerns.</p>	<p>The strategy follows the requirements of the NPPF and legislation. The settlement has a range of services and facilities greater than that of a Smaller Settlement but less than that of a Key Service Centre including a primary school, public hall, public house, convenience and a part-time GP surgery. Allocation B1, West of Longacres, Bluntisham is grade 2 agricultural land and allocation BL2 is primarily grade 2 land, with the southern tip being grade 3. The site was assessed as part of the HELAA 2017. Other matters raised would be site specific considerations as part of planning applications.</p>

Allocations Introduction

Number of Representations		
Total	Objection	Support
7	6	1

Main issues

- 6.1 The housing trajectory was challenged regarding the ability to boost the supply of housing; issues relating to this matter are addressed in the 'Development Strategy' section. Most representations related to matters of detail or were promoting additional sites.
- 6.2 One omission site was put forward for Wyton-on-the-Hill for Phase 1 development of 1,000 dwellings.

Summary of issues

Table 64

Issue raised
<p>The Local Plan contains the most appropriate sites for development to meet Huntingdonshire's needs until 2036.</p>
<p>Historic England welcome the fact that some previously recommended changes on site allocations have been included. However, consistency is sought and additional wording based on the Planning (Listed Buildings and Conservation Areas) Act 1990 is recommended for inclusion.</p>
<p>No updated housing trajectory has been published within the PS HLP2036 consultation documents. There would be a substantial shortfall in housing and affordable housing as a result of the proposed development strategy.</p>

6 Section D: Allocations

Issue raised
The Council are under delivering in terms of the amount of homes that should be provided to meet the need. The 5 year housing land supply is very tight and the Framework seeks to boost significantly the supply of housing. Allocations in the Ramsey Spatial Planning Area total around 806 dwellings by not allocating additional sites there is no contingency plan. Larger sites like RAF Upwood may be slow to deliver. The allocation of additional smaller sites in Ramsey can make a significant contribution to housing supply and offer greater flexibility.
There is no value in allocating a site where the principle of development has been established through planning permission; double counting may arise in the housing trajectory.
Disagree with the findings of the HELAA in respect of land at Gifford's Park in St Ives, and request that the site assessment is revised. Provides reassessment against most sustainability objectives setting out the sustainability credentials of a proposal for a strategic scale mixed use development at Gifford's Park.
A new policy should be included for Wyton-on-the-Hill allowing for a first phase of development for a 1,000 units whilst the remainder of the site should be safeguarded for development, within this plan period and beyond, in the event that the road infrastructure constraints enabling development beyond 1,000 units are resolved. A Phase 1 scheme of 1,000 new homes can be delivered through improvement of existing local road infrastructure and also public transport infrastructure particularly by way of improving linkages to the Cambridgeshire Guided Busway. In terms of sustainability, a community of the scale of the first phase proposed would be commensurate with the network of other rural settlements in the central Huntingdonshire area, to the north of Huntingdon and St Ives.
Additional site proposed for allocation at Riversfield, Little Paxton. This has not been allocated despite a broadly favourable HELAA assessment and is appropriate for allocation irrespective of the outcome of the planning application. Employment land is over-allocated so this site is no longer required to deliver employment growth.
Additional site proposed on land north of Oundle Road, Alwalton. The village should be considered in its context immediately adjacent to Peterborough not in isolation; the site could meet needs from both districts.
Additional 4ha site submitted to the north of Stilton fronting in part onto North Street. Details supplied setting out its sustainability credentials. Objects to the lack of a housing allocation as the Local Plan has failed to allocate land which can genuinely be delivered in the short term for housing purposes without causing harm.

Chapter 9: Huntingdon Spatial Planning Area

Number of Representations		
Total	Objection	Support
81	62	19

Main issues raised on Chapter 9

Table 65

Issue raised	Response to issue
The deliverability of the anticipated housing trajectory at Alconbury Weald was strongly challenged. It was considered unachievable	It is not unreasonable that delivery will be marginally slower at the very start, allowing for the implementation of infrastructure. The trajectory submitted is that of the applicant, who is confident

Section D: Allocations 6

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Issue raised	Response to issue
due to the capacity of housebuilders to build and sell so many properties in one location coupled with concerns over the funding and delivery of supporting infrastructure.	that the trajectory, as submitted, can be delivered. Since the grant of planning permission the applicant has been working closely with the LPA and stakeholders and delivered the necessary infrastructure and there have been no delays to the project as a result of funding to deliver housing, employment and infrastructure. For these reasons the Council supports the deliverability of Alconbury as set out in the annual monitoring report 2017.
The availability of SEL1.2 RAF Alconbury was challenged and its removal from the plan sought due to uncertainty	The Defence Infrastructure Organisation supported its allocation and confirmed its availability from around 2024.
The market for new homes in Huntingdon in close proximity to the Alconbury Weald SEL was challenged at HU1 Ermine Street although the site's promoters sought an increase to 1,600 dwellings.	The Council has a need to identify sustainable locations to deliver new homes to meet the Council's Objectively Assesses Need of 20,100 homes to 2036. Having regard to the NPPF HU1 Ermine Street is considered to be in a very sustainable location being within the Huntingdon Spatial Planning Area. It would not be reasonable to not allocate this land on the grounds of market competition with Alconbury Weald.
The need to protect land for a future realignment of the A141 around the north west of Huntingdon was challenged due to the uncertainty over when and whether it would be required or delivered.	The A141 is one of the key routes running through Huntingdonshire and the Strategic Transport Study, in support of the Local Plan 2036, recognises that some of the longest delays can be observed on the A141 around Huntingdon and goes onto highlight specific junctions and potential mitigation. Cambridgeshire County Council Long Term Transport Strategy 2015 recognises the need for A141 capacity enhancements around Huntingdon. There is no doubt that improvements are required by 2036 and the Council is working proactively with partners including Cambridgeshire County Council and the Cambridgeshire and Peterborough Combined Authority.
The need for HU10 Hinchingsbrooke Country Park extension to be achieved in advance of much more housing to alleviate pressure on recreational and wildlife assets was highlighted but the landowner raised concerns over the impact of release of the land on the farming business.	The NPPF sets out the governments policy on the provision of housing and concerns about wildlife will need to be considered as part of site specific planning applications. It is unclear how the farming business will be impacted and again, that can be clarified and considered as part of a site specific planning application.
The proposed site allocations in Brampton were all supported with just a few minor amendments sought.	Support for the site allocations is welcomed.
All proposed allocations in Godmanchester were supported in principle although additional flexibility was sought within the allocations and deletion was sought of the requirement for inclusion of employment land within HU19 Bearscroft Farm.	Support for the allocations in Godmanchester is welcomed. HU19 is Land North West of Bearscroft Farm was granted planning permission on the 6th March 2014 and included employment land. Given the scale of this development is it

6 Section D: Allocations

Issue raised	Response to issue
	considered that a mixed use development, comprising housing, employment and a new school will result in a more sustainable form of development than housing alone.
One omission site was put forward in Huntingdon: land at Lodge Farm.	The NPPF sets out the governments policy on the provision of housing and this site is in the open countryside and separated from Huntingdon by the A141. are not required to meet the Council's identified objectively assessed need. In the event the Inspector feels the Council's need is higher than 20,100 homes alternative sites can be be discussed at the Examination.
Two omission sites were put forward in Brampton: 1) land off and to the North of 66-100 Thrapston Road and 2) land to the east of no.66 Thrapston Road.	Land adjacent 66 - 100 Thrapston Road was subject of a planning application that was refused. The refusal was upheld on appeal on the grounds of unacceptable impact on local landscape and townscape.
Three omission sites were put forward in Godmanchester: 1) South of Stokes Drive and Bluegate, 2) Dexter's Farm and 3) East and south east of Romans' Edge.	The NPPF sets out the governments policy on the provision of housing and these additional sites are in the open countryside are not required to meet the Council's identified objectively assessed need. In the event the Inspector feels the Council's need is higher than 20,100 homes alternative sites can be be discussed at the Examination.

Huntingdon Spatial Planning Area General Issues

Number of Representations		
Total	Objection	Support
5	5	0

Main issues

6.3 The deliverability of allocations in the Huntingdon spatial planning area as a whole was challenged due to the reliance on temporary measures to address capacity issues in waste water treatment works.

Summary of issues raised

Table 66

Issue raised
Concerned that throughout Section 9 and Section 10: there is a quoted reliance on temporary measures for Wwtw in Huntingdon, Warboys & St.Neots which calls into question whether the plan is deliverable. We question whether due consideration been given to the consequences regards the environment and water quality on the large number of discharge consents which may be required, together with the cumulative impact of meeting the requirements of the Water Framework Directive. We believe a more comprehensive investigation rather than the piecemeal approach may be required.

Section D: Allocations 6

Issue raised
The assumptions made in the Housing Trajectory in respect of delivery on the strategic expansion location sites are over-optimistic and are an unreliable basis for, firstly, establishing a rolling five year supply which meets identified housing needs in full, and secondly, the delivery of the housing requirement across the full Plan period.
The Council has not provided robust reasoning for the rejection of land at Lodge Farm as an option for sustainable development. The only logical and appropriate direction for growth at Huntingdon is to the northeast; the town is constrained by flood zones, ecological interests and the A14 trunk road. The highways impact of Lodge Farm has been assessed in the Huntingdonshire Strategic Transport Study (HSTS), however, we consider the basis of this assessment is flawed and therefore not a reliable basis for the decisions taken within the Local Plan.
The Stukeleys Parish Council is the parish which has the most development proposed within it within the local plan period and as such is the most impacted. In addition to the 5000 homes and enterprise zone within the existing Alconbury Weald outline permission there are 3 major allocations impacting on the villages and their relationship to Huntingdon; totalling an additional 4620 over the plan period.
The Stukeleys Parish Council noted that a large proportion of land surrounding the Stukeleys and owned by Agreserves has been submitted. The PC are in complete opposition to any further planning of this scale being considered by HDC.

Strategic Expansion Location: Alconbury Weald

Number of Representations		
Total	Objection	Support
18	17	1

Individual site representations breakdown	Total	Objection	Support
SEL1 general	3	3	1
SEL1.1	7	7	0
SEL1.2	8	7	1

Main issues

- 6.4** The deliverability of the anticipated housing trajectory at Alconbury Weald was strongly challenged. It was considered unachievable due to the capacity of housebuilders to build and sell so many properties in one location coupled with concerns over the funding and delivery of supporting infrastructure.
- 6.5** Separation and protection of green space between Alconbury Weald and the Stukeleys was an issue of particular concern.
- 6.6** The potential for additional housing to be incorporated into SEL1.1 Former Alconbury Airfield and Grange Farm was both challenged and supported.
- 6.7** The availability of SEL1.2 RAF Alconbury was challenged and its removal from the plan sought due to uncertainty; the Defence Infrastructure Organisation supported its allocation and confirmed its availability from around 2024.

6 Section D: Allocations

6.8 Other representations related more to matters of detail and implementation of the policy rather than principle.

Summary of issues raised

Table 67

Issue raised
<p>Alconbury Weald Strategic Expansion Location - Significant concerns in relation to the additional housing numbers proposed on Alconbury Weald given that the existing development is only part way through phase one it is considered premature to allocate further numbers until it can be confirmed that the current scheme is successful. Draft plan does not adequately explain how the 30%+ uplift in numbers will be accommodated having regards to the assurances provided by HDC and the land owners given in the previous local plan and outline planning permission in relation to character of the area, protection of green space, separation of settlements, etc. Additional traffic impacts must be fully addressed and additional funding made available for works to Ermine Street to complete and extend environmental improvements in and around Ermine Street. Full integration required of the site to the proposed allocation at RAF Alconbury with vehicular access provided from Alconbury Weald.</p>
<p>The Stukeleys Parish Council will not support the allocation if it involves the loss of any green space in the green buffer between the villages and Alconbury Weald development or on Grange Farm as set out on the Alconbury Weald outline permission parameter plan.</p>
<p>Given the planned growth at Alconbury Weald potentially in conjunction with the possible redevelopment of RAF Alconbury, The scale and function of the retail and services elements of the Alconbury Weald development will need to be reviewed so that they are adequate for a significantly larger catchment population. The limitations on retail capacity are intended to encourage residents to shop in Huntingdon but the most direct route is through the villages of Little Stukeley and Great Stukeley, The Stukeleys Parish Council completely rejects this part of the plan and are opposed to the encouragement of heavy traffic and increased fumes through the villages, solely to benefit Huntingdon town centre.</p>
<p>Concerned about the deliverability of these SELs within the plan period. The Council need to ensure they are applying realistic lead in times and delivery assumptions, which provide sufficient comfort that these schemes will deliver as assumed. The housing delivery rates for Alconbury Weald are unrealistic. It is inadequate simply to incorporate developer/housebuilder assumptions about housing delivery without further scrutiny.</p>
<p>Alconbury Airfield and RAF Alconbury should, for the purpose of housing delivery, be considered as a single site given they physically abut one another and given paragraph 9.5 and draft Policy SEL 1.2 of this Draft Local Plan states that when available, RAF Alconbury should be incorporated into the wider Alconbury Airfield development. The assumption on housing delivery rates needs to be explained. There is a limit to the market demand for a single location for growth. One of the findings of the Nathaniel Lichfield & Partners' 'Start to Finish' Report (November 2016) was that the highest average annual build rate of the schemes assessed is 321 dwellings per year at Cranbrook in East Devon, which received significant amounts of public funding to support delivery including infrastructure. Cambourne in South Cambridgeshire has historically delivered approximately 235 dwellings per year. The combined delivery assumptions for these two adjacent Alconbury sites far exceeds anything that has been achieved locally or nationally. The Council has not sought to justify its delivery assumptions for these two adjacent sites. In the absence of clear justification to support what are extraordinarily high delivery assumptions, the Council's evidence base is not considered to be credible. If the Council's strategy is to be based on a sound evidence base and therefore pass the test of soundness, the delivery assumptions for Alconbury Airfield need to be significantly reduced. A maximum of 200 dwellings per annum should be assumed (in addition to the 102 units for year 17/18 as set out in the AMR, if delivered) and even this much reduced delivery assumption would need to be justified by clear evidence, especially if RAF Alconbury is also to be regarded as a deliverable site in the latter stages of the plan period.</p>

Issue raised
<p>The potential for additional growth offers the potential to accelerate delivery at the Strategic Expansion Location, with support from Homes England who have helped fund the delivery of infrastructure at the site. It is agreed that due to the close relationship between Alconbury Weald and RAF Alconbury that the two sites should feature a close planning and functional relationship. However, as each site is in different ownership and Alconbury Weald is well advanced, care needs to be taken with the policy structure and expectations on how the two sites will be integrated. Further to this, the supporting text should make clear that whilst Alconbury Weald will be developed in a coherent, well-planned way with the inclusion of necessary supporting infrastructure, the site is not solely responsible for the provision of all infrastructure that may be required as a result of all cumulative developments within the area, including at HU1, and any other adjacent sites that may come forward during the lifespan of the Local Plan.</p>
<p>The aspiration for integration of Alconbury Airfield and Grange Farm with RAF Alconbury should be strengthened as it is clearly key to the successful sustainable redevelopment of the RAF Alconbury site to have a very close relationship between the two sites, with the design of the masterplan consistent with the overall approach at Alconbury Weald and close pedestrian, road and cycle links available to facilitate use of the rail station, and facilities. This requirement should be stronger to ensure that the policy delivers an effective form of development in line with national policy.</p>
<p>SEL1.1 Former Alconbury Airfield and Grange Farm - Urban&Civic object to the inclusion of policy sub section 2 which highlights the need to safeguard land to facilitate the provision of a realigned A141. There is a lack of clear justification for the realigned A141 safeguarding route which has no formal agreed plan or committed funding scheme and may additionally lead to the unintended consequence of a slower delivery of housing, or a reduction in the capacity of the site to allow for this provision. which may be unnecessary due to this imprecision in the policy. The recent Huntingdonshire Strategic Transport Study (2017) tested the provision of the re-routed A141 northern bypass and identified significant funding challenges in delivering this realignment. The need for the A141 is not specifically referenced within the 'key issues shaping the plan' in Chapter 3 of the Local Plan, nor is it highlighted within supporting text to Strategy for Development (policy LP2) to 4.54). The Infrastructure Delivery Plan November 2017 Update (December) does not identify the A141 realignment as a critical priority scheme.</p>
<p>SEL1.1 - Historic England welcome paragraph 9.11. This provides helpful advice regarding the importance of the site's historic environment. The policy would be strengthened by the addition of the following words at the end of criteria d) including the listed cold war structures and Prestley Wood scheduled monument. The wording of the policy could also be tightened to read 'conserves, and where appropriate enhances' instead of 'protects and enhances' for consistency with the wording in the PPG.</p>
<p>SEL1.1 - A number of access options exist, one of which may result in the loss of part of Great Stukeley Railway Cutting SSSI. Should this option be taken forward the applicant will need to implement compensatory habitat creation and SSSI creation of SSSI buffer habitat in accordance with Briefing Note 2 and the ES Addendum. We are aware that a railway station may also be developed to serve this development, and that this may also directly impact the SSSI. Bullet g. therefore needs to be amended to include the following requirement: i,- Provision of SSSI buffer habitat and, where required, compensatory habitat creation to be provided in accordance with Briefing Note 2 and the ES Addendum and in agreement with Natural England.</p>
<p>SEL1.1 - Paragraph 9.10 should reference the need for flexibility with regard to affordable housing provision, alongside guidance in relation to housing mix.</p>
<p>SEL1.1 - The reference to World War 11 within paragraph 9.12 should be revised to state World War II.</p>
<p>SEL1.1 - Paragraph 9.13 includes a reference to the need for each key phase of the development to assess the transport impact of each phase on the local road network, including the existing A14. This paragraph should reflect that the A14 is currently being upgraded which will significantly alter the surrounding infrastructure.</p>

6 Section D: Allocations

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Issue raised
<p>SEL1.1 - References within the supporting text to the exact locations of facilities and service centre provision should be removed from paragraph 9.15 or clarified in order to ensure ongoing flexibility of provision at Alconbury Weald.</p>
<p>SEL1.1 - Concern over the suggestion that SEL 1.1 has the potential to accommodate 6,500 dwellings at paragraph 9.10. The planning application approved a maximum of 5,000 homes in principle, albeit has a requirement for additional transport modelling to demonstrate that highway impacts beyond the detailed modelling for 879 homes can be overcome. This amount of development has not been properly tested and the evidence base to support the draft Local Plan does not support this commentary. This statement in the supporting text should be removed as it has the capacity to mislead.</p>
<p>SEL1.2 RAF Alconbury - Defence Infrastructure Organisation supports the allocation of 84ha for housing led mixed use development. RAF Alconbury has been declared surplus to military requirements, DIO confirms the site is expected to be available for development from around 2024. DIO welcomes the incorporation of the site into the Alconbury Weald Strategic Expansion Location to promote comprehensive redevelopment and assist with integrating the site with the adjacent former airfield site into a single new community. DIO will facilitate the completion of a public masterplanning exercise to enable the site to come forward in a phased development programme, contributing to housing land supply within the LP.</p>
<p>SEL1.2 - Increased green separation sought between the allocation and Little Stukeley as the current relationship is unattractive and leaves the Little Stukeley with a poor setting in relation to the allocation site.</p>
<p>SEL1.2 - Historic England welcome criteria b and paragraph 9.24. Again the wording of the policy could be tightened to read 'conserves, and where appropriate enhances'.</p>
<p>SEL1.2 - The allocation should be used as an opportunity to reduce traffic using Ermine Street by utilising existing and planned routes within Alconbury Weald. Opportunity to enhance pedestrian and cycle routes through Little and Great Stukeley should be a key aim of transportation planning associated with the scheme.</p>
<p>SEL1.2 - The existing built form and layout is not appropriate for a high quality built environment, a full redesign starting from design principles and constraints would be appropriate.</p>
<p>SEL1.2 - Objects due to the uncertainty over the availability of the site. The date by which it is assumed RAF Alconbury will become available for development is clearly unknown. No evidence has been provided to set out why further delays should not be expected and why a predicted date for delivering housing on the site of 2028/29 is credible. There is a significant question mark over whether any additional housing units would be delivered at the RAF Alconbury site given it will be an extension to the Alconbury Airfield site. This is of course assumes that the Council is able to demonstrate that the site of RAF Alconbury passes the deliverability tests set out within the NPPF. Based on the evidence presented to date, the site of RAF Alconbury should be removed entirely from the draft Local Plan.</p>
<p>SEL1.2 - The policy suggests a mixed use would be appropriate but is unclear on the uses which would be acceptable with the exception of retail and housing. Paragraph 9.28 highlights potential scope for retail uses with other services and facilities to be concentrated in a single centre towards the north west of the site. This assertion is at odds with the policy text which specifies a mix of uses comprising residential, education and social and community facilities. This should be clarified and justified.</p>
<p>SEL1.2 - Prestley Wood is considered to be a significant distance from the site and would appear to be of little relevance to the development of RAF Alconbury. It is a matter for the Alconbury Weald development to consider, which it is through the need for a management plan upon the commencement of any works within its setting. As such the inclusion of supporting paragraph 9.24 is considered superfluous to this policy.</p>

Section D: Allocations 6

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Issue raised
SEL1.2 - Objects as it fails to make adequate provision to address the significant impact on secondary school provision. An amendment to the Plan is required to ensure that the long term needs for secondary provision at Alconbury could be adequately addressed in a sustainable manner. The Pre-submission Plan includes an amendment to paragraph 9.29 that highlights the probable need to increase the planned capacity of the secondary provision on the adjacent Alconbury Weald site as a result of the release of additional residential development following the release of RAF Alconbury. However, the wording of paragraph 9.29 should be amended to strengthen this policy.

Huntingdon

Number of Representations		
Total	Objection	Support
34	23	11

Individual site representations breakdown	Total	Objection	Support
HU1 Ermine Street	9	6	3
HU2 Former Forensic Science Laboratory	1	0	1
HU3 Former Police HQ site	2	2	0
HU4 West of Railway, Brampton Road	1	1	0
HU5 West of Edison Bell Way	3	2	1
HU6 George Street	2	1	1
HU7 Gas Depot, Mill Common	2	1	1
HU8 California Road	2	1	1
HU9 Main Street	2	1	1
HU10 Hinchingsbrooke Country Park extension	6	5	1
HU11 Huntingdon Racecourse	4	3	1

Main issues

- 6.9** The market for new homes in close proximity was challenged at HU1 Ermine Street due to its proximity to the strategic expansion location at Alconbury Weald although the site's promoters sought an increase to 1,600 dwellings. The need to protect land for a future realignment of the A141 in this vicinity was challenged due to the uncertainty over when and whether it would be required or delivered. Transport impacts of the allocation were expected to be significant and greater certainty sought over their resolution.
- 6.10** Concern was expressed over the delivery of HU10 Hinchingsbrooke Country Park extension including the need for this to be achieved in advance of much more housing to alleviate pressure on recreational and wildlife assets but also from the landowner now raising concerns over the impact of release of the land on the farming business.

6 Section D: Allocations

- 6.11 Many of the relevant landowners or promoters confirmed the availability and merits of their sites and minor amendments were sought to some.
- 6.12 One omission site was put forward: land at Lodge Farm.

Summary of Issues Raised

Table 68

Issue raised
<p>HU1 Ermine Street - This site could impact on flood risk in Huntingdon downstream, and is a potential location for a flood alleviation measures that could reduce the risk of flooding to Stukeley Meadows. This site should be required to provide betterment as part of the development, reduce discharge rates or safeguard parts of the site for the provision of future works.</p>
<p>This allocation is developable and is considered deliverable in terms of its strategic location and immediate availability. Fully supports the broad concept of ensuring and maintaining green separation between Green End and the planned new development - it is entirely appropriate that the distinct identity of Green End and Great Stukeley is preserved and at the same time the allocated site is considered as an extension of Huntingdon.</p>
<p>There is a great deal of uncertainty as to whether any new aligned A141 should be delivered in the light of any assessment of need. In such circumstances, the College support an approach where land is safeguarded for such a route in principle and where the future provision of any new route is the subject of detailed analysis at the appropriate time. Clearly the safeguarding of any new route affects not only land either side of Ermine Street (i.e. within the allocated site) but also land outside this allocation boundary. It is important in this context that reference is made elsewhere to the need for the safeguarded realigned route which has the potential to connect through to the allocated land under HU1, otherwise there is no certainty of being able to deliver such a route. Whilst we acknowledge that the southern part of the Alconbury Weald site will provide a connection onto A141 there is no wider reference to the need to link into a new re-aligned A141 to the south.</p>
<p>It is noted that this policy allocation contains the stipulation that successful development of the site will require safeguarding of land to facilitate provision of a realigned A141, as proposed by the Third Cambridgeshire Local Transport Plan 2011-2031: Long Term Transport Strategy (2014) which tested the provision of the re-routed A141 northern bypass and identified significant funding challenges in delivering this realignment. The need for the A141 is not specifically referenced within the 'key issues shaping the plan' in Chapter 3 of the local plan, nor is it highlighted within supporting text to Strategy for Development (policy LP2) to 4.54). These sections address other transport infrastructure to be provided, including the A14 and A428 improvements. The Infrastructure Delivery Plan November 2017 Update (December) does not identify the A141 realignment as a critical priority scheme. It is therefore unclear what the rationale for the provision of the A141 realignment is and the requirement is not justified.</p>
<p>Additional traffic impact on the A14, A141 and Ermine Street will need to be satisfactorily resolved and a sustainable transport network put in place to be provided on site for vehicles, cyclists and pedestrians incorporating links into the surrounding area including the nearby right of way and the Alconbury Weald site to the north-east.</p>
<p>Severe concerns in relation to this poorly defined allocation as it is considered that it will adversely impact on the locality in terms of; transport on Ermine Street, lack of clarity on realignment of A141 (as depending on the line of the road the development of the site could significantly change in terms of scale, landscape or impact terms), scale of development and relationship to Huntingdon and Stukeleys, impacts on local amenity and local landscape amenity - particularly on the rising land to the north of Ermine Street, continued erosion of the separation between Huntingdon and Great Stukeley which is harmful to the local environment and the character and setting of the village. The Stukeleys are identified for a huge proportion of the district's strategic growth within the draft plan and it is considered that the implications of this in terms of impact on the Stukeleys character,</p>

Section D: Allocations 6

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Issue raised
<p>setting and function has not been fully addressed and the parish has not previously been involved in the local plan process. Any development that will be reliant on, or impact on Ermine Street must contribute to environmental and traffic improvements to it and its relationship to key routes.</p>
<p>The delivery of the site will be accommodated by a public Masterplanning exercise that addresses design and layout issues including the necessary provision of services and facilities at a timely manner through the relevant phasing of development. The College is fully supportive of the allocation within the Local Plan and can confirm its delivery at an early stage of the Plan. Proposals will come forward in the close collaboration with adjacent landowners to ensure a comprehensive masterplan scheme is implemented.</p>
<p>The current figure of 1,440 homes outlined in the policy allocation is not justified. At this stage, initial work has suggested that the site could accommodate a higher capacity for dwellings. Increasing this to a more realistic base figure of 1,600 homes would provide the Council the element of flexibility considered beneficial to the plan and consistent with national policy.</p>
<p>We understand that there are landownership constraints to the delivery of the anticipated pedestrian and cycle link; the land required to deliver a foot/cycle bridge 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. 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. As set out in our representations to Policy LP 2, we are concerned that there is an overemphasis in the development strategy on development in Huntingdon (and St Neots) with a number of strategic sites identified in this location. The implications for housing delivery associated with competing sites being located in close proximity of one another in Huntingdon have not been considered in relation to Alconbury Weald, RAF Alconbury and Ermine Street.</p>
<p>Historic England welcome the change in wording in criterion m to 'where appropriate'.</p>
<p>Detailed work has commenced on the masterplan for land within our client's control, comprising the land to the south of Ermine Street. It is anticipated that a planning application on the southern part of the allocation will be made to Huntingdonshire Council during the Summer 2018.</p>
<p>HU2 Former Forensic Science Laboratory - Persimmon (landowner) request the policy be adapted to reflect the associated planning consent for the site (reference 17/01597/FUL) as follows: 'The site is allocated for 103 homes;' Deletion of point d) and the first sentence of paragraph 9.47 - 'Significant landscape enhancements would need to be provided between the housing development and the education facilities' as we have an approved landscaping scheme for the site.</p>
<p>HU3 Former Police HQ site - The site lies within Huntingdon Conservation Area and close to the grade I listed Hinchbrooke House and a number of other associated listed buildings/structures. Development in this location would impact upon the Conservation Area and has the potential to impact upon the settings of the listed buildings. Whilst criterion a references the historic parkland of Hinchbrooke House and its setting and paragraph 9.52 references the conservation area and other heritage assets which is to be welcomed, Historic England suggest the reference should be made specifically to the fact that Hinchbrooke House is grade I listed and the need for careful design to protect the heritage assets and their settings.</p>
<p>Cambridgeshire Police anticipate being able to offer part or all of its site for development , within a relatively short time frame (1-3 years) and in that respect it can be considered as 'deliverable' for residential use and other uses If the site is developed in its entirety for C3, housing it has a potential yield of 140 houses based on an average density of 35 units per hectare accounting the physical constraints on the site. At the previous round of consultations the Police requested that the housing threshold for the site was raised to 105 dwellings</p>

6 Section D: Allocations

Issue raised
<p>with the balance of the land being available for D1 uses. Keen to embrace the potential for mixed commercial uses and in particular those which are complementary to residential and which have potential synergy with the hospital. If in reality if there is no demand the policy should be sufficiently robust to provide flexibility in the aspirational split to allow more housing particularly if it were in a form that is related to the hospital i.e. key worker accommodation. Cambridgeshire Police consider that the plan is unsound in that the split of uses is arbitrary and is not sufficiently flexible to reflect market conditions at the 'point of potential implementation'.</p>
<p>HU4 West of Railway, Brampton Road - Historic England welcome the mention of the Huntingdon Conservation Area in the policy and supporting text. Again we suggest the tightening of the wording as outlined above. We welcome paragraph 9.58 relating to the water tower.</p>
<p>HU5 West of Edison Bell Way - Support the use of the site for car parking. More parking is needed at or close to the rail station. Use of the station has been growing for some years and is likely to continue to do so with improved train services and planned new housing in the area. 180 car parking spaces will be lost at the station with the demolition of the A14 viaduct and the existing car park to the west of the railway off Brampton Road is allocated for business use in the local plan.</p>
<p>Historic England welcome the reference to the surrounding conservation area and requirement for the enhancement of the Conservation Area. However, query if it is more accurately the setting of the conservation area.</p>
<p>HU6 George Street - Historic England welcome the reference to the Conservation Area and listed buildings and their settings in criterion b and paragraph 9.65. Tightening of the wording is suggested.</p>
<p>The site is sustainably located between the railway station and town centre. A planning application (reference 17/00733/FUL) for the site's residential redevelopment is currently under consideration by the Local Planning Authority, accompanied by extensive supporting documentation. Numerous consultations have taken place with the Town Council, technical consultees, the general public, neighbouring occupiers and other interested parties. The completion of a further masterplanning exercise is not therefore necessary and point (a) of the draft policy text can be deleted accordingly.</p>
<p>HU7 Gas Depot, Mill Common - This site is adjacent to the Alconbury Brook, with associated flood risk history. Development on this site should be required to reduce discharge rates.</p>
<p>Historic England welcome the policy requirement for the development to enhance the conservation area and to reflect the sensitive landscape setting of the site.</p>
<p>HU8 California Road - The allocation of the site is considered to be suitable, credible and deliverable and this will enable new housing growth within Huntingdon delivering a sustainable development that contributes to the Local Plan growth strategy consistent with national policy.</p>
<p>Historic England welcome the requirement for archaeological investigation but suggest changing the wording for consistency with other policies eg policy HU14.</p>
<p>HU9 Main Street - The allocation of the site is considered to be suitable, credible and deliverable and this will enable new housing growth within Huntingdon delivering a sustainable development that contributes to the Local Plan growth strategy consistent with national policy.</p>
<p>Historic England acknowledge that the policy requires development to reflect the proximity of the Hartford Conservation Area as well All Saint's Church and Manor House. There are also several listed buildings to the west of the site. The wording could be tightened to reference settings and the archaeology wording amended for consistency with other policies.</p>

Issue raised
<p>HU10 Hinchingsbrooke Country Park extension - Additional car parking is needed in advance of an extension to the country park to help deal with increased visitor numbers. Overflow parking for the park already adds to the inappropriate, illegal and potentially dangerous parking along nearby residential streets especially on event days and during school holidays. An extension to the existing car park accessed via Hinchingsbrooke Park Road should be considered to address the existing shortfall in parking provision.</p>
<p>This will not effectively meet infrastructure requirements of nearby housing developments. There must be a requirement that the extension will be brought on-line ahead of developments in Brampton, in order to be effective and meet the green infrastructure needs of these developments. If the extension to Hinchingsbrooke is not on-line and accessible before occupation of nearby developments (such as allocations HU12 and HU13) the new residents will seek out alternative greenspaces and there will be adverse impacts on existing sites, in particular Brampton Wood SSSI, due to increased recreational pressure.</p>
<p>This should include a requirement for delivery of the Country Park extension ahead of new residential development, particularly in Huntingdon and Brampton. The additional accessible green infrastructure created through the Country Park extension will play a vital role in helping to mitigate the effects of further pressure from new residential development at sites such as Brampton Wood SSSI and Portholme SAC. Advises that this amendment is required to ensure that the policy is sound and consistent with the NPPF in conserving and enhancing the natural environment, including designated sites, and delivering sustainable development.</p>
<p>The allocation fails to take into consideration the severe adverse impact that the loss of the large area of grassland, which is an integral part of the Objector's livestock operation used for grazing and the making of hay and silage for fodder, would have on the farming enterprise. Objector is not willing participants to the delivery of the Park extension. Without the cooperation of landowners it is difficult to see how the extension can be delivered given there is no capital programme for acquiring the land at a cost of at least 0.5 million. Given the Councils budgetary constraints we question the deliverability of the proposal and we do not consider the detrimental effect this extension would have upon the farming business has been taken into account when considering the proposed allocation. There are more pressing infrastructure delivery matters, which are set out in the Infrastructure Delivery Plan. With an exceptional identified funding gap that relates to the delivery of specific sites, we do not believe it is a realistic proposal. The allocation should be deleted.</p>
<p>The site includes significant recreation and green infrastructure space, and could both be designed to reduce flood risk through flood storage and surface water attenuation on site, thereby reducing overall flood risk. The flood risk assessments should be required to include consideration of the site's potential for overall flood risk reduction on and beyond the site.</p>
<p>HU11 Huntingdon Racecourse - Historic England welcome that the development requires a programme of investigative works to be undertaken and subsequently discovered assets to be protected.</p>
<p>The hotel at the Racecourse operates and is owned separately from the Racecourse/JCR's business and should be excluded from the policy boundary. Fully support the inclusion of a Huntingdon Racecourse specific policy (HU11) within the Huntingdonshire Local Plan, it is justified, as the Local Plan should recognise the importance of the Racecourse, which warrants policy protection and support for ongoing maintenance and future enhancement. Object to the wording of the policy relative to the supporting information (flood risk assessment, sequential development strategy (relative to flood risk), a travel plan (and transport assessment required at paragraph 9.99) and archaeological work) required for planning applications, as it is not considered to be consistent with the NPPF and therefore this part of Policy HU11 is unsound.</p>
<p>The site includes significant recreation and green infrastructure space, and could both be designed to reduce flood risk through flood storage and surface water attenuation on site, thereby reducing overall flood risk. The flood risk assessments should be required to include consideration of the site's potential for overall flood risk reduction on and beyond the site.</p>

6 Section D: Allocations

Issue raised
<p>Omission site Lodge Farm - the Council has not provided robust reasoning for the rejection of land at Lodge Farm as an option for sustainable development. The HELAA sets out that the Lodge Farm site is discounted by reason of its expected highways impact and the associated cost of mitigating this impact. The highways impact of Lodge Farm has been assessed in the Huntingdonshire Strategic Transport Study, however, we consider the basis of this assessment is flawed and therefore not a reliable basis for the decisions taken within the Local Plan. Linden Homes Strategic Land's transport consultant Glanville considers that the third river crossing may not be necessary to support development at Lodge Farm in light of the likely workplace destinations of future residents.</p> <p>The assumptions made in the Housing Trajectory in respect of delivery on Alconbury Weald, RAF Alconbury and St Neots East are over-optimistic and are an unreliable basis for, firstly, establishing a rolling five year supply which meets identified housing needs in full, and secondly, the delivery of the housing requirement across the full Plan period. A maximum of 250 dwellings per year at each of Alconbury Weald and St Neots East might be deliverable albeit still optimistic, having regard to market saturation and the observed delivery rates at larger local schemes such as Cambourne, Hampton, Northstowe and Waterbeach. The potential for delays to the commencement of development mean that the Local Plan should provide additional flexibility; one way of achieving this is through additional allocated sites. Land at Lodge Farm, Huntingdon is put forward for development of approximately 4,000 dwellings and associated uses on 307ha of land.</p>

Brampton

umber of Representations		
Total	Objection	Support
7	3	4

Site Allocation	Total	Objection	Support
HU12 Dorling Way	-	-	-
HU13 Brampton Park	-	-	-
HU14 Brampton Park (off-site)	-	-	-
HU15 Farm Lane Change	-	-	-

Main issues

- 6.13** The proposed site allocations were all supported with just a few minor amendments sought.
- 6.14** Two omission sites were put forward: 1) land off and to the North of 66-100 Thrapston Road and 2) land to the east of no.66 Thrapston Road.

Summary of issues raised

Table 69

Issue raised
<p>HU12 Dorling Way - Historic England welcome the policy wording for archaeological assets.</p>
<p>HU13 Brampton Park - The policy objective to seek a viable use for the grade II listed Brampton Park House (officer's mess) is welcomed (although not on HAR register), however, there is concern regarding the word viability in paragraph 9.108 and how this interacts with the NPPF requirements regarding the balance of harm</p>

Section D: Allocations 6

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Issue raised
against public benefit embodied in paragraph 133. The draft policy requirements should be more explicit in terms of protecting heritage assets within and adjacent to the site (the current wording only refers to landscape design and views of Brampton Park House).
HU14 Brampton Park Golf Club Practice Ground - Historic England welcome the changes to the policy and supporting text in relation to archaeology.
HU15 - Park View Garage - The allocation of this site for employment use is supported. We also acknowledge and note the amendments to the wording which recognises the site's prominent location as a gateway to Brampton.
Omission site North of 66-100 Thrapston Road - an application for 63 dwellings was dismissed at Appeal in December 2017 for land off and to the North of 66-100 Thrapston Road, Brampton (APP/H0520/W/17/3172571) as the site was considered to have a harmful impact on the local landscape and townscape. The Inspector's findings are challenged (and we have lodged a judicial review of the decision) on this point and note the Council did not consider this site to comprise part of a valued landscape in its determination of the original planning application. We therefore consider the site is still suitable for 63 dwellings and lies within a sustainable location which would not harm the landscape or setting of Brampton. The site is also suitable for affordable housing.. The applicant considers that Land off and to the North of 66-100 Thrapston Road is suitable, available and achievable for the provision of new residential development within the next 5 years and therefore the site should be included as a residential allocation within the Proposed Submission Local Plan.
Omission site East of no.66 Thrapston Road - the smaller frontage site, to the east of no.66 Thrapston Road, should be considered for allocation within the Proposed Submission Local Plan. The site is 0.49ha and capable of accommodating 14 dwellings along the frontage of Thrapston Road. This would address the perceived impact on the valued landscape raised in the Inspector's Appeal Decision. A frontage scheme would continue the established pattern of houses and would complement the village form and settlement pattern. Additionally any impact on the character of the village edge or the landscape would be limited due to the reduced extension of development into the countryside. Previous concerns over flood risk have subsequently been removed owing to the more up-to-date Environment Agency flood risk maps.

Godmanchester

Number of Representations		
Total	Objection	Support
17	14	3

Individual site representations breakdown	Total	Objection	Support
HU16 Tyrell's Marina	3	1	2
HU17 RGE Engineering	3	3	0
HU18 Wigmore Farm Buildings	3	2	1
HU19 Bearscroft Farm	3	3	0

6 Section D: Allocations

Main issues

- 6.15** All proposed allocations were supported in principle although one objection was raised to HU19 Bearscroft Farm despite the site already being under construction. Additional flexibility was sought within the allocations and deletion was sought of the requirement for inclusion of employment land within HU19 Bearscroft Farm.
- 6.16** Three omission sites were put forward: 1) South of Stokes Drive and Bluegate, 2) Dexter's Farm and 3) East and south east of Romans' Edge.

Summary of issues raised

Table 70

Issue raised
HDC must allocate additional land in Godmanchester for a cemetery, either as an extension to the existing site, or in another suitable location, particularly as they have granted planning permission for 753 houses at Bearscroft and included other Godmanchester sites in the plan. HDC should purchase the land using CIL receipts as this is essential infrastructure directly required because of the developments it is allowing in Godmanchester.
HU16 Tyrell's Marina - Historic England welcome the changes to the policy to introduce reference to settings and the Conservation Area. We request a justification in the supporting text for the archaeological requirements.
Supports mixed use redevelopment of this previously developed land, assuming appropriate mitigation can be taken against flood risk and adequate parking is provided on site. As it is a prominent site forming a gateway to Godmanchester and Huntingdon, high quality design will be particularly important.
This allocation is supported. The site has been purchased by Aragon Homes and a planning application for a mixed use development has been submitted that will deliver an enhancement to the area.
HU17 RGE Engineering - Notes loss of employment land and parking on the site. Objects to the 90 houses now proposed an increase of 20, recommend fewer are built to leave more parking available. Parking remains a significant problem in Godmanchester and will be worsened by the additional houses and jobs proposed for the town. New developments in Bridge Place were given planning permission dependant on using this car park, and the potential shops and cafe proposed at Tyrell's Marina could require this. It is also possible that the Medieval Bridge across the Ouse will be closed to private vehicles after the A14 viaduct is removed, so adequate parking will be needed on the Godmanchester side of the bridge to allow people to be able to access Huntingdon by foot/bus. Godmanchester is already blighted by commuter parking elsewhere and keeping cheap parking here and linking it to a bus stop could alleviate pressure elsewhere. We welcome the proposal for a cycle/foot bridge across Cook's Stream to the dismantled railway to link in with the wider pedestrian / cycle network which urgently needs enhancing throughout Godmanchester.
Historic England welcome the changes proposed to the policy. Again the wording could be tightened.
Supports the principle of the site's allocation. Seeks more flexibility over the capacity of development and amendment to the recognition of heritage assets and their settings. Criterion e and the last two sentences of paragraph 9.134 should be deleted.
HU18 Wigmore Farm Buildings - Generally supportive of the development of this site for a few houses. We note that a planning application for 13 houses has been approved. However, we remain concerned that the access to the site along Silver Street is not adequate
This site could impact on flood risk to Stoneyhill Brook and Godmanchester. In order to address this, development on this site should be required to reduce discharge rates.

Issue raised
<p>HU19 Bearscroft Farm - Maintain that this site is not suitable for such a large mixed development and other sites in the district are more sustainable. Have significant concerns about the A1198 running through this site, splitting Godmanchester in two and dividing the new community from the existing town.</p>
<p>The draft allocation currently states that 4.4 hectares of employment land is suitable for uses falling with Use Classes B1 and B2. The outline application 1200685OUT limited the use of the commercial land to uses falling within Use Class B1 only. This restriction was agreed following detailed noise modelling which illustrated that the land to the west of the A1198, because of its relationship with existing housing beyond, and land to the east of the A1198, because its access passes through the residential estate, were not suitable for B2 uses given the potential for noise and disturbance by operations and by HGV vehicle movements. It is not clear why the draft allocation is seeking to support the principle of B2 uses on the employment land parcels. It is suspected that this is a text error only given the extensive work already undertaken in respect of the harmful noise implications of uses other than B1. For completeness and accuracy The Fairfield Partnership's first observation is that if the draft policy wording is to continue to refer to employment uses the policy should omit reference to B2 use for the employment land parcels as such a use is not deliverable. The 4.4ha of employment land granted outline consent in 2014 has been the subject of a comprehensive marketing exercise by a national agent since February 2015. As the Council is also already aware, the marketing of the employment land has been unsuccessful. The lack of interest generally within the market is cited but the little verbal interest that has surfaced has highlighted significant concerns with regards to the physical constraints of the land. There is no reasonable prospect of the employment land delivering 'B class' uses so reference to the employment should be deleted.</p>
<p>The policy should be amended to refer to archaeological potential as articulated in the reasoned justification of the supporting text. Please include the standard archaeological wording in this policy.</p>
<p>Omission site South of Stokes Drive and Bluegate - this land is within the Huntingdon Spatial Planning Area and represents a sustainable extension to the existing framework of Godmanchester. We object to the omission of the Site from section D of the proposed Submission Local Plan and the Huntingdon SPA proposals map. The site is located directly adjacent to residential development comprising predominantly 2-storey detached and semi-detached properties with development up to 3 storeys being developed to the opposite side of London Road on the Bearscroft Farm scheme which is under construction.</p>
<p>Omission site Dexter's Farm - The plan conflicts with the sequential test to direct development to areas with the lowest risk of flooding. The Sustainability Appraisal (SA) does not justify why sites with a greater risk of flooding are to be allocated when there are reasonably available sites in Flood Zone 1. There is no justification as to the weight afforded to 'non-flooding' factors and why these outweigh the sequential test. The Council's sequential test does not consider all sources of flooding, Bellway Homes' site at Dexter's Farm (HELAA reference 188) has been consistently promoted as a deliverable and developable opportunity to do so. It is wholly within Flood Zone 1 (sequentially preferable and is within Huntingdon Spatial Planning Area and adjacent to draft allocation HU 19 Bearscroft Farm). Delivery rates are over-optimistic on the strategic expansion locations. The 12.9ha site can deliver up to 370 homes plus a range of benefits. The site could have a key role to play in delivering the homes needed lying within a sustainable and sequentially preferable location.</p>
<p>Omission site East and south east of Romans' Edge - detailed representation submitted under LP2. Land to the east and south east of Romans' Edge should be identified as a strategic location for growth within the Huntingdon Spatial Planning Area. The Local Plan should be revised to include a draft allocation at land east of Romans' Edge.</p>

6 Section D: Allocations

Chapter 10: St Neots Spatial Planning Area

Number of Representations		
Total	Objection	Support
36	19	17

Main issues raised on Chapter 10

Table 71

Issue raised	Response to issue
The principle of SEL2 St Neots East was supported with details confirming availability and deliverability submitted by the site's promoters.	Support noted and welcomed
The principle of insufficient sites being allocated within St Neots was raised as part of a concern that the plan should look to allocate higher housing numbers overall.	The Council's Objectively Assessed need is 20,100 homes, 3,800 of which are in St. Neots (allocation SEL2) but as set out at paragraph 4.10 , in total housing completions since 2011, commitments as at 1st April 2017 and allocations in the plan account for approximately 22,500 new homes, equivalent to 112% of the identified need.
No objections were received to the principle of any of the proposed allocations in St Neots or Little Paxton.	The Council welcomes that there are no objections.
Two omission sites were put forward relating to SEL2 St Neots Eastern Expansion: 1) land between the railway line, St Neots bypass and Potton Road and 2) Gifford's Park, St Ives as an additional strategic expansion location to boost delivery based on the objector's assumption that insufficient housing delivery will be achieved across the St Neots East and Alconbury Weald strategic expansion locations.	<p>The strategy follows the requirement of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need.</p> <p>Both sites have transport challenges that undermine the achievability and deliverability of both sites.</p> <p>Site 1 - the bridge over the ECML is too narrow for pedestrians, thus undermining the sustainability of the proposal.</p> <p>Site 2: This site is a greenfield site in the open countryside. This site was tested the Strategic Transport Study where it was demonstrated that the road infrastructure requirements to serve the development of Giffords Farm, and the funding requirements for such infrastructure is not deliverable at this time. This is the same challenge faced by Wyton Airfield, a brownfield site also located in close proximity to the market town of St. Ives. Having regard to the NPPF, and in the event funding for such infrastructure was to be found, brownfield land should be prioritised for any new development in this area.</p>

Issue raised	Response to issue
Three omission sites were put forward in St Neots: 1) East of Potton Road and south of the A428, 2) South east of the current A428 and 3) East of Brook Road, Eaton Socon.	The strategy follows the requirement of the NPPF and legislation. Both sites lie in greenfield sites, clearly detached from the built up area of St. Neots and are regarded to be unsustainable.

Strategic Expansion Location: St Neots East

Number of Representations		
Total	Objection	Support
20	5	15

Main issues

- 6.17** The principle of SEL2 St Neots East was supported with details confirming availability and deliverability submitted by the site's promoters.
- 6.18** Issues were raised related to matters of detail and implementation including several discrepancies between the proposed allocation and the St Neots Eastern Expansion urban Design Framework 2010.
- 6.19** Two omission sites were put forward: 1) land between the railway line, St Neots bypass and Potton Road and 2) Gifford's Park, St Ives as an additional strategic expansion location to boost delivery based on the objector's assumption that insufficient housing delivery will be achieved across the St Neots East and Alconbury Weald strategic expansion locations.

Summary of issues raised

Table 72

Issue raised
There are 9 identified key development components of the SEL as part of Policy SEL2. Agree with these, following confirmation that the neighbourhood centre will be located at Wintringham Park not on Loves Farm East. Also agree that the criteria listed for successful development of the site (a-v) are appropriate and acceptable. The land at Loves Farm East and adjacent sites have the potential to make an important contribution to meeting the strategic housing and employment needs of Huntingdonshire District. The strategic site represents a highly sustainable and deliverable opportunity for quality development to meet the future growth needs of the District. Therefore confirm support for the progression of the St Neots Strategic Expansion Land in accordance with the draft Policy SEL2.
Development of this site would affect the setting of a number of Grade II listed structures which surround the site. There is also a scheduled monument (the deserted village at Wintringham) located to the east of the site. These should be referenced in both the policy and the supporting text of the Plan.
Proposed Policy SEL 2 refers to the delivery of approximately 22 ha. of employment development. However the St. Neots Eastern Expansion Urban Design Framework 2010 that is referred to in paragraph 10.32 of the text identifies the delivery of 25 ha. of employment development. The Council's Employment Land Study 2014 refers to the delivery of 25 ha. of employment development in the allocation. Assume the reference to 22 ha. in the policy is a typographical error?

6 Section D: Allocations

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Issue raised
<p>Supports the delivery of growth to the east of St Neots through mixed-use sustainable development. Policy SEL2 clearly sets out the infrastructure requirements associated with such a proposal, and supports the inclusion of the specific points in relation to the successful development of the site which are considered to be very comprehensive. Specifically; satisfactory resolution of the impact of additional traffic on the A428, A1 and the local highway network having regard to a transport assessment and travel plan and comprehensive master planning to be undertaken by the site developer with public engagement with the cooperation of the Council. Central Beds Council would like to be involved in future discussions and work collaboratively with Huntingdonshire DC as the proposals for the development of the site emerge given the proximity of the settlement to Central Bedfordshire and the potential impact this scale of growth may have on villages and settlements within the administrative area. Particularly in relation to the impact on the A428 and A1 corridor to ensure that wider cumulative impacts of growth proposals and existing planning permissions are fully considered.</p>
<p>The local and district centre terminology within SEL2 is not consistent with the UDF. Prescriptive policy requirements relating to the mix, scale and type of retail and commercial uses are not appropriate and should allow for flexibility in view of changing market demands. The assessment of transport impacts is not consistent with the scope of Transport Assessments which have been undertaken in support of the Wintringham Park planning application (17/02308/OUT) and which have been agreed with Cambridgeshire County Council. The submitted Transport Assessments fully address the transport impacts arising from the Wintringham Park development without need for further transport assessments to be undertaken at later stages and also demonstrate the scope of junction and route enhancements required to mitigate the identified impacts. The expectation for further transport assessment for each phase of the development, and for the specific off-site enhancements is not therefore justified.</p>
<p>Concerns regarding the deliverability of these SELs within the plan period. The Council need to ensure they are applying realistic lead in times and delivery assumptions, which provide sufficient comfort that these schemes will deliver as assumed.</p>
<p>The St Neots Eastern Expansion Urban Design Framework (2010) has informed the masterplan for the outline planning application for Loves Farm East - application reference 1300388OUT.</p>
<p>Highway's England has confirmed no objection, subject to conditions, to the outline planning application by Gallagher Estates for Loves Farm East (HDC ref 1300388OUT) (dated 17 November 2016).</p>
<p>The outline planning application by Gallagher Estates for Loves Farm East (HDC ref 1300388OUT) provides an appropriate level of information to demonstrate connectivity for all transport modes, including pedestrians.</p>
<p>The delivery of open space and green infrastructure is an integral part of the outline planning application (HDC ref 1300388OUT) by Gallagher Estates</p>
<p>The applicants for Loves Farm East (1300388OUT), Gallagher Estates are working with the applicants for the Wintringham Park site (17/02308/OUT), Urban&Civic and HDC to coordinate the delivery of infrastructure to support the mixed use sustainable development of the eastern expansion. The current outline planning application 1300388OUT is progressing to determination by HDC committee in Spring 2018.</p>
<p>The outline planning application by Gallagher Estates for Loves Farm East (HDC ref 1300388OUT) provides an appropriate level of information to demonstrate how the component parts of the development and mixed use elements can be delivered. The application is supported by a Planning, Design and Access Statement which shows how the masterplanning principles have been informed by the Urban Design Framework and demonstrates the consideration of this, the context and character of the area and a commitment to high quality design, place making and access for all.</p>

Section D: Allocations 6

Issue raised
The development of the Loves Farm East site, as proposed in the outline planning application by Gallagher Estates for Loves Farm East (HDC ref 1300388OUT) will continue the distribution of employment and community uses first established in Love's Farm and enable the development of a district centre on the south side of Cambridge Road.
The delivery of highways infrastructure related to the delivery of the SEL2 site is being co-ordinated between the respective applicants and will be secured as part of the planning proposals for the component sites.
Gallagher Estates are working with the applicants for the Wintringham Park site, Urban&Civic and HDC to coordinate the delivery of infrastructure, including community facilities and schools, to support the mixed use sustainable development of the SEL2 site. This will be secured in planning obligations as part of a S106 Agreement with HDC.
Omission site land between the railway line, St Neots bypass and Potton Road - land should be included as part of this allocation, due to it being located in a highly sustainable location by virtue of its proximity to a range of services. It is located immediately south of the St Neots East allocation and comprises a logical extension of the settlement of St Neots. The land is currently subject to a planning application for up to 79 dwellings. Cambridgeshire County Council has now confirmed that an acceptable proposal involving new signals and traffic calming is satisfactory and a safety audit is current being undertaken relating to the provision of safe pedestrian access linking the site across the East Coast Main Line railway to the adjacent residential area to the west of the site. The proposed A428 highway upgrade is strongly supported with a preference for the proposed orange route which would best suit the growth objectives of Huntingdonshire District Council in enabling St Neots to expand sustainably. Additionally, it is recommended that the existing A428 be retained as a local road serving communities along the route and to provide greater resilience in the event of incidents occurring on the proposed new upgraded A428.
Omission site Gifford's Park, St Ives - The housing delivery rates for St Neots East at Loves Farm East and Wintringham Park are unrealistic. Loves Farm East has not yet been determined with technical matters and planning obligations yet to be finalised. There is no evidence to justify a substantial increase in annual delivery rates above historic levels at Loves Farm. Likewise the Wintringham Park application is at early stages. Delivery times and quantities proposed are unrealistic and the housing trajectory should be amended to reflect a more robust and realistic assessment. St Neots East will not deliver policy compliant levels of affordable housing (based on the amount proposed with the Wintringham Park development), at least in the early phases, and it is unlikely that affordable housing levels will increase in later phases. Therefore, additional suitable and deliverable sites need to be identified, include a residential-led mixed use development at Gifford's Park, to meet the under supply of housing from St Neots East and the non-delivery of policy compliant levels of affordable housing.

St Neots

Number of Representations		
Total	Objection	Support
13	12	1

Table 73

Individual site representations breakdown	Total	Objections	Support
SN1 St Mary's Urban Village	1	1	0
SN2 Loves Farm Reserved Site	2	1	1
SN3 Cromwell Road North	3	3	0
SN4 Cromwell Road Car Park	0	0	0

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Individual site representations breakdown	Total	Objections	Support
SN5 Former Youth Centre, Priory Road	1	1	0
St Neots general issues	6	6	0

Main issues

- 6.20** No objections were received to the principle of any of the proposed allocations. Representations related to matters of detail.
- 6.21** The principle of insufficient sites being allocated within St Neots was raised as part of a concern that the plan should look to allocate higher housing numbers overall.
- 6.22** Three omission sites were put forward: 1) East of Potton Road and south of the A428, 2) South east of the current A428 and 3) East of Brook Road, Eaton Socon.

Summary of issues raised

Table 74

Issue raised
There are insufficient allocated sites within St Neots. Only 5 sites are allocated providing 194 dwellings, a number of which already benefit from planning permission, leaving just 100 dwellings unallocated. This approach is not justified and the plan should look to allocate a greater number of sites to achieve a housing target of 979 dwellings per annum.
SN1 St Mary's Urban Village - The reference to the Conservation Area, listed buildings and settings and views is supported. The wording needs to be tightened. No mention is made of other buildings within the allocation area that have historic and architectural interest and these should be mentioned in the policy. They should include those opposite the west front of the church and a terrace on the southern side of the allocation. Workshop buildings within the allocation area also appear to have merit.
SN2 Love's Farm Reserved Site - The requirement for development to address the Grade II listed milestone in both the policy and the supporting text is welcomed.
This site is adjacent to the Fox Brook, associated with flood risk in St Neots. Development on this site should be required to reduce discharge rates into the Fox Brook.
SN3 Cromwell Road North - The site is within St Neots' Conservation Area. Development of the proposed site would have the potential to impact upon the setting of the conservation area; as such this should be referred to in the supporting text.
Wintringham Brook appears to be culverted through this development site. In order to reduce flood risk, opportunities for de-culverting this, or any other watercourses within the site, should be explored. This should be a requirement in the Flood Risk Assessment. To reduce flood risk opportunities for deculverting Wintringham Brook should be explored. The course of the watercourse should be within public open space. Building over any sections of watercourse that needed to remain in the culvert should be restricted to essential infrastructure.
SN4 - Cromwell Road Car Park - no representations received.
SN5 Former Youth Centre, Priory Road - The requirement for development to address the site's location within St Neots Conservation Area is supported; however the wording of the policy should refer to the character or appearance of the conservation area and its setting. Reference in the supporting text of Paragraph 10.46 to the WWII Pill Box and improving the character of the site and the setting of the conservation area is welcomed.

Section D: Allocations 6

Issue raised
SN6 North of St James Road, Little Paxton - allocation of this land was supported and the landowner confirmed their intention to facilitate prompt development of the allocation should the Local Plan be found sound and adopted.
Omission site East of Potton Road and south of the A428 - land is submitted for longer term consideration for development in conjunction with upgrading of the A428.
Omission site South-east of the current A428 - land is submitted for longer term consideration for development in conjunction with upgrading of the A428.
Omission site East of Brook Road, Eaton Socon - is capable of delivering 120 units. The evidence base and site allocations need to be fundamentally reviewed and the site reconsidered as it is in a sustainable location; it can achieve suitable access, pedestrian and cycle linkages; it is close to community amenities; flood risk can be mitigated and it will provide a Riverside Park linking existing green infrastructure. There is extensive planning history. The site is not designated open space, being privately owned pasture land and there are no ecological designations preventing development. Furthermore, being within a Conservation Area should not preclude development.

Little Paxton

Number of Representations		
Total	Objection	Support
2	2	0

6.23 North of St James Road is the only site in Little Paxton so both representations above relate to this.

Main issues

6.24 Issues related to matters of detail rather than the principle of this proposed allocation and sought minor additions.

Summary of issues raised

Table 75

Issue raised
SN6 North of St James Road - There are no designated heritage assets within the site but three to the south; their setting should be carefully considered
Bat surveys should be undertaken prior to this site being allocated to ensure that any adverse impacts can be adequately mitigated.

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Chapter 11: St Ives Spatial Planning Area

Number of Representations		
Total	Objection	Support
40	36	4

Main issues raised on Chapter 11

Table 76

Issue raised	Response to issue
The proposed development of SI1 St Ives West generated issues regarding its level of remaining capacity for housing and the quantity, location and nature of open space provision.	This site is a complex site in a sensitive location on the outskirts of St. Ives and requires a sensitive approach to development given Houghton Grange is a Grade 2 listed building, there are a number of trees subject of a tree preservation order and immediately south of the Grange is a county wildlife site designated for its grassland value. The eastern most part of the site is a former golf course which has planning permission for 180 dwellings that is currently being built out. In order to ensure that this site responds to local constraints it is considered that approximately 400 dwellings is a reasonable quantum that can be achieved on site.
Substantial issues were raised over SI2 St Ives Football Club focused on traffic and road safety implications, surface water flood risk and whether the land should be retained for extending St Ivo School.	The Housing and Employment land Availability Assessment 2017 identifies that there are no significant constraints on this site. Having regard to the NPPF this is considered to be a sustainable location for development and the Strategic Transport Study did not highlight any transport challenges associated with this site. Site specific traffic and safety implications are for consideration as part of the planning application.
Issues raised on SI4 Former Car Showroom, London Road related primarily to details particularly regarding flood risk; a higher development capacity was sought.	This is a derelict site on the approach to the town centre of St. Ives where the majority of the site falls within floodzones 2 and 3a but the site protected by modern flood defences and for that reason presents a regeneration opportunity. The delivery of approximately 50 dwellings is reasonable given the character and appearance of the area and the identified constraints of the site .
Eight omission sites were put forward for consideration: 1) Giffords Park (as an additional strategic expansion location), 2) Galley Hill, Fenstanton, 3) Vindis Car Showroom, 4) St Ives North, 5) Land off Old Ramsey Road, 6) East of Old Ramsey Road, 7) Meadow Lane and 8) North of Houghton Road.	The strategy follows the requirements of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need. Furthermore, the HELAA 2017 assesses these sites and addresses why they are not suitable and have not been allocated.

St Ives

Table 77

Individual site representations breakdown	Total	Objection	Support
SI1 St Ives West	10	8	2
SI2 St Ives Football Club	13	11	2
SI3 Giffords Farm	2	2	0
SI4 Former Car Showroom, London Road	6	6	0
St Ives general issues	9	9	0

Summary of issues raised

Table 78

Issue raised
<p>The St Ives spatial planning area is not consistent with the approach being made in relation to other spatial areas around the market towns. Hemingford Grey is omitted from the St Ives spatial area, which is confined to a relatively small area of the town and its immediate environs. Hemingford Grey has good accessibility to the town centre on foot and by cycle and development should be preferred to settlements elsewhere, which now have proposed allocations, although they are relatively remote.</p>
<p>The whole of the Local Plan should be based upon the principles of spatial Planning and Sustainability. If correctly worded, the policies contained within the Local Plan and applying to whole of the District, will work automatically to direct development towards the most suitable and sustainable areas of the District, and which in themselves will not always be the areas surrounding Market Towns as put forward in this Local Plan submission. Separate SPAs as defined potentially undermine the sustainable development approach which must apply to the whole of the District. It is dangerous to think of these isolated Spatial Planning Areas and lose sight of the fact that sustainability needs to be optimised throughout all of the geography. Within this Proposed Local Plan submission the Spatial Planning areas take precedent and yet there is no elected representation at this level from those living within the parish. This creates an unnecessary dislocation between the electorate and the planning system which needs to be addressed. Local Plan should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation. When applied to the St.Ives SPA and the overlap with the parish of Houghton & Wyton it becomes a duplication of Houghton & Wyton Neighbourhood Plan policy HWNP 1 Built Up Areas which supports a presumption in favour of development within the built up areas of the parish.</p>
<p>SI1 St Ives West - The constraints section does not acknowledge the potential for impacts on the Houghton Grange Meadow County Wildlife Site. A Plan should state that an ecological assessment and enhancement scheme would be needed for the development.</p>
<p>This site is immediately next to the Great Ouse floodplain, and there are opportunities to reduce flood risk to St Ives through development on this site being required to reduce discharge rates.</p>
<p>Most of the allocation has planning permission or under construction, we request that the wording of the policy and housing trajectory are updated to reflect the current situation. It is misleading to identify St Ives West as an allocation, when it should be correctly identified as a commitment. We request that more development should be directed to St Ives, including a residential-led mixed use development at Gifford's Park.</p>
<p>Support the fact that the policy does not set an upper limit to development, however, the policy should provide a realistic indication of growth in this location over the plan period to help inform local stakeholders, statutory undertakers and decision makers. Failure to recognise the true potential of the site in the Local Plan could cause delays in the later design, consultation and application stages. Of the 5 sites in the allocation, the Field site is the only land left available on which the remaining 119 houses allocated to this area could be built. The</p>

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Issue raised
<p>HELAA and the Local Plan Viability Study (June 2017 and December 2017) assume a 50% net to gross site ratio and 35 dwellings per hectare for Sustainable Urban Extensions of this nature. Applying these assumptions to Homes England's landholding would result in over 500 units. This level of growth would be unrealistic in light of the constraints. The two HWNP examiners both recommended the inclusion of an anti-coalescence policy to ensure St Ives and Houghton do not coalesce. The second HWNP examiner note that in order to plan for the strategic needs of the District: 'some difficult judgements will need to be made in that emerging plan as to where to provide for the number of houses required'. Homes England requests that the Local Plan (including the illustrative diagram) provides more certainty on where to expect future development on the Field site. The illustrative diagram should remain flexible and not place an embargo on development for this part of the Field site. Homes England considers that there is nothing substantive in the SA assessment (or the HELAA) that precludes the Field site from accommodating 220+ units whilst remaining fully policy compliant. The principle constraint is centered on landscape impacts and coalescence. A sensitive landscape-led masterplan offers great scope to 'feather in' development and reduce visual impacts. Homes England's appointed consultants (AECOM) have undertaken a preliminary Landscape and Visual Appraisal which confirms that the Field site has the potential to deliver approximately 220+ units without coalescing with The Spires development to the east, through well-planned development and sensitive design. Homes England request that SI 1 (2) is modified to read: '2. approximately 400 to 500 units', Additionally, all reference to the out of date urban design work should be removed from paragraph 11.4. Ideally, at this stage the Infrastructure Delivery Plan schedule should provide as much detail as possible on desired new green infrastructure linkages for the allocation. The identification of 23ha of green space in combination with the illustrative diagram and supporting text, places an artificial restriction on the future development of the Field Site. The open space on the eastern side of the Field should be reduced by 6ha and the new residential areas on the western side of the Field should be increased to provide a more accurate developable area.</p>
<p>11.4 of the plan refers to detailed Urban Design work but this is not included the Proposed Submission version of the plan. 11.2 refers to the eastern most part of a new 'country park', there must be a western part as well? This would envelope the ancient St.Ives Thicket woodland. The St.Ives Thicket wood has been left out of the list included in HLP35 Heritage Strategy 8.36 ancient woodlands, which is an omission given its history and importance to the area as well as its rarity from comprising areas of woodland carr as it meets the river. Concerned that if the country park were to be overly manicured or urban in nature it could change the character of the whole area. Without more details it is not possible to say whether the social and community facilities are justified for the wider area.</p>
<p>Historic England welcome the reference to setting in the policy. However, the wording could be tightened.</p>
<p>Given the time that has lapsed since the site was first identified in the adopted Core Strategy and planning applications being submitted for both parts of the site, there is concern the site is currently undeliverable and therefore should not form a proposed allocation in the plan.</p>
<p>The provision of a gap between St Ives and Houghton has been part of previous HDC plans and needs to be retained</p>
<p>This site is immediately next to the Great Ouse floodplain, and there are opportunities to reduce flood risk to St Ives through development on this site being required to reduce discharge rates.</p>
<p>Concern that provision is made in paragraph 11.11 for a limited amount of retailing and is not consistent with the response to comments in the Statement of Consultation which said: the requirement for shop deleted.</p>
<p>SI2 St Ives Football Club - There is already a problem with sewage and rainwater not being dealt with properly. The road into this area (Westwood Road) is already overloaded with traffic congestion. It would be better if the District Council took over this area either as another sports area or for St Ivo school.</p>

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Issue raised
<p>This land is used on a weekly basis as an overflow car park for up to 40 vehicles from the Recreation centre. The centre is so popular that the car park at peak times is totally full. The leading road to the centre is full of cars parked on the grass and the pavement. If this grass goes then where will all these cars park? It will cause more danger. There are huge drainage issues in this area and a recent flood in nearby streets. Any further surface water run off will cause huge issues. Any drainage measures such as drainage ditches etc would need to be huge to capture and hold the water that will run downhill. The soil is clay with water run off. 30 dwellings is too many, 15 is more appropriate with landscaping and drainage ditches. The road onto the S bend is an absolute disaster waiting to happen.</p>
<p>The proposed housing density of 50 for this site is far higher than the surrounding housing. Traffic concerns with extra traffic along heavily used Westwood Road. Reducing this capacity of parking for leisure further, by building on the grass overflow car park, will exacerbate an already congested location. There are late night noise issues from One Leisure and Burgess Hall and anti social drivers, this will be a problem for new residents with noise complaints. The football pitch is poorly drained due to clay soils, with local flooding after heavy rain. The drains and sewers cannot cope. Removal of the eastern boundary Leylandii trees will be devastating for wildlife, birds and bats. There is a recreational covenant on the land preventing being developed for anything other than recreational use. If the covenant is to be lifted it should be with public consultation and agreement. The site should remain a sports field or the school or sheltered housing for the elderly.</p>
<p>There has been a lack of consideration of alternative options for the site (eg. much needed expansion of St Ivo School). Public awareness has been limited due to poor communication; there has been a lack of proper consideration given to the inclusion of this site and its suitability for development; residents' knowledge and concerns have been ignored.</p>
<p>This site is adjacent to St Ivo School and it represents a clear opportunity to provide land to enable the school, which is the only secondary school in the town, to expand during the plan period. County Council officers have acknowledged that the option to expand St Ivo School onto the St Ives Football Club site has merit. The availability of the football club land depends on the club being able to relocate, which can be facilitated at Gifford's Park.</p>
<p>We note the requirement to provide an additional 137 spaces for secondary education. HDC should confirm that this site is not required to provide such school accommodation.</p>
<p>Nearby properties already experiencing flooding issues due to the extra load on the sewers due to the golf club development, the football pitch is also currently flooding,</p>
<p>St Ives Town Football Club supports this allocation, it is a fundamental part in the proposed relocation of the football ground to a new site on the edge of the town. The funds generated from the sale of the land will be used to cover the relocation costs. Without these funds a new ground will not be possible.</p>
<p>The St Ives Conservation Area is situated to the south of the proposed site allocation. The policy should require development of the site to have regard to the setting of this heritage asset.</p>
<p>Westwood Road does not get a mention on the plan yet it is the route that would be used by all traffic to and from the new development. It is already jam-packed twice a day with traffic (cars, cyclists, and pedestrians) to and from St Ivo School, and is often dangerously busy at other times as it leads directly to the leisure centre. It is used more and more as a public car park and can be difficult to cross and dangerous for residents to drive onto. Any more traffic is just inviting accidents to happen.</p>

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Issue raised
<p>The policy does not capture the requirement to also safeguard the adjoining sports centre, Burgess Hall and School from the impact of any proposed development. I have the residents' car parking in mind as it will impact on the facilities' existing visitor car parking. It is clear that residents of the proposed development would occupy the parking places intended for the sports centre, Burgess Hall and School.</p>
<p>SI3 Giffords Farm - Stocks Bridge Way should be extended northwards to eventually form a junction with Somersham Road at Nuffield Road. This is to create an alternative route for traffic to/from the bypass and Somersham Road, thus avoiding the very congested section of the A1123 just to the west. In the event that Giffords Park is taken further the new route should be extended to join Somersham Road at the Marley Road roundabout. It is important this should be a through route and not designed as a low speed local road. However, this or any other proposal should not be approved until the Critically required infrastructure works to the A1123 and A1096 identified in Table 6 of the St Ives SPA Infrastructure Requirements 206 - 2036 have been completed.</p>
<p>SI4 Former Car showroom, London Road - The northern site boundary is incorrect as it includes the garage to Tamour Cottage; this should be removed from the site allocation. The correct boundary was submitted with planning application 16/01529/FUL for Demolition of vacant existing buildings. Corrected plans supplied.</p>
<p>If developed at a density range appropriate to the site's setting and context, having also had regard to its sustainability credentials and previously-development nature, would result in this 1.4 hectare site being appropriate for the provision of not less than 60 dwellings. Failure to do so would not make best use of this sustainably-located brownfield site and consequently, would not be neither effective nor consistent with national policy. An illustrative masterplan is enclosed, which demonstrates one way in which the site could be appropriately developed for 63 dwellings.</p>
<p>Recommend that the wording is clarified to ensure that responsibilities are clear regarding what the applicants have to achieve to demonstrate that the development is safe and that it will not increase risk to others. It is the responsibility of the LPA to comment on whether the FRA has demonstrated that future occupiers will be safe</p>
<p>The applicant continues to liaise with the Environment Agency on a detailed and ongoing basis. The Agency has confirmed that, as a defended site, there is no need for onsite flood storage mitigation provision. Over-topping/breach analysis work is well-progressed which will inform the finished floor levels and safe means of pedestrian egress proposals (including a pedestrian route to Harrison Way) within a site-specific Flood Risk Assessment. Consequently, the reference to 'no net loss of floodplain storage' is unnecessary and unjustified. This element of the draft supporting text should be deleted to meet the soundness test.</p>
<p>The word 'significant' should be removed from paragraph 11.27 as there is extensive publicly accessibly open space in the vicinity of the site and no quantitative open space shortfall that warrants significant open space. Having due regard to flood risk, heritage and easement considerations, the site's masterplanning should be able to respond to these constraints in a flexible manner in order to maximise the enhancement of the character and appearance of the Conservation Area. The location and quantum of any onsite open space is most properly informed by these technical and evidence-based considerations, given the lack of evidence that there is a defined 'need' for any local open space deficiency to be addressed. Equally, the nature/extent/location of onsite landscaping should be a matter for detailed assessment and consideration as part of the design process.</p>
<p>Omission site Giffords Park - There are no constraints to development at the Giffords Farm site which should be integrated into a larger scheme allocated for a residential-led mixed use development for approximately 1,750 dwellings including land for employment. A revised Illustrative masterplan has been prepared for the proposed development at Gifford's Park.</p>
<p>Omission site Land at Galley Hill Fenstanton - The plan does not make sufficient provision to achieve the economic growth strategy and specifically the delivery of sustainable economic growth that will serve the St Ives Spatial Planning Area. 78% of the employment allocation is at Alconbury Weald. this concentration is out</p>

Issue raised
<p>of kilter with with statement LP2, with housing, employment and retail growth around four spatial planning areas. Additional employment land needs to be identified for St Ives SPA. The land at Galley Hill offers a well related sustainable location to achieve this.</p>
<p>Omission site Vindis Car Showroom - The site could accommodate in excess of 70 dwellings; it was in a previous draft as SI5 and should be re-introduced.</p>
<p>Omission site St Ives North - The site could come forward in a phased manner. Most of the site is flood zone 1, less vulnerable uses could be located or amenity land on high flood risk areas. This could be developed via a masterplan. There are unlikely to be any significant technical constraints which would prevent the allocation of the site. It is anticipated that the development could accommodate a new primary school, business uses and a small 'neighbourhood' retail offering. approximately 1,500 dwellings on 50ha of land could be developed.</p>
<p>Omission site Land off Old Ramsey Road - There are 11 sites with flood risk issues assessed within the HELAA in St Ives. We consider that these sites are sequentially less preferable to Land off Old Ramsey Road and the Council has failed the sequential test set out in the NPPF by not adequately assessing this site within Flood Zone 1 before actively promoting other sites. The allocation of some sites within Flood Zone 2 may be necessary in order to meet the Council's Objectively Assessed Need but they should be shown to meet the Sequential and Exception Tests set out in the NPPF. We object to these sites being allocated before all possible sites within Flood Zone 1 have been assessed and allocated where they are identified as being sustainable. A Sustainability Matrix based on the Council's HELAA criteria was prepared and submitted with application 17/00931/OUT and the previously withdrawn application 16/01884/OUT. Of the 23 criteria tested, there were 12 positive returns, 10 neutral and only 1 negative (relating to the site not being previously developed land). We therefore object to the fact that a number of sites have been allocated as a result of the 2017 HELAA which have a similar or higher number of negative impacts when assessed against the sustainability criteria. Land off Old Ramsey Road is suitable, available and achievable for the provision of new residential development within the next 5 years.</p>
<p>Omission site Land East of Old Ramsey Road - Given the status of St Ives as one of the four most sustainable centres, the proposed level of growth for the next 20 years is disproportionate relative to the three other towns. Alternative/additional land will be required to ensure the delivery of at least the 2017 OAN levels plus a minimum 10% buffer. Land to the East of Old Ramsey Road represents a sustainable extension to the existing framework of St Ives that would help to improve the distribution of housing across the district and provide greater support for the town to 2036. A corrected HELAA assessment of the site demonstrates that there are no technical constraints to delivery and that the site is sustainably located to the northern edge of the town. The evidence submitted at the Call for Sites stage justifies an allocation for around 250 homes.</p>
<p>Omission site Meadow Lane - The site is in a sustainable location and in close proximity to the Guided Busway. It can be developed for residential use without increasing flood risk at the site or elsewhere. The site is low quality scrub land at present and development would provide significant opportunities for enhancement for biodiversity including planting, accessibility to the public, and ensuring its long term maintenance. Giffords Farm and former Car Showroom, London Road are both proposed for development. In the accompanying text to the policies, it states that both the sites appear to be at risk of flooding and that detailed flood risk assessments with detailed mitigation measures will be needed to support a planning application. Floodline question why the Council are allocating sites within flood zones 2 and 3a where significant work on flood modelling and protection is required.</p>
<p>Omission site North of Houghton Road - St Ives is one of the most sustainable locations in the district, but has largely been overlooked in terms of new strategic residential allocations. The Council is seriously underestimating the true extent of it housing requirements over the plan period. There is strong evidence and</p>

6 Section D: Allocations

Issue raised
justification for St Ives to take a more significant role in the spatial strategy and for the site north of Houghton Road to be allocated for residential development to help lead this process, providing a new western gateway into St Ives.

Chapter 12: Ramsey Spatial Planning Area

Number of Representations		
Total	Objection	Support
32	29	3

Main issues raised on Chapter 12

Table 79

Issue raised	Response to issue
The ability of the local road network to accommodate additional traffic arising from new development was a significant cause for concern.	The HSTS considered the Ramsey allocations as part of the evidence base for the Local Plan. Ramsey gateway and Field Road have planning permission where site specific traffic implications were considered. Site specific implications will also be considered for all future planning applications on allocated sites.
Most proposed allocations were supported in principle with representations addressing matters of detail.	Support in Principle welcomed.
Four omission sites were put forward: 1) Stocking Fen Road, 2) South of Tunkers Lane and Buryfields, 3) Meadow Lane and 4) Upwood Road.	The strategy follows the requirements of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need.

Ramsey

Table 80

Individual site representations breakdown	Total	Objection	Support
RA1 Ramsey Gateway (High Lode)	5	5	0
RA2 Ramsey Gateway	2	2	0
RA3 West Station yard and Northern Mill	3	3	0
RA4 Field Road	3	3	0
RA5 Whytefield Road	2	2	0
RA6 94 Great Whyte	3	3	0
RA7 East of Valiant Square	4	2	2
RA8 Former RAF Upwood and Upwood Hill House	6	5	1
Ramsey general issues	4	4	0

Summary of issues raised

Table 81

Issue raised
<p>RA1 Ramsey Gateway (High Lode) - The requirement for development to address the site's location within Ramsey Conservation Area is supported. However the wording should be amended to require development to preserve or enhance the character or appearance of the Ramsey Conservation Area.</p>
<p>Includes a line requiring agreement with the Middle Level Commissioners that they will not object on the basis of flood risk in the Middle Level system. This is not necessary or accurate: the LLFA is the statutory consultee for surface water flood risk; the Middle Level Commissioners are not a statutory consultee, although it is best practice to involve them in development proposals within their area. Wording should be deleted or amended to 'agreement with the Middle Level Commissioners and the Lead Local Flood Authority that the development will adequately manage flood risk on site and elsewhere and, where appropriate, will provide flood risk betterment'.</p>
<p>Concerns over traffic levels on approach roads into Ramsey and congestion on Great Whyte. Comprehensive traffic and roads scheme needed which is not addressed in any of the development proposals in Ramsey.</p>
<p>There is a typo; the year lawful development could be implemented should read 2017 not 2107.</p>
<p>RA2 Ramsey Gateway - The policy is supported. However the wording should be amended to require development to preserve or where opportunities arise enhance the character or appearance of the Ramsey Conservation Area.</p>
<p>No objection to the homes but a comprehensive transport solution should be provided including a new route from the Tesco's roundabout to take traffic round the western side of the town away from residential streets. This could be used to access developments on Field Road, Biggin Lane and RAF Upwood.</p>
<p>Includes a line requiring agreement with the Middle Level Commissioners that they will not object on the basis of flood risk in the Middle Level system. This is not necessary or accurate: the LLFA is the statutory consultee for surface water flood risk; the Middle Level Commissioners are not a statutory consultee, although it is best practice to involve them in development proposals within their area. Wording should be deleted or amended to 'agreement with the Middle Level Commissioners and the Lead Local Flood Authority that the development will adequately manage flood risk on site and elsewhere and, where appropriate, will provide flood risk betterment'.</p>
<p>RA3 West Station Yard and Northern Mill - The policy is supported. However the wording should be amended to require development to preserve or where opportunities arise enhance the character or appearance of the Ramsey Conservation Area.</p>
<p>The site owner observes that conversion of the Northern Mill is unlikely to be economically viable without grant support. Access from St Mary's Road is privately owned and development would need to use Field Road instead. Greater flexibility is required.</p>
<p>Includes a line requiring agreement with the Middle Level Commissioners that they will not object on the basis of flood risk in the Middle Level system. This is not necessary or accurate: the LLFA is the statutory consultee for surface water flood risk; the Middle Level Commissioners are not a statutory consultee, although it is best practice to involve them in development proposals within their area. Wording should be deleted or amended to 'agreement with the Middle Level Commissioners and the Lead Local Flood Authority that the development will adequately manage flood risk on site and elsewhere and, where appropriate, will provide flood risk betterment'.</p>

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Issue raised
<p>RA4 Field Road - There is no plan to accommodate the extra traffic and there will be unacceptable traffic levels on Field Road and Blenheim Road. A comprehensive transport solution should be provided including a new route from the Tesco's roundabout to take traffic round the western side of the town away from residential streets. This could be used access developments on Field Road, Biggin Lane and RAF Upwood.</p>
<p>This site has a surface water flood route along the south-eastern edge. In order to reduce flood risk into Ramsey, the development should be required to reduce discharge rates.</p>
<p>Includes a line requiring agreement with the Middle Level Commissioners that they will not object on the basis of flood risk in the Middle Level system. This is not necessary or accurate: the LLFA is the statutory consultee for surface water flood risk; the Middle Level Commissioners are not a statutory consultee, although it is best practice to involve them in development proposals within their area. Wording should be deleted or amended to 'agreement with the Middle Level Commissioners and the Lead Local Flood Authority that the development will adequately manage flood risk on site and elsewhere and, where appropriate, will provide flood risk betterment'.</p>
<p>RA5 Whytefield Road - The policy is supported. However the wording should be amended to require development to preserve or where opportunities arise enhance the character or appearance of the Ramsey Conservation Area. The garage building at the front of the site appears to have some architectural interest, and we recommended further investigation as to whether it merits retention.</p>
<p>Includes a line requiring agreement with the Middle Level Commissioners that they will not object on the basis of flood risk in the Middle Level system. This is not necessary or accurate: the LLFA is the statutory consultee for surface water flood risk; the Middle Level Commissioners are not a statutory consultee, although it is best practice to involve them in development proposals within their area. Wording should be deleted or amended to 'agreement with the Middle Level Commissioners and the Lead Local Flood Authority that the development will adequately manage flood risk on site and elsewhere and, where appropriate, will provide flood risk betterment'.</p>
<p>RA6 94 Great Whyte - This has surface water flood risk identified across the site. This is not reflected in the site specific policies; a site specific flood risk assessment, covering all sources of flooding, should be required.</p>
<p>The policy is supported. However the wording should be amended to require development to preserve or where opportunities arise enhance the character or appearance of the Ramsey Conservation Area.</p>
<p>Includes a line requiring agreement with the Middle Level Commissioners that they will not object on the basis of flood risk in the Middle Level system. This is not necessary or accurate: the LLFA is the statutory consultee for surface water flood risk; the Middle Level Commissioners are not a statutory consultee, although it is best practice to involve them in development proposals within their area. Wording should be deleted or amended to 'agreement with the Middle Level Commissioners and the Lead Local Flood Authority that the development will adequately manage flood risk on site and elsewhere and, where appropriate, will provide flood risk betterment'.</p>
<p>RA7 East of Valiant Square - The allocation is supported and a pre-application enquiry followed by full application are planned to be submitted to the LPA. The identified planning issues will be addressed as part of a planning application. The site will be deliverable within the timetable of the local plan.</p>
<p>Includes a line requiring agreement with the Middle Level Commissioners that they will not object on the basis of flood risk in the Middle Level system. This is not necessary or accurate: the LLFA is the statutory consultee for surface water flood risk; the Middle Level Commissioners are not a statutory consultee, although it is best practice to involve them in development proposals within their area. Wording should be deleted or amended to 'agreement with the Middle Level Commissioners and the Lead Local Flood Authority that the development will adequately manage flood risk on site and elsewhere and, where appropriate, will provide flood risk betterment'.</p>
<p>Objects to construction traffic using Tunkers Lane as access can be made from Valiant Square.</p>

Issue raised
<p>Agree that the most suitable access to the site is directly off Tunkers Lane.</p>
<p>RA8 Former RAF Upwood and Upwood Hill House - RAF Upwood is not a heritage asset but there is concern about the heritage value of the site and potential loss of structures. The first sentence of the supporting text suggests that the majority of historic buildings on site could not be realistically refurbished which does undermine the compulsion to conserve these historic buildings. Guidance is provided about how to retain some historical integrity within the master planning process. This is considered a major urban expansion and there is concern about the impact of 450 new dwellings on the site and surrounding countryside and the nature of the gap between Ramsey and the village of Upwood, which is a conservation area.</p>
<p>The scale of development is a problem as it will force traffic through residential roads and the town centre to access Tesco's which will create an unsafe residential environment. A comprehensive transport solution is sought including a new route from the Tesco's roundabout to take traffic round the western side of the town away from residential streets. This could be used access developments on Field Road, Biggin Lane and RAF Upwood.</p>
<p>Supports the Policy RA8 Allocation in principle and confirms that the site is available and capable of viable development within 5 years.</p>
<p>Supports the allocation, however the northern boundary of the allocation is not supported being cited as arbitrary and irrational. Proposes that the northern boundary would be better set along the northern edge of the residual concrete runway, immediately to the north of the currently proposed allocation. This recognisable physical boundary could be readily reinforced in landscape and visual terms by a substantial belt of structural tree and shrub planting.</p>
<p>Includes a line requiring agreement with the Middle Level Commissioners that they will not object on the basis of flood risk in the Middle Level system. This is not necessary or accurate: the LLFA is the statutory consultee for surface water flood risk; the Middle Level Commissioners are not a statutory consultee, although it is best practice to involve them in development proposals within their area. Wording should be deleted or amended to 'agreement with the Middle Level Commissioners and the Lead Local Flood Authority that the development will adequately manage flood risk on site and elsewhere and, where appropriate, will provide flood risk betterment'.</p>
<p>Development should be directed to St Ives rather than Ramsey because it is more sustainable and Gifford's Park should be identified as a strategic allocation. Object to policy RA8 which allocates 450 dwellings as part of mixed use development. Planning permission already exists on part of the site for 160 dwellings and the housing trajectory needs to be altered to reflect this. This site has extensive planning history and a High Court Appeal (Ref APP/H5020/A/09/2112959) was dismissed citing transport sustainability as a key issue and there remains concern that the evidence base in the HELAA does not refer to this, nor does it show how transport issues will be overcome.</p>
<p>Omission site East of Stocking Fen Road - put forward to provide for up to 150 houses and industrial development considered to be sustainable, being adjacent as it is to the town centre, industry and recreation.</p>
<p>Omission site South of Tunkers Lane and Buryfields - this land should be allocated for residential development to boost the supply of housing, including affordable housing, and to provide important public open space to the east of the site and (subject to negotiation) an element of retail as benefit to the local community. The site is sustainable and has access to local facilities, like the adjoining allocated site. The impact on the landscape can be minimised using a landscape buffer and by reducing the scale of development at the edge of the site which would overall 'round off' the southern fringe of the settlement.</p>

6 Section D: Allocations

Issue raised
<p>Omission site Meadow Lane - Additional 2.2ha site put forward for residential development of approximately 40 houses at Meadow Lane, east of Bury in the Ramsey SPA. There is scope to provide a high quality and sensitively designed housing scheme on this site which could enhance this part of the conservation area and provide an improved edge to the settlement boundary in this location. It would also help to secure the long-term future of Ramsey Golf Club. The site should be allocated for low-medium density residential development.</p>
<p>Omission site Upwood Road - More development should be allocated to Ramsey including land off Upwood Road which would provide a sustainable location close to local facilities for up to 100 new dwellings, with associated infrastructure, landscaping and open space. The site and access point are described and is deemed deliverable within the plan time period. The Ramsey spatial planning area could accommodate more development than is currently proposed as it can be clearly demonstrated that there is deliverable land available. The council's OAN figures are inaccurate. The development strategy is flawed, relying on allocations around Huntingdon, Alconbury Weald and St Neots. The council does not use a recognised methodology to determine the levels of development appropriate for each centre.</p>

Chapter 13: Key Service Centres

Number of Representations		
Total	Objection	Support
143	113	30

Main issues raised on Chapter 13

Table 82

Issue raised	Response to issue
<p>BU1 East of Silver Street and South of A1 gave rise to concerns related to the potential impacts on the site of noise and air pollution due to its proximity to the A1 and realigned A14. Traffic impacts on the road network also generated significant concern.</p>	<p>This site is included in the HSTS which forms part of the evidence base for the Local Plan. Allocation BU1 specifically states that any application will need to be accompanied by a noise assessment and appropriate mitigation from the A1 and realigned A14. Site specific concerns will be considered in greater detail during the course of a planning application.</p>
<p>SM5 East of Robert Avenue generated substantial objections to the principle of its proposal for residential development. Main issues of concern were: impact on the adjoining nature reserve including disturbance and loss of habitat; lack of capacity on the local road network; increased risk to pedestrians and cyclists particularly on Robert Avenue; lack of headroom at Somersham waste water treatment works; increased surface water flood risk; and the lack of capacity within local services to accommodate the needs of additional residents.</p>	<p>This site is included in the HSTS which forms part of the evidence base for the Local Plan. Allocation SM5 specifically identifies that an ecological assessment will be required along with a transport assessment. Any application will also need to have agreement with the EA and Anglian Water that waste water flows from the proposal can be accommodated. Site specific concerns will be considered in greater detail during the course of a planning application.</p>

Section D: Allocations 6

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Issue raised	Response to issue
SM6 North of The Bank also gave rise to challenges relating to its potential impact on the nature reserve, surface water flooding, traffic impacts and capacity of services to support the additional development.	This site is included in the HSTS which forms part of the evidence base for the Local Plan. Allocation SM5 specifically sets out a number of requirements that would need to be addressed as part of any future application. Somersham is a Key Service Centre and the delivery of additional development would also ensure existing services are sustained. Site specific concerns will be considered in greater detail during the course of a planning application.
One omission site was put forward in Buckden: North of Mill Road.	The strategy follows the requirements of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need.
Two omission sites were put forward in Fenstanton: 1) East of Hilton Road and 2) North of West End Farm.	The strategy follows the requirements of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need.
Two omission sites were put forward in Sawtry: 1) North of Black Horse Industrial Estate and 2) West of Glatton Road.	The strategy follows the requirements of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need.
Two omission sites were put forward in Warboys: 1) Bencroft Lane and 2) Ramsey Road.	The strategy follows the requirements of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need.

Key Service Centres General Issues

Table 83

Total	Number of representations	
	Objection	Support
12	12	0

Main issues

- 6.25** One omission site was put forward in Buckden: North of Mill Road.
- 6.26** Two omission sites were put forward in Fenstanton: 1) East of Hilton Road and 2) North of West End Farm.
- 6.27** Two omission sites were put forward in Sawtry: 1) North of Black Horse Industrial Estate and 2) West of Glatton Road.
- 6.28** Two omission sites were put forward in Somersham: 1) West of College Farm and 2) Chatteris Road.
- 6.29** Two omission sites were put forward in Warboys: 1) Bencroft Lane and 2) Ramsey Road.

6 Section D: Allocations

Summary of issues raised

Table 84

Issue raised
A total of approximately 450 dwellings are allocated at Buckden. St Ives, which is a larger and more sustainable settlement, contains only three allocations which would deliver approximately 480 dwellings. More development should be allocated to St Ives in the development strategy and through allocations. Land at Gifford's Park is identified as a strategic allocation
Three sites have been identified in Fenstanton. FS1 and FS2 are already being built so should not be included. Fenstanton was already classified as a large village and the policy was for only small infill housing to be allowed so as to maintain the character of the village. All of this over development of housing plus the additional six lanes of dual carriageway under construction in the form of the widened and rerouted A14 passing through the bounds is completely destroying the village environment in and around Fenstanton with the loss of much agricultural land that the country just cannot afford to lose.
Omission site North of Mill Road, Buckden - land is promoted for a residential development of approximately 270 dwellings. Gladman note that there may be the potential to incorporate an element of housing for older people through an extra care component of the development which will be investigated further as the proposals are developed.
Omission site East of Hilton Road, Fenstanton - Proposed site of 4.2ha put forward for approximately 50 dwellings including affordable dwellings and open space in Flood zone 1, however the Sustainability Appraisal Assessment concluded that the site is to be excluded from the Local Plan process on the basis that the site is poorly related to Fenstanton and detached from the Settlement. The site is adjacent to the settlement envelope of Fenstanton and within walking distance of community services and facilities. Objects to the inclusion of site allocations in Great Staughton, which is a Local Service Centre in preference to the parcel of land east of Hilton Road as Great Staughton is less sustainable.
Omission site North of West End Farm, Fenstanton - put forward for allocation for residential development for approximately 10 dwellings. Site area is 4.6ha but frontage development only is proposed due to flood risk. Contends that the site is well related to the services and facilities of Fenstanton and is more sustainable than allocations proposed in Great Staughton.
Omission site North of Black Horse Industrial Estate, Sawtry - New employment site allocation sought based on the relocation needs of Spirotech SRD Group. This is for 3.6ha of land which forms a logical grouping with the Blackhorse Industrial Estate. It meets the company's unique needs and would facilitate retention of the existing workforce.
Omission site West of Glatton Road, Sawtry - More development should be allocated to Sawtry than other Key Service Centres given its greater level of services and sustainability than other locations received allocations. Reserve site allocations should also be identified in all of the centres. This flexible approach would be more consistent with the overarching aims of national planning policy. An additional site allocation is put forward for 16.7ha of land west of Glatton Road for which an indicative masterplan is provided.
Omission site West of College Farm, Somersham - The housing proposals within the plan will be inadequate to meet the growth needs and the plan needs to allocate additional housing sites. An additional site is put forward for residential development comprising 1.9ha of land west of College Farm, Somersham. The allocation of the site would broaden the range of housing sites available in the village, providing a wider choice of development opportunities to the market and strengthening the local supply of housing land.
Omission site Chatteris Road, Somersham - The strategy over-emphasises large strategic sites and additional small/ medium sites should be allocated to ensure flexible housing delivery. An additional site allocation is put forward comprising approximately 2.6ha of land fronting Chatteris Road, Somersham for development of 78 houses adjacent to allocation SM6. The allocation of the site would result in the remediation of a part brown-field site and removal of a commercial use which is not conducive in the rural aspects of the countryside. Immediately east of the site is land north of The Bank, Somersham which is allocated as reference SM6 for approximately 120 homes. The site benefits from excellent access directly from the B1015. Bounding the site in an almost interrupted fashion is mature and dense landscaping. The site is only 1.2km from the centre of Somersham.

Section D: Allocations 6

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Issue raised
Omission site Bencroft Lane - It is noted that the previous draft allocation at Bencroft Lane has been omitted. It is outlined that the site was omitted due to concerns regarding access; however the lack of a suitable access is contested. Details are provided of three potential points of access to the site. Removal of the allocation, based on concerns regarding a suitable access, is not justified nor reasonable and the site should be allocated.
Omission site Ramsey Road, Warboys - 11.6ha of land is put forward for development suggesting it could accommodate approximately 230 dwellings and should be included as a residential allocation.

Buckden

Number of Representations		
Total	Objection	Support
14	5	9

Table 85

Individual site representations breakdown	Total	Objection	Support
BU1 East of Silver Street and South of A1	11	3	8
BU2 Luck's Lane	3	2	1

Main issues

6.30 The main issues arising on BU1 East of Silver Street and South of A1 related to the potential impacts on the site of noise and air pollution due to its proximity to the A1 and realigned A14. Traffic impacts on the road network also generated significant concern.

6.31 BU2 Luck's Lane was supported by the site's promoter and a slightly higher capacity sought.

Summary of issues raised

Table 86

Issue raised
BU1 East of Silver Street and South of A1 - the site will be close to an elevated section of the new A14 and there must be considerable uncertainty about the potential noise and air quality impacts on residential development at this site, until such time as the road is in place. It is likely that significant noise and air quality mitigation measures will be required on site as part of the proposed development, in order to provide acceptable living conditions for future residents, which could affect the extent of any buffer and the land available for development.
A Phase 1 Geo-Environmental Desk Study has been prepared which shows that no development has taken place on the site with the exception of one residential property to the far south western corner constructed between 1900 and 1920. An area of allotments is shown in the south west part of the site dating from 1926. No potentially significant ground contamination has been identified which would significantly impact on the development of the site. Localised potential contamination sources may be present in relation to the area of allotments and the residential property present in the south west corner. Service location plans have been obtained. These identify that the only service on the Site is an above ground high voltage electric power line which crosses the site at the south west corner.

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Issue raised
<p>This is a much larger allocation for approximately 270 homes. Historic England welcome the inclusion of the requirement for archaeology within the policy although suggest that the wording is amended for consistency with other policies. Whilst there are no designated heritage assets within the site boundary, Buckden Conservation Area lies to the south west of the site. The Conservation Area contains a high concentration of listed buildings, included the grade I Inner Gatehouse, part of Buckden Towers which itself is scheduled. The policy should make reference to these assets and the need to protect or enhance their settings.</p>
<p>Not until the A1 is sorted out should any more development be considered, it will load the Buckden A1 roundabout with more traffic is absolute madness.</p>
<p>This development will be subject to noise from the A1 and the new upgraded A14, and so any proposal should show in detail how this problem can be mitigated effectively whilst protecting the appearance of the site from the surrounding countryside and from the within the existing built area. Providing safe and efficient access to the site will be difficult. The access should be such that the development is properly integrated into the existing community. It is not clear how this can be achieved with the site bounded as it will be by the A1, the upgraded A14, green fields and a narrow residential street. The Buckden Roundabout on the A1 is already over capacity. This is the major access to Buckden from the west, north and south. The access to Buckden from the east is via the East Coast mainline level crossing and the narrow river bridges across the Ouse. Given that the Luck's Lane development has received outline planning permission by appeal, and that these problems are likely to be made worse as a result, Buckden Parish Council submits that this development should be conditional on the construction of a bridge over the East Coast mainline and the realignment of the A1 to the west of Buckden. Any major development on this site should be phased with the Luck's Lane development so that the two sites are not being developed simultaneously.</p>
<p>The site access can be provided via a simple priority 'T' junction onto Silver Street. The optimal location for this access would require the removal or relocation of the priority traffic calming feature currently located on Silver Street. The site is in a sustainable location with several local amenities and facilities available within a 2km walking distance and 5km cycling distance. It also has potential links to the local footway network which will allow for safe pedestrian passage to local facilities. An initial trip generation and distribution assessment has been undertaken based upon a potential scheme of 350 dwellings. It is not expected that there would be any capacity issues at the proposed site access. As the site is likely to generate additional traffic on the A1 it is recommended that discussions are held with Highways England.</p>
<p>A Masterplan has been prepared to show how the site could be developed. The Masterplan includes circa 300 - 350 dwellings, open space, pedestrian and cycle links, and play areas. Access is proposed from Silver Street with a further pedestrian/cycle/emergency access. Boundary planting is proposed with a sensitive green edge to the north-eastern boundary and lower density development to the boundaries.</p>
<p>Supports the proposed allocation and considers that this site could deliver approximately 300 - 350 dwellings. Buckden is a Key Service Centre with a range of services and facilities. There are no designated heritage assets on or adjacent to the site. At the planning application stage a heritage assessment will be undertaken which will assess the potential of the site to contain archaeological assets and if necessary a programme of work to protect any archaeological assets will be implemented.</p>
<p>An Ecology Survey has been undertaken which identifies that the site is not covered by any statutory designations; and no statutory sites of European importance occur within 5km. With respect to national designations, given that there is a single designation (Brampton Wood; 1.9km to the north west) within 2km of the site, it is not considered that there is any likelihood of the proposed development resulting in significant adverse effects to any statutory designations of national importance. The SSSI within 2km is considered sufficiently distant from the site to avoid any direct or indirect significant effects. The site is not covered by any non-statutory designations. Adjacent to the site, one County Wildlife Site (CWS) has been identified, namely known as 'Settling Bed East of Silver Street'; which is designated due to the aquatic habitats that it supports.</p>

Issue raised
<p>It is considered that there is scope through the design of the greenspace within the site to complement the biodiversity interest of the CWS through the provision of new, purposely designed habitats which enhance the wider ecological connectivity of the local landscape. The proposed requirements in draft allocation BU1 will provide opportunities for the development to deliver ecological enhancement. Subject to further survey and, where necessary, consultation at the planning application stage, there are no 'in-principle' (significant) ecological constraints precluding development of the site.</p>
<p>A drainage strategy plan is submitted to support the proposed scheme.</p>
<p>A Noise Constraints Report is submitted which supports the masterplanning of the site. Consideration will need to be given to screening from the A1 through the use of building orientation and / or barriers such as close boarded fences or earth bunds. Generally standard double glazing would be acceptable within the site but for habitable rooms located within closer proximity to the A1, enhanced glazing may be required. Alternative ventilation will need to be considered within the parts of the site most exposed to road traffic noise.</p>
<p>BU2 Luck's Lane - This is a new allocation for 165 dwellings. Whilst there are no designated heritage assets within the site boundary, Buckden Conservation Area lies to the north of the site. The Conservation Area contains a high concentration of listed buildings, included the grade I Inner Gatehouse, part of Buckden Towers which itself is scheduled. The policy should make reference to these assets and the need to protect or enhance their settings.</p>
<p>The KSC have the ability to accommodate a further scale of growth than proposed and that the Council should be allocating additional sustainable sites in these locations. This would help ensure housing delivery over the course of the plan period, provide contingency and flexibility for instances where the SELs do not come forward as envisaged and provide choice and competition in the market. Gladman support proposed allocation BU2 which seeks to allocate 10.3ha of land at Luck's Lane, Buckden for residential development. Outline permission was granted on this site at appeal for up to 180 dwellings in July 2017 (appeal ref APP/H0520/W/16/3159161). Gladman note that policy BU2 allocates the site for approximately 165 dwellings, Gladman recommend this should be amended to up to 180 dwellings to accord with the planning permission.</p>

Fenstanton

Number of Representations		
Total	Objection	Support
7	5	2

Main issues

- 6.32** Representations addressed matters of detail rather than the principle of any of the proposed allocations although inclusion of FS1 Former Dairy Crest was questioned as it is now under construction.

6 Section D: Allocations

Summary of issues raised

Table 87

Issue raised
<p>FS1 Former Dairy Crest Factory - Queries why this is still included as it is under construction. Should have waited for completion to assess impact before allowing FS2 Cambridge Road West. FS3 Cambridge Road East should be discarded along with the additional three sites of agricultural land off the Hilton Road listed in HDC's document 'Housing & Economic Land Availability Assessment: October 2017' and identified as sites 075, 127 and 128. All of this over development of housing plus the additional six lanes of dual carriageway under construction in the form of the widened and rerouted A14 passing through the bounds is completely destroying the village environment in and around Fenstanton with the loss of much agricultural land.</p>
<p>It is recommended that the policy and supporting text make reference to the need to consider the setting of nearby heritage assets. An important component of the character and appearance of the High Street is the siting of buildings on, or in close proximity to, the back of the pavement, careful consideration will need to be given to the height, typology and detailed design of buildings on this site to ensure successful integration into the existing urban form. Cambridge Road, which sits just to the south of the site, is a Roman Road which increases archaeological potential; the policy and supporting text should therefore reference the need to consider potential undesignated heritage assets and archaeological remains.</p>
<p>What is really needed are traffic mitigation issues down the Low Road to dissuade 'rat running' from and to St Ives. During am and pm rush hours, the traffic levels are a serious hazard to children going to school (there are no pedestrian crossings) and anyone else using the narrow pavements. Adding to the traffic by allowing access from this site to the High Street will cause additional problems. Traffic levels through the village need to be monitored.</p>
<p>FS2 Cambridge Road West - Development of this site would have the potential to impact upon the setting of the Conservation Area Therefore the policy and supporting text should make reference to this. Cambridge Road is a Roman Road which increases archaeological potential; the policy and supporting text should therefore consider the impact of development upon potential undesignated heritage assets and archaeological remains. Again the archaeology requirement should be specifically referenced in the policy and the Conservation Area in the policy and supporting text.</p>
<p>FS3 Cambridge Road East - The allocation is supported but to maximise the opportunities an amendment to the allotment gardens element is suggested. There may be an opportunity to improve and increase provision but elsewhere within the locality and give greater flexibility to the housing allocation.</p>
<p>There are no designated heritage assets within the site boundary. The Fenstanton Conservation Area does however sit to the north of the site. Cambridge Road is a Roman Road which increases archaeological potential. The policy should include reference to the archaeology requirements and the Conservation Area.</p>
<p>Concerned that flood risk has not been highlighted as a key factor. The flood map for surface water indicates that this site is at significant risk of surface water flooding that could impact the feasibility of this development. The site therefore requires a flood risk assessment covering flooding from all sources.</p>

Kimbolton

Number of Representations		
Total	Objection	Support
9	7	2

Main issues

- 6.33** Representations addressed matters of details rather than the principle of any of the proposed allocations.
- 6.34** No omission sites were submitted in Kimbolton.

Summary of issues raised

Table 88

Issue raised
<p>KB1 West of Station Road - There a number of Grade II listed buildings to the west of the site; these include Brittens Farmhouse, Wornditch Farm and its associated granary. Historic England re-iterate the request that reference be made to the listed buildings and their settings in the policy. In addition, reference needs to be made in the policy to the archaeological requirements. Historic England welcome the change to paragraph 13.34.</p>
<p>This site includes a surface water flood route that links directly to the River Kym, and could affect downstream flood risk in Kimbolton. Development should be required to reduce discharge rates. Development provides an opportunity to reduce the flood risk downstream through the safe management of the surface water flow paths that are indicated in the SFRA. We would like to see the policy include specific requirements for managing flood risks through reducing discharge rates, flood risk betterment measures included in the development, or setting aside land for future flood mitigation schemes.</p>
<p>KB2 North of Station Road/ Stowe Road - Three listed buildings lie to the south west of the site. Development should preserve these listed buildings and their settings. This requirement should be included in the policy and supporting text.</p>
<p>This site is close to a surface water flow route that connects to the River Kym, and could affect downstream flood risk in Kimbolton. Development should be required to reduce discharge rates. Development provides an opportunity to reduce the flood risk downstream through the safe management of the surface water flow paths that are indicated in the SFRA. We would like to see the policy include specific requirements for managing flood risks through reducing discharge rates, flood betterment measures included in the development, or setting aside land for future flood mitigation schemes.</p>
<p>The allocation of the site is considered to be suitable, credible and deliverable and this will enable new housing growth within Kimbolton delivering a sustainable development that contributes to the Local Plan growth strategy consistent with national policy.</p>
<p>KB3 South of Bicton Industrial Estate - There are no known designated heritage assets which would be affected. Consideration should be given to how development of this site would integrate into the surrounding landscape.</p>
<p>The allocation is considered to be sound and credible, and this will enable economic growth for Kimbolton delivering a sustainable development that contributes to the Local Plan growth strategy and is consistent with national policy.</p>

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Sawtry

Number of Representations		
Total	Objection	Support
5	3	2

Main issues

6.35 Representations addressed matters of details rather than the principle of any of the proposed allocations.

Summary of issues raised

Table 89

Issue raised
<p>SY1 East of Glebe Farm - The Parish Council have previously submitted comments, some of which have been included, and some not. The Parish Council are pleased to see the plan move forward in its current format.</p>
<p>This site is on the Sawtry Brook, and could affect flood risk in Sawtry. Development should be required to reduce discharge rates into the Sawtry Brook. Parts of the site are at surface water flood risk, and the site therefore requires a flood risk assessment covering flooding from all sources. In order to deliver betterment run off rates and volumes must be reduced.</p>
<p>SY2 South of Gidding Road - The Parish Council have previously submitted comments, some of which have been included, and some not. The Parish Council are pleased to see the plan move forward in its current format.</p>
<p>This policy should reference the archaeology requirements, consistent with other policies.</p>

Somersham

Number of Representations		
Total	Objection	Support
76	74	2

Main issues

- 6.36** SM5 East of Robert Avenue generated substantial objections to the principle of its proposal for residential development. Main issues of concern were: impact on the adjoining nature reserve including disturbance and loss of habitat; lack of capacity on the local road network; increased risk to pedestrians and cyclists particularly on Robert Avenue; lack of headroom at Somersham waste water treatment works; increased surface water flood risk; and the lack of capacity within local services to accommodate the needs of additional residents.
- 6.37** SM6 North of The Bank also gave rise to challenges relating to its potential impact on the nature reserve, surface water flooding, traffic impacts and capacity of services to support the additional development.
- 6.38** Issues raised on the other proposed allocations related to matters of detail rather than principle although the cumulative impact of the proposed allocations was of concern.

Summary of issues raised

Table 90

Issue raised
<p>The rural edge of the village (western) will be changed to a housing estate. The traffic volumes on St Ives Road are constant and allowing 3 developments will exacerbate the problem. Traffic flow through our village centre is already challenging, with regular blockages when vehicles attempt to pass parked cars in the High Street. A radical rethink of how traffic moves is required. There are no buses at weekends in the village. With a total of 300 homes proposed in the Plan for Somersham, it would be a fair assumption that such development will be matched with investment in the village infrastructure, to support the influx of people and their needs.</p>
<p>Concerns over the supporting WWtW which is well documented as currently having no headroom to support such a development. Reviewing the recent Waste Water Management section of the Huntingdonshire Local Plan to 2036: Targeted Consultation documentation I noted significant observations including from the Environment Agency on the feasibility of such upgrades and concerns over proposed interim solutions.</p>
<p>SM1 College Farm, West of Newlands Industrial Estate - The designation of Somersham as a KSC is appropriate, reflecting the role of the village within the settlement hierarchy and the range of local services, facilities and employment that it offers. . The site is physically well related to the village built up area framework and local roads and footways, which provide safe and convenient links to the village's services and facilities. The design and layout of the development can reflect the spacious pattern of development in the area with open space and respond to any noise impact arising from the low key adjacent business premises. The landowners also own neighbouring land offering the opportunity to secure substantial planting around the boundaries that will minimise the impact on views from the surrounding countryside and wider landscape. The landowners are working to bring forward an early planning application.</p>
<p>SM2 Newlands, St Ives Road - There are surface water flood risk areas across this site. Although this is recognised in the supporting text, there is no policy requirement relating to flooding. The requirement for a flood risk assessment, covering flooding from all sources should be included, and development on the site should be required to reduce surface water runoff and improve water management on site to address the flood risk issue to St Ives Road.</p>
<p>Historic England welcome the reference to the conservation area and its setting in the policy although the wording could be tightened.</p>
<p>SM3 The Pasture - The allocation is supported but the changes since the 2015 Targeted Consultation draft are not supported. The allocation should be reverted to 0.9ha of land and approximately 15-17 dwellings, as there is no sound reason for the reduction to 0.6ha. The allocation appears to have been reduced by removing the eastern parcel due to concerns about the impact upon the conservation area and access from Rectory Lane. The conservation area and setting to Somersham House can be protected by a sensitively designed scheme, including landscape. The Inspector's Report on the Huntingdonshire Local Plan Alteration 2002 considered that safe access could be achieved from Rectory Lane to this land.</p>
<p>The conservation area and Somersham House lie to the north of the site. The policy could be improved by referring the setting of these heritage assets.</p>
<p>SM4 Somersham Town Football Ground - 'Scheduled ancient monument' should be amended to 'scheduled monument' for consistency with current NPPF terminology. The new reference to archaeological investigation in the policy is supported. However, the archaeological potential of the site should be assessed prior to a decision being made so that the impacts of any development can be properly understood and mitigated by archaeological recording. Part b of the policy is still unclear. If the current extent of the football pitch is to be used as marker for the limit of development then a clear map showing the outline of the pitch itself should be included in the plan to ensure that the policy can be realistically implemented. In addition the setting of a heritage</p>

6 Section D: Allocations

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Issue raised
<p>asset can encompass areas beyond immediate physical proximity. In addition to the requirements for a buffer, the policy should refer to the need for development to have regard to the setting of the scheduled monument in general. At present this implies that the provision of the buffer is all that is required to ensure setting is conserved.</p>
<p>The B1086 and High Street are dangerously congested. Additional vehicles will exacerbate traffic volumes and movements, noise, congestion, and create dangerous conditions for drivers and pedestrians. Primary school has no capacity for additional pupils; funding has been reduced and additional numbers will increase pressure. School is under scrutiny due to poor performance. No additional amenities, facilities or shops are proposed to cope with the additional houses. Doctors and the dentists are currently operating at their maximum. Surface water flooding is a risk and additional charge will affect the village as a whole.</p>
<p>Much of this site (not just the southern part identified in 13.81) is affected by surface water flood risk. There is no policy requirement relating to flooding. The requirement for a flood risk assessment, covering flooding from all sources should be included, to replace the reference to surface water flows in point f, which does not adequately address this issue. Development on this site should be required to reduce flood risk overall.</p>
<p>SM5 East of Robert Avenue - Access routes to the site are residential with substantial on street parking and sharp bends. Robert Avenue is of insufficient size to provide a suitable means of vehicular and pedestrian access. Somersham Parish Council has objected to the proposal and has indicated that it has no intention of giving up any land to accommodate such a development.</p>
<p>Creation of a new access route from Robert Avenue will result in the loss of part of the designated County Wildlife Site and Local Nature Reserve.</p>
<p>Robert Avenue is a quiet cul-de-sac, safe for drivers, children and pedestrians. The proposal will create a thoroughfare on Robert Avenue resulting in increased noise, more vehicular movement and unsafe driving conditions. The volume of traffic on local access roads is already high; Parkhall Road is sometimes inaccessible. The proposal will create a thoroughfare on Robert Avenue resulting in increased noise, more vehicular movement and unsafe driving conditions.</p>
<p>The roads and infrastructure are not suitable, there is already serious congestion on many of the roads leading to the High Street at peak times, the High Street can become grid-locked very easily, causing dangerous conditions for drivers and pedestrians, especially the children walking to school.</p>
<p>Traffic to get in and out of Somersham is appalling. Parking is a major problem in Somersham, buses get stuck trying to get between cars. Somersham need to look at their parking, traffic and transport.</p>
<p>Navigation through The Trundle is already difficult with parked cars on bends creating blind spots. This will have a knock on effect on all of the village exacerbating the already unacceptable delays in accessing and passing through the High Street and other village roads. There would be increased pollution and noise.</p>
<p>To gain access to the site, an access road, will need to be constructed resulting in the loss/damage of a section of the LNR/CWS. The LNR/CWS is jointly owned by Somersham Parish Council and Cambridgeshire County Council.</p>
<p>Due to the proposed access being very limited it would be impossible to not remove trees and plants from the access area.</p>
<p>Access will cause disruption to residents of Robert Avenue and surrounding roads. The road layout is not conducive to the amount of traffic that would be produced. Robert Avenue has a lot of pedestrians walking through this road to get to the lake and nature reserve, it is not capable of taking building machinery etc.</p>

Section D: Allocations 6

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Issue raised
The development will result in the loss of an area of habitat that supports a number of national and European protected species, including; great crested newt, common lizard, grass snake, turtle dove to name a few.
Defra have identified the land as a High Spatial Priority Woodland Priority Habitat (inventory Deciduous Woodland).
Potential impacts of increased visitor pressure including gates being made from back gardens onto the County Wildlife Site/Nature Reserve.
The loss of habitat bordering the reserve can only have a negative impact on the biodiversity within it, and consequent loss of amenity for those who walk in the reserve and along the old railway line.
The nature reserves are an asset to Somersham and development adjacent would be disastrous. Development would impinge on open countryside.
The nature reserve is home to a number of species and is a real highlight of Somersham and with the addition of the lake is a real focal point for the town. The introduction of more housing surrounding this area will deter these species from wanting to nest within the nature reserve and move them away.
Property prices will be affected.
The proposed site is an important habitat for a number of protected species, including Common toad, Great-crested newt, Linnet, Yellowhammer, Bullfinch, Dunnock, Turtle Dove, Song Thrush, Hedgehog and Goat moth, all of which are listed as species of 'principal importance' S.41 of the Natural Environment & Rural Communities Act (NERC) 2006.
The development will partly encapsulate the nature reserve cutting off natural movements of animal and plant life. This will have a negative affect on wildlife and the natural amenity of this area of the village.
There has been no study to determine the use of this land by protected species.
Part of the site already floods. Localised flooding and surface water run-off are significant risks. a large area adjacent is flood zone 3; development will extend and exacerbate the existing high to medium risk of surface water flooding.
Sewage capacity struggles with existing requirements; adding to these will not be effective. Robert Avenue has flooded during heavy rain; removing green land will escalate this.
Somersham Waste water Treatment Works (WwTW) currently has no headroom to support such a development.
Development will create large area of hard surfaces and the associated run off of water cannot be efficiently absorbed as this area is vulnerable to flooding already. There is no capacity to deal with the waste water flows and it will impact on the whole of the village. Green land in areas vulnerable to flood should not be used for development.
No contamination studies have been performed, therefore the issues are unknown.
Current facilities are inadequate to support additional development; the school is under-performing and struggling to recruit staff; adding more children will not help.
The school, doctors surgery and other services do not have the capacity to take the extra people. The village is not able to support the extra demands that would be imposed. The school, doctors surgery, dentist and shops are already struggling to cope with demand.

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Issue raised
<p>The Parish Council does not believe the Planning Authority has correctly assessed and identified a need for major development in Somersham other than a requirement to fulfil national (Government) calls for more development land.</p>
<p>The Parish Council is aware of the strong local opposition to these development sites on the points above and in addition, they consider the Planning Authority proposals are not sustainable with the lack of infrastructure, public transport and services in Somersham and as such you have not fully considered the effect any significant development will have on the parish.</p>
<p>The landowner considers the allocation for approximately 50 dwellings to be sound. Somersham is a KSC and the site is within walking distance of the village's main services and facilities. There is a regular bus service to St Ives, Ramsey and Cambridge. There are no known physical limitations or constraints on the site which would make development of the site difficult or unacceptable. It provides a natural extension to this part of the settlement and does not make a significant contribution to the wider landscape character. The site is available for development within the control of a single owner. The site is achievable, its development would be economically viable. Services are easily connectable and readily available. It is noted that Somersham WwTW currently has no consented headroom but interim treatment solutions could be implemented until such time as a permanent treatment solution is put in place. There are no known reasons why a Sustainable Urban Drainage System (SUDS) could not be incorporated, thus addressing any pressures on the current drainage network. The site is located adjacent to a county wildlife site and community orchard with a plethora of walking facilities available, opportunities to connect into this facility would be utilised. The site is also a short distance from the Meadowlands Park and Millennium Sports Facility which has a large playing field. Where possible, biodiversity net gains would be sought. Development should only be prevented on highways grounds where it can be demonstrated that the residual cumulative impacts of development are severe. The site is being actively marketed to development partners at the present time and discussions are underway with a view to bringing the site forward as soon as possible should it be finalised as an allocation within the Local Plan.</p>
<p>SM6 North of The Bank - Proposal will increase urban density of the village and encapsulate the nature reserve further cutting off natural movement routes for animals negatively affecting wildlife and plant life. Development will increase surface water flood risk. Areas around the nature reserve are designated medium to high flood risk from rivers and fluvial sources; building on this is against policy. The site must remain undeveloped.</p>
<p>Historic England has no specific comment to make on this site and there are no known designated assets which would be affected. Consideration should be given to how development of this site would integrate into the surrounding landscape.</p>
<p>The addition of 120 more houses will put huge pressure of the existing traffic network. The B1086 and High Street are dangerously congested. Additional vehicles will exacerbate traffic volumes and movements, noise, congestion, and create dangerous conditions for drivers and pedestrians. The Bank is also used excessively by large trucks (Mick George) and Dews Coaches.</p>
<p>The proposed entry / exit to this site will effectively create a crossroads, as opposed to presently a T junction. The amount of traffic using this exit / entrance will cause a very dangerous situation especially during peak times in the mornings and evenings. Noise and traffic pollution will significantly be increased. There is no footpath on one side of the road, which means we have to cross the road at the proposed entry / exit to take children to school in good weather. Visibility will be worse in the early morning and evenings during the winter months.</p>

Section D: Allocations 6

Issue raised
The Primary school has no capacity for additional pupils; funding has been reduced and additional numbers will increase pressure. School is under scrutiny due to poor performance. No additional amenities, facilities or shops are proposed to cope with the additional houses. Doctors and the dentists are currently operating at their maximum.
Localised flooding and surface water run-off are significant risks. a large area adjacent is flood zone 3; development will extend and exacerbate the existing high to medium risk of surface water flooding.
This would have a major impact on the nature reserve. community orchard and dog walking field. Whilst not being built on the actual nature reserve it would prevent wildlife access to the area and impact the natural habitat of many species. Rare birds, moths, and other animals can be found in the area but building up the surrounding fields would destroy this. The land on the proposed site and has not been used for some time for agricultural purposes and wildlife has flourished. We regularly see a pair of buzzards, muntjac deer as well as owls and other wildlife.
Access to the Local Nature Reserve to the north-west of the development will result in destruction of the woodland. This has already happened to the west of the nature reserve where residents of Bank Avenue have made access from their gardens into the wood. Children have damaged trees and dug holes. Residents also fly-tip their rubbish behind their gardens.
Unsure why Site SM6 differs from the other 5 proposed Somersham Sites SM1 - SM5 with regards to the WWtW and current headroom. SM6 would be facilitated by the Somersham WWtW and not the Huntingdon WWtW as referenced? Reviewing the recent Waste Water Management section of the Huntingdonshire Local Plan to 2036: Targeted Consultation documentation I noted significant observations including from the Environment Agency on the feasibility of such upgrades and concerns over proposed interim solutions.

Warboys

Number of Representations		
Total	Objection	Support
18	6	12

Main issues

- 6.39** The capacity of Old Hurst waste water treatment works to be upgraded within the limits of conventional treatment to accommodate additional development was raised in the context of WB1 West of Ramsey Road.
- 6.40** Historic England raised the issue of preparing a Heritage Impact Assessment for WB2 Manor Farm Buildings to inform whether the proposed allocation is acceptable in principle due to its sensitivity in terms of nearby heritage assets.
- 6.41** WB3 South of Stirling Close was challenged on the grounds of its encroachment on the countryside.
- 6.42** Issues raised on WB4 South of Farrier's Way and WB5 Extension to West of Station Road related to details rather than the of principle of the proposed allocations although minor amendments were sought.

6 Section D: Allocations

Summary of issues raised

Table 91

Issue raised
<p>WB1 West of Ramsey Road - The Parish Council supports the inclusion of the following site for housing development in Warboys - 45 homes on 1.7 has. of land west of Ramsey Road (WB1).</p>
<p>The requirement to have consideration to the adjacent conservation area is welcomed although the wording could be tightened. However, there are also three Grade II listed buildings situated to the east (one of which is referenced in the supporting text). The policy and supporting text should be amended to refer to these heritage assets and to the need for development of this site to have regard to their settings. Long views from the west across the open landscape will need to be considered as this is a key aspect of the setting of the town's conservation area.</p>
<p>Support provided for allocation of the site. The availability of a suitable vehicular access and presence of drainage infrastructure is confirmed.</p>
<p>The WCS states that Old Hurst Water Treatment Works does not have the capacity to accommodate all of the predicted growth in its catchment and the specific sites that have been assessed in Warboys are described as being able to be supported by the local network subject to some minor reinforcements. This appears to be at odds with paragraph 13.98 of which states that the Old Hurst Water Treatment Works has no available headroom. In terms of Part g, the WCS is clear that the Old Hurst WwTW can be improved within the limits of conventional treatment which would not impact on the attainment of future Water Framework Directive water quality objectives so reference to the Environment Agency in part f should be deleted. It will be beneficial to the delivery of sites in the earlier part of the plan period to take a more bespoke approach requiring upgrades to capacity only where this is necessary having regard to the scale, timing, and location of development. Reference to the relevant consultees is not necessary as the input of Anglian Water would be sought as part of the planning application process.</p>
<p>Support as it accords with the development strategy which seeks to provide the greatest access to services and facilities possible. The constraints can be mitigated and in some cases improved. It would be challenging to provide a pedestrian link and retain 21 Ramsey Road but support the suggestion of an alternative arrangement with vehicular access being taken from Ramsey Road, which is supported along with the retention of appropriate replacement of mature trees on the frontage or their suitable replacement as these are only of moderate to low quality and their blanket protection is overly restrictive. The replacement of the trees could also result in a net arboricultural gain for the site. The existing property at No 21 at best makes a neutral contribution to the conservation area and has poor architectural qualities. Creation of an all-purpose access through the grounds of No 21 would be deliverable and desirable. Landscaped features along the access can be retained with the built development area located to the rear of the site where views are more concealed. Appropriate buffers can be retained to the site boundaries.</p>
<p>WB2 Manor Farm Buildings - The Parish Council supports the inclusion of the following site for housing development in Warboys - 10 homes on 0.6 has. of land at Manor Farm Buildings, Church Road (WB2).</p>
<p>This is an extremely sensitive site in terms of heritage assets and would require very careful planning and Historic England have concerns regarding this allocation. The policy helpfully refers to the conservation area and listed buildings, but the exact nature and amount of development will depend on the overall impact on these heritage assets. We note that a heritage statement is now mentioned as a requirement in the supporting text. A specific proportionate Heritage Impact Assessment is requested to be produced to understand the potential impact of new development on heritage assets, in advance of the allocation of the site to inform whether the allocation is acceptable in principle and to inform the capacity of the site and any potential mitigation measures required. We suggest that you commission a report in advance of the EiP to ensure that you have a sufficient evidence base with respect to this site and to inform the capacity of the site.</p>

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Issue raised
<p>WB3 South of Stirling Close - The site would encroach upon an area of open countryside and would create a precedent for further allocations to the south of the village. It would affect views of the village from the south and east and would see a further encroachment upon the area of land bordered by the A141 and B1040 south of the village in a piecemeal fashion without any compensatory community benefit to the village. The village infrastructure is unable to accommodate the increase in population generated by the Stirling Close site in addition to that generated by the sites already allocated.</p>
<p>Historic England welcome reference to the conservation area in bullet point d. We suggest that this also refers to the setting of the conservation area. We also welcome reference to views of the church.</p>
<p>The allocation of the site is considered to be suitable, credible and deliverable and this will enable new housing growth within Warboys delivering a sustainable development that contributes to the Local Plan growth strategy consistent with national policy. Accordingly the allocation is considered sound.</p>
<p>Includes a line requiring agreement with the Middle Level Commissioners that they will not object on the basis of flood risk in the Middle Level system. This is not necessary or accurate: the LLFA is the statutory consultee for surface water flood risk; the Middle Level Commissioners are not a statutory consultee, although it is best practice to involve them in development proposals within their area. Wording should be deleted or amended to 'agreement with the Middle Level Commissioners and the Lead Local Flood Authority that the development will adequately manage flood risk on site and elsewhere and, where appropriate, will provide flood risk betterment'.</p>
<p>WB4 South of Farrier's Way - The Parish Council supports the inclusion of the following site for housing development in Warboys - 75 homes on 3.6 has. of land south of Farrier's Way (WB4).</p>
<p>Concerns raised with regards to the impact upon the setting and character of the Conservation Area and the impact upon the town's setting, given views from the south across open landscape. Outlined that the policy should include the need to protect or enhance the Conservation Area and its setting, and reference the archaeological potential of the site.</p>
<p>WB5 Extension to West of Station Road - The Parish Council supports the inclusion of the following site for housing development in Warboys - 80 homes on 3.63 has. of land as an extension to the west of Station Road development (WB5).</p>
<p>Concerns are expressed with regards to the permission 15/01818/REM (for 120 dwellings west of Station Road) and the narrow access serving the development and the provision of access from Station Road. It is outlined that permission 16/02519/OUT (for an additional 80 residential units) repeated many of the previous concerns. Concerns are expressed with regards to a lack of capacity at Moat House Surgery. A number of criteria are outlined for inclusion within the allocation to reduce the impact of development on the surrounding properties, landscapes and Warboys.</p>
<p>Key Service Centres could accommodate additional growth than proposed and therefore more sites should be allocated in Key Service Centres. This would help ensure housing delivery over the course of the plan period, provide contingency and flexibility. Support provided for allocation WB5.</p>

Yaxley

Number of Representations		
Total	Objection	Support
2	1	1

6 Section D: Allocations

Main issues

6.43 No main issues were raised on the two proposed allocations in Yaxley.

6.44 No omission sites were put forward.

Summary of issues raised

Table 92

Issue raised
YX1 Askew's Lane - Allocation YX 1 is supported.
The proposed site fronts the Yaxley Conservation Area along the main road, although most of the site is outside of the conservation area. We welcome the reference to the conservation area in the policy and the identification of an opportunity to enhance the setting of the conservation area in the supporting text although the wording could be tightened as outlined above.
YX2 Yax Pak - No representations were received on this site.

Chapter 14: Local Service Centres

Number of Representations		
Total	Objection	Support
125 which includes three representations comprising:		
1) 123 signed copies of a standard letter submitted by Bluntisham Parish Council		
2) 102 signed copies of a standard letter submitted by Colne Road Action Group	111	14
3) 294 signatures were entered on an e-petition arranged by Colne Road Action Group		

Main issues raised on Chapter 14

Table 93

Issue raised	Response to issue
Historic England note that there is no reference to archaeology for any of these sites. They assume that this is deliberate and that the sites have been screened for archaeological potential.	Heritage assets were considered as part of the HELAA process. Site specific archaeology will be considered further as part of planning applications.
Support was expressed for the concept of Local Service Centres.	Support for the concept of Local Service Centres is welcomed.

Section D: Allocations 6

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Issue raised	Response to issue
<p>HDC should identify further small to moderate site to boost housing land supply delivery within the district. These should be within/adjacent to the key service centres and within local service centres.</p>	<p>The strategy follows the requirements of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need.</p>
<p>The number of local service centres should be extended to include settlements that have a primary school, such as Holme, Needingworth and Stilton.</p>	<p>The requirement of a Local Service Centre is greater than that of a school alone and should include services as set out in the Local Plan.</p>
<p>Concern was expressed over the accessibility of the consultation system by residents of Alconbury and Bluntisham and the lack of a prior opportunity to make representations on new proposed allocations.</p>	<p>As part of the exploration of a range of options to help ensure that the identified need over the 2011-2036 would be met, and also to ensure that it could be demonstrated that there were sufficient deliverable sites to meet the specific need over the next 5 year, officers explored a range of options. The inclusion of Local Service Centres as one of the ways of ensuring this was supported by Members at the Overview and Scrutiny Panel (Economy and Growth) who considered the Local Plan 2036: Proposed Submission 2017 on the 12th December 2017. The papers for this meeting were publicly available from the 5th December 2017. The Council's Cabinet and Full Council considered the Huntingdonshire Local Plan 2036: Proposed Submission 2017 on the 13th December. The papers for those meetings were available from the 6th December.</p> <p>An email was sent to all parish clerks, including Bluntisham Parish Council on Thursday 21st December highlighting that Full Council endorsed the Plan and that they will have received an email from the system on Monday the 18th December inviting representations on the Plan up to 5pm on the 5th February 2018. Representations could be submitted via the portal, by email or by letter.</p>
<p>Substantial concern was expressed over the lack of prior consultation on the potential change of status of Bluntisham.</p>	<p>As part of the exploration of a range of options to help ensure that the identified need over the 2011-2036 would be met, and also to ensure that it could be demonstrated that there were sufficient deliverable sites to meet the specific need over the next 5 year, officers explored a range of options. The inclusion of Local Service Centres as one of the ways of ensuring this was supported by Members at the Overview and Scrutiny Panel (Economy and Growth) who considered the Local Plan 2036: Proposed Submission 2017 on the 12th December 2017. The papers for this meeting were publicly available from the 5th December 2017. The Council's Cabinet and Full Council considered the Huntingdonshire Local Plan 2036: Proposed Submission 2017 on the 13th December. The papers for those meetings were available from the 6th December.</p>

6 Section D: Allocations

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Issue raised	Response to issue
	<p>An email was sent to all parish clerks, including Bluntisham Parish Council on Thursday 21st December highlighting that Full Council endorsed the Plan and that they will have received an email from the system on Monday the 18th December inviting representations on the Plan up to 5pm on the 5th February 2018. Representations could be submitted via the portal, by email or by letter.</p>
<p>AL1 North of School Lane generated substantial objections to the principle of its proposal for residential development. Main issues of concern were: lack of capacity on the local road network including the historic bridge in the village centre; increased parking congestion; the impact on the character of the village and lack of need for additional housing given the scale of development at nearby Alconbury Weald; impact on biodiversity and in principle protection of greenfield land; loss of land used for informal recreation; loss of views and privacy due to the sloping nature of the site; the lack of capacity within local services to accommodate the needs of additional residents; increased flood risk; and noise impacts due to proximity to the A1(M).</p>	<p>The strategy follows the requirements of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need.</p> <p>This site is included in the HSTS which forms part of the evidence base for the Local Plan. Allocation AL1 specifically sets out a number of requirements that would need to be addressed as part of any future application including a suitable means of access, a noise assessment and mitigation from the A1 and an ecological assessment and enhancement scheme. Site specific concerns will be considered in greater detail during the course of any future planning application</p>
<p>The designation of Bluntisham as a local service centre and proposed allocation BL1 West of Longacres generated substantial objections to the principle of designation and residential development with a lesser number directed at BL2 North of 10 Station Road. Main issues of concern were: the lack of community services and facilities to accommodate the demand arising from the proposed development, in particular the part-time nature of the GP surgery provision; impact on the character of Bluntisham and potential coalescence with Colne; loss of valuable agricultural land; impact on wildlife and biodiversity; poor access to employment and public transport services; and increased flood risk and sewage capacity concerns.</p>	<p>The strategy follows the requirements of the NPPF and legislation. The settlement has a range of services and facilities greater than that of a Smaller Settlement but less than that of a Key Service Centre including a primary school, public hall, public house, convenience and a part-time GP surgery. Allocation B1, West of Longacres, Bluntisham is grade 2 agricultural land and allocation BL2 is primarily grade 2 land, with the southern tip being grade 3. The site was assessed as part of the HELAA 2017. Other matters raised would be site specific considerations as part of planning applications.</p>
<p>Two omission sites were put forward in Bluntisham: 1) Rear of 18 Holliday's Road and 2) South of Mill Lane.</p>	<p>The strategy follows the requirements of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need.</p>
<p>One omission site put forward in Needingworth: Meeting Lane</p>	

Section D: Allocations 6

Huntingdonshire District Council | Statement of Representations March 2018

Issue raised	Response to issue
	The strategy follows the requirements of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need.
Two omission sites were put forward in Stilton: 1) Stilton Oaks Golf Course and 2) North of Elm Close and West of Harvest Close.	The strategy follows the requirements of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need.
Five omission sites were put forward in Holme: 1) East of Church Street and North of Short Drove, 2) South of Short Drove and West of Yaxley Road, 3) Packing Station West of Pingle Bank, 4) South of Glatton Lane, and 5) South of Station Road.	The strategy follows the requirements of the NPPF and legislation. The Council has identified land to meet our Objectively Assessed Need.

Local Service Centre General Issues

Number of Representations		
Total	Objection	Support
6	5	1

Main issues

- 6.45** There is no reference to archaeology for any of these sites.
- 6.46** Needingworth, Stilton and Holme are put forward to be classified as local service centres.
- 6.47** Eight omission sites were put forward: 1) Meeting Lane, Needingworth, 2) Stilton Oaks Golf Course, Stilton, 3) North of Elm Close and West of Harvest Close, Stilton, 4) East of Church Street and North of Short Drove, Holme, 5) South of Short Drove and West of Yaxley Road, Holme, 6) Packing Station West of Pingle Bank, Holme, 7) South of Glatton Lane, Holme and 8) South of Station Road, Holme.

Summary of issues raised

Table 94

Issue raised
Historic England note that there is no reference to archaeology for any of these sites. We assume that this is deliberate and that the sites have been screened for archaeological potential.
Support expressed for the concept of Local Service Centres. There are additional settlements which could be identified as Local Service Centres including Needingworth, Stilton, and Holme.
Omission site Meeting Lane, Needingworth - site put forward for 60 dwellings; contends that Needingworth is more sustainable than Alconbury or Great Staughton and so should be designated as a Local Service Centre.

6 Section D: Allocations

Issue raised
<p>Omission site Stilton Oaks Golf Course, Stilton - site put forward for 60 dwellings; contends that Stilton is more sustainable than Alconbury or Great Staughton and so should be designated as a Local Service Centre.</p>
<p>Omission site North of Elm Close and West of Harvest Close, Stilton - 7.9ha site put forward for residential development. Contends that HDC should identify further small to moderate site to boost housing land supply delivery within the district. These should be within/adjacent to the key service centres and within local service centres.</p>
<p>Omission site East of Church Street and North of Short Drove, Holme - contends that HDC should identify further small to moderate site to boost housing land supply delivery within the district. These should be within/adjacent to the key service centres identified in the new local plan and within local service centres. The number of local service centres should be extended to include settlements that have a primary school, such as Holme.</p>
<p>Omission site South of Short Drove and West of Yaxley Road, Holme - contends that HDC should identify further small to moderate site to boost housing land supply delivery within the district. These should be within/adjacent to the key service centres identified in the new local plan and within local service centres. The number of local service centres should be extended to include settlements that have a primary school, such as Holme.</p>
<p>Omission site Packing Station West of Pingle Bank, Holme - contends that HDC should identify further small to moderate site to boost housing land supply delivery within the district. These should be within/adjacent to the key service centres identified in the new local plan and within local service centres. The number of local service centres should be extended to include settlements that have a primary school, such as Holme.</p>
<p>Omission site South of Glatton Lane, Holme - contends that 34ha of predominantly agricultural land should be allocated for development as it is well related to the village, has no environmental designations and offers access to key services and amenities.</p>
<p>Omission site South of Station Road, Holme - contends that 8ha of agricultural land should be allocated for development as it is well related to the village, has no environmental designations and offers access to key services and amenities.</p>

Alconbury

Concern was also expressed over the accessibility of the consultation system. Number of Representations		
Total	Objection	Support
80	73	7

Main issues

- 6.48** AL1 North of School Lane generated substantial objections to the principle of its proposal for residential development. Main issues of concern were: lack of capacity on the local road network including the historic bridge in the village centre; increased parking congestion; the impact on the character of the village and lack of need for additional housing given the scale of development at nearby Alconbury Weald; impact on biodiversity and in principle protection of greenfield land; loss of land used for informal recreation; loss of views and privacy due to the sloping nature of the site; the lack of capacity within local services to accommodate the needs of additional residents; increased flood risk; and noise impacts due to proximity to the A1(M). Concern was also expressed over the accessibility of the consultation system.

Summary of issues raised

Table 95

Issue raised
AL1 North of School Lane, Alconbury - The need for additional housing, in particular affordable housing, given the proximity of planned large scale development at Alconbury Weald and in Huntingdon, Godmanchester and St Neots is questioned.
There seems little need for the site so close to the expansion of Alconbury Weald.
Acknowledges that further housing is needed but Alconbury has fulfilled its quota and Alconbury Weald is underway. Infrastructure and services cannot sustain Alconbury Weald and further housing will add to this bottleneck.
The high level process used to assess the suitability of sites is flawed.
There are other sites which would be more suitable for development than those identified in Alconbury.
New homes are needed but this is the most unsuitable spot in the village. There is a much larger area of land on the south-eastern edge bounded by Globe Lane which would have less impact.
Objection to 130 houses. Areas within Huntingdonshire other than Alconburys and Stukeleys should be allocated for housing, for example Alconbury Weald, RAF Wyton and the villages near the A14, such as the Hemmingfords.
A Phase 1 Geo-Environmental Desk Study has been prepared. It identifies the site as agricultural land with no development on it since 1887, that there is no potentially significant ground contamination and also identifies service location plans. There is an above ground high voltage electric power line which crosses the centre of the Site branching off to the south east and south west.
Concerns are raised with regards to an increase in traffic as additional traffic would exacerbate existing congestion.
Concerns are raised regarding the point of access as well as the increase in traffic that development of the site would result in.
Concern that 95 houses will increase traffic within the village as a whole, further impede traffic flow over the narrow village bridge create further congestion along School Lane, a narrow village street where the school, shop and doctors surgery is located.
The village is only served by a community bus and public transport links are poor.
Concerns are also expressed regarding the lack of a regular bus service and the lack of employment opportunities within the villages, resulting in residents having to travel for work.
The local highway network is inadequate to accommodate additional traffic, including construction traffic and heavy plant machinery.
Additional traffic will have to negotiate a sharp bend and the scheduled single lane packhorse bridge. There is existing congestion outside of the village shop, school, and surgery. It would be naive to think new residents will walk or cycle each day and construction traffic alone would cause problems.
There are existing parking problems in the area and development would impact upon the safety of the community.
The provision of cycle ways would not assist, as there are limited services and facilities in the village.

6 Section D: Allocations

Huntingdonshire District Council | Statement of Representations March 2018

Issue raised
<p>A Transport Feasibility Assessment is provided for the site. The site would be accessed through a T junction onto School Lane. It is a sustainable site within walking distance of many facilities, with access to Public Rights of Way and to the National Cycle Networks. An initial trip generation and distribution assessment has been undertaken based upon a potential scheme of 130 dwellings with the outcome that access onto School Lane is not expected to have capacity issues. Discussions with Highways England should be sought to discuss the generation of additional traffic on the A1.</p>
<p>Concerns also expressed regarding the impact development of the site would have upon air quality, noise pollution and residential amenity.</p>
<p>There would be higher noise pollution.</p>
<p>Noise from the A1 is already heard in the area and will be worse following the A14 improvement works, the development site is closer and elevated so will have significantly worse impacts.</p>
<p>The noise study does not take in to account the traffic and noise level generated by the A1/ A14 construction traffic. The impact of elevated walls from the proposed development on existing residents is a concern.</p>
<p>The noise study does not take account of reflective noise on residents nor does it take in to account re-routed lorry traffic on the A1M.</p>
<p>The development would be detrimental to local amenities and the school does not have capacity.</p>
<p>Services will not be able to cope with increased resident numbers.</p>
<p>The development would completely overwhelm the existing village. It will put pressure on village resources and infrastructure, including the school, doctors and shop.</p>
<p>Support for site which can deliver approximately 110- 130 dwellings. The Local Service Centre can meet the needs of it's residents by providing a a primary school, doctor's surgery, village hall, pub, church, Post Office, and convenience store. These are within walking distance of the site.</p>
<p>The village would lose its unique identity and is in danger of becoming a much larger community and is at risk of becoming a much larger conurbation.</p>
<p>Pressure is already being placed on the local medical centre as a result of development at Alconbury Weald.</p>
<p>Objects to the disruption resulting from the need to increase capacity of utilities as a result of development of the site.</p>
<p>The site is greenfield and is therefore protected from development.</p>
<p>Brownfield sites should be developed prior to greenfield sites. Concerns are raised with regards to the loss of green amenity space and the loss of biodiversity.</p>
<p>The site is of importance for wildlife and biodiversity and should be subject to relevant surveys</p>
<p>Development of the site would impact local habitats and the positive impact that being so close to the wildlife has on the village.</p>
<p>Concern for the loss of crops, habitats and bug-life.</p>

Section D: Allocations 6

Huntingdonshire District Council | Statement of Representations March 2018

Issue raised
This sloping site is very visible and is ridge and furrow pasture land supporting a diversity of wildlife, regularly used as grazing land. Development would be visually dominant and alter the character of the village.
An Ecology Survey has been undertaken. The site is not covered by any statutory or non-statutory designations and a walkover survey shows it supports no habitat which is notable in its own right. Therefore there are no 'in principle' constraints relating to the proposed allocation of the site for accommodating residential development. There are 3 recommendations: to retain and protect existing hedgerows and trees, substantial landscaping along the northern and western boundaries, and to retain, buffer and enhance an existing pond.
Concerns are expressed regarding the gradient of the site and the impact on development of the views from existing properties and towards the village.
The plan does not consider the impact of the development on views of the church from existing properties despite this being acknowledged as a landmark and which would be spoiled by additional housing.
Strong objection to the development of pasture land which provides a habitat for wildlife and forms an attractive feature within the local landscape.
Objections on the grounds of visual impact as the site is elevated and provides the only countryside view from the northern side of the village,
Any planned development would ruin the aesthetics of the village and remove its unique landscape and character.
It is all well and good about the development seeking views of the local church but does not consider the residents that border the site and views of those that live in the Paddock and the potential loss of privacy.
Concerns over loss of privacy from development as the field slopes upwards.
With Alconbury weald nearby, Alconbury is in danger of losing its identity and turning into suburbia, other identified sites are more sustainable with equivalent or better services than Alconbury.
Concerns are expressed that the scale of development would lead to a negative change to the demography of the village.
Loss of views from existing houses will de-value property.
Questions whether compensation will be given for impact upon property.
Concerns raised over loss of village tradition of sledging on the land.
Support the views to Grade 1 Listed church are noted in the policy. Concern that the site does not note the grade II listed building, Mon Abri to the south west of the site as well as the Alconbury Conservation Area.
Concern over the impact of development on the historic environment.
Concerns on the potential impact on heritage assets e.g. Ermine Street recent findings at the church which could indicate the field could also have archaeological importance.
The land has high historic interest and includes ridge and furrow features.
This site is upstream of a surface water flow route that links to the Alconbury Brook, associated with flood risk in Alconbury. Development on this site should reduce discharge rates.

6 Section D: Allocations

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Issue raised
The lowest point of the site, adjacent to the stream, can flood during periods of heavy rainfall.
The field helps soak up excess rainfall and development would exacerbate the threat of flooding and attenuating ponds.
The land slopes down and will create increased risk of flooding further into the village.
Concerns over the effect on local water and sewerage services.
Building on the floodplain will increase the risk of Alconbury Brook flooding. Floods cause disruption, being upsetting and traumatic for both families and businesses. When the brook floods it makes it difficult to access the village.
The flood risk does not take into account that residents in the area around School Lane already suffer from significant floods.
Concern over the addition of surface water to a fast flowing stream adjacent to the site.
The local area is prone to flooding and any development within the flood plain of Alconbury Brook will have significant impact on neighbouring villages through the increase in concrete surfaces housing and roadways. The proposed site acts as a natural soak away and hold back the release of water during significant rain events.
School Lane/Manor Lane and the hall car park suffer from surface water flooding during periods of heavy rain. Additional development, adding more concrete and roads will worsen the situation and increase flood risk.
Concerns are raised with regards to a lack of consultation prior to allocation of the site. The Parish Council and residents of Alconbury were not made aware of the potential allocation of sites within Alconbury in the Plan. The period of consultation on the HELAA was insufficient and the previous version of the Plan made no reference to allocations within Alconbury. The assessment and selection process cannot therefore comply with the Council's Statement of Community Involvement.
Better communication is required with residents and that the website is challenging to use to make representations.
The scheme is supported in principle. An illustrative masterplan is provided for 110-130 dwellings. It shows a pedestrian link to village facilities and services on School Land and a potential link to a public right of way to the west. A landscape buffer is proposed for the south of the site.
The Site is entirely within Flood Zone 1 and is therefore at low risk of flooding. A Drainage Strategy Plan has been prepared which identifies an attenuation pond to the south west of the site and an indicative foul pumping station to the south west. This informs the masterplan. A Flood Risk Assessment and Surface Water Drainage Strategy will be developed for the planning application stage.
A Noise Constraints Report has been prepared and establishes that residential development is suitable on the site. Noise attenuation will need consideration, such as building orientation and barriers to the A1 and A14. Standard double glazing will be acceptable throughout the site but alternative ventilation will need to be considered within parts of the site exposed to road traffic noise.

Bluntisham

Number of Representations		
Total	Objection	Support
39 plus: 123 signed copies of a standard letter submitted by Bluntisham Parish Council		
88 signed copies of a standard letter submitted by Colne Road Action Group	36	3
294 signatures were entered on an e-petition arranged by Colne Road Action Group		

Main issues

6.49 The designation of Bluntisham and proposed allocation BL1 West of Longacres generated substantial objections to the principle of designation and residential development with a lesser number directed at BL2 North of 10 Station Road. Main issues of concern were: the lack of community services and facilities to accommodate the demand arising from the proposed development, in particular the part-time nature of the GP surgery provision; impact on the character of Bluntisham and potential coalescence with Colne; loss of valuable agricultural land; impact on wildlife and biodiversity; poor access to employment and public transport services; and increased flood risk and sewage capacity concerns. Substantial concern was also expressed over the lack of prior consultation on the potential change of status of Bluntisham.

Summary of issues raised

Table 96

Issue raised
Object to the designation of Bluntisham as a Local Service Centre. Bluntisham was designated as a Small Settlement (LP10) and now, within the Proposed Local Plan 2017-2036, Bluntisham has been changed to a Local Service Centre (LP9). This change was made without notice or consultation with Bluntisham Parish Council or the residents of Bluntisham and based on flawed evidence and process.
Objects to designation of Bluntisham as a Local Service Centre as this is not justified by evidence. This change was not subject to consultation.
The Local Service Centre status would allow large scale housing which would harm the rural character and appearance of the village.
Object to Bluntisham being classified as a Local Service Centre. Object to the allocation for the following reasons: 1. Health and safety risk to children, 2. Impact of additional traffic in village, 3. Impact on traffic in surrounding areas, 4. Lack of available services, 5. Impact on the rural character of both Bluntisham and Colne, 6. Flooding concerns, 7. Sewage capacity concerns, 8. The change of definition of Bluntisham to a Local Service Centre from a Small Settlement, 9. The 2 developments will be around 170 houses which is NOT LIMITED development nor within the existing boundaries, 10. Environment impact on wildlife, 11. Loss of prime agricultural land, 12. No local support, 13. Affordable housing developments are already under construction under a mile

6 Section D: Allocations

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Issue raised
<p>away. 14. Impact of a 4 year construction project on surrounding environment and families. 15. This unnecessary development will have a major effect on the communities of both Bluntisham and Colne, and the surrounding environment, wildlife and countryside.</p>
<p>Concerned about the reclassification of Bluntisham as a Local Service Centre being done to allow development to go ahead following loss of capacity at RAF Wyton. Bluntisham's infrastructure will not be able to cope with such a large development which will cause traffic congestion at key points of the day.</p>
<p>Change in status to Local Service Centre is a cynical attempt to offload the Council's housing quota to an area unequipped to handle it following the failure of planning for RAF Wyton. Bluntisham has poor public transport, roads are over-subscribed and access to A14 will only get worse. Limited GP service does not qualify in the spirit of a local service centre. Development is questionable in many ways eg lack of local policing; it cannot be supported with integrity.</p>
<p>The decision to include Bluntisham as a Local Service Centre is questionable because of the existing facilities in the village. The Public House is only open in the evenings and weekends and the lease for the pub has been for sale for over 18 months with no interest. There is no dedicated Doctor's Surgery in Bluntisham. What exists is a branch surgery located within the Village Hall provided by Church Street Health Centre, Somersham. Bluntisham Parish Council offer a subsidised rent to retain the surgery in the hall and this contract is renewed every two years. Dr Lui visits Bluntisham for only one and half hours per week at the village hall which has no specialist medical facilities, no clinics and very few appointments. There is a receptionist on site Monday to Friday for one and half hours. NHS England have confirmed there is not enough health provision for this development. Alconbury and Great Staughton (the other Local Service Centres) have full time doctor's surgeries and therefore Bluntisham should not be categorised alongside Alconbury and Great Staughton because it does not share the same level of GP provision and no patients travel into Bluntisham for their care. The Council has not been consistent in applying the criteria to qualify as a Local Service Centre as Earith (next door to Bluntisham) also meets the criteria for a Local Service Centre, but remains designated as a Smaller Settlement.</p>
<p>The Doctors Surgery is a 'roving' facility provided by Dr Liu for a morning each each week.</p>
<p>The village has no Doctor's Surgery. Instead it is a satellite surgery at the village hall where a Doctor is available for one hour per week.</p>
<p>Dr Lui visits Bluntisham for only one and half hours per week at the village hall which has no specialist medical facilities, no clinics and very few appointments. There is a receptionist on site Monday to Friday for one and half hours. NHS England have confirmed there is not enough health provision for this development. Alconbury and Great Staughton (the other Local Service Centres) have full time doctor's surgeries and therefore Bluntisham should not be categorised alongside Alconbury and Great Staughton because it does not share the same level of GP provision and no patients travel into Bluntisham for their care.</p>
<p>The village has lost facilities as it once had: swimming pool, tennis courts, library van, public house, village shop, butchers, general shop, policeman and two permanent GP Surgeries.</p>
<p>Infrastructure Delivery Plan highlights that Bluntisham will require a marked increase in community facilities as a result of the proposed development which results from the change in status.</p>
<p>The pressure on the village from the developments likely to arise from the change in status will overwhelm the other facilities that exist in the village such as parking at the village shop which is often at capacity as being at the edge of the village it is at a distance that means most people travel by car rather on foot or cycle, the village school only has 26 places available according to the latest figures made available.</p>

Section D: Allocations 6

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Issue raised
<p>The designation of Bluntisham as a Local Service Centre is driven by the opportunity to build houses and was not subject to consultation with Local District Councillors, the Parish Council and local residents. It is illegal and unsound. Bluntisham's amenities and facilities have decreased over recent years at a time when the village has been growing with approved developments. The public house is only open at the weekend and evenings and has been up for sale for some time. The doctor surgery is only open 11 hours per week. The Post Office and village shop have closed. Bus services have been substantially reduced.</p>
<p>At no stage were the residents, Parish Council or District Councillors of Earith Ward made aware of the addition of the new tier of Local Service Centre and the subsequent re-designation of Bluntisham from a Small Settlement to a Local Service Centre, or were at any time consulted on this change. During the consultation on the HELAA document Bluntisham was defined as a 'Small Settlements with Good Sustainability' and elsewhere in the document no mention is made in regard to a potential change in status as a result of the consultation. This change in designation appears contrived and aimed at justifying the approval of planning applications for land at Colne Road and Station Road. The minutes of the Overview & Scrutiny Committee (Economic Growth) meeting in December gave an assurance that the process to create Local Service Centres was robust, but a search of the evidence base revealed no such robust assessment. The decision to include Bluntisham as a Local Service Centre is questionable because of the existing facilities in the village.</p>
<p>No evidence of prior consultation with any key stakeholders on the change to local service centre status of Bluntisham. Concern expressed over the democratic process.</p>
<p>Necessary road improvements have been identified and costed in Table 6 St Ives SPA Infrastructure Requirements 2016-2036 at £3,234,050. There is zero funding identified for these improvements, which are entirely for the relief of congestion on the A1123 and A1096. Until these critically necessary schemes are complete there should be no additional development in areas that feed traffic into St Ives.</p>
<p>BL1 West of Longacres - The land has been allocated despite the fact that the planning application has not been determined and despite the large number of objections to it from local residents, the Parish Councils of Bluntisham, Colne and Earith, the local councillors Mike Francis and Robin Carter and the local MP Shailesh Vara. The Colne Road Action Group has raised a petition on HDC's own website which has now attracted over 280 signatures. Object to the Proposed Submission on the grounds of legal compliance and soundness. Objections based on legal compliance: contrary to the National Planning Policy Framework (NPPF) tests for compliance; lack of consultation with the key stakeholders including the Parish Council, local councillors and the residents themselves about a significant change to the settlement hierarchies in the district; , HDC has not acted in accordance with its Statement of Consultation or its Statement of Community Involvement. Objections based on soundness: the Plan is not positively prepared and is not justified within the tests of the National Planning Policy Framework. the future infrastructure needs, as identified in the Infrastructure Delivery Plan Addendum December 2017 (LSC18 to LSC24, LSC 34 to LSC35 and LSC44 to LSC49), have not been funded and are in any event not achievable due to physical constraints. In respect of paragraph 4.100, Bluntisham does not qualify because it does not have a Doctor's surgery. At present Dr Lui visits Bluntisham for only one and half hours per week at the village hall which has no specialist medical facilities, no clinics and very few appointments. This does not constitute a Doctor's surgery. By contrast, the other Local Service Centres of Alconbury and Great Staughton, do have full time doctor's surgeries. Bluntisham should therefore not be categorised alongside Alconbury and Great Staughton because it does not share the same level of GP provision and no patients travel into Bluntisham for their care. Commuting to Cambridge by bus (a journey of over one hour) would require departing the village at 6:27am, 6:47am or 7:22am. There are no further departures during the day. On Saturday there is just one bus leaving at 7:42am and on Sunday no buses at all. This means that there is high dependency on the private car as the only practical way of travelling out of Bluntisham for work and leisure purposes. Land allocation West of Longacres, Bluntisham (BL 1) would be would harm wildlife, would adversely affect the character and tranquility of the countryside and would create light pollution. There is "no employment land" allocated for development in Bluntisham and very limited existing employment opportunity in the village.</p>

6 Section D: Allocations

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Issue raised
<p>Objects to development of 135 homes near the school in Colne Road. The village has limited services and is not able to support development of more homes. There is no doctor surgery; no space in the primary school; already narrow, congested roads; and only one shop (with limited, overcrowded parking that is already dangerous). The proposed development roads will exit onto the Colne Road opposite the village Primary School which will be extremely dangerous.</p>
<p>Facilities are not within a reasonable distance for people to walk or cycle. Specifically the development fails to meet any of the 'protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people'. Budgens Garage is not a viable location to undertake a family weekly shop (a higher order centre is required when considering developments of this size), there is 'no' viable doctors surgery in the village, long-term flood risk is apparent to neighbouring properties and the nearest reasonable employment opportunities are St.Ives, Huntingdon and Cambridge.</p>
<p>The HELAA Sustainability Analysis for 'West of Longacres, Bluntisham' is flawed. The flaws are as follows: Section 1) The impact of losing good quality Grade 2 farming land outside the village boundary is seen as acceptable Section 3) Whilst the site itself isn't classified as a flood risk it does pose a flood risk to existing properties on Colne Road due to the slope of the land and the natural run-off of surface water. Section 6) The proposal place large 3 storey MDU's overlooking existing housing to the West of the site. This intrusion of privacy (and potentially light) would be excessive and constant. Section 10) The proposed access road is directly opposite two houses on Colne Road. The light pollution (headlights directly lined up to windows) and privacy intrusion of this proposal would be extreme and excessive. Section 17) The nearest food shop is 1.3km away - creating more traffic as people would use their cars. Section 18) 'Earith Business Park' is a grand term for a 'small number (c.10-15) of old industrial units for small business'. There are very few job opportunities here - this needs to be investigated further. Section 19) The answer is clearly 'No' so why isn't this Red? Section 21) Bluntisham is a Small Village with limited access routes. How can 21b be Green? There is already major congestion on 'all' access routes to and from the village during peak times (07:00-9:00). This should be Red</p>
<p>There is a cluster of grade II listed buildings to the south west of the site. Development of the site has the potential to impact on the setting of these listed buildings. It is recommended that there should be sufficient planting along the south western boundary of the site. These requirements should be included in the policy and supporting text.</p>
<p>Development of the land would result in the loss of high grade (Grade 2) agricultural land; taking land out of food production.</p>
<p>The development of the land would lead to coalescence with Colne village. This allocation has been included in the Local Plan because of the speculative application for outline planning permission 17/00906/OUT for 135 homes, submitted when Bluntisham was a 'smaller settlement' in the hierarchy.</p>
<p>Supports the allocation of Bluntisham as a Local Service Centre as set out within emerging policy LP9. Bluntisham's position within the settlement hierarchy is appropriate given that it provides a primary school, doctor's surgery, public hall, public house and convenience shop. The village also has a service station, cafe, Baptist church and a bus service. Supports the development strategy and associated distribution of growth as set out within policy LP2 'Strategy for Development'. Supports the emerging allocation of Land West of Longacres, Bluntisham for up to 150 dwellings indicated by Policy BL1 and the associated Policies Map. The outline planning application submitted on behalf of R2 Developments Limited for up to 135 dwellings (17/00906/OUT) meets the criteria within policy BL1 to achieve successful development of the site. St Helen's Primary School has expressed support for the development which it believes will help increase pupil enrolment, class numbers and improvements to the school.</p>

Section D: Allocations 6

Issue raised
Natural England welcomes amendment to this policy to require assessment of the potential impacts on the Ouse Washes SAC/SPA/Ramsar site and the Berry Fen SSSI arising from increased recreational pressure and requirements for appropriate mitigation or alternative recreational provision.
Concerns over future maintenance of surface water drainage facilities.
BL2 North of 10 Station Road - Supports this allocation of land to accommodate 30 dwellings. There is a current planning application which is referred to in paragraph 14.14 (17/01015/OUT) which deals with transport, flood relief, ecology and arboriculture. The allocation does not optimise the available land in a sustainable manner. The allocation can form a larger allocation for housing.
There is a grade II* and two grade II listed buildings to the east of the site. The Bluntisham Conservation Area lies immediately to the north east of the site. Development of the site has the potential to impact on the setting of these listed buildings and the conservation area. Any development should preserve the listed buildings and their settings and preserve or where opportunities arise enhance the Conservation Area and its setting. These requirements should be included in the policy and supporting text.
Omission site Rear of 18 Holliday's Road - this should be identified for residential development as it is a more appropriate site than the 2 sites that have been allocated under Policy BL1 and BL2.
Omission site South of Mill Lane - delivery assumptions for the 4 strategic sites Policy SEL 1.1: Alconbury Airfield and Grange Farm / Policy SEL 1.2: RAF Alconbury / Policy HU 1: Ermine Street / Policy SEL 2: St Neots East are not justified, nor is a fallback position identified should these strategic sites fail to deliver as predicted. To reduce the risk of not delivering sufficient housing land and to provide flexible housing land supply delivery, the authority should identify further small to moderate site to boost housing land supply delivery within the district. These should be within/adjacent to the key service centres identified in the new local plan and within local service centres.

Great Staughton

Number of Representations		
Total	Objection	Support
5	2	3

Main issues

- 6.50** Issues related to details rather than the principle of the proposed allocations; minor amendments were sought.

Summary of issues raised

Table 97

Issue raised
Given existing parking issues, any new development in Great Staughton will need to include adequate parking.
GS1 South of 29 The Green - The landowners welcome and support the proposed allocation. Rationale for allocation of the site is provided and allocation of the site is considered to be suitable, credible and deliverable. The allocation is therefore considered sound.

6 Section D: Allocations

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Issue raised
Development of the site has the potential to impact on the setting of Grade II listed numbers 31 and 33 The Green and Grade II listed 1 The Green. Any development should preserve the listed buildings and their settings. It is outlined that these requirements should be included in the policy and supporting text.
Concerns are raised that although the site is identified as being at significant surface water flood risk, the policy does not specify that a Flood Risk Assessment is required, nor does it specify what outcomes the Local Planning Authority wish to achieve through the site. It is outlined that the policy should require a Flood Risk Assessment covering flooding from all sources, and demonstrating overall flood risk reduction.
GS2 between 20 Cage Lane and Averyhill - Any potential new development will need adequate parking as there are already on going parking issues in Great Staughton.

7 Appendices

Number of Representations		
Total	Objection	Support
2	2	0

Main issues

7.1 Issues related only to matters of detail and minor amendments were sought.

Summary of issues raised

Table 98

Issue raised
<p>Appendix C - The representation relies entirely on an attached pdf which comprises an extract from the Infrastructure Delivery Plan with tracked changes and 'sticky note' annotations of suggested changes put forward by NHS England Midlands and East (East). The amendments relate to suggested changes in section 7.1 of IDP June 2017 to the descriptions of health provision. No comments were directly related to the Appendix.</p>
<p>Glossary - Definitions should be included for listed building, scheduled monument and registered park and garden.</p>

Appendix 1 Statement of representations procedure

Huntingdonshire District Council | Statement of Representations March 2018

Appendix 1 Statement of representations procedure

Statement of Representations

Procedure for the

Huntingdonshire Local Plan to 2036

Huntingdonshire District Council has prepared a draft local plan entitled “Huntingdonshire’s Local Plan to 2036” which is being published for representations. The representations period runs from **18 December 2017 to 5 February 2018**.

During the consultation period a copy of the draft local plan will be available at Pathfinder House, St Mary’s Street, Huntingdon, PE29 3TN, during normal office opening days and times on Mondays to Thursdays between 8:45am and 5pm and on Fridays between 8:45am and 4.30pm.

The representations period includes the Christmas and New Year period when the offices have limited opening. For full information please see the Council’s website: <http://www.huntingdonshire.gov.uk/news/christmas-and-new-year-opening-times-2017/>

Representations on the content of the draft local plan can be made in a number of ways:

- Online through the Council’s planning consultation portal at http://consult.huntingdonshire.gov.uk/portal/pp/hlp2036/lp2036_pro_sub
- By email to local.plan@huntingdonshire.gov.uk
- In writing to Mr A Moffat, Planning Services, Huntingdonshire District Council, Pathfinder House, St Mary’s Street, Huntingdon, Cambridgeshire, PE29 3TN

Please note that the representations period **closes at 5pm on Monday 5 February 2018**. As per current planning regulations any representations received after this time will be treated as if they were received on the next working day and as such will not be considered to be duly made and will not be considered in the examination process with those representations that have been received during the representations period. As this is a formal representations period no exceptions or extensions can be made.

Representations

During this period representations are required to state how they relate to ‘Soundness’ and ‘Legal Compliance’. For advice about making representations please see the ‘Advice on making representations’ document that is available on the Council’s planning consultation portal.

Following the representations period

Following the representations period the draft local plan, all proposed submission documents and all duly made representations will be submitted to the Secretary of State for examination. The Council aims to complete the submission by the end of March 2018.

Representations in plan order Appendix 2

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Appendix 2 Representations in plan order

Chapter 1: What is the Plan and What does it do?

Table 99

Plan reference	Representor	Representation reference
1.2	Mack	PS642
1.2	Pryce	PS116
1.6	Urban & Civic	PS824
1.11	Pryce	PS91
1.11	Urban & Civic	PS825
1.12	Dale	PS384
1.17	Pryce	PS102
1.18	Davies	PS337
1.19	Davies	PS336
1.19	Pryce	PS92
1.20	Behrendt	P658
1.20	Central Bedfordshire	PS476
1.20	Central Bedfordshire	PS776
1.20	Marnes	PS692
1.20	Mayor of London	PS719
1.20	National Grid	PS89
1.20	NNJPU	PS148
1.20	Perez	PS36
1.20	Peterborough City Council	PS251
1.20	Pollock	PS578
1.20	Pryce	PS93
1.21	Albans, Hannah	PS444
1.21	Thornewill	PS341
1.22	Endurance Estates and Edmund Thornhill	PS789
1.22	Nuttall	PS713
1.22	Ranson and Axiom Developments Ltd	PS720
1.22	Thornewill	PS342
1.23	Nuttall	PS698
1.23	Nuttall	PS714
1.24	Central Bedfordshire	PS779
1.25	Pryce	PS103
1.25	Tindle	PS572

Chapter 2: Huntingdonshire District

Table 100

Plan reference	Representor	Representation reference
2.2	Endurance Estates and Edmund Thornhill	PS781
2.2	Marnes	PS171
2.7	Mack	PS480
2.8	Marnes	PS172
Figure 1	Pryce	PS104

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Plan reference	Representor	Representation reference
Largest Villages	Pryce	PS105

Chapter 3: Issues Shaping the Local Plan

Table 101

Plan reference	Representor	Representation reference
3.2	Bellway Homes	PS518
3.2	Bellway Homes	PS723
3.2	Nuttall	PS699
3.2	Pryce	PS108
3.2	Thornewill	PS343
3.2	Thronewill	PS344
3.2	Urban & Civic	PS827
3.2	Williams	PS151
Key issues	Pryce	PS107
Key Issues	Urban & Civic	PS826
3	Mack	PS485
3	Mack	PS487
3	Marnes	PS173
3	Marnes	PS174

Chapter 4: Development Strategy

Table 102

Plan reference	Representor	Representation reference
4.45	Gladmans	PS880
4.45	St John's College	PS263
4.45	Thornewill	PS357
4.49	Marnes	PS177
4.50	Marnes	PS178
4.78	Countryside Properties	PS688
4.78	SFHL Ltd + Bloor Homes (South Mids)	PS729
4.78	St John's College	PS265
4.78	Urban & Civic	PS832
4.78	Williams	PS153
4.79	Caddick Land	PS260
4.79	Endurance Estates and Edmund Thornhill	PS785
4.83	John Martin & Associates	PS350
4	Larkfleet Homes Ltd	PS674
4	Larkfleet Homes Ltd	PS689
LP1	Abbey Properties (Cambs) Ltd	PS677
LP1	Albans, Hannah	PS443
LP1	Bedfordia Developments	PS648
LP1	Bedfordia Developments	PS564
LP1	Behrendt	PS659
LP1	Bellway Homes	PS725
LP1	Bellway Homes	PS519

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Plan reference	Representor	Representation reference
LP1	Brand, Andy	PS423
LP1	Caddick Land	PS254
LP1	Central Bedfordshire	PS777
LP1	Conroy	PS554
LP1	Countryside Properties	PS660
LP1	Crest Nicholson	PS882
LP1	Dale	PS388
LP1	Dews Coaches	PS560
LP1	Endurance Estates and Edmund Thornhill	PS782
LP1	Fairfield Partnership	PS213
LP1	Floodline Developments	PS649
LP1	Gladman	PS851
LP1	Hallam Land Management	PS400
LP1	Hutchinson and Barford	PS597
LP1	Hutchinson	PS387
LP1	Larkfleet Homes Ltd	PS822
LP1	Linden Homes Strategic Land	PS424
LP1	Measures Farms Ltd	PS768
LP1	Partners in Planning	PS477
LP1	Perez	PS41
LP1	Ranson and Axiom Developments Ltd	PS721
LP1	St John's College	PS264
LP1	Thornewill	PS347
LP1	Urban & Civic	PS828
LP1	Woolway	PS403
LP2 4.6	Marnes	PS180
LP2 4.10	Marnes	PS176
LP2 4.10	Pryce	PS109
LP2 4.16	Mack	PS494
LP2 4.20	John Martin & Associates	PS349
LP2 4.21	Crest Nicholson	PS883
LP2 4.21	Nuttall	PS700
LP2 4.23	Dale	PS402
LP2 4.24	Pryce	PS110
LP2 4.25	Dale	PS396
LP2	Abbey Properties (Cambs) Ltd	PS678
LP2	Abbey Properties (Cambs) Ltd	PS686
LP2	Abbotsley Farms	PS758
LP2	AgReserves	PS535
LP2	Albans, Hannah	PS445
LP2	AWG Landholdings	PS717
LP2	Baker PW & JW	PS761
LP2	Banks Trustees	PS671
LP2	Bedfordia Developments	PS574
LP2	Behagg	PS425
LP2	Behrendt	PS661
LP2	Bellway Homes	PS520
LP2	Bellway Homes	PS727
LP2	Brand, Andy	PS429

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Plan reference	Representor	Representation reference
LP2	Caddick Land	PS255
LP2	Catesby Estates Ltd	PS743
LP2	Central Bedfordshire	PS778
LP2	Crest Nicholson	PS884
LP2	Dale	PS417
LP2	Dews Coaches	PS561
LP2	Doyle	PS470
LP2	Endurance Estates and Edmund Thornhill	PS783
LP2	Extra MSA Group	PS646
LP2	Fairfield Partnership	PS221
LP2	Fairfield Partnership	PS222
LP2	Floodline Developments	PS650
LP2	Gladman	PS852
LP2	Hallam Land Management	PS405
LP2	John Martin & Associates	PS348
LP2	Larkfleet Homes Ltd	PS823
LP2	Lattenbury Farms Ltd	PS765
LP2	Linden Homes Strategic Land	PS427
LP2	Mack	PS490
LP2	Measures Farms Ltd	PS769
LP2	Nuttall	PS701
LP2	Oxford University	PS887
LP2	Partners in Planning	PS479
LP2	Pegasus Group	PS675
LP2	Perez	PS42
LP2	Peters	PS434
LP2	Rawlinson	PS745
LP2	Roberts	PS475
LP2	SFHL Ltd + Bloor Homes (South Mids)	PS735
LP2	Thornewill	PS352
LP2	Urban & Civic	PS829
LP3	Albans, Hannah	PS446
LP3	Bedfordia Developments	PS587
LP3	Bedfordia Developments	PS656
LP3	Nuttall	PS702
LP3	Oxford University	PS888
LP3	Patience	PS816
LP3	Urban & Civic	PS830
LP3	Williams	PS152
LP4 4.55	Marnes	PS179
LP4 4.55	West	PS295
LP4 4.57	Dale	PS404
LP4	Albans, Hannah	PS447
LP4	Behrendt	PS662
LP4	Endurance Estates and Edmund Thornhill	PS784
LP4	Hupton	PS399
LP4	Patience	PS817
LP4	Rawlinson	PS754
LP4	Tindle	PS563

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Plan reference	Representor	Representation reference
LP4	Urban & Civic	PS831
LP5	Brand, Andy	PS435
LP5	Fitzsimmons	PS202
LP5	Porter	PS790
LP5	Rawlinson	PS756
LP6	Brand, Andy	PS437
LP6	Daniels, J L Discretionary Trust	PS270
LP6	Patience	PS818
LP6	Urban & Civic	PS833
LP7 4.85	SFHL Ltd + Bloor Homes (South Mids)	PS733
LP7 4.86	Hutchinson	PS374
LP7 4.86	Rawlinson	PS748
LP7	Abbey Properties (Cambs) Ltd	PS679
LP7	Abbotsley Farms	PS759
LP7	Albans, Hannah	PS448
LP7	Aldi Stores	PS143
LP7	Baker PW & JW	PS762
LP7	Banks Trustees	PS669
LP7	Bedfordia Developments	PS576
LP7	Bedfordia Developments	PS653
LP7	Bellway Homes	PS521
LP7	Bellway Homes	PS730
LP7	Endurance Estates and Edmund Thornhill	PS786
LP7	Floodline Developments	PS651
LP7	Gladman	PS853
LP7	Urban & Civic	PS834
LP8 4.95	Buchanan, Jim	PS52
LP8 4.95	Buchanan, Jim	PS53
LP8 4.96	Hallam Land Management	PS406
LP8	Caddick Land	PS256
LP8	Daniels, J L Discretionary Trust	PS266
LP8	Ely Diocesan Offices	PS168
LP8	Endurance Estates and Edmund Thornhill	PS787
LP8	Gladman	PS854
LP8	Measures Farms Ltd	PS770
LP8	Perez	PS43
LP9 4.99	Caswell	PS252
LP9 4.99	Dunn	PS279
LP9 4.99	Dunn	PS287
LP9 4.99	Dunn	PS288
LP9 4.99	Ely Diocesan Offices	PS166
LP9 4.99	Ernst	PS10
LP9 4.99	Hart Bros Ltd	PS489
LP9 4.99	Walton	PS13
LP9 4.100	Davies	PS333
LP9 4.100	Dunn	PS280
LP9 4.100	Dunn	PS289
LP9 4.100	Lusmore	PS76
LP9 4.100	Worth	PS328

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Plan reference	Representor	Representation reference
LP9 4.101	Brant, Paul	PS301
LP9 4.101	Dunn	PS286
LP9 4.101	McAulay	PS533
LP9 4.101	Worth	PS329
LP9 4.102	Dunn	PS281
LP9 4.102	Dunn	PS290
LP9	Caddick Land	PS257
LP9	Catesby Estates Ltd	PS744
LP9	Curtis	PS57
LP9	Endurance Estates and Edmund Thornhill	PS788
LP9	Everest	PS56
LP9	Gedye	PS47
LP9	Gladman	PS855
LP9	Hallam Land Management	PS408
LP9	Holme Wood Property Development	PS507
LP9	Holme Wood Property Development	PS575
LP9	Moore	PS244
LP9	Needingworth Consortium	PS246
LP9	Shears	PS40
LP9	Stewart	PS567
LP10 4.104	Chandler	PS383
LP10 4.105	John Martin & Associates	PS351
LP10 4.106	Wilmer	PS150
LP10	Albans, Hannah	PS472
LP10	Boots Pensions Ltd	PS694
LP10	Bush, Andy	PS582
LP10	Caddick Land	PS258
LP10	Caddick Land	PS259
LP10	Catesby Estates Ltd	PS755
LP10	Catesbsy Estates Ltd	PS763
LP10	Crest Nicholson	PS885
LP10	Doyle	PS471
LP10	Gladman	PS856
LP10	Gladman	PS874
LP10	Gladman	PS877
LP10	Hallam Land Management	PS409
LP10	Holmes	PS588
LP10	Jepson	PS101
LP10	John Martin & Associates	PS353
LP10	Lattenbury Farms Ltd	PS766
LP10	Measures Farms Ltd	PS771
LP10	Oxford University	PS889
LP10	Pegasus Group	PS676
LP10	Perez	PS44
LP10	Rochester Bridge Trust	PS696
LP10	Topham	PS389
LP10	Urban & Civic	PS835
LP11 4.117	Dunn	PS283
LP11	Abbey Properties (Cambs) Ltd	PS680

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Plan reference	Representor	Representation reference
LP11	Bellway Homes	PS732
LP11	Dunn	PS282
LP11	Gladman	PS857
LP11	Perez	PS45
LP11	Bellway Homes	PS522

Chapter 5: Requiring Good Design

Table 103

Plan reference	Representor	Representation reference
5.3	Marnes	PS181
Requiring Good Design	Taylor	PS16
LP12	Albans, Hannah	PS449
LP12	Bellway Homes	PS523
LP12	Bellway Homes	PS731
LP12	Countryside Properties	PS672
LP12	Gladman	PS859
LP12	Measures Farm Ltd	PS773
LP12	Thornewill	PS358
LP12	Urban & Civic	PS836
LP13	Bellway Homes	PS524
LP13	Bellway Homes	PS734
LP13	Gladman	PS858
LP13	Measures Farms Ltd	PS774
LP13	Patience	PS819
LP13	Urban & Civic	PS837
LP14	Albans, Hannah	PS450
LP14	Bellway Homes	PS525
LP14	Bellway Homes	PS746
LP14	Gladman	PS860
LP14	Hupton	PS398
LP14	Pryce	PS94
LP14	Thornewill	PS359
LP14	Urban & Civic	PS838
LP15	Brand, Andy	PS438
LP15	Gladman	PS861
LP15	Urban & Civic	PS839
LP16 5.34	Fitzsimmons	PS200
LP16 5.39	Fitzsimmons	PS201
LP16 5.39	Porter	PS795
LP16	Patience	PS820
LP17 5.45	Holnes	PS7
LP17 5.47	Holnes	PS6
LP17	Albans, Hannah	PS493
LP17	Bellway Homes	PS526
LP17	Bellway Homes	PS747
LP17	Marnes	PS182

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Plan reference	Representor	Representation reference
LP17	Nuttall	PS703
LP17	Pryce	PS112
LP17	Thornewill	PS360
LP17	Urban & Civic	PS840
LP18 5.53	Buchanan, Jim	PS54
LP18	Albans, Hannah	PS458
LP18	Countryside Properties	PS673
LP18	Dale	PS416
LP18	SFHL Ltd + Bloor Homes (South Mids)	PS736
LP18	Urban & Civic	PS841

Chapter 6: Building a Strong, Competitive Economy

Table 104

Plan reference	Referentor	Representation reference
LP19 6.17	Gadsby	PS73
LP19 6.17	Pryce	PS95
LP19	Aldi Stores	PS146
LP19	Nuttall	PS704
LP19	Urban & Civic	PS842
LP20 6.24	Ridewood	PS5
LP20	Gadsby	PS74
LP20	John Martin & Associates	PS355
LP20	Mack	PS495
LP20	Marnes	PS183
LP20	Nuttall	PS705
LP21	Mack	PS497
LP22	Aldi Stores	PS145
LP22	Mack	PS501
LP22	Rawlinson	PS750
LP22	Urban & Civic	PS843
LP23	Pryce	PS96
LP23	Pryce	PS97
LP24	Nuttall	PS706

Chapter 7: Strengthening Communities

Table 105

Plan reference	Representor	Representation reference
7.3	Marnes	PS184
LP25	Albans, Hannah	PS461
LP25	Allgood Services	PS393
LP25	Aragon Homes	PS394
LP25	Behrendt	PS663
LP25	Bellway Homes	PS527
LP25	Bellway Homes	PS749
LP25	Brand, Andy	PS439

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Huntingdonshire District Council | Statement of Representations March 2018

Plan reference	Representor	Representation reference
LP25	Campbell	PS421
LP25	Countryside Properties	PS666
LP25	Dadge	PS581
LP25	Gladman	PS862
LP25	Marnes	PS185
LP25	Measures Farm Ltd	PS775
LP25	Partners In Planning	PS392
LP25	Pryce	PS98
LP25	Rentplus	PS613
LP25	SFHL Ltd + Bloor Homes (South Mids)	PS737
LP25	Thornewill	PS361
LP25	Urban & Civic	PS844
LP26 7.23	Stevenson	PS369
LP26	Albans, Hannah	PS463
LP26	Behrendt	PS664
LP26	Bellway Homes	PS528
LP26	Bellway Homes	PS751
LP26	Brand, Andy	PS440
LP26	Hallam Land Management	PS411
LP26	Pryce	PS99
LP26	Stevenson	PS367
LP26	Urban & Civic	PS845
LP28	Mack	PS503
LP28	Nuttall	PS707
LP29 7.45	Oxford University	PS892
LP29	Gladman	PS864
LP29	Hallam Land Management	PS412
LP29	Oxford University	PS891
LP29	Pryce	PS100
LP30	Abbey Properties (Cambs) Ltd	PS682
LP30	Mack	PS505
LP30	Marnes	PS186
LP30	Tindle	PS544
LP31	Albans, Hannah	PS465
LP31	Behrendt	PS665
LP31	Gladman	PS865
LP31	SFHL + Bloor Homes (South Mids)	PS738
LP31	St John's College	PS267
LP31	Thornewill	PS362

Chapter 8: Conserving and Enhancing the Environment

Table 106

Plan reference	Representor	Representation reference
8	Mack	PS509
8	Scarisbrick	PS229
LP32 8.10	Williams	PS156
LP32 8.13	Williams	PS157

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Plan reference	Representor	Representation reference
LP32 8.18	Williams	PS159
LP32	Floodline Developments	PS652
LP32	Gladman	PS866
LP32	Nuttall	PS708
LP32	Williams	PS154
LP33	Nuttall	PS709
LP33	SFHL Ltd + Bloor Homes (South Mids)	PS739
LP34	Raisewell	PS236
LP35 8.31	Tindle	PS514
LP35	Rochester Bridge Trust	PS697
LP36 8.35	Mack	PS511
LP36	Albans, Hannah	PS467
LP36	Bedfordia Developments	PS657
LP36	Bedfordia Developments	PS585
LP36	Brand, Andy	PS441
LP36	Gladman	PS867
LP36	Mack	PS512
LP36	Urban & Civic	PS846
LP37	Fitzsimmons	PS196
LP37	Marnes	PS187
LP37	Marnes	PS332
LP37	Patience	PS821
LP37	Reeves	PS70
LP38	Albans, Hannah	PS468
LP40	Pryce	PS113

Section D: Allocations

Table 107

Plan reference	Representor	Representation reference
D	Caddick Land	PS253
D	Cooper	PS481
D.1	Langlands	PS9
D.2	Thornewill	PS364
D	Mack	PS513
D	Thornewill	PS363
D.1	Crest Nicholson	PS886

Chapter 9: Huntingdon Spatial Planning Area

Table 108

Plan reference	Representor	Representation reference
Brampton	Abbey Properties (Cambs) Ltd	PS683
Brampton	Abbey Properties (Cambs) Ltd	PS684
Brampton	Thornewill	PS377
HU12	Mack	PS543
HU13	Mack	PS545

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Plan reference	Representor	Representation reference
HU14	Mack	PS546
HU15	Datoo	PS354
Godmanchester Additional site	Thomas, Fergus	PS540
Godmanchester Additional site	Thomas, Fergus	PS542
Godmanchester Additional site	Thomas, Fergus	PS541
Godmanchester	Countryside Properties	PS667
Godmanchester	Pryce	PS117
HU16	Aragon Homes	PS395
HU16	Mack	PS547
HU16	Pryce	PS127
HU17	Mack	PS548
HU17	Pryce	PS114
HU17	RGE Engineering	PS879
HU18	Fitzsimmons	PS207
HU18	Porter	PS794
HU18	Pryce	PS128
HU19	Fairfield Partnership	PS228
HU19	Pryce	PS115
HU1	Fitzsimmons	PS203
HU1	Mack	PS517
HU1	Mimiene	PS625
HU1	Porter	PS791
HU1	SFHL Ltd + Bloor Homes (South Mids)	PS741
HU1	St John's College	PS268
HU1	St John's College	PS269
HU1	Thornewill	PS370
HU1	Urban & Civic	PS849
HU2	Albans, Hannah	PS469
HU3	Cambridgeshire Police	PS596
HU3	Mack	PS529
HU4	Mack	PS530
HU5	Bowers, Raymond	PS134
HU5	Croucher	PS124
HU5	Mack	PS531
HU6	Croucher	PS129
HU6	Mack	PS532
HU7	Fitzsimmons	PS204
HU7	Mack	PS534
HU8	Mack	PS536
HU8	Sharpe	PS321
HU9	Mack	PS538
HU9	Pryce	PS322
HU10	Bowers, Raymond	PS135
HU10	Fitzsimmons	PS205
HU10	Nuttall	PS711
HU10	Porter	PS792

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Plan reference	Representor	Representation reference
HU10	Sewell	PS379
HU10	Williams	PS160
HU11	Fitzsimmons	PS206
HU11	Jockey Club Racecourses	PS767
HU11	Mack	PS539
HU11	Porter	PS793
Huntingdon	Linden Homes Strategic Land	PS426
Huntingdon	Linden Homes Strategic Land	PS430
Huntingdon SPA	Dale	PS410
9	Mimiene	PS566
9	Mimiene	PS414
SEL 1	Gladman	PS869
SEL 1	Mimiene	PS381
SEL 1	Mimiene	PS621
SEL 1.1 9.10	SFHL Ltd + Bloor Homes (South Mids)	PS740
SEL 1.1	Fairfield Partnership	PS224
SEL 1.1	Gladman	PS868
SEL 1.1	Mack	PS515
SEL 1.1	Nuttall	PS710
SEL 1.1	Thornewill	PS365
SEL 1.1	Urban & Civic	PS847
SEL 1.2 9.29	Fitzsimmons	PS197
SEL 1.2	Fairfield Partnership	PS227
SEL 1.2	Gladman	PS870
SEL 1.2	Limbrick	PS60
SEL 1.2	Mack	PS516
SEL 1.2	Mimiene	PS623
SEL 1.2	Thornewill	PS368
SEL 1.2	Urban & Civic	PS848

Chapter 10: St Neots Spatial Planning Area

Table 109

Plan reference	Representor	Representation reference
SEL 2 10.3	Gallagher	PS451
SEL 2 10.4	Gallagher	PS453
SEL 2 10.5	Gallagher	PS454
SEL 2 10.6	Gallagher	PS455
SEL 2 10.6	Gallagher	PS456
SEL 2 10.6	Gallagher	PS457
SEL 2 10.7	Gallagher	PS459
SEL 2 10.8	Gallagher	PS460
SEL 2 10.9	Gallagher	PS462
SEL 2 10.10	Gallagher	PS464
SEL 2 10.12	Gallagher	PS466
SEL 2	Abbotsley Farms	PS760
SEL 2	Baker PW & JW	PS764
SEL 2	Banks Trustees	PS670

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Plan reference	Representor	Representation reference
SEL 2	Central Bedfordshire	PS780
SEL 2	Gallagher	PS452
SEL 2	Gladman	PS871
SEL 2	Mack	PS551
SEL 2	Page	PS570
SEL 2	Urban & Civic	PS850
SN1	Mack	PS552
SN2	Fitzsimmons	PS208
SN2	Mack	PS553
SN3	Fitzsimmons	PS209
SN3	Mack	PS557
SN3	Porter	PS796
SN5	Mack	PS558
SN6	Mack	PS559
SN6	Nuttall	PS715
SN6	Oxford University	PS890
St Neots	Abbotsley Farms	PS757
St Neots	Baker PW & JW	PS878
St Neots	Bedfordia Developments	PS583
St Neots	Befordia Developments	PS654
St Neots	Hutchinson and Barford	PS600
St Neots	Thornewill	PS371

Chapter 11: St Ives Spatial Planning Area

Table 110

Plan reference	Representor	Representation reference
SI1 11.11	Dale	PS419
SI1	Bellway Homes	PS728
SI1	Dale	PS418
SI1	Fitzsimmons	PS199
SI1	Fitzsimmons	PS210
SI1	Hupton	PS386
SI1	Mack	PS604
SI1	Porter	PS797
SI1	Rawlinson	PS752
SI1	Thornewill	PS372
SI2 11.12	Fox	PS62
SI2 11.14	Grosset	PS61
SI2 11.15	Fox	PS63
SI2	Haylock	PS271
SI2	Humphrey	PS274
SI2	Kessel	PS83
SI2	Mack	PS605
SI2	Marshall	PS48
SI2	Morton	PS277
SI2	Rawlinson	PS753
SI2	St Ives Town Football Club	PS397

Appendix 2 Representations in plan order

Huntingdonshire District Council | Statement of Representations March 2018

Plan reference	Representor	Representation reference
SI2	Thornewill	PS375
SI2	Wells	PS232
SI3	Giffords Farm Stewart	PS579
SI3	Thornewill	PS376
SI4 11.21	Croucher	PS243
S14 11.27	Croucher	PS245
SI4	Eeley	PS34
SI4	Mack	PS606
SI4	Porter	PS798
11.1	Behagg	PS436
11.1	Dale	PS390
11.1	Floodline	PS647
11.1	Hutchinson	PS346
St Ives	Bellway Homes	PS722
St Ives	Ranson and Axiom Developments Ltd	PS726
St Ives	Abbey Properties (Cambs) Ltd	PS685
St Ives	Behagg	PS432
St Ives	Brand, Andy	PS442

Chapter 12: Ramsey Spatial Planning Area

Table 111

Plan reference	Representor	Representation reference
RA1 12.2	Brand, Andy	PS473
RA1 12.4	Abblitt	PS1
RA1	Mack	PS607
RA1	Porter	PS799
RA1	Porter	PS800
RA2	Abblitt	PS2
RA2	Mack	PS608
RA3	Mack	PS609
RA3	Morris	PS8
RA3	Porter	PS801
RA4	Abblitt	PS3
RA4	Fitzsimmons	PS211
RA4	Porter	PS802
RA5	Mack	PS610
RA5	Porter	PS803
RA6	Fitzsimmons	PS212
RA6	Mack	PS611
RA6	Porter	PS804
RA7 12.43	Abbey Group and Trustees of CR East	PS431
RA7 12.43	Brindley, Pete	PS11
RA7	Abbey Group and Trustees of CR East	PS428
RA7	Porter	PS805
RA8	Abblitt	PS4
RA8	Mack	PS612
RA8	Porter	PS806

Representations in plan order Appendix 2

Huntingdonshire District Council | Statement of Representations March 2018

Plan reference	Representor	Representation reference
RA8	Strawsons Property (Ominvale Ltd)	PS234
RA8	Strawsons Property (Ominvale Ltd)	PS235
RA8	Thornewill	PS378
Ramsey	Abbey Properties (Cambs) Ltd	PS687
Ramsey Additional site	Wagstaffe, Abblitt, Fellowes	PS238
Ramsey	Cooper	PS486
Ramsey	Larkfleet Homes Ltd	PS688

Chapter 13: Key Service Centres

Table 112

Plan reference	Representor	Representation reference
BU1	Knox	PS478
BU1	Knox	PS482
BU1	Knox	PS483
BU1	Knox	PS484
BU1	Knox	PS488
BU1	Knox	PS491
BU1	Knox	PS492
BU1	Knox	PS496
BU1	Knox	PS614
BU1	Marnes	PS188
BU1	West	PS296
BU2 13.9	Christie	PS577
BU2	Gladman	PS872
BU2	Mack	PS615
FS1 13.15	Buchanan, Jim	PS51
FS1	Mack	PS616
FS2	Mack	PS617
FS3	Ely Diocesan Offices	PS162
FS3	Ely Diocesan Offices	PS163
FS3	Mack	PS618
FS3	Porter	PS808
Buckden	Gladman	PS876
Buckden	Thornewill	PS380
Fenstanton	Everdell	PS550
Fenstanton	Everdell	PS584
Fenstanton	Farbon	PS555
Fenstanton	Lee	PS303
Sawtry	Gadsby	PS75
Sawtry	Larkfleet Homes Ltd	PS690
Somersham Additional Site	Woolway	PS415
Somersham	Dews Coaches	PS569
Warboys	Gladman	PS875
KB1	Fitzsimmons	PS214
KB1	Mack	PS619

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Huntingdonshire District Council | Statement of Representations March 2018

Plan reference	Representor	Representation reference
KB1	Porter	PS809
KB2	Fitzsimmons	PS215
KB2	Mack	PS620
KB2	Porter	PS810
KB2	Seabrook	PS320
KB3	Mack	PS622
KB3	Seabrook	PS167
SY1	Davis	PS69
SY1	Fitzsimmons	PS216
SY1	Porter	PS811
SY2	Davis	PS71
SY2	Mack	PS624
SM1 13.59	Bradshaw, Tracy	PS420
SM1 13.64	Christie	PS589
SM1	Woolway	PS324
SM2 13.72	Christie	PS592
SM2	Fitzsimmons	PS217
SM2	Mack	PS626
SM2	Porter	PS812
SM3 13.76	Christie	PS595
SM3	Ely Diocesan Offices	PS164
SM3	Mack	PS627
SM4 13.82	Christie	PS598
SM4	Fitzsimmons	PS218
SM4	Mack	PS628
SM4	Porter	PS813
SM4	Wormwald	PS18
SM5 13.83	Crawford	PS88
SM5 13.83	Holland	PS297
SM5 13.83	McConville	PS325
SM5 13.83	Millar	PS24
SM5 13.83	Millar	PS29
SM5 13.83	Reay	PS327
SM5 13.83	Riordan	PS247
SM5 18.83	Roberts	PS87
SM5 13.83	Scarisbrick	PS130
SM5 13.83	Thomas, Andrea	PS79
SM5 13.83	Toye	PS84
SM5 13.84	Christie	PS191
SM5 13.84	Wormwald	PS22
SM5 13.85	Christie	PS192
SM5 13.85	Millar	PS32
SM5 13.85	Millar	PS28
SM5 13.85	Riordan	PS249
SM5 13.85	Thomas, Andrea	PS81
SM5 13.87	Christie	PS193
SM5 13.87	Christie	PS194
SM5 13.87	Millar	PS25
SM5 13.87	Millar	PS31

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Huntingdonshire District Council | Statement of Representations March 2018

Plan reference	Representor	Representation reference
SM5 13.88	Millar	PS27
SM5 13.89	Christie	PS195
SM5 13.89	Millar	PS26
SM5 13.89	Millar	PS30
SM5 13.89	Thomas, Andrea	PS82
SM5 13.89	Wormwald	PS23
SM5	Bryant, Penny	PS149
SM5	Christie	PS190
SM5	Christie	PS602
SM5	Clark	PS106
SM5	Dench	PS111
SM5	Fitzsimmons	PS198
SM5	Gauci	PS691
SM5	Grace	PS14
SM5	Johnson, Ian	PS314
SM5	Kenny	PS326
SM5	Leadbitter	PS695
SM5	Mansfield	PS35
SM5	Mansfield	PS37
SM5	Nixon	PS38
SM5	Riordan	PS72
SM5	Riordan	PS250
SM5	Scarisbrick	PS132
SM5	Thomas, Andrea	PS78
SM5	Toye	PS85
SM5	Watson	PS33
SM5	Whitfield	PS137
SM5	Wormwald	PS17
SM6 13.90	Jones	PS86
SM6 13.90	Massey	PS141
SM6 13.91	Christie	PS580
SM6 13.91	Massey	PS140
SM6 13.94	Christie	PS571
SM6	Liebing	PS138
SM6	Mack	PS629
SM6	Scarisbrick	PS133
SM6	Wormwald	PS19
SM6	Wormwald	PS20
SM6	Wormwald	PS21
WB1	Daniels, J L Discretionary Trust	PS261
WB1	Daniels, J L Discretionary Trust	PS262
WB1	Gould Construction	PS233
WB1	Mack	PS630
WB1	Reeves	PS64
WB2	Mack	PS631
WB2	Reeves	PS65
WB3	Mack	PS632
WB3	Porter	PS807
WB3	Reeves	PS68

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Huntingdonshire District Council | Statement of Representations March 2018

Plan reference	Representor	Representation reference
WB3	Stokes	PS323
WB4	Augstein B	PS237
WB4	Augstein B	PS422
WB4	Mack	PS633
WB4	Reeves	PS66
WB5	Gladman	PS873
WB5	Reeves	PS67
WB5	Wright	PS433
YX1	Mack	PS634
YX1	Providence	PS169

Chapter 14: Local Service Centres

Table 113

Plan reference	Representor	Representation reference
AL1 14.1	Brown, Stephen	PS306
AL1 14.1	Parkhouse	PS401
AL1 14.1	Welsh	PS119
AL1 14.2	Daley	PS158
AL1 14.2	King	PS165
AL1 14.2	Welsh	PS118
AL1 14.2	Welsh	PS121
AL1 14.3	Brown, Stephen	PS307
AL1 14.3	MacLennan	PS591
AL1 14.3	Robertson	PS293
AL1 14.3	Welsh	PS120
AL1 14.4	MacLennan	PS599
AL1 14.4	Welsh	PS122
AL1 14.5	Brown, Stephen	PS308
AL1 14.5	Brown, Stephen	PS309
AL1 14.5	Welsh	PS123
AL1 14.5	Welsh	PS125
AL1	Adams	PS331
AL1	Barber, Susan	PS276
AL1	Bell, Nigel	PS230
AL1	Blenkiron	PS136
AL1	Bodley	PS319
AL1	Boyce, Thomas	PS302
AL1	Brown, Joan	PS340
AL1	Brown, Kathleen	PS474
AL1	Brown, Naomi	PS568
AL1	Brown, Nathan	PS562
AL1	Brown, Reg	PS345
AL1	Brown, Stephen	PS305
AL1	Brown, Stephen	PS306
AL1	Brown, Tracey	PS382
AL1	Buisseret	PS316
AL1	Burton, Len & Eileen	PS742

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Huntingdonshire District Council | Statement of Representations March 2018

Plan reference	Representor	Representation reference
AL1	Chapman	PS310
AL1	Daley	PS155
AL1	Daley	PS161
AL1	Eeles	PS240
AL1	Fitzsimmons	PS219
AL1	Getliffe	PS318
AL1	Glover	PS304
AL1	Hansen	PS335
AL1	Horsley	PS637
AL1	Ingles	PS655
AL1	Jackson	PS643
AL1	Johnson, Gary	PS147
AL1	King-Venables	PS126
AL1	Knox	PS498
AL1	Knox	PS500
AL1	Knox	PS502
AL1	Knox	PS504
AL1	Knox	PS506
AL1	Knox	PS508
AL1	Knox	PS510
AL1	Luscombe	PS556
AL1	Lynch	PS317
AL1	Mack	PS636
AL1	MacLennan	PS139
AL1	MacLennan	PS586
AL1	Maynard	PS294
AL1	McCamley	PS50
AL1	McKay	PS273
AL1	McKay	PS312
AL1	Mepstead	PS142
AL1	Morgan	PS225
AL1	Naegeli	PS603
AL1	Nicol	PS641
AL1	Parkhouse	PS407
AL1	Parkhouse	PS601
AL1	Parkhouse	PS413
AL1	Porter	PS814
AL1	Read	PS298
AL1	Read	PS299
AL1	Rusk Davies	PS311
AL1	Rusk Davies, Sean	PS275
AL1	Sanders	PS313
AL1	Scott	PS144
AL1	Smith	PS189
AL1	Starkey	PS385
AL1	Steeden	PS315
AL1	Wood	PS231
BL1 14.9	Davies	PS338
BL1 14.10	Davies	PS339

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Huntingdonshire District Council | Statement of Representations March 2018

Plan reference	Representor	Representation reference
BL1	Barwell, Michael	PS90
BL1	Butterworth, Rob	PS39
BL1	Colne Road Action Group	PS716
BL1	Colne Road Action Group	PS724
BL1	Davies	PS334
BL1	Davies	PS565
BL1	Dunn	PS285
BL1	James	PS12
BL1	Lusmore	PS80
BL1	Mack	PS638
BL1	Nuttall	PS712
BL1	R2 Developments	PS537
BL1	Young	PS278
BL2	Highland	PS220
BL2	Highland	PS239
BL2	Mack	PS639
Bluntisham	Ashcroft, Gerald	PS58
Bluntisham	Bowd, Jane	PS49
Bluntisham	Carter	PS131
Bluntisham	Davidson	PS59
Bluntisham	Dunn	PS284
Bluntisham	Dunn	PS292
Bluntisham	Lusmore	PS77
Bluntisham	McAulay	PS573
Bluntisham	Mitchell	PS272
Bluntisham	Mitchell	PS373
Bluntisham	Oswald	PS645
Bluntisham	Rollin	PS46
Bluntisham	Searle	PS499
Bluntisham	Taylor	PS693
Bluntisham	Worth	PS330
Bluntisham	Brant, Paul	PS300
GS1 14.17	Russel	PS590
GS1	Childerley	PS366
GS1	Mack	PS640
GS1	Porter	PS815
GS2 14.20	Russel	PS594
Holme New Sites	Measures Farms Ltd	PS881
LSCs	Darke and Ruff	PS223
LSCs	Darke and Ruff	PS241
LSCs	Mack	PS635
LSCs	Morgan	PS15
Needingworth New Site	Needingworth Housing Consortium	PS226

Representations in plan order Appendix 2

Huntingdonshire District Council | Statement of Representations March 2018

Appendices and glossary

Table 114

Plan reference	Representor	Representation reference
C.1	NHS England Midlands and East	PS718
Glossary	Mack	PS644

Appendix 3 List of representors

Huntingdonshire District Council | Statement of Representations March 2018

Appendix 3 List of representors

Abbey Group and Trustees of CR East

Abbey Properties (Cambs) Ltd

Abblitt, KR

Abbotsley Farms Ltd

Adams, Jeremy

AgReserves

Albans, Hannah - Persimmon Homes Ltd

Aldi Stores Ltd

Allgood Services Ltd

Aragon Homes

Ashcroft, Gerald

Augstein, B E A

AWG Landholdings Ltd

Baker, PW & JW

Banks Trustees

Barber, Susan

Barwell, Michael

Bedfordia Developments

Bedfordia Group Ltd

Behagg, Chris

Behrendt, Mark - Home Builders Federation

Bell, Nigel

Bellway Homes Limited

Bellway Homes Limited, C/o Agent

Blenkiron, Steven

Bodley, Christian

Boots Pensions Ltd

Holywell-cum-Needingworth Parish Council

List of representors Appendix 3

Huntingdonshire District Council | Statement of Representations March 2018

Bowd, Jane
Bowers, Raymond
Boyce, Thomas
Bradshaw, Tracy
Brand, Andy - The Abbey Group (Cambridgeshire) Limited
Brant, Paul
Brindley, Pete
Brown, Joan
Brown, Kathleen
Brown, Naomi
Brown, Nathan
Brown, Reg
Brown, Stephen
Brown, Tracey
Bryan, Penny
Buchanan, Jim
Burton, Len and Eileen
Bush, Andy
Buisseret, Rosemary
Butterworth, Rob
Caddick Land
Cambridgeshire Police
Clients of Andrew S Campbell Associates Ltd
Campbell, Andrew S
Carter, Robin
Caswell, John
Catesby Estates Ltd
Central Bedfordshire Council
Chandler, Peter
Chapman, Susan

Appendix 3 List of representors

Huntingdonshire District Council | Statement of Representations March 2018

Childerley, S

Christie, Kyle

Clark, Philip - Friends of Somersham Nature Reserve

Colne Road Action Group

Conroy, M & N

Cooper, Nick

Countryside Properties (UK) Ltd and The Huntingdon Freemans Trust

Crawford, LIsa

Croucher, James

Curtis, Cynthia

Dadge, John - Barker Storey Matthews

Dale, Lois - Houghton and Wyton Parish Council

Daley, Anton

Daniels, J L - Discretionary Trust

Darke and Ruff

Datoo, Mohammed

Davidson, T - Bluntisham Parish Council

Davies, Paul

Davis, Diane - Sawtry Parish Council

Dench, Lesley

Dews Coaches

Doyle, H - Land Promotions & Development Ltd

Dunn, Chris

Eeles, Yvonne

Eeley, Stephen

Ely Diocesan Offices

Endurance Estates & Edmund Thornhill

Ernst, Matthew

Everdell, Mr & Mrs

Everest, RGW & SJ

List of representors Appendix 3

Huntingdonshire District Council | Statement of Representations March 2018

Extra MSA Group

Fairfield Partnership, The

Farbon, Vanda

Fitzsimons, Colum - Cambridgeshire County Council

Floodline Developments

Fox, Dennis

Gadsby, David - Spirotech SRD Group Limited

Gallagher Estates Ltd

Gauci, Yvonne

Gedye, David

Getliffe, Phil

Gladman Developments

Glover, Anthony

Gould, Construction

Grace, Paul

Grosset, Philip

Hallam Land Management & Persimmon

Hansen, Neal

Hart Bros Ltd

Haylock, Angela

Highland, Stephen

Holland, Richard

Holme Wood Property Development

Holmes, Malcolm

Holnes, John

Horsley, Gill and Bill

Humphrey, John

Hupton, Claire - Homes England (formerly Homes and Communities Agency)

Hutchinson, Keith - Flaircross Properties

Hutchinson & Barford, Messrs

Appendix 3 List of representors

Huntingdonshire District Council | Statement of Representations March 2018

Ingles, Alan
Jackson, Joanne
James, Gary
Jepson, Linda
Jockey Club Racecourses
John Martin & Associates
Johnson, Gary
Johnson, Ian
Jones, Gary
Kenny, Miranda
Kessel, John
King, Anthony
King-Venables, Andrew
Knox, Lauren - WYG Environment Planning Transport Ltd
Langlands, Fiona
Larkfleet Homes Ltd
Lattenbury Farms Ltd
Leadbetter, Anna - William Gosney Ltd
Lee, Trevor
Liebing, Katharina
Limbrick, Mark - Defence Infrastructure Organisation
Linden Homes Strategic Land
Luscombe, Clare
Lusmore ,Peter
Lynch, Sarika
Mack, Debbie - Historic England
MacLennan, Tom
Mansfield, Jennifer
Marnes, Alan - Southoe and Midloe parish council
Marshall, Lee

List of representors Appendix 3

Huntingdonshire District Council | Statement of Representations March 2018

Martin, Gareth - Fenland District Council

Massey, Geoffrey

Maynard, Rachel

Mayor of London, Greater London Authority

McAulay, Lewis - Porta Planning

McCamley, Andrew

McConville, Dawn

McKay, Fiona

McKay, Jamie

Measures Farms Ltd

Mepsted, Carol and Harry

Millar, Derek

Mimiene, Ramune - The Stukeleys Parish Council

Mitchell, Ken

Mitchell, Valerie

Moore, Anthony

Morgan, Elizabeth

Morgan, Susan

Morris, Hayden

Morton, Tom

Naegeli, Rebecca

National Grid

Needingworth Housing Consortium

NHS England Midlands and East (East)

Nicol, John

Nixon, Jodie

North Northamptonshire Joint Planning Unit (NNJPU)

Nuttall, Janet - Natural England

Oswald, Catherine

Page, Martin - Brown & Co Barfords

Appendix 3 List of representors

Huntingdonshire District Council | Statement of Representations March 2018

Parkhouse, Andrew

Parkhouse, Linda

Partners in Planning and Architecture

Patience, Stewart - Anglian Water

Pegasus Group c/o Milton (Peterborough) Estates Company

Perez, Joanne - Hilton Parish Council

Peterborough City Council

Peters, J - Hemingford Abbots Parish Council

Pollock, C - Hemingford Abbots Parish Council

Porter, Dawn -Environment Agency

Price, Nick

Providence Land Ltd

Pryce, V - Godmanchester Town Council

R2 Developments

Ransom and Axiom Developments Ltd

Rawlinson, Sue - St Ives Town Council

Read, Roger

Reay, Anthony

Reeves, Roy - Warboys Parish Council

Rentplus

RGE Engineering

Ridewood, Gareth - CPRE

Riordan, R D

Riordan, Robin

Roberts, David - South Cambridgeshire District Council

Roberts, Emma

Robertson, Alan

Rochester Bridge Trust

Rollin, Elizabeth

Rusk Davies, Amber

List of representors Appendix 3

Huntingdonshire District Council | Statement of Representations March 2018

Rusk Davies, Sean
Russel, Jo - Great Staughton Parish Council
Sanders, Colin
Scarisbrick, Peter
Scott, Richard
Seabrook, Paul - Seabrook Farms
Searle, Peter
Sewell, John - Sewell (GB & Partners)
SFHL Ltd/ Bloor Homes (South Mids)
Sharpe, Derek - Cambridge Regional College
Shears, John
Smith, Alan
St Ives Town Football Club
St John's College, Cambridge
Starkey, Rosalind
Steeden, Zoe
Stevenson, Mark - Potton Homes
Stewart, David - Civic Society of St Ives
Stokes, Richard
Strawsons Property (Omnivale Ltd)
Taylor, Geoffrey and Doreen
Taylor, H - Yaxley Parish Council
Thomas, Andrea
Thomas, Fergus - Bellway Homes Limited and Henry H Bletsoe & Son LLP
Thornewill, Tom - Hallam Land Management
Tindle, Simon - Brown&Co Barfords
Topham, Michael
Toye, Kirsten
Urban & Civic
Wagstaffe, Abblitt, Fellowes

Appendix 3 List of representors

Huntingdonshire District Council | Statement of Representations March 2018

Walton, David

Watson, Sarah

Wells, Joanne

Welsh, Alan

West, Georgina - Buckden Parish Council

Whitfield, Chris

Williams, Sian - Wildlife Trust BCN

Wilmer, Andrew & Sally

Wood, Phil

Woolway, R

Wormald, Michelle

Worth, Michael

Wright, David

Young, Darren