

HUNTINGDONSHIRE
LOCAL PLAN
EXAMINATION

MATTER 2: DUTY TO
COOPERATE

REP ID: 1118661

HEARING STATEMENT

CONTENTS

Matter 2 – The duty to co-operate	1
Introduction	1
Issue	1
Questions	1
General	1
Overall Housing Provision	1
Jobs Growth and Employment Land Provision	3
Transport Infrastructure	3
Site Allocations	5

Appendices

Appendix 1: Huntingdonshire District Council representations to the Central Bedfordshire First Draft Local Plan	7
Appendix 2: Central Bedfordshire Council representations to PS HLP2036	8

MATTER 2 – THE DUTY TO CO-OPERATE

Introduction

- 1.1 This Matter 2 Statement has been prepared by Carter Jonas LLP on behalf of Hallam Land Management (HLM), who are promoting land at Gifford's Park in St Ives for a residential-led mixed use development. Representations were submitted to Paragraph 1.20 to 1.21 of the Proposed Submission Huntingdonshire Local Plan 2036 (PS HLP2036) relating to the Duty to Cooperate (DtC) – see Rep Id. 341.

Issue

Whether the Council has complied with the duty to co-operate in the preparation of the Local Plan.

Questions

General

1) *What are the genuinely strategic matters as defined by S33A(4) of the Planning and Compulsory Purchase Act?*

- 1.2 There are two strategic matters for PS HLP2036 which have cross-boundary implications; housing and transport. As set out in our representations to Paragraph 1.20 to 1.21, the cross boundary strategic matters relate to the following:
- The housing target in Policy LP1 is lower than previously agreed with neighbouring authorities through the Cambridgeshire & Peterborough Memorandum of Co-operation (May 2013), which has implications for the supply and delivery of housing and affordable housing within the housing market area
 - The proposed strategic expansion location at St Neots East is on the A428 Corridor and in close proximity to the boundary with Central Bedfordshire, which has implications for the delivery of housing and affordable housing and highway capacity because of the proposed future growth location at Tempsford and new transport infrastructure associated with East West Rail and the Oxford to Cambridge Expressway.
- 1.3 As set out in our response to Qu.2, there is no evidence that there has been any engagement on these strategic matters with neighbouring planning and highway authorities and with Highways England, in order to demonstrate that the requirements of the DtC process have been complied with.

Overall Housing Provision

2) *Who has the Council engaged with in terms of overall housing provision and what form has this taken?*

- 1.4 We identified the requirements of the DtC in our representations to Paragraph 1.20 to 1.21, with reference to Section 33A of the Planning and Compulsory Purchase Act 2004 and Paragraphs 178 to 181 of the NPPF. We noted in particular that the DtC imposes a requirement to engage “constructively”, “actively” and “on an on-going basis”. In summary, we conclude that there is no evidence of engagement on the proposed lower housing target or the cross boundary implications of the strategic allocation at St Neots East on neighbouring authorities.
- 1.5 A Statement of Compliance with the Duty to Cooperate has been prepared [Doc Ref. CORE/06] for PS HLP2036. We would have expected the DtC Statement to identify and explain the engagement that occurred on the proposed lower housing target and on strategic developments and infrastructure in the A428 Corridor. However, there is no evidence of engagement on these matters.
- 1.6 It was previously agreed through the Cambridgeshire and Peterborough Memorandum of Co-operation (May 2013) that Huntingdonshire would accommodate 21,000 dwellings in emerging PS HLP2036. However, Policy LP1 of PS HLP2036 identifies a housing target of 20,100 dwellings between 2011 and 2036. So far as we are aware, this outcome has not been discussed or agreed with the neighbouring Cambridgeshire authorities, and as a consequence we conclude that the requirements of the DtC have not been met. The proposed lower

housing target would have a negative impact on the supply and delivery of housing and affordable housing within Huntingdonshire and across the Cambridgeshire HMA, which are strategic matters.

- 1.7 We consider that the strategic expansion location at St Neots East for 3,820 dwellings should have been subject to detailed discussions and scrutiny through the DtC process in the context of the implications for other strategic developments and infrastructure in the vicinity of the A428 Corridor e.g. Bourn Airfield New Village and Cambourne West (both within South Cambridgeshire), the future growth location at Tempsford for a new settlement (within Central Bedfordshire), the potential transport implications associated with East West Rail and the Oxford to Cambridge Expressway. The quantum of development proposed at these strategic developments in neighbouring areas is substantial and would require significant infrastructure improvements, and could have implications for the delivery of St Neots East. There will be implications for development viability and the delivery of affordable housing at St Neots East. There will be implications for the delivery, funding and capacity of new road and rail transport infrastructure required for the proposed strategic developments along the A428 Corridor, comprising a new offline route for the Oxford to Cambridge Expressway along the A428 and a new rail line for East West Rail. There is no evidence in the DtC Statement that any engagement has taken place on these housing and transport matters in respect of St Neots East with South Cambridgeshire, Central Bedfordshire as Local Planning Authority and Highway Authority, Bedford Borough as Local Planning Authority and Highway Authority, Cambridgeshire County Council as Highway Authority, and Highways England. We consider that invitations to meetings and limited discussions during the early stages of the Local Plan process do not demonstrate that the requirements of the DtC have been met.
- 1.8 We note that representations have been submitted by Huntingdonshire District Council and Central Bedfordshire to consultations on their respective local plan documents about the proposed developments at Tempsford New Settlement and St Neots East, which indicates that engagement between these two authorities on strategic cross boundary matters has been limited. In July 2017 Huntingdonshire District Council submitted representations to the Central Bedfordshire First Draft Local Plan consultation about the proposed Tempsford New Settlement option and the potential implications for St Neots; the response is provided in **Appendix 1**. In February 2018, Central Bedfordshire Council submitted representations to PS HLP2036 consultation about St Neots East; the response is provided in **Appendix 2**.
- 1.9 We note that Tempsford is identified as a future location for growth in the Proposed Submission Central Bedfordshire Local Plan, to be confirmed through an early local plan review and subject to the outcome of decisions on routes for East West Rail and the Oxford to Cambridge Expressway. However, we would still have expected some engagement on the matters and implications associated with these strategic developments and infrastructure through the DtC process. It is possible that the early review of the Central Bedfordshire Local Plan, which is due to commence within six months of adoption, could bring forward a new settlement and strategic transport infrastructure in the vicinity of St Neots East during the plan period for PS HLP2036. As a result, we consider that the housing and transport matters affecting the A428 Corridor should have been subject to engagement through the DtC process.

5) What is the basis for updating the OAN for Huntingdonshire, rather than the wider Cambridge Sub Region Housing Market Area (HMA)? Is this an appropriate approach and how does it affect other authorities?

- 1.10 The previous SHMA formed the basis for agreed housing need figures across the HMA. This identified an agreed figure of 21,000 new dwellings in Huntingdonshire over the plan period which formed the authorities agreement under the duty to cooperate set out in the memorandum of understanding agreed by the HMA authorities.
- 1.11 The OAN Update for Huntingdonshire provides a single authority update and does not consider needs elsewhere in the Cambridge HMA despite concluding that the latest data supports the established definition of the HMA (para 35).
- 1.12 The SHMA Update identifies a reduced OAN figure of 20,100 dwellings – 900 fewer than the HMA-wide SHMA. However, the OAN Update report only considers the needs for Huntingdonshire and it is therefore not clear about the impact this will have on neighbouring authorities.

8) What is the position of other authorities in the HMA and elsewhere in terms of the planned level of housing in Huntingdonshire? Have specific concerns been raised through duty to co-operate discussions or representations?

- 1.13 As set out in our response to Qu.2 there is no evidence that the implications of the proposed housing target in Policy LP2, which is lower than the figure contained in the Cambridgeshire and Peterborough Memorandum of Cooperation, have been discussed or agreed with the neighbouring Cambridgeshire authorities. We conclude that the requirements of the DtC have not been met. The proposed lower housing target would have a negative impact on the supply and delivery of housing and affordable housing within Huntingdonshire and across the Cambridgeshire HMA. Paragraph 47 of the NPPF expects local planning authorities to meet the full, objectively assessed needs for market and affordable housing in the housing market area.

Jobs Growth and Employment Land Provision

13) *What are the wider implications of the Alconbury Enterprise Zone and how have these been taken into account?*

- 1.14 The Proposed Submission Local Plan identifies that the Alconbury Enterprise Campus is expected to accommodate 8,000 new jobs in the employment use classes. This represents a significant step change in jobs growth in Huntingdonshire and is not adequately addressed in the Council's economic forecasts – the EEFM.
- 1.15 Our analysis of the sectoral jobs growth in the EEFM shows that the model accounts for a growth of around 2,425 jobs in employment (B Class) and related sectors which would take place at Alconbury. This leaves 5,575 jobs which are being planned for at Alconbury which are unaccounted for in the EEFM baseline. The 14,400 jobs being planned for in the Local Plan is 2,030 above the EEFM baseline. However, even if we are to assume that 100% of these jobs are to be supported at Alconbury, the planned for figure is still insufficient to cover this shortfall (even assuming all of the additional 2,030 jobs were to Alconbury).
- 1.16 This means the Council's housing-led (labour supply) jobs growth figure 14,400 does not sufficiently capture the planned for jobs growth in the District when accounting for Alconbury. If Alconbury is to deliver the level of jobs growth which is being planned for, this will require a much higher workforce growth in the District than would be supported by the housing target of 20,100 dwellings.
- 1.17 This will have impacts on neighbouring areas both in terms of their economic growth but also on housing provision. The OAN does not adequately take account of the level of jobs growth at Alconbury, and therefore the additional workforce growth at Alconbury will not be supported by new housing in Huntingdonshire. This will result in considerable increased commuting from neighbouring authorities. There is no evidence that this has been taken into account through the duty to cooperate.

Transport Infrastructure

15) *What are the strategic matters and particular issues?*

- 1.18 The Huntingdonshire Strategic Transport Model (HSTS) was used to inform the Local Plan. Four development scenarios, of which Gifford's Park was included in just one, were assessed as part of the HSTS First Submission (first submission into the public domain). It is apparent that, out of these four scenarios, the scenario that included Gifford's Park (Development Scenario 3) was deemed the preferred development mix and required the lowest level of strategic highway spending relative to the other three scenarios. However, as all scenarios were deemed by the Council to require strategic highway interventions, the HSTS concluded that none of the four original scenarios were deliverable through developer contribution alone and therefore did not recommend any of the original four development scenarios. The fact that Gifford's Park was limited to inclusion in just one development scenario, which included other developments, does not permit the appropriate assessment of the merits associated with a site such as Gifford's Park. The merits of Gifford's Park have been impossible to assess with any precision due to the presence of other developments within Development Scenario 3 and therefore the assessment of merits associated with Gifford's Park, as part of the Local Plan process, has been distorted.
- 1.19 Instead of then assessing a refined range of development scenarios or engaging further with stakeholders, the HSTS went on to assess a single 'bolt on' Development Scenario 5 - with no justification as to why this option was determined as the only additional scenario to be assessed.

- 1.20 No evidence or justification was presented as to why this fifth scenario was assessed over other potential development mix scenarios and no other reasonable development mix scenarios were assessed. Given that Development Scenario 3 was deemed to require the *least* level of funding towards a mitigation package of the four original development scenarios, it would have been assumed, at the very least, that a combination of developments included within Development Scenario 3 would have been further assessed and cross referenced, particularly in relation to the sustainable and strategic merits of each development site. This process would have allowed for a robust case when recommending a preferred development scenario for PS HLP2036. Instead only one additional 'bolt on' development scenario was assessed with no justification or engagement with stakeholders as to why other reasonable development mix scenarios were ignored.
- 1.21 Also, the HSTS concentrates on strategic improvements for a package of development scenarios, rather than mitigation required for each individual development, which would have enabled a diagnostic approach to scenario formulation based on individual merit and strategic interaction. Given that the strategic mitigation measures were deemed as undeliverable due to potential cost, prior to the introduction of a 'bolt on' development scenario, it would be considered appropriate to engage with stakeholders to determine standalone deliverability, and/or to test alternative scaled down strategic interventions in the first instance. For example, the dualling of shorter sections of the A141 or more focused junction improvements around St Ives.
- 1.22 Alternative development mix scenarios in addition to the original four development scenarios could then be tested fairly against each other in the context of a wider range of mitigation measures more appropriate to the funding levels available. It is not clear who the Council engaged with to ensure all viable mitigation was taken into account.
- 1.23 Also, there was no clear evidence of cooperation provided to suggest how benefits of key sustainable infrastructure, such as the Guided Busway, have been afforded appropriate weight when assessing the impacts of individual sites within each Development Scenario.
- 1.24 In addition, and following the submission of the HSTS, a further Development Scenario put forward by the Council (Development Scenario 6) which replicates Development Scenario 5 but with an uplift in dwellings for RAF Alconbury. The HSTS was not updated to take account of this uplift, instead the Council submitted an addendum note in support of Development Scenario 6 concluding "the main impact of the additional trips associated with the additional 230 dwellings included in Development Scenario 6 will be at the site access junctions and those closest to the site".

16) *Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?*

- 1.25 It is apparent that the strategic transportation modelling has not effectively assisted the Council in formulating its Local Plan strategy as limited engagement was undertaken following the presentation of the original HSTS results.
- 1.26 The Gifford's Park promoter then requested that Gifford's Park be included as part of the HSTS, and specifically to be included as part of a number of development scenarios. However, HSTS only assessed four development scenarios, with Gifford's Park included in just one of these scenarios as discussed above.
- 1.27 The Gifford's Park promoter then requested that the number of development scenarios be expanded, but were told by the Council that assessing additional scenarios was not possible. Despite this, a further 'bolt on scenario' was only commissioned following the conclusion from the HSTS, that none of the four original development scenarios could be concluded to be sound without the requirement for strategic highways mitigation, and Gifford's Park was not included within this 'bolt on' scenario. It is not clear from the HSTS; how this additional development scenario came about, what stakeholder consultation was undertaken, or what evidence was collated to determine the most appropriate additional scenarios, why only one additional development scenario was taken forward for testing, why the latest Development Scenario 6 put forward by HDC was not assessed within the HSTS, why a variation on the original development mix scenarios was not taken forward for testing, or most importantly what ongoing engagement took place.
- 1.28 Whilst it is understood the HSTS provides high level strategic outputs, given that PS HLP2036 relies on the recommendations provided within the HSTS, it is considered imperative that additional mitigation measures

should have been added and investigated later on in the study or at the very least developed further through appropriate and ongoing engagement before a preferred development scenario was concluded.

17) *In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?*

1.29 In advance of the Huntingdonshire Strategic Transport Model analysis being undertaken, numerous requests were made by email and telephone, on behalf of the promoters of Gifford's Park, for the inclusion of additional development scenarios to the original four proposed. In addition, requests were also made to reduce the scale of development being assessed for Gifford's Park to a level more compatible with that being promoted. All these requests were turned down by Huntingdonshire District Council on the grounds that the four development scenarios were already determined and changes could not be made at that stage. Of particular note was a response received from Huntingdonshire District Council (HDC) on 6th October 2016 stating the following:

"The development scenarios [Development Scenarios 1- 4] for the CSRM runs have been developed based on the assessments we [HDC] have undertaken in the draft HELAA with the aim of putting together a set of varied packages that enable us to meet the objectively assessed need targets of 21,000 new homes and 19,000 new jobs. The scenarios [Development Scenarios 1- 4] aim to test packages of sites that focus on use of previously developed land where available and ensure a sustainable distribution of development across the district.we [HDC] do not wish to over-complicate the modelling runs by looking at too many potential scenarios. If these do not demonstrate a deliverable and sustainable solution, then we [HDC] will consider assessment of further potential scenarios."

1.30 Since the requests on behalf of the Giffords Park promoter, were made and refused by the Council, it is not clear within the HSTS why then a further standalone 'bolt on' scenario was tested with no consideration for other alternative potential scenarios or developments to be included, and no consultation with stakeholders.

Site Allocations

27) *Are there cross boundary issues in relation to any of the proposed site allocations such as transport or other infrastructure requirements? If so how have they been addressed through co-operation?*

1.31 See response to Qu.2 in respect of the proposed allocation at St Neots East.

**APPENDIX 1: HUNTINGDONSHIRE DISTRICT COUNCIL REPRESENTATIONS
TO THE CENTRAL BEDFORDSHIRE FIRST DRAFT LOCAL PLAN**

HDC response to Central Bedfordshire Draft Local Plan Consultation July-August 2017

Huntingdonshire District Council is of the view that the emerging Central Bedfordshire Local Plan is positively prepared as it seeks to more than meet objectively assessed development and infrastructure requirements responding to growth pressures in a positive way. The plan also seems to be broadly consistent with national policy subject to the caveats set out below. However, there are concerns about the plan as it stands. We would also commend the efforts made with the material available for the consultation, the summary information on the Council's website was particularly useful.

We have concerns that it is not clear what quantum of development is being proposed in the plan. We follow and understand the figures in table 7.1: Commitments at 1 April 2017, however we do not follow or understand the figures in table 7.2: Housing Need and Delivery. We understand the aim of the table in establishing what range of allocations for development might be required in the plan. Without any explanation we do not follow the calculations presented, specifically from row d) onwards. While there may be sound reasoning to explain the calculations we are concerned that this table would appear to be inflating housing numbers unjustifiably. This raises concern that when selecting development options less sustainable options may be included on the basis of an unjustifiable inflated target. We would suggest that either these calculations are explained in supporting text or all of the calculations and explanation are set out in supporting evidence. Related to this concern it is not clear whether all development options put forward in this draft are considered 'preferred options', we assume that this is the full range of strategic options and that later work will determine which are taken forward.

It is not possible to comment on whether the plan as a whole will be justified as the current consultation plan only includes strategic development options and we are told that only a selection of these will be required which may or may not include the development option identified to develop a new market town at Tempsford. The site assessment of the Tempsford new town has identified important heritage concerns and the views of Historic England on the balancing exercise undertaken by Central Bedfordshire to justify its possible allocation are not yet known. There is also no draft policy for the new town to give any certainty about how the new town will come forward or the mitigation measures it would be required to provide.

There is concern about the Tempsford option. We would seek assurances that should this option be taken forward as a draft allocation that safeguards would be put in place that would ensure that the town would 'consume its own smoke' in so far as it would not place any additional burdens on services and facilities in Huntingdonshire, specifically St Neots. With regards to infrastructure we are pleased to see that this option is heavily caveated with regards to its delivery relying on the delivery and detail of major transport infrastructure; the East-West Rail project, specifically the location of a train station that would provide interchange with the East Coast Mainline Railway (we would note that options for the location of this station are still being considered and include options to the south of Sandy) and the delivery and route of the A428 Caxton-Gibbet to the Black Cat roundabout

scheme. While we support the full range of development options being explored and so understand the inclusion of the Tempsford option we are concerned that this option may be somewhat premature. The evidence base for the draft plan has identified that crucial enabling infrastructure and other important infrastructure which will also help to enable the new town and which may actually impinge upon the site of the new town is in its formative stages. The options for the A428 specifically do not make any provision for additional junctions between the A1 'Black Cat' junction and the junction at Cambridge Road to the east of St Neots. The Council would not support any additional junctions as they would undermine the function of the road by increasing the amount of 'local traffic' using the new road.

We also have some concerns about the viability of and hence the feasibility of several elements of the required infrastructure relating to their cost; a new bridge over the East Coast Mainline Railway would be a significant burden as would direct connections with the A1.

The Local Plan evidence base does not provide much information on the possible impacts of the town at Tempsford on Huntingdonshire. Tetworth in particular as our nearest village is not mentioned. Abbotsley and Waresley are also close by. Although it is understandable that these small settlements do not feature, there is little mention of St Neots, which is a market town of some considerable size. The only mention is in relation to retail infrastructure requirements where the viability of St Neots is not to be undermined, which is supported particularly given the Cambridgeshire and Peterborough Combined Authority's aims of regenerating St Neots' Town Centre. We would want to see mention of similar requirements with regards to employment; we would not want to see such a scale of employment development at a new town in this location (a new Science and Technology/ Business Park is identified) that would act as a significant draw for potential employees from St Neots as this could add significantly to traffic, particularly on rural roads that are unsuitable for significantly increased volumes. If the site were to be allocated for development in the Local Plan appropriate provision should be made for the mitigation of traffic impacts on rural roads and local villages including villages in Huntingdonshire.

Further to the comments on Employment above we would also observe that commercial space is now coming online at the enterprise zone at Alconbury, which specifically excludes B8 uses. It may be a better complement to the enterprise zone, and potentially be more achievable, for employment development at the new town option to be providing B8 rather than science & technology space.

We would like reassurances that transport modelling which supports the plan takes account of the levels of new development being planned in Huntingdonshire in our new Local Plan, specifically the 3,820 homes draft allocation east of St Neots.

Overall given the identified deliverability concerns regarding the Tempsford market town, based on the information currently available its inclusion in subsequent versions of the Local Plan will depend on a significant amount of work to prove such a significant development could be deliverable in the plan period. While the location may be an appropriate location for future growth it seems clear that it is not needed to ensure that objectively assessed development needs are met in the plan period to 2035 and there are significant concerns about its deliverability in that time frame. As the required transport infrastructure is still in its formative stages it remains to be seen whether it is appropriate to allocate the site in this Local Plan.

We would want to continue to work with Central Bedfordshire to ensure that the Local Plans for our respective authorities are deliverable.

We have a number of specific comments:

The Key Diagram on page 76 is mostly clear and legible. We would however note that the use of numbers to identify the employment sites is not particularly clear, given that there are the same numbers used for other annotations. We would suggest that either the number sequence used for other annotations is continued with employment sites numbered 9, 10, 11 and 12 or that letters are used. Either option would eliminate any potential confusion.

While we have no specific comments about 12.7 Self and Custom Build Housing, starting on page 150, we would observe that the requirement for self and custom build housing set out in policy H7 is considerable and may adversely affect deliverability if taken forward.

With regards to 17.3 Large Scale Renewable Energy, specifically 17.3.4, our understanding is that to be compatible with the written ministerial statement areas that are identified as suitable for wind energy development must be identified and included within the Local Plan.

**APPENDIX 2: CENTRAL BEDFORDSHIRE COUNCIL REPRESENTATIONS TO
PS HLP2036**

The Local Plans Team
Huntingdonshire District Council
Pathfinder House
St. Mary's Street
Huntingdon
PE29 3TN

Your ref: Huntingdonshire LP
Our ref: HDC Reg19
Date: 05/02/2018

Dear Sir/Madam

Huntingdonshire Local Plan to 2036: Proposed Submission 2017

Central Bedfordshire Council (CBC) welcomes the opportunity to comment on the Huntingdonshire Local Plan to 2036: Proposed Submission 2017.

Overall, CBC 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 your own administrative boundaries. CBC has the following comments to make in relation to the Huntingdonshire Local Plan which we hope you will find helpful and supportive.

Duty to Cooperate

The legal framework around the Duty to Co-operate underpins the positive working relations between our two Councils. CBC is clear that by working with neighbouring authorities and other prescribed bodies on strategic and cross boundary issues, we can ensure the soundness of our respective local plans, maximising their effectiveness and deliverability.

CBC is committed to working effectively with Huntingdonshire DC to deliver sustainable growth through our respective local plans. CBC 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. We are fully supportive of neighbouring authorities progressing with their respective plans which also provide certainty to our residents, businesses and investors. CBC is supportive of both the timeframe and timetable of the Huntingdonshire Local Plan.

Policy LP1 – Amount of Development.

CBC supports this Policy and the delivery of at least 20,100 new homes and approximately 14,400 new jobs within Huntingdonshire.

Policy LP2 – Strategy for Development

CBC further supports the strategy approach to deliver this need 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 across Huntingdonshire as detailed within the policy is considered to be appropriate. Whilst CBC is supportive of growth to the east of St Neots, we would wish to be included within future discussions about how this growth is planned and delivered. We make further comments in relation Policy SEL2 below.

It is noted that within the reasoning following on from this policy, that through existing completions, commitments and allocations within this plan, account for approximately 22,500 new homes, and that additional provision is anticipated through rural exceptions, small and windfall sites. CBC welcomes this approach and considers it is prudent to ensure an oversupply through additional sites and other means including windfall to allow for contingency and the potential for under delivery of larger allocations within the timeframes identified.

Council Approach to Site-Specific Development Viability.

CBC supports the approach set out within Section 1 of the plan in relation to viability testing and the recognition that there may be circumstances where there is cause to negotiate in relation to development standards and/or infrastructure provision in order to reach an economically viable solution to enable a development to go ahead. CBC further supports the need for the developer to provide a formal 'open book' viability assessment to support a proposal that does not comply with policies set out within the plan. In order to ensure that the maximum potential is gained as part of future developments for the benefit of existing and future communities, it is considered that this approach is essential. It is therefore considered that a slight amendment to the wording from 'a developer *may* be required...' to 'a developer *will* be required...' would be beneficial to ensure this approach applies to all.

Policy SEL 2 St. Neots East

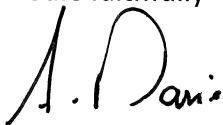
As identified above, CBC supports the delivery of growth to the east of St Neots through mixed-use sustainable development, comprising 3,820 homes and 22ha of employment land. Policy SEL2 clearly sets out the infrastructure requirements associated with such a proposal, and CBC welcomes the inclusion of the specific points in relation to the successful development of the site which are considered to be very comprehensive. CBC specifically supports points a and b:

- a. 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*
- b. comprehensive master planning to be undertaken by the site developer with public engagement with the cooperation of the Council.*

Whilst CBC supports the proposed development to the east of St Neots, given the proximity of the settlement to Central Bedfordshire and the potential impact this scale of growth may have on villages and settlements within our administrative area such as Tempsford and Everton, as well as the local and strategic road network, CBC would like to be involved in future discussions and work collaboratively with Huntingdonshire DC as the proposals for the development of the site emerge. This is considered to be particularly important 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.

I hope you have found the above comments and observations helpful. Please do not hesitate to contact me if you wish to discuss the above further.

Yours faithfully



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