

Huntingdonshire Local Plan to 2036 Examination

Hearing Statement Matter 2:

The Duty to Co-operate

Huntingdonshire District Council

June 2018

Issue

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

1. General

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

- 1.1. Section 33A(4) of the Planning And Compulsory Purchase Act (2004) as amended by the Localism Act 2011 provides the following formal definition of strategic matters for the purposes or preparation of development plan documents:
(a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas; and
(b) sustainable development or use of land in a two-tier area if the development or use-
 - (i) is a county matter, or
 - (ii) has or would have a significant impact on a county matter.'
- 1.2. The statutory requirements above are summarised within the Duty to Cooperate Statement (CORE/06, paras 2.2-2.5).

2. Overall housing provision

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

- 2.1. Engagement on establishing the overall housing provision has taken place principally with the city and district councils in the Cambridge Housing Market Area (HMA), Cambridgeshire County Council and other neighbouring authorities. The relevant authorities in the HMA are: Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Forest Heath District Council, Huntingdonshire District Council, South Cambridgeshire District Council and St Edmundsbury Borough Council. The principal neighbouring authorities the Council has engaged with are Bedford Borough, Central Bedfordshire and East Northamptonshire Councils.
- 2.2. Regular liaison on strategic planning issues, including local plan preparation and housing provision, occurs between the Cambridgeshire and Peterborough authorities through meetings of Chief Planning Officers and the Planning Policy Forum (Local Plan managers group). These groups meet around every six weeks. These meetings and related technical meetings have established the evidence to support the extent of the HMA (see question 3 below for further detail) and agreement on the overall approach to OAN. Following

publication of the initial Strategic Housing Market Assessment in 2013, local plan reviews in the HMA progressed at different speeds over the next few years. Consequently, given the very different stages of local plan reviews across the HMA, the constituent authorities recognised and agreed that it would not be possible to undertake a full SHMA review and that individual authorities, including Huntingdonshire, should undertake their own update of OAN (see question 5 below for further detail).

- 2.3. In terms of accommodating OAN, all the authorities in the HMA have agreed that, aside from an existing commitment by Peterborough City Council to accommodate 2,500 homes from the Cambridge Sub-Region HMA, there is no unmet need arising from current local plans, including Huntingdonshire's. The responses to questions 5 and 6 provide further details.
- 2.4. Meetings have been held with officers from Bedford Borough, Central Bedfordshire and East Northamptonshire authorities throughout the preparation of the Local Plan. Engagement has also taken place through correspondence on studies and technical work relating to this issue. With regard to the HMA boundary, neighbouring authorities outside the Cambridge Sub-Region HMA undertook a study to establish HMAs in Bedfordshire and surrounding areas. Huntingdonshire engaged with this work and it provided the opportunity to establish clear agreement about the extent of the Cambridge Sub-Region HMA, of which Huntingdonshire is a part, and those of neighbouring authorities.
- 2.5. Meetings with neighbouring authorities have also included discussion of emerging housing numbers and implications of whether these can be accommodated wholly within districts or whether there would be any unmet need. Huntingdonshire has been able to state unequivocally at these meetings that it can accommodate its need and this has been the case for the relevant neighbouring authorities also (see questions 6 and 7 for further details).
- 2.6. As a result of this positive engagement with relevant authorities there are no outstanding duty to cooperate matters related to housing provision and OAN that require further engagement and resolution.

Question 3: What are the inter-relationships with other authorities in terms of migration, commuting and housing markets?

- 2.7. Huntingdonshire district is within the Cambridge Sub-Region HMA, which comprises the administrative areas of seven city and district councils¹. The district has borders with the Peterborough HMA to the north and HMAs in Northamptonshire and Bedfordshire to the west. These HMA boundaries have been established through engagement with neighbouring authorities. Recent testing based on 2011 Census data confirms that the Cambridge Sub-Region HMA remains appropriate in terms of the degree of self-containment related to migration and commuting. At the time of the last Census, 83% of people who

¹ Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Forest Heath District Council, Huntingdonshire District Council, South Cambridgeshire District Council and St Edmundsbury Borough Council.

worked in Huntingdonshire lived in the HMA and 78% of people who lived in Huntingdonshire worked in the HMA.

Question 4: How have these been taken into account in preparing the Local Plan and specifically in terms of the Objectively Assessed Need for housing (OAN)?

- 2.8. Details of how the OAN was established and related housing matters are addressed under Matter 4, *overall provision for housing*. The principal issue related to the duty to cooperate is how the local planning authority has addressed paragraph 159 of the National Planning Policy Framework (the Framework). This requires the district council to work with the other authorities in the Cambridge Sub-Region HMA to prepare a Strategic Housing Market Assessment (SHMA) to assess its and others' full housing needs.
- 2.9. The *Strategic Housing Market Assessment for the Cambridge Sub-Region (2013)* established an objectively assessed housing need (OAN) figure for the HMA as a whole and for each district within it. This was based on national guidance that was available at the time, although detailed guidance was subsequently issued in the Planning Practice Guidance (PPG; see response to Question 5, below).
- 2.10. The *Cambridgeshire & Peterborough Memorandum of Co-operation, Supporting the Spatial Approach 2011-2031*² (the MoC) was published alongside the SHMA in 2013. This was developed in large part to demonstrate a coherent approach to development in the wider area and, in particular, as evidence of the authorities proactively addressing the duty to cooperate. It was produced in accordance with the guidance in paragraph 181 of the Framework.

Question 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?

- 2.11. Following the publication of the Cambridge Sub-Region SHMA in 2013, the constituent HMA authorities' local plans proceeded on different timescales. For Huntingdonshire's plan review (and three others in the HMA), it was not possible to rely on the OAN in the SHMA and reflected in the MoC to inform their housing targets, for two principal reasons. First, more recent national population and household projections had been issued; the PPG confirms that these should be the starting point for establishing OAN³. Second, the PPG itself had been issued since the SHMA and MoC. As this now provided national guidance on undertaking housing needs assessments, the approach needed to be followed in any current assessment of OAN.
- 2.12. Given the very different stages of local plan reviews across the HMA, the authorities recognised and agreed that it would not be possible at present to undertake a full SHMA

² This included housing figures for Huntingdonshire to 2036 in accordance with the current plan period of 2011-2036.

³ Paragraph: 015 Reference ID: 2a-015-20140306.

review (this was discussed and agreed through the meetings mentioned in paragraph 2.2 above). Therefore, as a pragmatic response to the current situation each of the four authorities undertook an OAN assessment for its area. These circumstances are recognised in the PPG, which states: *“Where Local Plans are at different stages of production, local planning authorities can build upon the existing evidence base of partner local authorities in their housing market area but should co-ordinate future housing reviews so they take place at the same time”*⁴.

- 2.13. Building on the existing evidence base of partner local authorities in the Cambridge Sub-Region HMA, the work undertaken by the Cambridgeshire County Council Research Group to update OAN figures for the four authorities is consistent and follows closely the guidance in the PPG and technical advice in the *Objectively Assessed Need and Housing Targets* note prepared for the Planning Advisory Service by Peter Brett Associates.
- 2.14. For all authorities in the HMA, as well as those neighbouring Huntingdonshire, there is no suggestion that they will not be able to accommodate fully their own identified need. Moreover, Peterborough City Council maintains its agreement to accommodating 2,500 homes from the Cambridge Sub-Region HMA (see response to Question 6, below). Consequently, the original purpose of the MoC remains intact, reflecting a key element of the duty to cooperate required by the Framework, that the local authorities in an HMA should collaborate to have a clear understanding of housing needs in their area and how these will be accommodated.

Question 6: Are there issues of unmet need from within the wider HMA or other authorities? If so how are these being addressed?

- 2.15. As referred to above, the authorities in the HMA reached agreement with Peterborough City Council that it would accommodate 2,500 dwellings from the Cambridge Sub-Region HMA. This agreement is recorded in the MoC⁵ and is maintained through Peterborough City Council’s current local plan review.
- 2.16. As also noted above, all authorities within the HMA and neighbouring Huntingdonshire district can otherwise accommodate their housing need. Therefore, the original purpose of the MoC remains intact, reflecting a key element of the duty to cooperate required by the Framework, that the local authorities in an HMA should collaborate to have a clear understanding of housing needs in their area and how these will be accommodated.
- 2.17. For neighbouring authorities outside the HMA, Huntingdonshire has discussed through regular meetings its and others’ emerging housing numbers and implications of whether these can be accommodated wholly within districts or whether there would be any unmet need. Huntingdonshire has been able to state unequivocally at these meetings that it can accommodate its need and this has been the case for the relevant neighbouring authorities also. This is further evidenced by the lack of representations on this issue to the current plan review; indeed, in their representations a number of neighbouring authorities are supportive

⁴ Paragraph: 007 Reference ID: 2a-007-20150320.

⁵ Appendix 1, paragraphs 3.4-3.8.

of the approach taken to housing provision through the duty to cooperate. As such, there are no issues regarding unmet need from within the wider HMA or concerning other authorities areas and nothing under the duty to cooperate that requires further engagement or resolution.

Question 7: Does the overall housing provision being planned in the Local Plan for Huntingdonshire have any implications for other authorities? If so, what are they and how are these being addressed?

2.18. Given the conclusion above, that all authorities within the HMA and neighbouring Huntingdonshire district can accommodate their housing need, there are no implications for other authorities in terms of the district's overall housing provision.

Question 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?

2.19. As indicated in paragraph 2.13 above, all authorities within the HMA and neighbouring Huntingdonshire district can accommodate their housing need. No other authorities have raised concerns about the planned level of housing and a number of neighbouring authorities are supportive of the approach taken to housing provision through the duty to cooperate.

2.20. Central Bedfordshire Council raised the possibility of Huntingdonshire being called on to help meet unmet housing need from Luton subject to their own capacity assessments. This issue did not develop further and Luton Borough Council has now adopted its Local Plan without making a formal request to the district council on unmet housing need.

Question 9: In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan? What has been the outcome of co-operation and how has this addressed the issue of housing provision?

2.21. The Council has engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan on this matter. It has engaged effectively and on an ongoing basis with partner authorities in the HMA and direct neighbours (paragraph 2.2); it has addressed the requirements of national guidance through initial preparation of the 2013 SHMA (paragraph 2.6) and subsequently through a pragmatic and agreed approach to updating its OAN (paragraph 2.10); and it has ensured through engagement that there is no outstanding unmet housing need to be addressed, arising either from its own district or from the HMA and neighbouring authorities (paragraph 2.13). There are no objections from duty to cooperate bodies or interested local authorities to this matter, and a number are supportive of the Council's approach.

3. Jobs growth and employment land provision

Question 10: Who has the Council engaged with in terms of jobs growth and employment land provision and what form has this taken?

- 3.1. The Council has primarily engaged with Cambridgeshire County Council in terms of preparing estimates of jobs growth and employment land provision with the Research Group undertaking economic forecasting alongside work on housing need. The Council has also engaged with the Greater Cambridgeshire Greater Peterborough Local Enterprise Partnership, local businesses, Huntingdon Business Improvement District and other town centre partnerships through meetings to discuss needs and concerns to inform the early preparation of the plan as set out in the Statement of Consultation (CORE/05, pages 123-124 and 129-130), further meetings and ongoing consultation as the plan progressed (CORE/05, pages 240 and 353). Inputs have also been obtained from the Council's Economic Development team who have regular contact with local business representatives and individual companies.
- 3.2. The Council has worked closely with the Greater Cambridgeshire Greater Peterborough Local Enterprise Partnership (GCGP LEP) and partner authorities with regard to the 150 hectare Alconbury enterprise zone to maximise the potential benefits for inward investment and jobs arising from this opportunity. This included regular meetings between the LEP and the leaders and senior members of this Council and partner authorities. Since 1 April 2018 the role of the GCGPLEP has been subsumed into the operations of the Cambridgeshire and Peterborough Combined Authority through a new Business Board.

Question 11: What are the inter-relationships with other authorities in terms of economic activity, travel to work and the market for employment land and premises?

- 3.3. The Council's April 2017 OAN update at paragraphs 28 to 32 provides an analysis of commuting flow patterns to help identify the key functional linkages between places where people in this area live and work. The top twelve origins and destinations of people who travelled into and from Huntingdonshire to work in March 2011 includes four of the six other districts in the Cambridge housing market area (South Cambridgeshire, Cambridge, Fenland and East Cambridgeshire), as well as Peterborough, Bedford, and Central Bedfordshire. This analysis suggests the Cambridge housing market area overlaps the housing market areas of other districts within the Greater Cambridge Greater Peterborough and South East Midlands local enterprise partnership areas.

Question 12: How have these inter-relationships been taken into account in preparing the Local Plan in terms of jobs growth and employment land provision?

- 3.4. The Council's April 2017 OAN update at paragraphs 68 to 89 makes an assessment of the likely change in job numbers taking account of the latest East of England Forecasting Model

(EEFM) employment forecasts. The EEFM provides economic-based forecasts for population, employment and housing over the next thirty years across the LEP areas which are either wholly or partly in the East of England, including the Greater Cambridge Greater Peterborough and South East Midlands LEP areas. The forecasts generated by the EEFM provide a particularly robust evidence base because they are integrated and consistent with wider economic trends. Particularly important is the consistency between all LA areas within the region and in neighbouring regions, including those LA areas in the Cambridge housing market area and overlapping housing market areas.

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

3.5. The Population, Housing and Employment Forecasts Technical Report April 2013 at paragraphs 5.7.1 to 5.7.6 considered the wider implications of the Alconbury Enterprise Zone for the HMA districts. To take into account the implications of the additional jobs growth at the Enterprise Zone, an additional population increase was added to Huntingdonshire's forecast population change, with implications for Huntingdonshire's forecast housing need. However, as a finding of the report was that the implications for the other districts were relatively small, no adjustments were made to the other districts' population figures. The Council's April 2017 OAN update takes account of more recent economic forecasts. The Alconbury Enterprise Zone forecasts in the 2013 report were informed by policy-based assumptions that were put into the forecasting model at a time when no actual data were available. The EEFM 2016 forecast in the Council's April 2017 report takes account of actual data relating to the Alconbury Enterprise Zone. Slower jobs growth has been realised at the Enterprise Zone than was assumed in 2013, with implications for jobs growth and housing need within Huntingdonshire rather than the wider HMA.

Question 14: In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan? What has been the outcome of co-operation and how has this addressed the issue of jobs growth and employment land provision?

3.6. The Council has engaged with a wider range of partners and stakeholders to maximise the effectiveness of the Local Plan with respect to jobs growth and provision of employment land. Few strategic issues have been raised as identified in the Duty to Cooperate Statement (CORE/06, pages 10-11). Selection of the former Alconbury airfield as an enterprise zone for the GCGP LEP in 2011 has fundamentally shaped the Local Plan in terms of jobs growth and provision of employment land by providing a major opportunity for the district to attract new and more diverse jobs growth and to offer substantial parcels of land for redevelopment for employment. The Council is fully engaged as a member of the Cambridgeshire and Peterborough Combined Authority and will continue to work with partners to facilitate successful delivery of jobs and employment land.

- 3.7. Cooperation with Peterborough City Council highlighted the importance of sustainable transport links between Alconbury Weald and Peterborough. Sustainable transport options are required within the allocations for the Alconbury Weald Strategic Expansion Location; guided busway services were extended to serve Peterborough in 2012 and currently stop by the main access to the site.

4. Transport infrastructure

Question 15: What are the strategic matters and particular issues?

- 4.1. A significant proportion of Huntingdon residents work outside the District with Peterborough, South Cambridgeshire, and Cambridge being key destinations. There is also an important, level of inbound commuting trips with around one third of jobs within Huntingdon being occupied by residents from outside the district; Peterborough, South Cambridgeshire and Fenland are the most important external origins
- 4.2. There is a mixed pattern of trip attractors across the District with office, industrial and retail provision is concentrated in the market towns. Car ownership levels are high across the District as a whole, with less than 20% of journeys to work being made by sustainable travel modes (active travel and public transport). Car ownership levels in the four market towns are lower than the District's average.
- 4.3. The District is generally well-placed with respect to the strategic highway network with the A428 and A14 providing east-west connectivity and the A1/ A1(M) providing north-south links. There are consequently significant traffic flows in the District, particularly on the trunk road network with daily flows of 60-70,000+ vehicles observed on both the A1 and the A14. There is a high proportion of HGVs on the A14 (up to 21% HGVs on A14, west of A1). It should be noted that the north east of the District is less well connected to the trunk road network.
- 4.4. Significant delays can be observed on the A14 eastbound towards Cambridge (particularly in the AM Peak), on the A141 around Huntingdon and on the A1123 between Huntingdon and St Ives. It is anticipated that these existing congestion issues will be resolved by the delivery of the Highways England A14 improvement scheme.
- 4.5. The District is well-placed with respect to the strategic rail network with stations available at Huntingdon and St Neots, providing access to London and Peterborough, and interchange for a wide range of other destinations. While rail accounts for around 4% of journey to work trips to/from the District, there has been significant growth in travel via both Huntingdon and St Neots stations over the past 10 years, with passenger numbers totalling 1.84m and 1.35m respectively for 2016/17 (compared to 1,37m and 822,064 respectively in 2006/07).
- 4.6. The Cambridgeshire Guided Busway operates in Huntingdonshire and provides three, frequent and high quality, services into and out of Cambridge. Bus patronage on the Cambridgeshire Guided Busway as a whole has increased by 50% from opening in 2011 to 2015. Elsewhere in the District, bus services are relatively infrequent with provision being

focused on the market towns. The exception is the X5 longer distance Cambridge to Oxford service serving St Neots in the south of the District.

- 4.7. There are several national cycling routes that run through Huntingdonshire which connect the key towns and villages. A number of local cycle routes are provided within Huntingdon and St Neots, with a more limited network in St Ives. All three settlements though have good connections onto the strategic cycle network; cycle provision elsewhere in the district is more.

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

- 4.8. The Council has engaged with Cambridgeshire County Council as the local highway authority, Highways Agency then Highways England as the strategic road network authority, Network Rail regarding the East Coast mainline railway and the Environment Agency regarding water based transport on the main river network. Focussed engagement started in April 2012; specific discussions were held regarding strategic road and rail issues and improvements in September 2012 and July 2013 to help shape the initial development of the strategy. Engagement has been active and ongoing since this as the local plan has evolved.
- 4.9. Engagement with Cambridgeshire County Council has been particularly active with the Council contributing to preparation of the Long Term Transport Strategy (2015) (INF/13). This was followed by joint commissioning of the Strategic Transport Study (May/ November 2017) (INF/09, 10 and 11). The Council took an active role in the public inquiry into the A14 upgrade to influence its form in the local area and are contributing financially to the project.
- 4.10. In addition all adjoining local authorities, town and parish councils, and local business and environmental groups have been engaged with on an ongoing basis as set out in the Statement of Consultation (CORE/05) and the Statement of Representations (CORE/04) .

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

- 4.11. The Council has engaged constructively with Highways England throughout the development of the A14 improvement scheme acknowledging its importance in facilitating development in the district. The Council participated in the public inquiry into the development consent order for the A14 improvement scheme and is contributing £5million towards the costs of the scheme.
- 4.12. The Council has engaged constructively by working in partnership with Cambridgeshire County Council to prepare the Strategic Transport Study (INF/09,10 and 11) which identified issues with the local highways network and tested a range of possible solutions based on alternative development scenarios. This work has also considered potential for improvements to sustainable transport modes including extensions to the guiding busway routes. The outcomes of this co-operation have been to strongly influence the development strategy and package of individual development sites put forward in the Local Plan. The co-

operation has had a positive outcome in preparing a deliverable highways solution for the scale and distribution of growth proposed.

- 4.13. References to ongoing and future highway improvements are incorporated into the Local Plan and in particular are recognised within the Key Issues influencing the plan (CORE/01, pages 20-21 and within the Development Strategy (CORE/01, paras 4.13 and 4.49-4.53).
- 4.14. Engagement with Network Rail has been ongoing throughout preparation of the Local Plan with proposals to upgrade the East Coast mainline railway in preparation to allow for more frequent and faster rail journeys both south to London and to the north. Discussions are also ongoing with the promoters of Alconbury Weald and Network Rail regarding opportunities to introduce a new railway station within SEL1.1 as set out in the Local Plan (CORE/01, para 9.14).

5. Water resources/ waste water

Question 18: What are the strategic matters and particular issues?

- 5.1. The strategic issues identified are the quality and capacity of infrastructure for water supply and wastewater (paragraph 3.38 of Core/06). Particular issues listed in the table on page 22 of the Submission Local Plan (Core/01) are that the District is situated in the driest region of the UK and local rivers and aquifers are close to the limits of abstraction. Pollution of ground water is also identified as an issue.
- 5.2. Core/04 records that issues raised during consultation on policy LP6 'Waste Water Management' related to details rather than the principle of the policy.

Question 19: Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?

- 5.3. On this issue the Council has engaged with the Environment Agency, Anglian Water, Cambridge Water and the Middle Level Commissions. This engagement began in Stage 1 of the Local Plan process and has continued actively across all subsequent stages, taking the form of written consultation.
- 5.4. The Environment Agency as a duty to cooperate prescribed body, was invited to the following meetings at Pathfinder House, Huntingdon: At Stage 1: Seminar for Environmental groups held on 24 May 2012; At Stage 2: Meeting pursuant to Duty to Cooperate held on 4 September 2012; At Stage 3: Meeting for Business and Environmental Groups held on 9 July 2013 and at Stage 4: Seminar for other Key Stakeholders held on 4 February 2015

Question 20: In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

- 5.5. Engagement has been constructive and has informed a range of policies in the plan (Core 01) that either directly or indirectly address the strategic matter of water resources/waste

water; including policy LP4 'Contributing to Infrastructure Delivery', policy LP6 'Waste Water Management' and policy LP39 which includes 'Protection of Groundwater' (refer to paragraph 3.40 of Core/06).

- 5.6. The plan (Core/01) has had full regard to the Huntingdonshire Stage 2 Detailed Water Cycle Study (WCS) – FLO/11 - which provides information about the capacity of the water environment and water services infrastructure to accommodate required growth during the plan period and the WCS has been prepared with the full cooperation of the Environment Agency as a duty to cooperate prescribed body and the relevant water companies.
- 5.7. The plan (Core 01) has had full regard to relevant strategies that have a bearing on water-related matters as a strategic priority, notably the Anglian District River Basin Management Plan 2 (2015) – FLO/12 - and Cambridge Water and Anglian Water's Water Resource Management Plan (FLO/13 and FLO/14). Anglian Water supports policies LP4 and LP6.

6. Flood risk

Question 21: What are the strategic matters and particular issues?

- 6.1. As listed in the table on page 22 of the Submission Local Plan (Core/01) there are areas at risk of flooding in the District that include the low lying fenland area and areas in the south east of the District along the River Great Ouse, which flows through the largest settlements in the District.
- 6.2. Compliance with national policy to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk through application of the sequential approach in the plan-making process is an issue.

Question 22: Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?

- 6.3. The Council has engaged with the Environment Agency, and the other relevant flood risk management bodies, including reservoir undertakers (i.e. Anglian Water, Cambridge Water, the Middle Level Commissions and Cambridgeshire County Council as Lead Local Flood Authority). This engagement began in Stage 1 of the Local Plan process and has continued actively across all subsequent stages of preparation.
- 6.4. The Environment Agency as a duty to cooperate prescribed body, was invited to the following meetings at Pathfinder House, Huntingdon: At Stage 1: Seminar for Environmental groups held on 24 May 2012; At Stage 2: Meeting pursuant to Duty to Cooperate held on 4 September 2012; At Stage 3: Meeting for Business and Environmental Groups held on 9 July 2013 and at Stage 4: Seminar for other Key Stakeholders held on 4 February 2015.

Question 23: In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

- 6.5. Constructive engagement and cooperation with the Environment Agency led to the completion in June 2017 of a Level 1 and 2 Strategic Flood Risk Assessment (FLO/02) to support the Local Plan Draft Consultation 2017. The SFRA is endorsed by the Environment Agency. A Sequential Test and Exception Test report (FLO/01) was also completed to support the proposed allocations within the Plan and sites passing the sequential test collectively meet objectively assessed need. The overall strategy was considered to be appropriate and was retained for the Draft Consultation 2017 (PREP/02).
- 6.6. Constructive engagement and cooperation with the other relevant flood risk management bodies, has resulted in modifications to the policies in the plan.

7. Other strategic matters

Question 24: What are the other strategic matters and particular issues?

- 7.1. The strategic priorities identified in the Framework that are not covered by the preceding questions are: the provision of retail, leisure and other commercial development; the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. The Council did not consider that these matters as addressed in the local plan raised particular strategic cross boundary issues that required specific engagement with duty to cooperate and other bodies.
- 7.2. However, strategic issues have been raised with the district council about provision of social infrastructure, climate change and the natural environment (see response to Question 26, below). There are no other strategic matters or issues that, in the council's opinion, have a bearing on the duty to cooperate in relation to preparation of the local plan.

Question 25: Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?

- 7.3. The Council's principal engagement on these issues has been with the duty to cooperate bodies prescribed by regulation, Cambridgeshire County Council and neighbouring district councils.
- 7.4. The engagement has largely come about as a result of responses to consultation on the local plan and issues raised by consultees identified above. The district council has not raised these issues as strategic matters with cross-boundary implications that require targeted engagement with particular bodies. Therefore, engagement has been through consideration of consultation responses and, where relevant, amendments to the local plan.

Question 26: In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

- 7.5. The Council has engaged constructively. Where issues have been raised, it has considered carefully representations made by duty to cooperate bodies and others. The district council continues to engage with Cambridgeshire County Council on how best to address the costs of play space, special schools and early years education where CIL cannot reasonably be expected to meet all infrastructure deficits. Clearly, these challenges are not unique to Huntingdonshire.
- 7.6. Table 6 in the Council's *Statement of Compliance with the Duty to Cooperate* provides details of the issues raised and the Council's response on the natural environment and climate change. For example, the plan was amended to address the Environment Agency and Natural England's representations about further referencing climate change and designated European wildlife sites in the district.

8. Site allocations

Question 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?

- 8.1. The modelling approach for the Strategic Transport Study (INF/09) used the Cambridgeshire Sub-Regional Model (version 2); although the study area focussed on Huntingdonshire the model also includes detailed representation for East Cambridgeshire, South Cambridgeshire and Cambridge City. The transport implications and improvements identified for the proposed site allocations do not identify any cross boundary issues.
- 8.2. Central Bedfordshire Council (rep no HLP2036-PS:780) have specifically made representations on SEL2 St Neots East which adjoins their boundary and support both the overall proposed site allocation and specifically the elements relating satisfactory resolution of the impact of additional traffic on the A428, A1 and local highway network. The Council has worked collaboratively with Central Bedfordshire Council throughout the preparation of the Local Plan to ensure the wider cumulative impacts of growth in St Neots are addressed.