

**RPS**

**Proposed Submission  
Local Plan Examination  
Hearing Statement –  
Matter 3**

In respect of

Huntingdonshire District Council  
Proposed Submission Local Plan  
Examination

On behalf of

Abbey Properties Cambridgeshire  
Limited and De Bene Esse Ltd

Respondent No. 753723

RPS Ref: JCG22793

15 June 2018

*Secure & Stable*  
ADDING VALUE

# QUALITY MANAGEMENT

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Date:	<b>June 2018</b>
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# 1 INTRODUCTION

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- 1.1 We are instructed by our clients, Abbey Properties Cambridgeshire Limited and De Bene Esse Ltd to submit Hearing Statements and appear at the Huntingdonshire Local Plan Examination on their behalf in relation to the Huntingdonshire Proposed Submission Local Plan and associated evidence base.
- 1.2 RPS previously submitted representations on behalf of our clients to the Huntingdonshire Local Plan to 2036: Proposed Submission, the November 2017 Call for Sites, the Local Plan to 2036 Consultation Draft 2017 and a number of Housing and Employment Land Availability Assessments produced between 2016 and 2017.
- 1.3 The representations to the Local Plan Consultation Draft 2017 and to the Proposed Submission Plan are enclosed (**Appendix A** and **Appendix B**) with this Statement for ease of reference.
- 1.4 This Statement details our clients' responses to Matter 3 of the Matters and Issues identified by the Inspector. A Hearing Statement has also been prepared in respect of Matter 4. We reserve our position to submit further Hearing Statements in relation to Matters 6-15 at the appropriate juncture.



## 2 RESPONSE TO THE MATTERS AND ISSUES IDENTIFIED BY THE INSPECTOR

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- 2.1 The Inspector has posed a number of questions in respect of 15 Examination Matters. This Hearing Statement seeks to respond to questions of relevance to our clients' interest in respect of Matter 3. These responses are provided below.

### **Matter 3 – Development Strategy**

*Whether the Development Strategy is justified, effective and consistent with national policy*

#### **Overall**

##### Question 1

- 2.2 Question 1 seeks comment on the basis for the overall strategy for development and distribution of growth set out in Policy LP2 of the Proposed Submission Plan. Our client considers that this strategy for development is not justified, effective, positively prepared or consistent with national policy.
- 2.3 Huntingdonshire District Council's (HDC) strategy proposes to deliver a large proportion of the anticipated housing numbers at two strategic allocations of Alconbury Weald (5,000 units) and St Neots East (3,820 units). HDC is therefore relying on these sites to provide the majority (44%) of the total housing provision targeted within the Plan. This strategy fails to plan positively for growth across the District and focuses growth too heavily upon these two strategic locations both of which involve the same property development company.
- 2.4 We consider that too much emphasis on large strategic sites is not planning effectively to ensure that dwellings are delivered throughout the Plan period. Strategic sites require the completion of significant new infrastructure before units can be built/occupied. For example, in relation to Loves Farm East and Wintringham Park (St Neots East), Highways England have requested that both applications be subject to conditions/S106 obligations which limit the delivery of dwellings until improvements to the A428 have been completed. We understand these conditions/obligations have yet to be discharged.
- 2.5 The reliance on the delivery of significant infrastructure for large strategic sites effectively delays the commencement of development on these sites and the number of units capable of coming forward year on year until towards the end of the Plan period. This is not effective planning for Huntingdonshire and does not comply with the NPPF requirement to maintain a five-year supply of housing land to meet the housing target.
- 2.6 Additionally large sites historically take longer for dwellings to be completed than smaller sites. HDC has historically overestimated the number of dwellings which can be completed each year from Alconbury Weald. The 2016 AMR forecast that 200 dwellings would be completed in 2017/18. However, according to the 2017 AMR (published in December) only 48 units had been delivered on

site. This demonstrates that HDC has historically overestimated delivery, particularly on the large strategic sites.

- 2.7 This conclusion is further supported by the findings of the Nathaniel Lichfield & Partners November 2016 'Start to Finish' research (**Appendix C**) which notes that on sites of up to 1,499 completions barely exceed 100 units per annum, and of the 55 case studies reviewed in Figure 6 only 5 sites experienced build rates of over 200 dwellings per annum.
- 2.8 The Government commissioned Oliver Letwin MP to review issues of housing delivery and his preliminary update (March 2018) indicated that the fundamental driver of slow build out rates for large sites appears to be the 'absorption rate'. Large sites provide house-builders control over sales rates and limit opportunities for rivals to enter the market and compete for customers. Additionally, when a housebuilder occupies the whole of a large site, the size and style of the homes on offer will typically be fairly homogeneous which again reduced the absorption rate. The allocation of more smaller sites rather than fewer large strategic sites would create the opportunity for a greater variety of housebuilders to enter the local market and offer a greater variety of homes.
- 2.9 Letwin's preliminary update indicates that large strategic sites do not lead to higher build out rates and could result in Councils not delivering against the OAN.
- 2.10 HDC's focus on these large strategic sites is contrary to national guidance with the Housing White Paper and draft NPPF encouraging greater use of small sites to diversify opportunities for builders and increasing the number of schemes which can be built out quickly. We therefore do not consider that the draft Local Plan reflects the direction of travel of emerging national guidance.
- 2.11 Furthermore Policy LP2 does not state which services and facilities have been used to categorise the difference between Key Service Centres, Local Service Centres and Small Settlements. For the policy to be considered positively prepared and justified we consider that it is necessary to clearly identify the characteristics which define the different types of centres within the settlement hierarchy.
- 2.12 We have also been unable to find any evidence that HDC has considered different options for the distribution of growth across the District. The Sustainability Appraisal does not appear to assess different forms of growth options for the District and the benefits this could bring. For example it does not appear that HDC has assessed the option of delivering housing provision through the greater use of smaller sites across the district. A more varied approach to growth would help support the rural economy and ensure that both local market and affordable housing needs are met.
- 2.13 We therefore do not consider that HDCs overall strategy for development and the distribution of growth has been justified or is effective, and conflicts with national policy.

## **Spatial Planning Areas**

### Question 2

- 2.14 Question 2 seeks confirmation as to whether the Spatial Planning Areas (SPAs) are appropriately defined and the basis for them. We consider that the SPAs are not appropriately defined within the

Proposed Submission Draft Local Plan. The current definitions used are vague and create uncertainty for applicants, and are therefore ineffective.

- 2.15 An example of this is the Huntingdon SPA which includes small parts of Alconbury, Kings Ripton, Wyton on the Hill and Houghton and Wyton parishes '*where they closely relate to the built up area of Huntingdon*' as well as Brampton and Godmanchester. This definition is vague and as a result does not enable a clear understanding of the SPA's extent.
- 2.16 Furthermore we note that parts of certain parishes such as Houghton and Wyton are located in both the Huntingdon and St Ives SPAs, and the SPAs of Huntingdon and St Neots are made up of separate land parcels according to the Key Diagram. No justification is provided within the Plan as to how the various parts of the Huntingdon and St Neots SPAs relate to each other and why they are considered to comprise a Spatial Planning Area.
- 2.17 The Key Diagram also does not provide defined boundaries for the SPAs. These should be defined on the main Policies Map.

#### Question 5

- 2.18 Question 5 raises queries over the justification for the Strategic Expansion Locations (SELs) at Alconbury Weald and St Neots East and whether any alternative strategies for accommodating development were considered. As set out for Question 1 we object to HDC's concentrated focus on large strategic sites and consider that until the necessary highway improvement work to the A428 has been completed development at the scale proposed for St Neots East has not been justified as a deliverable allocation in the Plan.
- 2.19 We consider that HDC's reliance on large strategic sites for 44% of the housing target is not adequately explained or justified within the draft Local Plan or the supporting evidence base. Huntingdonshire Housing Strategy 2012-2015 demonstrates some of the issues in relying on large strategic sites and partly attributes the reduction in new affordable dwellings being completed to '*the lack of progress on other large strategic sites*'. This is a clear admission by HDC that large strategic sites are not delivering much needed affordable housing in a timely fashion and are not adequately addressing the obvious shortfall.
- 2.20 Furthermore the provision of the majority of dwellings in these two locations will not meet the housing needs of residents across the whole of the district and will fail to boost significantly the delivery of housing land as required by the NPPF. The proposed SELs will focus resources and facilities on two localised areas of the District which is an unsustainable approach for Huntingdonshire having regard to the need to provide the necessary infrastructure and services for the number of dwellings proposed. This approach is not justified and should be modified as Huntingdonshire currently suffers from some of the highest barriers to housing and services within England according to the Indices of Deprivation 2015 (**Appendix D**).
- 2.21 We have also been unable to find any evidence that alternative strategies were considered for accommodating development within the District and why the development of large strategic sites is advocated. We do not consider that the Housing & Economic Land Availability Assessments provide a clear conclusion as to why certain sites within the 'Broad Locations' are more suitable than others and therefore allocated in the draft Plan.

## **Small Settlements**

### Questions 12 & 13

- 2.22 We do not consider that the Small Settlements are appropriately defined within the draft Local Plan. Paragraph 4.105 states that these have very limited or no services or facilities available and are less sustainable than other categories of settlement within the hierarchy. Therefore there are no proposed housing allocations in Small Settlements.
- 2.23 However, settlements such as Needingworth provide a number of services and facilities such as a pre-school, primary school, convenience store and post office, pub and sports club within the settlement boundary. Needingworth is also a short distance from St Ives Spatial Planning Area which provides sustainable access to additional services and employment opportunities. This is supported by the recent Officer's Report for Outline Planning Permission 17/01687/OUT (**Appendix E** – see particularly paras 7.101 to 7.104).
- 2.24 We therefore consider that a blanket embargo on allocations within Small Settlements is not justified and fails to plan positively and sustainably for this tier of settlement within Huntingdonshire. The Local Plan should acknowledge that some Small Settlements can accommodate development and should allocate sites accordingly such as Meeting Lane, Needingworth.

## **Countryside and definition of built up areas**

### Question 15

- 2.25 We do not consider that Policy LP11 has been positively prepared, justified or is consistent with existing and emerging national policy.
- 2.26 Policy LP11 requires that all development in the countryside must avoid the irreversible loss of the best and most versatile agricultural land. However, this policy fails to recognise that there are suitable sites for development located on grade 3a agricultural land. The proposed blanket protection fails to plan positively for opportunities to meet HDC's identified housing need on sites which will not harm the countryside.
- 2.27 Furthermore, the policy directly contradicts the majority of HDC's Strategic Allocations such as Alconbury Weald, Bearscoft Farm and East of Silver Street and south of A1, Buckden which have all been allocated for residential development despite the sites comprising grade 2 agricultural land according to the HELAA December 2017. We therefore consider that the blanket protection set out in Policy LP11 is not justified and is inconsistent with the approach HDC has taken elsewhere in the Plan.
- 2.28 Policy LP11 part b seeks to protect the intrinsic character and beauty of the countryside. This is inconsistent with the NPPF which does not seek to protect the intrinsic character and beauty of the countryside for its own sake. Rather Footnote 9 seeks to protect sites which carry a special designation (e.g. Green Belt).

### Question 16

- 2.29 The definition of built-up areas is vague and has not been justified within the draft Local Plan. Paragraph 4.82 states that '*the built-up area does not need to be a single contiguous area; distinct*

*areas of development may exist within a parish that are separated by areas of countryside*'. However, this is not recognised within the definition of built up areas. Rather, only land which relates more to a group of buildings than the surrounding countryside is considered to form part of the built-up area. Therefore, the current definition of built up areas does not comply with the guiding principles set out in the supporting text.

- 2.30 Moreover, the grouping of 30 or more homes appears to be an arbitrary figure with no justification provided within the Local Plan. No justification is provided why, for example, 25 dwellings in a nucleated development pattern would not be considered as a built up area while 30 dwellings in a linear pattern separated by areas of countryside would be. HDC should therefore justify why they would consider a minimum of 30 dwellings to be necessary to comprise a built up area.
- 2.31 Additionally, we do not consider that built up areas should be restricted to include homes. Supporting paragraph 4.79 states the built-up area definition should apply to Policy LP11 'The Countryside'. However, restricting built up areas to those which include homes excludes previously development land in sustainable locations. It is also inconsistent with a number of allocations included within the Local Plan.
- 2.32 For example both RAF Upwood and Alconbury Weald are former RAF bases. However, neither meets the criteria of a built-up area on HDC's definition because pending redevelopment they do not comprise 30 dwellings. Therefore both allocations would be treated as countryside under this definition which is clearly not the intention. Huntingdonshire has a number of air bases either in current use or in the process of being decommissioned. Policy clarification is therefore required to address this anomaly and ensure the Plan is positively prepared.

## **Flood Risk**

### Question 18

- 2.33 We do not consider the Sequential Test has been correctly applied within the draft Local Plan. A number of allocations for new housing developments are promoted within Flood Zone 3, including sites such as Loves Farm, St Neots and Priory Road, St Neots. These sites are identified within HDC's evidence document 'Huntingdonshire Local Plan to 2036: Sequential Test for Flood Risk' as being partly within Flood Zone 3b.
- 2.34 NPPF paragraphs 99-102 establish that Flood Zone 3 should only be considered for development where there is insufficient land within Flood Zones 1 and 2 for the Council to meet its overall housing need. Furthermore the aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding.
- 2.35 As per our previous representations to both the Local Plan and the HELAAs, we promoted a number of sites located within Flood Zone 1 (e.g. Land North of 66-100 Thrapston Road, Brampton, Old Ramsey Road, St Ives, and Meeting Lane, Needingworth), but these have not been allocated within the Local Plan (see **Appendix A and B**).
- 2.36 According to the NPPF, each of these sites, in lower flood risk areas, should be considered as sequentially preferable and therefore should have been thoroughly explored as part of the plan preparation and plan making process. The allocations at Loves Farm and Priory Road, St Neots should not be promoted in the Local Plan until HDC can demonstrate that there is insufficient land

within Flood Zones 1 and 2 to meet the identified level of housing need or that the Exceptions Test clearly applies.

- 2.37 We consider Policy LP5 is inconsistent with national policy. The draft policy states that '*where proposals would occupy the functional flood plain, the developer must ensure that it does not impact upon the ability of the floodplain to store or convey water....*'. However, this implies that the results of the sequential test can be ignored provided that the impact on the floodplain can be mitigated. This is inconsistent with national policy. Therefore the wording of this policy should be amended to ensure that the Sequential Test is applied correctly before any Exception Test considerations are brought into the equation.

### 3 CONCLUSION

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3.1 On behalf of our clients, we have a number of concerns in relation to the soundness of Huntingdonshire's Local Plan to 2036: Proposed Submission 2017. This Hearing Statement has been produced in response to Matter 3: Questions 1, 2, 5, 12, 13, 15, 16 and 18.

3.2 We consider that the draft Local Plan is unsound; a number of policies have not been justified and are not consistent with national policy. We contend that the following amendments are required in order for the Plan to be considered sound:

- The overall strategy and distribution of growth should be rebalanced to place less emphasis on two large strategic allocations and direct more development towards smaller sites;
- The SPAs require better definition and explanation;
- The SELs of Alconbury Weald and St Neots East should be justified within the Plan and further demonstrated why the use of large strategic sites is the most appropriate method of meeting HDC's housing need;
- That Small Settlements such as Needingworth are either reclassified or considered acceptable for housing allocations in recognition of their sustainable location and facilities provided;
- The Policy LP11 is amended to remove the blanket protection for the Countryside to ensure it is consistent with national policy;
- The definition of built up areas to be amended and justification provided as to why 30 dwellings is considered the minimum number of dwellings required to comprise a built up area; and
- That the proposed allocations and Policy LP5 are amended to correctly apply the Sequential Test to flood risk.

**APPENDIX A – REPRESENTATION LETTER TO  
CONSULTATION DRAFT DATED AUGUST 2017**

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**Our Ref: 19995/RMG/MB**  
**Your Ref:**

**E-mail: [mark.buxton@cgms.co.uk](mailto:mark.buxton@cgms.co.uk)**  
**Date: August 2017**

Local Plans Team  
Pathfinder House  
St Mary's Street  
Huntingdon  
PE29 3TN

Dear Sir/Madam,

**REPRESENTATIONS TO THE HUNTINGDONSHIRE LOCAL PLAN TO 2036:  
CONSULTATION DRAFT 2017**

RPS CgMs are instructed to submit representations on behalf of our client, Abbey Properties Cambridge Limited ('Abbey Properties'), to the Huntingdonshire Consultation Draft Local Plan.

This letter sets out our objections to, and where relevant, support for, the Consultation Draft Local Plan.

**Objectively Assessed Needs (OAN)**

Paragraph 4.8 identifies that the emerging Local Plan will support the overall provision of at least 21,000 new homes. Paragraph 4.34 states the emerging draft Local Plan identifies that 20,100 homes are required to meet the forecast population growth between 2011 and 2036 according to the Objectively Assessed Need for Huntingdonshire (2017). This equates to 804 dwellings per annum.

To be positively prepared the Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. While we welcome Huntingdonshire District Council's intention to target an overall provision of new homes above their assessed OAN, the Plan only contains a single sentence (at paragraph 4.1) setting out that the Council has taken this approach. We consider further justification for this approach should be contained within the Plan to accord with the tests of soundness reflected in NPPF paragraph 182.

We also highlight that if the Council seeks to provide at least 21,000 new homes during the plan period they will need to provide in excess of 804 dwellings per annum. We therefore consider that the Council should make it clear how many dwellings are required per annum to achieve the provision of at least 21,000 new homes over the course of the plan period in order for the Plan to be considered sound.

Furthermore, we consider that the Council has underestimated its Objectively Assessed Need for housing in the district. Abbey Properties has commissioned its own assessment of OAN for Huntingdonshire which it considers to be an appropriate Housing Target for the District. This figure has been created using PopGroup Modelling software in order to determine the objective assessed housing need. The software incorporates a wide range of socio-economic data which is sensitive to local circumstances and satisfies the requirements of the NPPF. The

assessment has been submitted to the Council on a number of occasions in support of Outline Planning Applications: 16/01530/OUT, 17/01161/OUT and 17/00931/OUT. A further update has also been commissioned.

This work assessed a variety of different scenarios and concluded that taking account of the Demographic, Economic, Affordability and Market Signals for Huntingdonshire there is clear evidence of a housing need of between 23,809 and 27,068 to be met between 2011 and 2036.

Therefore, we consider that a housing need of 23,809 dwellings is a robust and sound figure based on the sensitivity testing and should be the minimum level of housing need countenanced by Huntingdonshire District Council.

### **Policy LP 1 - Strategy For Development**

The policy concentrates development in locations which provide the greatest access to services and facilities and directs substantial development to two strategic expansion locations: Alconbury Weald and St Neots East. We consider this strategy inhibits growth and does not provide a sufficiently flexible approach to bring further sites forward. The Policy also fails to comply with the NPPF which requires Local Planning Authorities *“to boost significantly the supply of housing”* (Paragraph 47).

The policy does not proactively address the key reasons behind the persistent under delivery of houses within the District during the previous plan period. The Local Plan again places over reliance on the delivery of a small number of large strategic sites which take a long time to bring forward, have substantial infrastructure requirements, and are more likely to be delayed.

We therefore consider that the Distribution of Growth should be planned more positively across the District with greater allowance made for additional small and windfall sites to support the larger strategic sites. The Housing White Paper ‘Fixing our Broken Housing Market’ advocates such an approach.

### **Policy LP 5 - Spatial Planning Areas**

We disagree with the Council’s position on developments on unallocated sites. We consider that this policy is too restrictive and fails to recognise that the built-up areas of identified Spatial Planning Area are unable to accommodate viable and sustainable further growth. We therefore consider this policy is unsound.

The built-up area act as a proxy for the settlement boundaries. These have not been positively planned or adequately reviewed in this Local Plan and therefore do not allow for future growth. This results in limiting and restricting much needed housing growth. Moreover the built-up areas are based on outdated policy, the 2002 Local Plan Alterations, and are no longer relevant nor are they supported by the evidence base.

The supporting text *states “allocations for new development reflect existing known opportunities within each spatial planning area”*. These areas are planned to cater for 70% of future housing growth. However the boundaries reflected in LP5 limit the opportunities to provide the future housing need of Huntingdonshire, as well-located and strategically placed housing settlements are not identified. These settlement boundaries should be reviewed as the areas defined are out of date.

We advise, with consideration to paragraph 151 of the NPPF, that to contribute to sustainable development less constrained boundaries are necessary. We consider there to be further sites suitable for residential development which are appropriately located with excellent access to services and public transport.

### **Policy LP 6 – Key Service Centres**

The Council identifies in its objectives that there should be a good supply of suitable land for growth and the promotion of high quality, well designed and locally distinctive sites. We support this objective but consider that certain policies fail to support this and are therefore unsound.

Policy LP 6 states that a “*proposal for development on a site in addition to those allocated in this plan will be supported where it is located within a built-up area of a Key Service Centre*”. However, we consider the Policy and emerging Plan has failed to support this aim by effectively retaining the existing settlement boundaries originally defined with the 1995 Local Plan and 2002 Local Plan Alterations through the Built-up Areas definition. Any sites suitable and viable for development would have already been identified and developed during the preceding years. We consider evidence of this can be seen through the Council’s failure to meet its annual housing target in 4 of the last 5 years. Therefore, we considered that this policy is unreasonable and fails to plan positively for the District.

As a result the emerging Local Plan relies too heavily upon a small number of large strategic sites which take a long time to bring forward, affecting housing delivery in the district. Notably the Council has failed to meet its identified need over the last 4 years; a position the Inspector at the recent Lucks Lane Inquiry (Appeal Ref: APP/H0520/W/16/3159161) concluded constituted ‘*persistent under delivery*’. Furthermore we disagree with the ‘built up area’ definition. Excluding sites which are not ‘Previously Developed Land’ or ‘relate to surrounding countryside rather than buildings’ limits the number of sustainable sites which could deliver sustainable development.

Paragraph 157 of the NPPF requires Local Plans to plan positively for the development and infrastructure required in the area. This means indicating broad locations for strategic development. We consider there are other suitable sites which can positively meet housing need in the District. Therefore, we submit that the Council should identify further locations where development will be supported when it is well-related to the built-up area. This is over and above the policy support espoused in Community Planning Proposals and Rural Exceptions Housing policies.

### **Policy LP8 - Countryside**

This policy states all development in the countryside must “*avoid the irreversible loss of the best and most versatile agricultural land (grade 1 to 3a) where possible.*”

While we recognise that this policy is supported by the NPPF, we consider this policy fails to recognise that there are suitable sites for development particularly in agricultural grade 3a. Selective planned development of these sites will not harm the countryside nor materially affect the amount of the best and most versatile agricultural land within the District and would furthermore provide opportunities for the Council to meet its housing need. We therefore argue that limiting development in the countryside is too restrictive and does not plan positively.

Moreover, the policy position appears to be a direct contradiction to the majority of the Council's Strategic Allocations and the 2017 HELAA. A number of sites being promoted and allocated by the Council are former agricultural land comprising of either Grade 2 to 3a.

We consider that the policy should be reworded to more accurately reflect the Council's Strategic Allocations and positively plan for the District.

### **Policy LP9 - Flood risk**

This policy determines the locations suitable for development and states proposals will only be supported where the flood risk has been addressed. This requires that *"all reasonable opportunities to reduce overall flood risk have been taken"*.

We support this policy but consider there is an inconsistency with this policy and a number of Strategic Allocations. We consider that the Council needs to address this inconsistency and ensure that it correctly implements the Sequential and Exception Tests as set out in the NPPF.

### **Policy LP23 – Affordable Housing Provision**

The policy sets out the provision of affordable housing to delivered on site. It targets the delivery of 40% affordable housing on sites where 11 homes or 1,001sqm residential floorspace or more is proposed except where it can be demonstrated that the target is not viable.

We support the principle of this policy, however, we consider that the range of affordable housing types, sizes and tenures should be clearly set out within the main policy text rather than a referring back to the Housing Register, the Cambridge sub-region Strategic Housing Market Assessment and other local sources. The Policy currently fails to provide certainty for developers seeking to establish the tenure mix and associated costs. The policy is also likely to create uncertainty during periods when evidence is being updated or in situations when the evidence documents contradict each other. We therefore consider that the Council should state the percentage of affordable housing types, sizes and tenures sought within the Local Plan.

Furthermore we have concerns in relation to bullet point c. This requires affordable housing to be dispersed across the development in *'small clusters of about 15 dwellings'*. This can only reasonably apply to the largest strategic allocations in the District. Furthermore, it exceeds the 11 unit threshold. For example, it would be impossible for a 12 unit scheme to meet this policy requirement.

We consider that 15 dwellings constitutes more than what would typically be considered a *'small cluster'* on the majority of sites. We consider this will result in the majority of the affordable units being located in one area of the site. We are also unaware of any evidence which supports this figure. We therefore consider this element of the policy to be unsound and not supported by evidence. We would wish to see this element of the policy amended with a reduced figure which can be reasonably considered to be a *'small cluster'* in the context of the proposed development. Amending the draft policy to refer to clusters of up to 15 units and removing the reference to a *'small cluster'* maybe an acceptable solution. We consider that this would also provide flexibility for smaller sites where the number of units proposed means a cluster of 15 dwellings is not possible or suitable.

We consider that the policy should also recognise that a site's location within the District and its local housing market characteristics could be a material consideration affecting the percentage

and mix of affordable housing which can be provided on site. The District Council should recognise that the different settlements within the District have different markets for affordable housing with some areas more attractive to affordable housing providers than others. The policy wording or supporting text should reflect that, where it is supported by viability evidence, the location of sites will be a material consideration to justify a reduction in the amount of affordable housing proposed on site.

### **Policy LP28 - Rural Exceptions Housing**

Policy LP28 offers flexibility to proposals outside the built-up area and provides a positive opportunity to meet housing need as a rural exception. The policy requires providing “*affordable housing for people with a local connection*” with the aim of increasing diversity in housing tenures and to meet Huntingdonshire’s housing need.

We support this policy in so far that it recognises that development might be necessary outside of the built-up area. The policy could enable the Council to support sites outside the built-up area of settlement to come forward to help meet the District’s housing need. The policy also recognises the need to provide both affordable and market housing on site to ensure such sites are viable. This could help offset the restrictions of LP1 Strategy for development and LP5 ‘Spatial Planning Areas’.

We are concerned however over the lack of clarity in this policy. The policy states the scale and location of the proposal must demonstrate the availability of services and infrastructure and the effect on the character of the immediate locality. This does not provide sufficient clarity to the development industry over issues such as the location of these exception sites or what scale will be acceptable.

### **Allocations**

We object that a number of sites which we consider to be sustainable and suitable for development have not been included within the emerging plan allocations. We therefore consider the allocations in the Plan to be unsound.

Separate representations on the HELAA and ‘Call for Sites’ forms have been submitted for each of these sites. We consider it is necessary for the HELAA and proposed allocations to be reviewed and additional sites included for the emerging plan to be considered sound.

A brief description and analysis of the additional sites we consider should be allocated is provided below:

#### *Biggin Lane, Ramsey*

Biggin Lane is located to the west of Ramsey and we consider could be developed for at least 141 dwellings. The site is assessed within the HELAA and was found to be suitable for only low density development before being considered as ‘not suitable’ within the summary table for Ramsey. We consider this is inconsistent and the HELAA has failed to consider a realistic capacity for the site.

We note that the majority of Biggin Lane comprises grade 3b agricultural land and is exclusively located within Flood Zone 1. We also consider the site has been incorrectly assessed within the Council’s Sustainability Appraisal for the reasons set out in our separate representation letter. *Old Ramsey Road, St Ives*

Old Ramsey Road is located to the north west of St Ives and despite representations being submitted to the 2016 HELAA Additional Sites Consultation, the site has been omitted from the HELAA 2017.

The site is approximately 10.81 hectares and we consider is suitable for 131 dwellings. The site is located entirely with Flood Zone 1 and could provide at least 40% affordable units. The site has been fully assessed through a number of technical reports submitted in support of Outline Planning 17/00931/OUT which demonstrate that the site is sustainable.

*Thrapston Road, Brampton*

The site is located to the north of Brampton and has in part been included with the HELAA, but limited to the frontage site only and therefore considered to have a capacity of just 8 dwellings. The site was not therefore considered for allocation as it fell below the capacity threshold of 10 dwellings. The full site was not assessed due to concerns relating to flood risk.

However, we consider that the HELAA has failed to reflect the Council's updated Strategic Flood Risk Assessment which identifies the site almost entirely within Flood Zone 1. The site performs well in the Sustainability Appraisal and we consider should only result in 6 negative impacts of the 32 criteria tested.

We therefore consider that the Thrapston Road site should be reassessed within the HELAA and allocated for 63 dwellings.

**Conclusion**

Overall we disagree with elements of the Council's Draft Local Plan. We believe the Plan to unduly limit potential future development sites. In addition we advise further consideration into its settlement boundaries is needed to deliver sites to meet, and potentially exceed, the OAN for housing and to provide sustainable and inclusive communities for the future.

RPS CgMs reserves the right to appear and speak at the Examination should the emerging Local Plan continue to fail to satisfactorily address our concerns over issues of soundness.

Please do not hesitate to contact either myself or my colleague Robert Mackenzie-Grieve if you require any information on, or wish to further discuss, this representation.

Yours Sincerely



Mark Buxton  
Director

**APPENDIX B – REPRESENTATION LETTER TO PROPOSED  
SUBMISSION PLAN DATED 5/2/18**

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**Date: 5<sup>th</sup> February 2018**

Local Plans Team  
Pathfinder House  
St Mary's Street  
Huntingdon  
PE29 3TN

***By email only***

Dear Sir/Madam,

**REPRESENTATIONS TO THE HUNTINGDONSHIRE LOCAL PLAN TO 2036: PROPOSED SUBMISSION**

RPS are instructed to submit representations on behalf of our client, Abbey Properties Cambridge Limited ('Abbey Properties'), to the Huntingdonshire Local Plan Proposed Submission.

This letter sets out our representations to the Proposed Submission version of the Local Plan and should be read alongside the representations made to the July 2017 Consultation Draft. Previous representations were submitted under the name of RPS CgMs.

We set out at the end of each representation whether we consider the policy/allocation meets the tests of soundness and the reasons why.

**LP1 – Amount of Development: OBJECT**

Policy LP 1 sets out the amount of development which is required in Huntingdonshire.

According to the Policy at least 20,100 new homes (both market and affordable) are required within the District. We consider that this policy fails to meet the Objectively Assessed Housing Need for the District for the reasons set out in the 'Huntingdonshire Housing Requirement and OAN' report by Regeneris Consulting attached to this letter.

According to the Regeneris Report the Council's OAN evidence contains the following shortcomings:

- A lack of consistency between the figures and aspects of the method in the 2013 SHMA and 2017 CRG study;
- The absence of any substantive consideration of the implications of Huntingdonshire's stand-alone OAN study for housing need figures in the wider Housing Market Area;
- The lack of a thorough assessment of past trends in household formation rates;
- Flaws in the Council's approach to economic growth adjustments in the OAN; and
- An adjustment for market signals which falls far short of an increase in the future housing supply relative to assessed demand which might reasonably be expected to result in an easing of affordability problems.



Regeneris consider that a minimum OAN of 23,750 (950 dpa) should be planned for the district and we support and endorse their conclusions.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	No	No evidence of joint working on strategic priorities
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

**LP2 – Strategy for Development: OBJECT**

This policy seeks to protect the intrinsic character and beauty of the countryside surrounding settlements and therefore seeks to apply a blanket protection to the whole of the countryside. This is inconsistent with the NPPF which is clear that account should be taken of the different roles and character of different areas. The NPPF only uses the term ‘protect’ in reference to valued landscape and designated areas. We therefore consider that this addition to Policy LP2 from previous draft versions of the Local Plan is inconsistent with National Guidance.

The policy further concentrates development in locations which provide the greatest access to services and facilities and directs substantial development to two strategic expansion locations: Alconbury Weald and St Neots East. This means that approximately 75% of housing growth is proposed to be located within the four spatial planning areas.

We consider this strategy potentially inhibits growth and does not provide a sufficiently flexible approach to encourage other sites to come forward. The Policy therefore arguably fails to comply with the NPPF which requires Local Planning Authorities “to boost significantly the supply of housing” (Paragraph 47).

The policy does not proactively address the key reasons behind the persistent under delivery of houses within the District earlier in the plan period. The Local Plan again places over reliance on the delivery of two large strategic sites which take a long time to bring forward, have substantial infrastructure requirements, and are more likely to be delayed.

We therefore consider that the distribution of growth should be planned more positively across the District with greater allowance made for additional small and windfall sites to support the larger strategic sites. The Housing White Paper ‘Fixing our Broken Housing Market’ advocates such an approach.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	N/A	
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

**LP7 – Spatial Planning Areas: OBJECT**

We disagree with the Council’s position on developments on unallocated sites. We consider that this policy is still too restrictive and fails to recognise that the built-up areas identified as Spatial Planning Area settlement are unable to accommodate sufficient viable and sustainable further growth to meet the Objectively Assessed Need. We therefore consider this policy is unsound.

The built-up area effectively acts as a proxy for the settlement boundaries. These have not been positively planned or adequately reviewed within the Local Plan and therefore do not allow for future growth. This results in limiting and restricting much needed housing growth. Moreover the built-up areas appear to be based on outdated policy, the 2002 Local Plan Alterations, and are no longer relevant nor are they supported by the evidence base.

The supporting text states *“allocations for new development reflect existing known opportunities within each spatial planning area”*. These areas are proposed to cater for 75% of future housing growth according to Policy LP2. However, supporting paragraph 4.8 states that to allow for the level of growth currently proposed the use of some greenfield land will be required to deliver the necessary scale of development. The policy wording of LP7 does not reflect this need and limits the opportunities to deliver the future housing need of Huntingdonshire, as well-located and strategically placed housing settlements are not identified. These settlement boundaries should be reviewed as the areas defined are out of date.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	No	No evidence of joint working on strategic priorities
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

**LP11 – The Countryside: OBJECT**

This policy requires that all development in the countryside must *“avoid the irreversible loss of the best and most versatile agricultural land (grade 1 to 3a) where possible.”*

While we recognise that this policy is supported by the NPPF through directing development to poorer quality land, we consider this policy fails to recognise that there are suitable sites for development particularly in agricultural land grade 3a. Selective planned development of these sites will not harm the countryside nor should it materially affect the amount of the best and most versatile agricultural land within the District. It would furthermore provide opportunities for the Council to meet its identified housing need. We therefore contend that the countryside policy is too restrictive and fails to plan positively.

Moreover, the policy position appears to be a direct contradiction to the majority of the Council’s Strategic Allocations and the 2017 HELAA. A number of sites being promoted and allocated by the Council are best and most versatile agricultural land comprising Grade 2 to 3a.

Furthermore we object to the policy seeking to protect the intrinsic character and beauty of the countryside. As stated above this is inconsistent with the NPPF which is clear that account should be taken of the different roles and character of different areas.

We consider that the policy should be reworded to more accurately reflect the Council's Strategic Allocations and positively plan for the District.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	N/A	
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

**LP25 – Affordable Housing Provision: OBJECT**

This policy sets out the provision of affordable housing to be delivered on site. It targets the delivery of 40% affordable housing on sites where 11 homes or 1,001sqm residential floorspace or more are proposed except where it can be demonstrated that the target is not viable.

We do not support this policy and consider, amongst other things, that 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. The Policy currently fails to provide certainty for developers seeking to establish the tenure mix and associated costs. The policy is also likely to create uncertainty during periods when evidence is being updated or in situations when the evidence base documents contradict each other. We therefore consider that the Council should state the percentage of affordable housing types, sizes and tenures sought within the Local Plan.

We support the removal of the reference in bullet point c to small clusters referring to ‘about 15 dwellings’. However, we still consider the reference to ‘small clusters of dwellings’ is unclear, inconsistent with the supporting text, and difficult to achieve on smaller sites.

Supporting paragraph 7.10 states that affordable housing should be ‘pepper-potted’ around a development and ‘may be provided in small clusters, proportionate to the scale of development’. However, the proposed wording of Policy LP25 is less clear and does not provide sufficient guidance regarding what is considered to be a ‘small cluster’. Furthermore, supporting paragraph 7.14 still refers to small clusters consisting of about 15 dwellings. While paragraph 7.14 acknowledges that clusters of 15 affordable dwellings could be too large on smaller sites we consider this reference currently provides the only indication of what the Council considers to be a ‘small cluster’.

We wish to see this element of the policy amended to provide further clarity on what is considered to be a ‘small cluster’ in the context of the proposed development or to remove the reference altogether. We consider that this would provide a greater degree of flexibility for smaller sites.

We consider that the policy should also recognise that a site's location within the District and its local housing market characteristics could be a material consideration affecting the percentage and mix of affordable housing which can be provided on site. The District Council should recognise that the different settlements within the District have different markets for affordable housing with some areas more attractive to affordable housing providers than others. The policy wording or supporting text should reflect that, where it is supported by viability evidence, the location of sites will be a material consideration to justify a reduction in the amount of affordable housing proposed on site.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	N/A	
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

**LP30 – Rural Exceptions Housing: OBJECT**

Policy LP30 offers some flexibility to proposals outside the built-up area and provides a positive opportunity to meet housing need as a rural exception. The policy seeks to provide “*affordable housing for people with a local connection*” with the aim of increasing diversity in housing tenures and to meet Huntingdonshire’s housing need.

We support this policy in so far as it recognises that development might be necessary outside of the built-up area. The policy could enable the Council to support sites outside the built-up area of settlements to come forward to help meet the District’s housing need. The policy also recognises the need to provide both affordable and market housing on site to ensure developments are viable. This provides a counter-balance to the restrictions on development of LP2 ‘Strategy for Development’ and LP7 ‘Spatial Planning Areas’.

We are concerned however over the lack of clarity in this policy. The policy states the scale and location of the proposal must demonstrate the availability of services and infrastructure and the effect on the character of the immediate locality. This does not provide sufficient clarity to the development industry over issues such as the location of these exception sites or what scale will be acceptable.

We are also concerned 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. We consider that the need for affordable houses across the District, as set out in LP25, should result in the Council allocating more new housing developments in order to achieve 40% affordable housing provision from those sites. This would address an urgent need within the District and provide access to affordable dwellings to all.

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	N/A	
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

**Allocations: OBJECT**

We consider that the following allocations should have been included within Huntingdonshire Proposed Submission Local Plan:

*Land off and to the North of 66-100 Thrapston Road, Brampton*

An application for 63 dwellings was dismissed at Appeal in December 2017 (APP/H0520/W/17/3172571) as the site was considered to have a harmful impact on the local landscape and townscape.

However, we do not agree with the Inspector's findings (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.

With regard to landscape impact the site is undesignated in landscape terms, contains no features of particular value and is enclosed to the public.

The site is approximately 3.25 hectares and is located to the north of Brampton. It is currently a vacant greenfield site with residential properties to the south. To the north, east and west of the site is open land including Hinchingsbrooke Country Park and Alconbury Brook Pond. Existing agricultural and commercial uses are located to the north and north east of the site including Poplars Farm.

The majority of the site comprises semi-improved grassland, tall ruderals and scrub with the site boundaries comprising individual trees, hedgerows and scrub. Development of the site should not have a negative impact on either Hinchingsbrooke Gravel Pits or Portholme SAC. Great Crested Newts have been identified within the pond on site and appropriate mitigation would therefore be required. No reptiles have been recorded on site.

No Tree Preservation Orders are in place on site and one group of trees would require partial removal to create the vehicle entrance. A number of trees are recommended for removal for reasons of good arboricultural practice.

There are no designated heritage assets within the site and a single listed building is located 100m to the south. The closest Scheduled Monument is located 500m west of the site. Development of the site will not affect the setting of these assets due to their distance from the site and the existing screening. There is no suggestion that the site contains archaeological remains that would prohibit development.

The site lies within the Huntingdon Spatial Planning Area (SPA) and presents a sustainable location for residential development in terms of access to local facilities and amenities as well as a good level of public transport provision. The site is well located to access local schools on foot/cycle as well as local shops and larger superstores. The site is also located in close proximity to the cycling routes. The nearest bus stops are located within 250m of the site's frontage to Thrapston Road. Development of the site would not have a detrimental impact on the local highway or sustainable transport networks.

The site is located within Flood Zone 1 and all built development can be proposed outside of the modelled 1 in 1000 year flood extent. SuDs such as permeable paving and detention basins can be incorporated into any scheme to ensure that runoff rates do not exceed greenfield rates.

According to Natural England Agricultural Land Classification the site comprises Grade 3 Agricultural Land; two grades below the best quality agricultural land. The site is also suitable for affordable housing.

For the reasons above we consider 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. Therefore the site should be included as a residential allocation within the Proposed Submission Local Plan.

#### *Thrapston Road Frontage Site*

Additionally, we consider (in the event that the site above is not allocated) that 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.

We consider that this site would address the perceived impact on the valued landscape raised in the Inspector's Appeal Decision referred to above (notwithstanding that a judicial review application has been lodged). A frontage scheme would not extend further north than the existing ribbon development, could not be described as 'in depth' and would not breach the visual boundary of Brampton.

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.

The Council assessed the suitability of this site within the May 2013 Environmental Capacity Study. It was concluded at that time that only the eastern part of the site would be suitable for development owing to flood risk issues. As a result the scheme would have been below the 10 dwelling threshold for allocation within the future Local Plan so was not separately identified.

These concerns from May 2013 over flood risk have subsequently been removed owing to the more up-to-date Environment Agency flood risk maps. The Council should therefore look favourably upon new development in this location on the edge of the settlement which relates more to the built-up area than the countryside.

We consider this site should be included within Huntingdonshire Local Plan Proposed Submission.

#### *Old Ramsey Road, St Ives*

The site is approximately 10.81 hectares and is located to the north west of St Ives. It is a greenfield site currently in agricultural use with a residential property, caravan storage business



to the east (in part) and allotments to the south. To the north of the site is agricultural land and RAF Wyton a short distance further north. The site would be accessed via Old Ramsey Road.

The site lies within the St Ives SPA and is currently subject to Outline Planning application 17/00931/OUT and we consider the site is suitable for 131 dwellings.

The site mainly comprises arable land with the boundaries consisting of individual trees, scrubs, and tall ruderals. A stream runs along the northern boundary. The arable land is not in itself of ecological significance. No reptiles were found on site however the site margins do have the potential to support invertebrates, amphibians, reptiles, breeding birds, foraging and commuting bats and hedgehogs. The site also has the potential to support Barn Owls as a Barn Owl box is present on the western boundary.

It is not necessary to remove any trees to enable development but a section of hedgerow on the eastern boundary of the site will need to be removed to facilitate vehicle access. The remaining boundary landscaping can be retained and enhanced through sensitive planting.

There are no designated heritage assets within the study site or the surrounding 1km search area. Evidence provided from the Historic Environment Record demonstrates that the site is considered to have low/negligible potential for significant archaeological evidence from all periods.

Vehicular access to the site could be provided from Old Ramsey Road in the form of a priority junction designed in accordance with DMRB standards. A new footway is proposed to be provided along the western side of Old Ramsey Road. The Transport Assessment establishes that the site enjoys a sustainable location in respect of the services and facilities and in respect of available public transport. A proposed development of 131 dwellings would not be anticipated to have a material impact on the operation of the local highway network.

The site is primarily located in Flood Zone 1 and is not considered to be at a significant risk of flooding from any sources assessed. However, parts of the site adjacent to the ordinary watercourse are at 'medium' to 'high' risk of surface water flooding and therefore any proposed development should be located wholly outside of this area. Sustainable Drainage can also be incorporated into the scheme to ensure that runoff rates do not exceed greenfield rates. This can be done through permeable paving and a retention basin on site.

As the site is located within Flood Zone 1 it is sequentially preferable to a number of sites assessed within the 2017 HELAA. We calculate there are 11 sites with flood risk issues assessed within the HELAA. 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.

The majority of the site comprises Grade 2 agricultural land. Therefore, we consider the development would not involve the loss of the best quality Grade 1 agricultural land. The site is located in very close proximity to the built up area of St Ives with urban uses immediately to the south east of the site.

The site could also provide additional affordable housing. The Proposed Submission Local Plan sets a target of 40% affordable housing on residential sites. We consider that this site could provide 40% affordable housing (equating to 52 units), or potentially more, while remaining viable. This development site could therefore provide a significant number of the affordable dwellings requirement within St Ives.

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. This found that 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.

For the reasons above we consider that land off Old Ramsey Road is suitable, available and achievable for the provision of new residential development within the next 5 years. Therefore the site should be included within the Huntingdonshire Local Plan to 2036: Proposed Submission.

#### *Meeting Lane, Needingworth*

The site is approximately 4.9 hectares and is located on the north west edge of Needingworth.

Needingworth is identified as a small settlement in the draft Local Plan. Draft Policy LP10 'Small Settlements' states that "*a proposal for development on land well-related to the built-up area may be supported where it accords with the specific opportunities allowed for through other policies of this plan*". We contend that land at Meeting Lane is very well related to the existing built up area.

The site is greenfield and accessible from either Meeting Lane or the High Street. The site lies primarily in Flood Zone 1 although access issues need to be satisfactorily resolved. It is located a short distance to the north of two bus stops and Needingworth Post Office. We therefore consider that the site is a sustainable location for development.

The site was assessed within the Housing & Economic Land Availability Assessment December 2017. Overall the appraisal was positive with some of the main positive features including the sites close proximity to Overcote Lane playing fields, Needingworth Village Hall, Post Office and One Stop Shop. The site is also only 700m away from the Holy Church of England Primary School and 1.9km from Needingworth Industrial Estate.

However, the Sustainability Appraisal within the 2017 HELAA concluded that the "*the site is not considered suitable for development as it contributes significantly to the character area of the local area*".

This conclusion seems to run counter to the overall assessment and is seemingly based on the fact the site would be inappropriate for higher density development.

We consider the site to be suitable for up to 50 dwellings and is also capable of providing significant public open space. At 4.9ha such a scale of development would qualify as very low density development, well below the Council's own assessment of 'low density' development of 30 dwellings per ha in the HELAA. We therefore consider this site is suitable for low density residential development.



Furthermore the site is supported locally for additional development in the village with the Parish Council expressing a positive early view of the site’s potential.

*Meadow Lane, Ramsey*

The site is approximately 2.2 hectares and is located to the east of Bury within the Ramsey Spatial Planning Area. The site is currently greenfield with an electricity sub-station adjacent to the south-eastern corner and was previously used as a practice ground by Ramsey Golf Club. The development would be accessed from Meadow Lane off Warboys Road.

The site is approximately 650m from Bury Stores and 750m away from Bury Church of England Primary School. The site is also within 2km of both the High Lode industrial Estate and the proposed employment site at Upwood Airfield.

We consider the site is suitable for 40 dwellings, open space and additional landscaping. The site is not located in an area of flood risk. It lies on the south-eastern edge of the extensive Ramsey Conservation Area adjacent to other housing which falls outside the Conservation Area.

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.

Accordingly, we consider the site should be allocated for low-medium density residential development in the Proposed Submission Local Plan.

A site location plan for this site is attached to this covering letter (area marked by black hatching).

Test of Soundness	Yes/No	Reasons
Positively Prepared	No	Not meet objectively assessed development requirements
Justified	No	Not the most appropriate strategy
Effective	No	Plan will not deliver levels of development needed over its period
Consistent with National Policy	No	Not accord with, inter alia, para 47 of NPPF

**Proposals Map: NOTE/OBJECT**

We consider the key to the Proposals Map is currently misleading. It contains a reference to SPA which is understood in this context to apply to ‘Special Protection Areas’ but could equally apply to ‘Spatial Planning Areas’. We consider this should be clarified and cross reference to relevant Plan policies in the key could assist in this regard.

**Conclusion**

We object to the Council’s Proposed Submission Local Plan for the reasons outlined above. We consider the Plan unduly limits potential future development sites. Further consideration of the settlement boundaries is required to deliver sites to meet, and potentially exceed, the OAN



for housing and to provide sustainable and inclusive communities for the future. We therefore consider the Local Plan, as drafted, fails the tests of soundness

RPS wish to participate at the oral examination on behalf of Abbey Properties Cambridgeshire Limited to ensure that our clients' interests are adequately addressed.

Please do not hesitate to contact either myself or my colleague Robert Mackenzie-Grieve if you require any information on, or wish to further discuss this representation letter.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Mark Buxton', written in a cursive style.

Mark Buxton  
Director

**APPENDIX C – NLP RESEARCH PAPER ‘START TO FINISH’**  
**NOVEMBER 2016**

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TRIP

Targeted Research  
& Intelligence Programme



Nathaniel Lichfield  
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Planning. Design. Economics.

# Start to Finish

## How Quickly do Large-Scale Housing Sites Deliver?

November 2016



# Executive Summary

There is a growing recognition that large-scale housing development can and should play a large role in meeting housing need. Garden towns and villages – planned correctly – can deliver sustainable new communities and take development pressure off less sustainable locations or forms of development.

However, what looks good on paper needs to deliver in practice. Plans putting forward large sites to meet need must have a justification for the assumptions they make about how quickly sites can start providing new homes, and be reasonable about the rate of development. That way, a local authority can decide how far it needs to complement its large-scale release with other sites – large or small – elsewhere in its district.

This research looks at the evidence on speed and rate of delivery of large-scale housing based on a large number of sites across England and Wales (outside London). We draw five conclusions:

1. If more homes are to be built, more land needs to be released and more planning permissions granted. There is no evidence to support the notion of systemic 'land banking' outside London: the commercial drivers of both house builders and land promoters incentivises rapid build out of permissions to secure returns on capital.
2. Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period. Because no one site is the same – and with significant variations from the average in terms of lead-in time and build rates – a sensible approach to evidence and justification is required.
3. Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times.
4. Plans should reflect that – where viable – affordable housing supports higher rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand for those products). This might mean some areas will want to consider spatial strategies that favour sites with greater prospects of affordable or other types of housing delivery.
5. For large-scale sites, it matters whether a site is brownfield or greenfield. The latter come forward more quickly.

In our conclusions we identify a check list of questions for consideration in exploring the justification for assumed timing and rates of delivery of large-scale sites.



An aerial photograph of a residential development. The top half shows a completed area with rows of brick houses and green lawns. The bottom half shows a construction site with foundations, some partially built houses, and a dirt area. A semi-transparent white box is overlaid on the top half, containing text.

## The Research in Figures

**70** number of large sites assessed

**3.9** years the average lead in time for large sites prior to the submission of the first planning application

**6.1** years the average planning approval period of schemes of 2,000+ dwellings. The average for all large sites is circa 5 years

**161** the average annual build rate for a scheme of 2,000+ dwellings

**321** the highest average annual build rate of the schemes assessed, but the site has only delivered for three years

**40%** approximate increase in the annual build rate for large sites delivering 30%+ affordable housing compared to those delivering 10%-19%

**50%** more homes per annum are delivered on average on large greenfield sites than large brownfield sites







# Introduction

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When it comes to housing, Government wants planning to think big. With its Garden Towns and Villages agenda and consultation on proposed changes to the National Planning Policy Framework (NPPF) to encourage new settlements, planning authorities and developers are being encouraged to bring forward large-scale housing development projects, many of them freestanding. And there is no doubt that such projects will be necessary if England is to boost supply and then consistently deliver the 300,000 new homes required each year<sup>1</sup>.

Large-scale sites can be an attractive proposition for plan-makers. With just one allocation of several thousand homes, a district can – at least on paper – meet a significant proportion of its housing requirement over a sustained period. Their scale means delivery of the infrastructure and local employment opportunities needed to sustain mixed communities.

But large-scale sites are not a silver bullet. Their scale, complexity and (in some cases) up-front infrastructure costs means they are not always easy to kick start. And once up and running, there is a need to be realistic about how quickly they can deliver new homes. Past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result.

So, if Local Plans and five year land supply assessments are to place greater reliance on large-scale developments – including Garden Towns and Villages – to meet housing needs, the assumptions they use about when and how quickly such sites will deliver new homes will need to be properly justified.

*“Local planning authorities should take a proactive approach to planning for new settlements where they can meet the sustainable development objectives of national policy, including taking account of the need to provide an adequate supply of new homes. In doing so local planning authorities should work proactively with developers coming forward with proposals for new settlements in their area.”*

**DCLG consultation on proposed changes to national planning policy (December 2015)**

The Planning Practice Guidance (PPG) offers little guidance other than identifying that timescales and rates of development in land availability assessments should be based on information that “*may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance should be made for several developers to be involved. The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year*”<sup>2</sup>. It also requires housing land availability assessments to include: “a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome.”<sup>3</sup>

This research provides insights to this topic – which has become a perennial discussion at Local Plan examinations and Section 78 appeals in recent years – by focusing on two key questions:

1. what are realistic lead-in times for large-scale housing developments?; and
2. once the scheme starts delivering, what is a realistic annual build rate?

NLP has carried out a desk-based investigation of the lead-in times and build-out rates on 70 different strategic housing sites (“large sites”) delivering 500 or more homes to understand what factors might influence delivery. For contrast 83 “small sites” delivering between 50 and 499 homes have been researched to provide further analysis of trends in lead in times and build rates at varying scales.

As well as identifying some of the common factors at play during the promotion and delivery of these sites it also highlights that every scheme has its own unique factors influencing its progress: there can be significant variations between otherwise comparable developments, and there is no one ‘typical scheme’. This emphasises the importance of good quality evidence to support the position adopted on individual projects.

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<sup>1</sup> House of Lords Select Committee on Economic Affairs (2016) Building more homes: 1st Report of Session 2016-17 - HL Paper 20

<sup>2</sup> PPG ID: 3-023-20140306

<sup>3</sup> PPG ID: 3-028-20140306

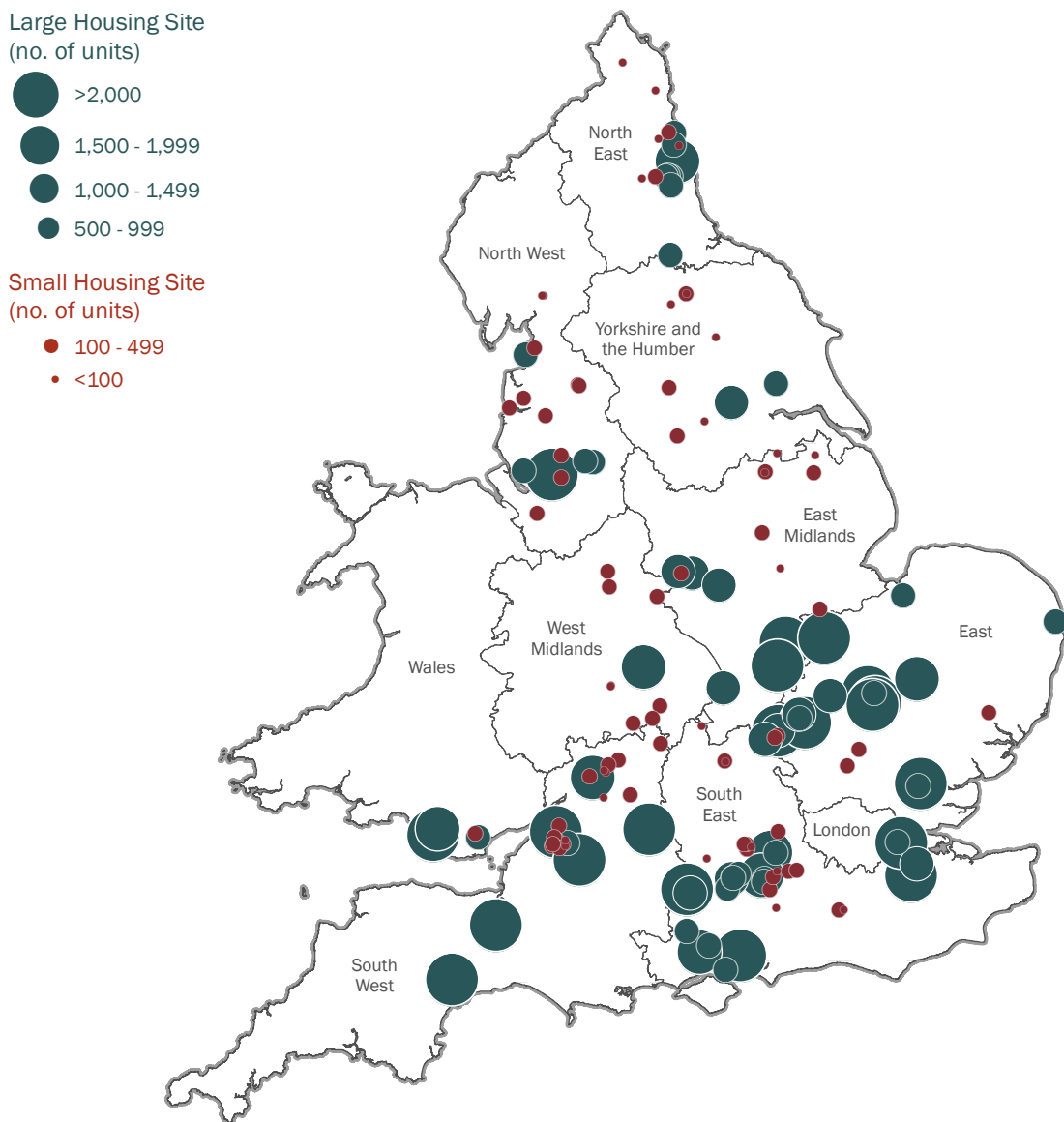


# Data Sources and Methodology

In total NLP reviewed 70 strategic sites (“large sites”) which have delivered, or will deliver, in excess of 500 dwellings. The sites range in size from 504 to 15,000 dwellings. The geographic distribution of the 70 large sites and comparator small sites is set out below in Figure 1. A full list of the large sites can be found in Appendix 1 and the small sites in Appendix 2. NLP focused on sites outside London, due to the distinctive market and delivery factors applicable in the capital.

Efforts were made to secure a range of locations and site sizes in the sample, but it may not be representative of the housing market in England and Wales as a whole and thus conclusions may not be applicable in all areas or on all sites.

Figure 1: Geographic Distribution of the 70 Large Sites and 83 Small Sites Assessed



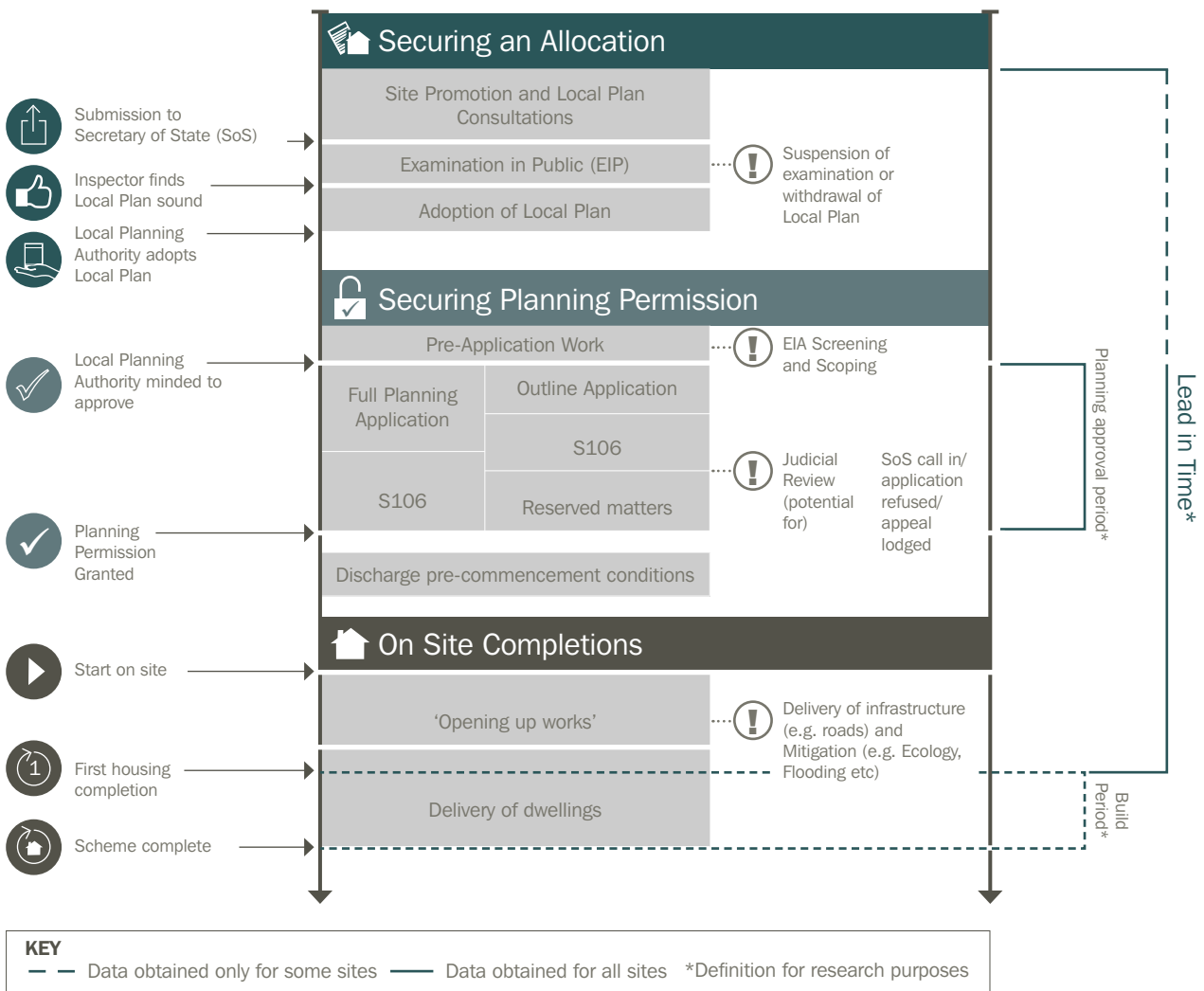
Source: NLP analysis

## Methodology

The research aims to cover the full extent of the planning and delivery period. So, wherever the information was available, the data collected on each of the 70 sites covers the stages associated with the total lead-in time of the development (including the process of securing a development plan allocation), the total planning approval period, starting works on site, delivery of the first dwelling and the annualised build rates recorded for the development up until to the latest year where data is available (2014/15). To structure the research and provide a basis for standardised measurement and comparison, these various stages (some of them overlapping) have been codified.

Figure 2 sets out the stages and the milestones used to measure them. These are assumed to fall under what are defined as 'lead-in times', 'planning approval periods' and 'build periods', with 'first housing completion' denoting the end of the lead-in time and start of the build period. Not every site assessed will necessarily have gone through each component of the identified stages sequentially, or indeed at all (for example, some sites secure planning permission without first being allocated).

Figure 2: Timeline for the Delivery of a Strategic Housing Site



Source: NLP

Start to Finish

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The approach to defining these stages for the purposes of this research is set out below:

- The **'lead-in time'** – this measures the period up to the first housing completion on site from either a) the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document) or where not applicable, available or readily discernible – b) the validation date of the first planning application made for the scheme.
- The **'planning approval period'** is measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwellings on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). The discharge of any pre-commencement and other conditions obviously follows this, but from a research perspective, a measurement based on a detailed 'consent' was considered reasonable and proportionate milestone for 'planning' in the context of this research.
- The date of the **'first housing completion'** on site (the month and year) is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a mid-point of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.
- The **'annual build rate'** falls within the overall 'build period'. The annual build rate of each site is taken or inferred from the relevant Local Planning Authority's Annual Monitoring Reports (AMR) or other evidence based documents where available. In some instances this was confirmed – or additional data provided – by the Local Planning Authority or County Council.

Due to the varying ages of the assessed sites, the implementation of some schemes was more advanced than others and, as a function of the desk-based nature of the research and the vintage of some of the sites assessed, there have been some data limitations, which means there is not a complete data set for every assessed site. For example, lead-in time information prior to submission of planning applications is not available for all sites. And because not all of the sites assessed have commenced housing delivery, annual build rate information is not universal. The results are presented accordingly.







# Getting Started: What are Realistic Lead-in Times?

How long does it take for large-scale sites to get up and running? This can be hard to estimate. Understandably, those promoting sites are positive about how quickly they can deliver, and local authorities choosing to allocate large-scale sites in their plans are similarly keen for these sites to begin making a contribution to housing supply. This leads some local housing trajectories to assume that sites can be allocated in Local Plans and all detailed planning approvals secured in double-quick time. However, the reality can prove different.

Our main focus here is on the average 'planning approval period' and the subsequent period from receiving a detailed planning approval to delivery of the first house on site. However, another important metric is how long it takes from the site being first identified by the local authority for housing delivery to getting started on site. Unfortunately, getting accurate data for this on some of the historic sites is difficult, so this analysis is focused on a just 18 of the sample sites where information was available.

## Lead-in Times

The lead-in time prior to the submission of a planning application is an important factor, because many planning issues are flushed out in advance of planning applications being submitted, not least in terms of local plan allocations establishing the principle of an allocation. In a plan-led system, many large-scale sites will rely on the certainty provided by Local plans, and in this regard, the slow pace of plan-making in the period since the NPPF<sup>4</sup> is a cause for concern.

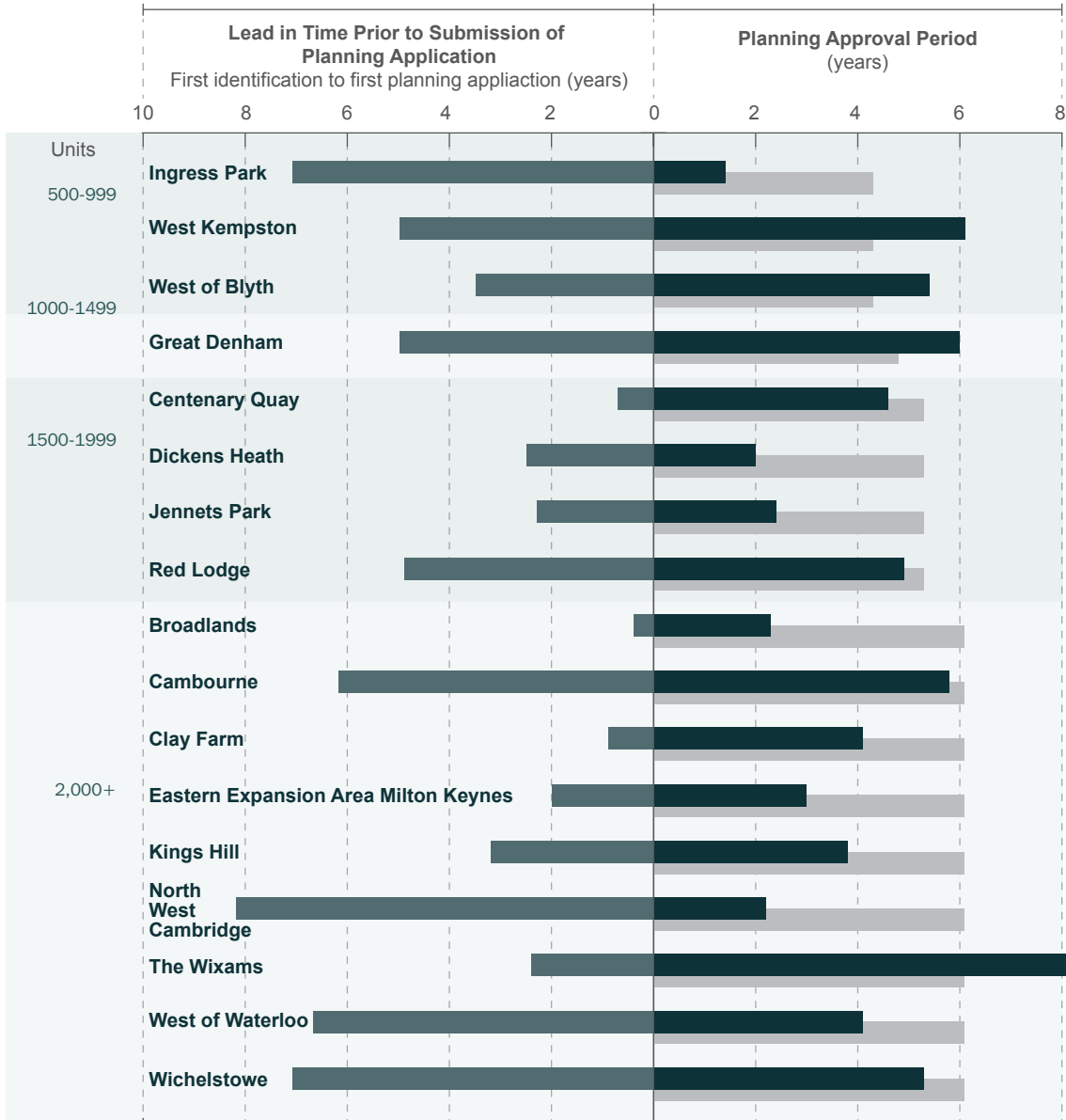
If the lead-in time prior to submission of an application is able to focus on addressing key planning issues, it can theoretically help ensure that an application – once submitted – is determined more quickly. Our sample of sites that has lead-in time information available is too small to make conclusions on this theory. However, there is significant variation within these sites highlighting the complexity of delivering homes on sites of different sizes. Of this sample of sites: on average it was 3.9 years from first identification of the site for housing to the submission of the initial planning application.

Moreover, a substantial lead-in time does not guarantee a prompt permission: 4 of the 18 sites that took longer to gain planning permission than the average for sites of comparable size and also had lead-in times prior to submission of a planning application of several years<sup>5</sup>.

<sup>4</sup> As at September 2016, just 34% of Local Authorities outside London have an up-to-date post-NPPF strategic-level Local Plan. Source: PINS / NLP analysis.

<sup>5</sup> The sites in question were The Wixams, West Kempton, West of Blyth, and Great Denham.

Figure 3: Average lead-in time of sites prior to submission of the first planning application



**KEY**  
 Lead in time prior to submission of planning application  
 Planning approval period  
 Average planning application period for site of that size

Source: NLP analysis

## The Planning Approval Period: Size Matters

The term ‘planning approval period’ in this report measures the period from the validation date of the first planning application for the scheme to the decision date of the first application which permits development of dwellings on site (this could be a full, hybrid or reserved matters application). Clearly, in many cases, this approval will also need to be followed by discharge of pre-commencement conditions (a focus of the Government’s Neighbourhood Planning Bill) but these were not reviewed in this research as a detailed approval was considered an appropriate milestone in this context.

The analysis considers the length of planning approval period for different sizes of site, including comparing large-scale sites with small sites. Figure 4 shows that the greater the number of homes on a site, the longer the planning approval period becomes. There is a big step-up in time for sites of in-excess of 500 units.

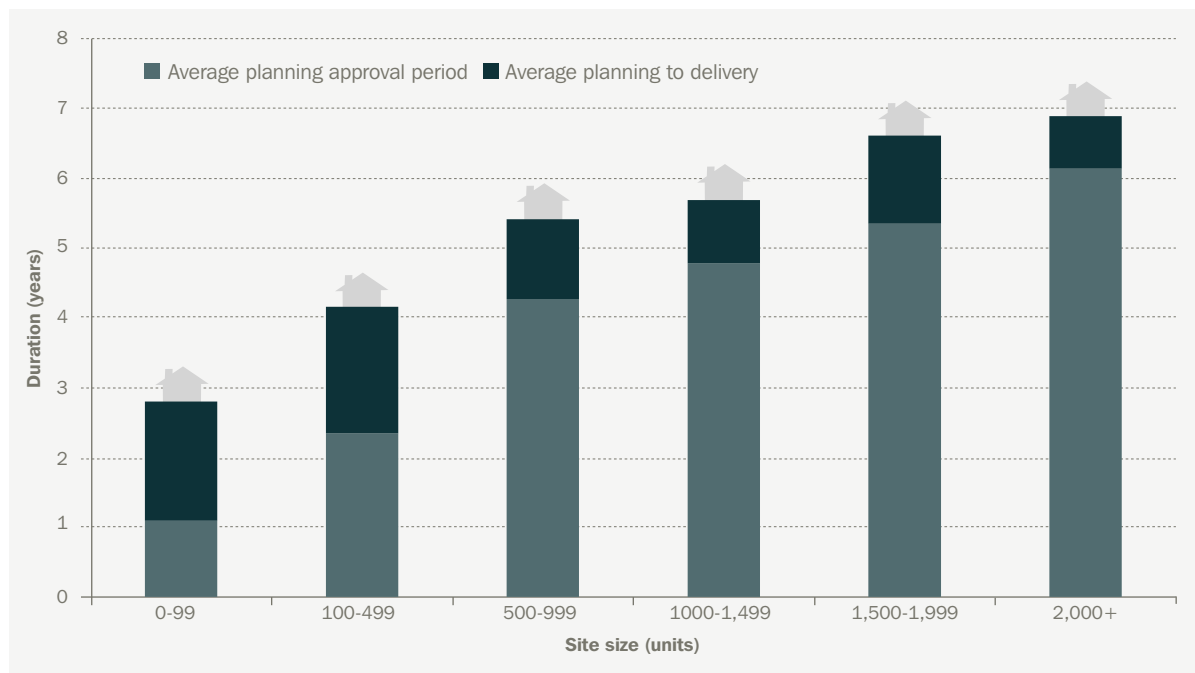
## Time Taken for First Housing Completion after Planning Approval

Figure 4 also shows the time between the approval of the first application to permit development of dwellings on site and the delivery of the first dwelling (during which time any pre-commencement conditions would also be discharged), in this analysis this is the latter part of the lead in time period. This reveals that the timescale to open up a site following the detailed approval is relatively similar for large sites.

Interestingly, our analysis points to smaller sites taking longer to deliver the first home after planning approval. This period of development takes just over 18 months for small sites of under 500 units, but is significantly quicker on the assessed large-scale sites; in particular, on the largest 2,000+ dwelling sites the period from receiving planning approval to first housing completion was 0.8 years.

In combination, the planning approval period and subsequent time to first housing delivery reveals the total period increases with larger sites, with the total period being in the order of 5.3 – 6.9 years. Large sites are typically not quick to deliver; in the absence of a live planning application, they are, on average, unlikely to be contributing to five year housing land supply calculations.

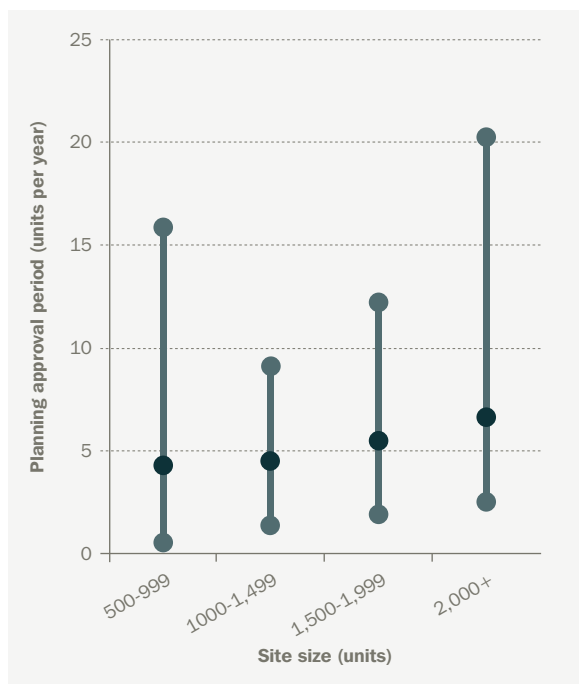
Figure 4: Average planning approval period and delivery of first dwelling analysis by site size



Source: NLP analysis

Of course, these are average figures, and there are significant variations from the mean. Figure 5 below shows the minimum and maximum planning approval periods for sites in each of the large size categories. This shows even some of the largest sites coming forward in under two years, but also some examples taking upwards of 15-20 years. Clearly, circumstances will vary markedly from site to site.

Figure 5: Site size and duration of planning



Source: NLP analysis

## Case Studies

If some sites are coming forward more quickly than the average for sites of that size, what is it that is driving their rapid progress? We explored this with some case studies. These suggest that when schemes are granted planning permission significantly faster than the above averages, it is typically due to specific factors in the lead-in time prior to the submission of a planning application.

### Gateshead – St James Village (518 dwellings): Planning approval period 0.3 years<sup>6</sup>

This site was allocated as a brownfield site in the Gateshead UDP (2000) prior to the submission of a planning application for the regeneration scheme. A Regeneration Strategy for East Gateshead covered this site and as at 1999 had already delivered high profile flagship schemes on the water front. Llewelyn Davis were commissioned by the Council and English Partnerships to prepare a masterplan and implementation strategy for the site which was published in June 1999. Persimmon Homes then acquired the site and it was agreed in autumn 1999 that they should continue the preparation of the masterplan. East Gateshead Partnership considered the masterplan on the 08th March 2000 and recommended approval. Subsequently, the outline application (587/00) with full details for phase 1 was validated on the 6th September 2000 and a decision issued on the 9th January 2001.

It is clear that although it only took 0.3 years for the planning application to be submitted and granted for a scheme of more than 500 units, the lead in time to the submission of the application was significant, including an UDP allocation and a published masterplan 18 months ahead of permission being granted. By the time the planning application was submitted most of the site specific issues had been resolved.

<sup>6</sup> St James Village is excluded from the lead-in time analysis because it is unclear on what date the site was first identified within the regeneration area



### **Dartford – Ingress Park (950 dwellings): Planning approval period 1.4 years**

This site was initially identified in a draft Local Plan in 1991 and finally allocated when this was adopted in April 1995. The Ingress Park and Empire Mill Planning Brief was completed in three years later (November 1998).

The submission of the first planning application for this scheme predated the completion of the Planning Brief by a few months, but the Council had already established that they supported the site. By the time the first application for this scheme was submitted, the site had been identified for development for circa seven years.

The outline application (98/00664/OUT) was validated on the 10th August 1998 and permission granted on the 21st Nov 2000, a determination period of 1 year and 3 months). A full application for the First Phase for 52 dwellings (99/00756/FUL) was validated and approved in just two months, prior to approval of the outline. Clearly, large-scale outline permissions have to wrap up a wide range of other issues, but having first phase full applications running in parallel can enable swifter delivery, in situations where a 'bite sized' first phase can be implemented without triggering complex issues associated with the wider site.

### **Cambridge and South Cambridgeshire – North West Cambridge (3,000 dwellings and 2,000 student bed spaces): Planning approval period 2.2 years**

Cambridge University identified this area as its only option to address its long-term development needs, and the Cambridgeshire and Peterborough Structure Plan 2003 identified the location for release from the Green Belt. The site was allocated in the 2006 Cambridge Local Plan, and the North West Cambridge Area Action Plan was adopted in October 2009. The Area Action Plan established an overall vision and set out policies and proposals to guide the development as a whole.

As such, by the time the first application for this scheme was submitted, there had already been circa eight years of 'pre-application' planning initially concerning the site's release from the Green Belt, but then producing the Area Action Plan which set out very specific requirements.. This 'front-loaded' consideration of issues that might otherwise have been left to a planning application.

The outline application (11/1114/OUT – Cambridge City Council reference) for delivery of up to 3,000 dwellings, up to 2,000 student bed spaces and 100,000 sqm of employment floorspace was validated on the 21st September 2011 and approved on the 22nd of February 2013. The first reserved matters application for housing (13/1400/REM) was validated on the 20th September 2013 and approved on the 19th December 2013. Some ten years from the concept being established in the Structure Plan.

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## Summary on Lead-in Times

1. On average, larger sites take longer to complete the planning application and lead-in processes than do smaller sites. This is because they inevitably give rise to complex planning issues related to both the principle of development and the detail of implementation.
2. Consideration of whether and how to implement development schemes is necessary for any scheme, and the evidence suggests that where planning applications are determined more quickly than average, this is because such matters were substantially addressed prior to the application being submitted, through plan-making, development briefs and/or master planning. There is rarely a way to short-circuit planning.
3. Commencement on large sites can be accelerated if it is possible to 'carve-out' a coherent first phase and fast track its implementation through a focused first phase planning application, in parallel with consideration of the wider scheme through a Local Plan or wider outline application.
4. After receiving permission, on average smaller sites take longer to deliver their first dwelling than do the largest sites (1.7-1.8 years compared to 0.8 years for sites on 2,000+ units).

# Lapse Rates: What Happens to Permissions?

Not every planning permission granted will translate into the development of homes. This could mean an entire site does not come forward, or delivery on a site can be slower than originally envisaged. It is thus not realistic to assume 100% of planning permission granted in any given location will deliver homes. Planning permissions can lapse for a number of reasons:

1. The landowner cannot get the price for the site that they want;
2. A developer cannot secure finance or meet the terms of an option;
3. The development approved is not considered to be financially worthwhile;
4. Pre-commencement conditions take longer than anticipated to discharge;
5. There are supply chain constraints hindering a start; or
6. An alternative permission is sought for the scheme after approval, perhaps when a housebuilder seeks to implement a scheme where the first permission was secured by a land promoter.

These factors reflect that land promotion and housebuilding is not without its risks.

At the national level, the Department for Communities and Local Government has identified a 30-40% gap between planning permissions granted for housing and housing starts on site<sup>7</sup>. DCLG analysis suggested that 10-20% of permissions do not materialise into a start on site at all and in addition, an estimated 15-20% of permissions are re-engineered through a fresh application, which would have the effect of pushing back delivery and/or changing the number of dwellings delivered.

This issue often gives rise to claims of 'land banking' but the evidence for this is circumstantial at best, particularly outside London. The business models of house builders are generally driven by Return on Capital Employed (ROCE) which incentivises a quick return on capital after a site is acquired. This means building and selling homes as quickly as possible, at sales values consistent with the price paid for the land. Land promoters (who often partner with landowners using promotion agreements) are similarly incentivised to dispose of their site to a house builder to unlock their promotion fee. Outside London, the scale of residential land prices has not been showing any significant growth in recent years<sup>8</sup> and indeed for UK greenfield and urban land, is still below levels last seen at least 2003<sup>9</sup>. There is thus little to incentivise hoarding land with permission.

The LGA has identified circa 400-500,000 units of 'unimplemented' permissions<sup>10</sup>, but even if this figure was accurate, this is equivalent to just two years of pipeline supply. More significantly, the data has been interpreted by LGA to significantly overstate the number of unimplemented permissions because 'unimplemented' refers to units on sites where either the entire site has not been fully developed or the planning permission has lapsed<sup>11</sup>. It therefore represents a stock-flow analysis in which the outflow (homes built) has been ignored.

Insofar as 'landbanking' may exist, the issue appears principally to be a London – rather than a national – malaise, perhaps reflecting that land values in the capital – particularly in 'prime' markets – have increased by a third since the previous peak of 2007. The London Mayor's 'Barriers to Housing Delivery – Update' of July 2014 looked at sites of 20 dwellings or more and reported that only about half of the total number of dwellings granted planning permission every year are built (Table 3); a lapse rate of circa 50% across London.

Clearly, the perceived problem of landbanking is seeing policy attention from Government, but caution is needed that any changes do not result in unintended consequences or act as a disincentive to secure planning permissions.

A more practical issue is that Plans and housing land trajectories must adopt sensible assumptions, based on national benchmarks, or – where the data exists – local circumstances, to understand the scale of natural non-implementation.

<sup>7</sup> DCLG Presentations to the HBF Planning Conference (September 2015)

<sup>8</sup> Knight Frank Residential Development Land Index Q1 2016 <http://content.knightfrank.com/research/161/documents/en/q1-2016-3844.pdf>

<sup>9</sup> Savills Development Land Index <http://www.savills.co.uk/research/uk/residential-research/land-indices/development-land-index.aspx>

<sup>10</sup> Glenigan data as referenced by Local Government Association in its January 2016 media release (a full report is not published) [http://www.local.gov.uk/web/guest/media-releases/-/journal\\_content/56/10180/7632945/NEWS](http://www.local.gov.uk/web/guest/media-releases/-/journal_content/56/10180/7632945/NEWS)

<sup>11</sup> This would mean that a site which has built 99% of homes will still show up as 100% of units being 'unimplemented'

# Build Rates: How Fast Can Sites Deliver?

The rate at which sites deliver new homes is a frequently contested matter at Local Plan examinations and during planning inquiries considering five year housing land supply. Assumptions can vary quite markedly and expectations have changed over time: in 2007, Northstowe – the new settlement to the north west of Cambridge – was expected by the Council to deliver 750-850 dwellings per annum<sup>12</sup>; it is now projected to deliver at an annual rate of just 250<sup>13</sup>.

There is a growing recognition that the rate of annual delivery on a site is shaped by ‘absorption rates’: a judgement on how quickly the local market can absorb the new properties. However, there are a number of factors driving this for any given site:

- the strength of the local housing market;
- the number of sales outlets expected to operate on the site (ie the number of different house builders or brands/products being delivered); or
- the tenure of housing being built. Are market homes for sale being supplemented by homes for rent, including affordable housing?

The analysis in this section explores these factors with reference to the surveyed sites.

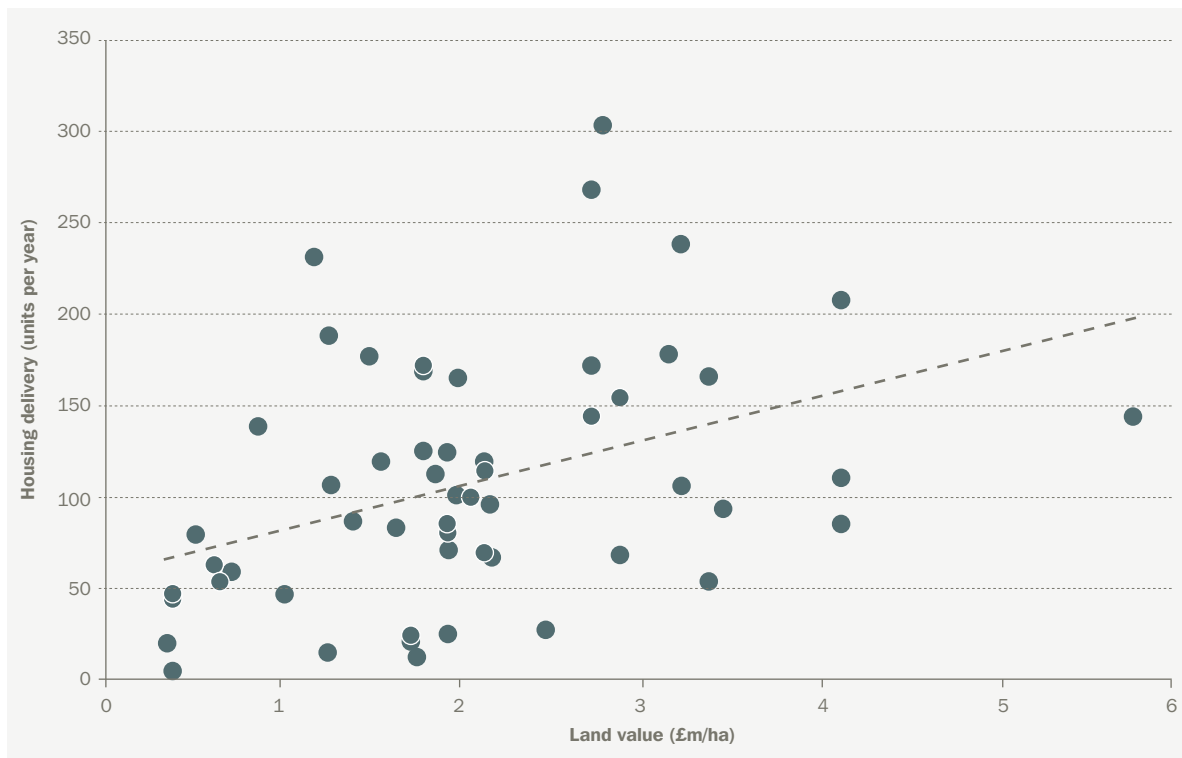
## Market Strength

It might seem a truism that stronger market demand for housing will support higher sales and build rates – but how far is that the case and how to measure it?

Figure 6 below compares CLG data on post-permission residential land value estimates (£/ha) by Local Authorities in 2014<sup>14</sup> to the average build out rate of each of the assessed strategic sites. Unfortunately the residential land value estimates are only available for England and as such the Welsh sites assessed are excluded, leaving 57 sites in total.

The analysis shows that markets matter. Relatively weaker areas may not be able to sustain the high build-out rates that can be delivered in stronger markets with greater demand for housing. There are significant variations, reflecting localised conditions, but the analysis shows a clear relationship between the strength of the market in a Local Authority area and the average annual build rates achieved on those sites. Plan makers should therefore recognise that stronger local markets can influence how quickly sites will deliver.

Figure 6: Average Annual Build-out Rates of sites compared to Land Values as at 2014



Source: NLP analysis and CLG Post-permission residential land value estimates (£/ha) by Local Authorities (February 2015)

<sup>12</sup> South Cambridgeshire Annual Monitoring Report 2006/07

<sup>13</sup> South Cambridgeshire Annual Monitoring Report 2014/15

<sup>14</sup> Post-permission residential land value estimates were released in December 2015, however the end date of the build rate data obtained is 2014/15; as such land value estimates at February 2015 are better aligned to the build periods assessed in this report and have been used for consistency.

## Size Matters

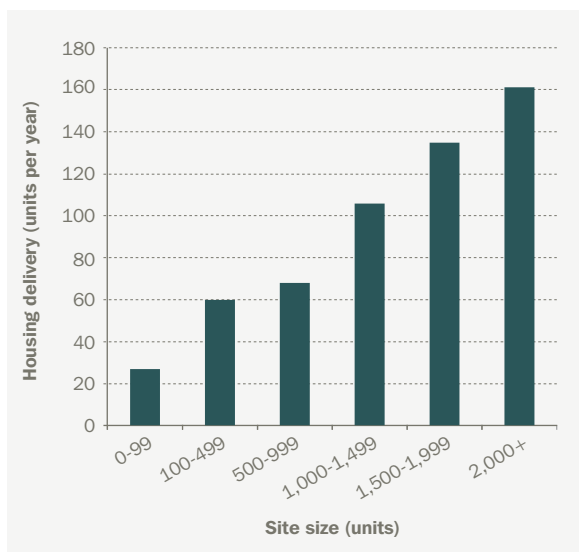
A key metric for build rates on sites is the number of sales outlets. Different housebuilders will differentiate through types or size of accommodation and their brands and pricing, appealing to different customer types. In this regard, it is widely recognised that a site may increase its absorption rate through an increased number of outlets.

Unfortunately, data limitations mean that the number of outlets is not readily available for the large sites surveyed within this research, and certainly not on any longitudinal basis which is relevant because the number of outlets on a site may vary across phases.

However, it is reasonable to assume that larger sites are likely to feature more sales outlets and thus have greater scope to increase build rates. This may relate to the site being more geographically extensive: with more access points or development ‘fronts’ from which sales outlets can be driven. A large urban extension might be designed and phased to extend out from a number of different local neighbourhoods within an existing town or city, with greater diversity and demand from multiple local markets.

Our analysis supports this concept: larger sites deliver more homes each year, but even the biggest schemes (those with capacity for 2,000 units) will, on average, deliver fewer than 200 dwellings per annum, albeit their average rate – 161 units per annum – is six times that of sites of less than 100 units (27 units per annum).

Figure 7: Average annual build rate by site size



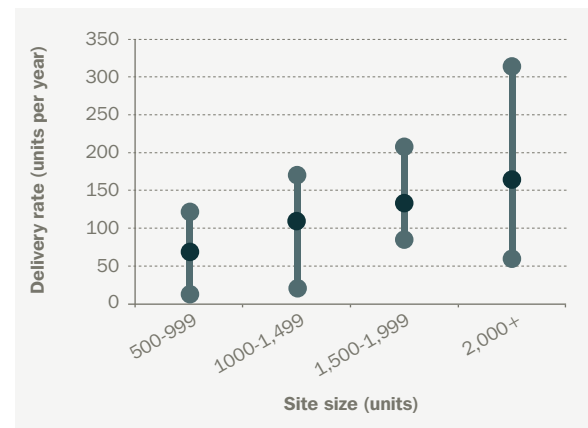
Of course, these are average figures. Some sites will see build rates exceeding this average in particular years, and there were variations from the mean across all categories (see Figure 8), suggesting that higher or lower rates than this average may well be possible, if circumstances support it.

Nevertheless, it is striking that annual average delivery on sites of up to 1,499 units barely exceeds 100 units per annum, and there were no examples in this category that reached a rate of 200 per annum. The highest rate – of 321 units per annum – is for the Cranbrook site, but this is a short term average. A rate of 268 per annum was achieved over a longer period at the Eastern Expansion Area (Broughton Gate & Brooklands) site in Milton Keynes. The specific circumstance surrounding the build rates in both these examples are explored as case studies opposite. It is quite possible that these examples might not represent the highest rate of delivery possible on large-scale sites in future, as other factors on future sites might support even faster rates.

Our analysis also identifies that, on average, a site of 2,000 or more dwellings does not deliver four times more dwellings than a site delivering between 100 and 499 homes, despite being at least four times the size. In fact it only delivers an average of 2.5 times more houses. This is likely to reflect that:

- it will not always be possible to increase the number of outlets in direct proportion to the size of site – for example due to physical obstacles (such as site access arrangements) to doing so; and
- overall market absorption rates means the number of outlets is unlikely to be a fixed multiplier in terms of number of homes delivered.

Figure 8: Average annual build-out rate by site size, including the minimum and maximum averages within each site size



Source: NLP analysis

## Cranbrook: East Devon

The highest average annual build out rates recorded in this analysis comes from the Cranbrook site in East Devon where an average of 321 dwellings per annum were delivered between 2012/13 and 2014/15. Delivery of housing only started on this site in 2012/13, with peak delivery in 2013/14 of 419 dwellings.

Cranbrook is the first new standalone settlement in Devon for centuries and reportedly – according to East Devon Council – the result of over 40 years of planning (this claim has not been substantiated in this research). It is the circumstances surrounding its high annual delivery rate which is of most interest, however.

Phase 1 of the development was supported by a £12 million repayable grant from a revolving infrastructure fund managed by the Homes and Communities Agency. The government also intervened again in the delivery of this site by investing £20 million for schools and infrastructure to ensure continuity of the scheme, securing the delivery of phase 2. The government set out that the investment would give local partners the confidence and resources to drive forward its completion.

The Consortium partnership for Cranbrook (including Hallam Land, Persimmon Homes (and Charles Church) and Taylor Wimpey) stated the following subsequent to the receipt of the government funding<sup>15</sup>.

*“Without this phase 2 Cranbrook would have been delayed at the end of phase 1, instead, we have certainty in the delivery of phase 2, we can move ahead now and commit with confidence to the next key stages of the project and delivering further community infrastructure and bringing forward much needed private and affordable homes”.*

Clearly, the public sector played a significant role in supporting delivery. The precise relationship between this and the build rate is unclear, but funding helped continuity across phases one and two of the scheme. More particularly, the rate of delivery so far achieved relates just to the first three years, and there is no certainty that this high build-out rate will be maintained across the remainder of the scheme.

## Eastern Expansion Area (Broughton Gate & Brooklands): Milton Keynes

The second highest average build out rates recorded in this analysis comes from the Eastern Expansion Area (Broughton Gate & Brooklands) site in Milton Keynes where an average of 268 dwellings per annum were delivered between 2008/09 and 2013/14. As is widely recognised, the planning and delivery of housing in Milton Keynes is distinct from almost all the sites considered in this research.

Serviced parcels with the roads already provided were delivered as part of the Milton Keynes model and house builders are able to proceed straight onto the site and commence delivery. This limited the upfront site works required and boosted annual build rates. Furthermore, there were multiple outlets building-out on different serviced parcels, with monitoring data from Milton Keynes Council suggesting an average of c.12 parcels were active across the build period. This helped to optimise the build rate.

<sup>15</sup> <https://www.gov.uk/government/news/government-funding-to-unlock-delivery-of-12-000-new-homes>

## Peak Years of Housing Delivery

Of course, rates of development on sites will ebb and flow. The top five peak annual build-out rates achieved across every site assessed are set out in Table 1 below. Four of the top five sites with the highest annual peak delivery rates are also the sites with the highest annual average build out rates (with the exception of Broughton & Atterbury). Peak build rates might occur in years when there is an overlap of multiple outlets on phases, or where a particular phase might include a large number of affordable or apartment completions. It is important not to overstress these individual years in gauging build rates over the whole life of a site.

Table 1: Peak annual build-out rates compared against average annual delivery rates on those sites

Scheme	Peak Annual Build-Out Rate	Annual Average Build-Out Rate
Cambourne	620	239
Hamptons	548	224
Eastern Expansion Area	473	268
Cranbrook	419	321
Broughton	409	171

Source: NLP analysis and various AMRs

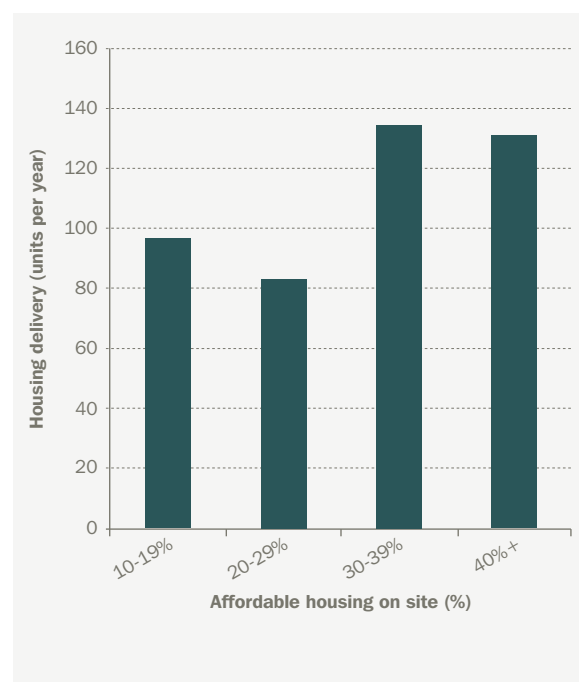
## Affordable Housing Provision

Housing sites with a larger proportion of affordable homes (meeting the definition in the NPPF) deliver more quickly, where viable. The relationship appears to be slightly stronger on large-scale sites (500 units or more) than on smaller sites (less than 500 units), but there is a clear positive correlation (Figure 9). For both large and small-scale sites, developments with 40% or more affordable housing have a build rate that is around 40% higher compared to developments with 10-19% affordable housing obligation.

The relationship between housing delivery and affordable (subsidised) housing is multi-dimensional, resting on the viability, the grant or subsidy available and the confidence of a housing association or registered provider to build or purchase the property for management. While worth less per unit than a full-market property, affordable housing clearly taps into a different segment of demand (not displacing market demand), and having an immediate purchaser of multiple properties can support cash flow and risk sharing in joint ventures. However, there is potential that starter homes provided in lieu of other forms of affordable housing may not deliver the same kind of benefits to speed of delivery, albeit they may support viability overall.

This principle – of a product targeting a different segment of demand helping boost rates of development – may similarly apply to the emergent sectors such as ‘build-to-rent’ or ‘self build’ in locations where there is a clear market for those products. Conversely, the potential for starter homes to be provided in lieu of other forms of affordable housing may overlap with demand for market housing on some sites, and will not deliver the kind of cash flow / risk sharing benefits that comes from disposal of properties to a Registered Provider.

Figure 9: Affordable housing provision and housing output



Source: NLP analysis

## The Timeline of the Build-out Period

Many planners’ housing trajectories show large sites gradually increasing their output and then remaining steady, before tailing off at the end. In fact, delivery rates are not steady. Looking at the first eight years of development – where the sample size of large sites is sufficiently high – NLP’s research showed that annual completions tended to be higher early in the build-out period before dipping (Figure 10).

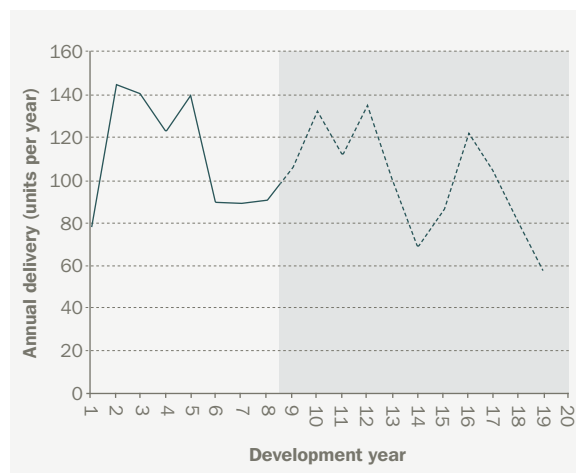
For sites with even longer build out periods, this pattern of peaks and troughs is potentially repeated again (subject to data confidence issues set out below). This surge in early completions could reflect the drive for



rapid returns on capital in the initial phase, and/or early delivery of affordable housing, with the average build rate year by year reducing thereafter to reflect the optimum price points for the prevailing market demand. Additionally, the longer the site is being developed, the higher the probability of coinciding with an economic downturn – obviously a key factor for sites coming forward over the past decade – which will lead to a reduction in output for a period.

Our sample of sites where the development lasted for more than eight years is too small to draw concrete findings, but it does flag a few other points. On extremely large sites that need to span more than a decade, the development will most likely happen in phases. The timing and rate of these phases will be determined by a range of factors including: the physical layout of the site, the ability to sell the homes; trigger points for payment for key social and transport infrastructure obligations; the economic cycle; and local market issues. Predicting how these factors combine over a plan period is self-evidently difficult, but plan makers should recognise the uncertainty and build in flexibility to their housing trajectories to ensure they can maintain housing supply wherever possible.

Figure 10: Average annual build-out rate per year of the build period



Source: NLP analysis

## Summary

1. There is a positive correlation between the strength of the market (as measured by residential land values) and the average annual build rates achieved.
2. The annual average build-rate for the largest sites (of 2,000 or more units) is circa 161 dwellings per annum
3. The rate of delivery increases for larger schemes, reflecting the increased number of sales outlets possible on large sites. However, this is not a straight line relationship: on average, a site of 2,000 units will not, deliver four times as fast as a site of 500. This reflects the limits to number of sales outlets possible on a site, and overall market absorption rates.
4. There is significant variation from the average, which means some sites can be expected to deliver more (or less) than this average. However, the highest average build-out rate of all the assessed sites is 321 dwellings per annum in Cranbrook. But this relates to just three years of data, and the scheme benefitted from significant government funding to help secure progress and infrastructure. Such factors are not be present in all schemes, and indeed, the data suggests sites tend to build at a higher rate in initial years, before slowing down in later phases.
5. Build rates on sites fluctuate over their life. The highest build rate recorded in a single year is 620 units at Camborne, but for the duration of the development period the average annual build rate is 239 dwellings.
6. There is a positive correlation between the percentage of affordable homes built on site and the average annual delivery of homes with sites delivering 30% or more affordable housing having greater annual average build rates than sites with lower affordable housing provision. The introduction of different tenures taps into different market segments, so a build to rent product may similarly boost rates of delivery – where there is a market for it – but starter homes may have the opposite effect if they are provided in lieu of other forms of affordable homes, and displace demand for cheaper market homes.



# A Brownfield Land Solution?

The NPPF encourages the effective use of previously-developed land, and recent Government announcements suggest increased prioritisation of development for brownfield sites. Efforts to streamline the planning process for brownfield sites may also speed up their delivery. But, is there a difference in how quickly brownfield sites can come forward compared to greenfield sites?

Research produced by CPRE and Glenigan in March 2016<sup>16</sup> suggested that the time between planning permission being granted and construction work starting is generally the same for brownfield and greenfield sites, but suggested that work on brownfield sites is completed more than six months quicker. However, it was not clear if this finding was because the greenfield sites were larger than the equivalent brownfield sites surveyed in that study. We therefore looked at how lead in times and build rates compared for large-scale sites of 500+ dwellings on greenfield and brownfield sites.

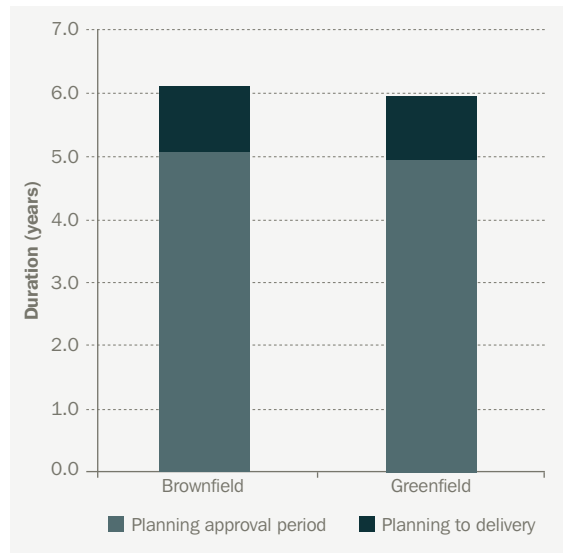
## The Planning Approval Period

Whether land is brownfield or greenfield does not impact on the planning approval period. On average, for all sites, the planning approval period for the sites delivering 500 dwellings or more is almost identical at 5.1 years for brownfield and 5.0 years for greenfield – see Figure 11, although this is skewed by the very largest sites of 2,000+ units (see Table 2), with brownfield sites in the smaller-size bands being on average slightly quicker than their greenfield counterparts (albeit caution is required given the small sample size for some size bandings).

What the analysis tends to show is that it is the scale of development – rather than the type of land – which has the greatest impact on the length of planning process, and that despite government prioritisation on brownfield land in the NPPF, this is unlikely to result in significant further improvements in timescales for delivery.

The time period between gaining a planning approval and the first delivery of a dwelling is also similar overall.

Figure 11: Previous land use and duration of planning



Source: NLP analysis

Table 2: Previous land use and duration of planning approval period

	Site Size (dwellings)	Number of sites in this group	Average Planning Approval Period
Greenfield Sites	500-999	14	4.5
	1,000-1,499	9	5.3
	1,500-1,999	7	5.5
	2,000+	13	5.0
	<b>Total/Average</b>	<b>43</b>	<b>5.0</b>
Brownfield Sites	500-999	16	4.1
	1,000-1,499	3	3.3
	1,500-1,999	1	4.6
	2,000+	7	8.6
	<b>Total/Average</b>	<b>27</b>	<b>5.1</b>

Source: NLP analysis

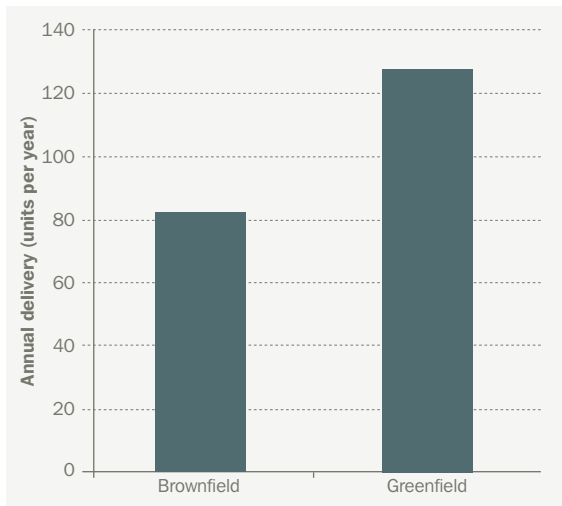
<sup>16</sup> Brownfield comes first: why brownfield development works CPRE, March 2016

## Build-out Rates

There is a more discernible difference between brownfield and greenfield sites when it comes to the annual build out rates they achieve, with the analysis in Figure 12 suggesting that brownfield sites on average deliver at lower rates than their greenfield counterparts, both overall and across the different size bandings (see Table 3) albeit recognising the small sample size for some sizes of site. On average, the annual build-out rate of a greenfield site is 128 dwellings per annum, around 50% higher than the 83 per annum average for brownfield sites.

This may reflect that brownfield sites carry extra costs (e.g. for remediation) which reduces the scale of contribution they make to infrastructure and affordable housing provision (which as shown can boost rates of delivery).

Figure 12: Previous land use and housing delivery



Source: NLP analysis

Table 3: Previous land use by size and average annual build out rate

	Site Size (dwellings)	Number of sites in this group	Average Annual Build-out Rate
Greenfield Sites	500-999	14	86
	1,000-1,499	9	122
	1,500-1,999	7	142
	2,000+	13	171
	<b>Total/Average</b>	<b>43</b>	<b>128</b>
Brownfield Sites	500-999	16	52
	1,000-1,499	3	73
	1,500-1,999	1	84
	2,000+	7	148
	<b>Total/Average</b>	<b>27</b>	<b>83</b>

Source: NLP analysis

## Summary

1. Brownfield and greenfield sites come forward at broadly similar rates, although at the smaller end of the scale, there does appear to be some 'bonus' in speed of decisions for previously-developed land. For the largest sites (of 2,000+ units) the sample of brownfield sites suggests an extended time period (3.6 years longer) compared to their equivalent greenfield sites;
2. Once started, large-scale greenfield sites do deliver homes at a more rapid rate than their brownfield equivalents, on average 50% quicker.

# Conclusion

---

There is a growing recognition that large-scale housing development can and should play a large role in meeting housing need. Garden towns and villages – planned correctly – can deliver sustainable new communities and take development pressure off less sustainable locations or forms of development.

However, if planners are serious about wanting to see more homes built each year and achieve the government’s target of one million by 2020 (or indeed, deliver the 300,000 per annum that are needed), simply allocating a site or granting a permission is not enough. The Government recognises this: the Minister for Planning has been quoted as saying that “*you cannot live in a planning permission*”.

Part of the debate has focused on perceptions of ‘land banking’ – the concept that developers are hoarding land or slowing down development. Equally, suggestions have been made that proposals for large-scale development should be ‘protected’ from competition from smaller sites or from challenge under five year land supply grounds. The evidence supporting these propositions appears limited.

In our view the real concern – outside London, at any rate – is ensuring planning decisions (including in plan-making) are driven by realistic and flexible housing trajectories in the first place, based on evidence and the specific characteristics of individual sites and local markets.

Based on the research in this document, we draw five conclusions on what is required:

1. If more homes are to be built, more land needs to be released and more planning permissions granted. Confidence in the planning system relies on this being achieved through local plans that must be sufficiently ambitious and robust to meet housing needs across their housing market areas. But where plans are not coming forward as they should, there needs to be a fall-back mechanism that can release land for development when it is required.
2. Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period. Because no one site is the same – and with significant variations from the average in terms of lead-in time and build rates – a sensible approach to evidence and justification is required.
3. Spatial strategies should reflect that building homes is a complex and risky business. Stronger local markets have higher annual delivery rates, and where there are variations within districts, this should be factored into spatial strategy choices. Further, although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times. To secure short-term immediate boosts in supply – as is required in many areas – a good mix of smaller sites will be necessary.
4. Plans should reflect that – where viable – affordable housing supports higher rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand for those products). Trajectories will thus need to differentiate expected rates of delivery to respond to affordable housing levels or inclusion of other market products. This might mean some areas will want to consider spatial strategies that favour sites with greater prospects of affordable or other types of housing delivery. This plays into the wider debate about support for direct housing delivery for rent by local government and housing associations and ensuring a sufficient product mix on sites.
5. Finally, in considering the pace of delivery, large-scale brownfield sites deliver at a slower rate than do equivalent greenfield sites. The very largest brownfield sites have also seen very long planning approval periods. Self-evidently, many brownfield sites also face barriers to implementation that mean they do not get promoted in the first place. In most locations outside our biggest cities, a good mix of types of site will be required.

## A Checklist for Understanding Large-scale Site Delivery

In setting or assessing reasonable housing trajectories for local plans or five year housing land supply, the lead-in times and average rates of housing delivery identified in this research can represent helpful benchmarks or rules of thumb, particularly in situations where there is limited local evidence.

However, these rules of thumb are not definitive. It is clear from our analysis that some sites start and deliver more quickly than this average, whilst others have delivered much more slowly. Every site is different.

In considering the evidence justifying the estimated time and rate of delivery, the questions listed in Table 4 below represent a checklist of questions that are likely to be relevant:

Table 4: Questions to consider on the speed of housing delivery on large-scale sites

Lead-in times to getting started on site	Factors affecting the speed of build out rate
<input checked="" type="checkbox"/> Is the land in existing use?	<input checked="" type="checkbox"/> How large is the site?
<input checked="" type="checkbox"/> Has the land been fully assembled?	<input checked="" type="checkbox"/> Will the scale, configuration and delivery model for the site support more sales outlets?
<input checked="" type="checkbox"/> If in multiple ownership/control, are the interests of all parties aligned?	<input checked="" type="checkbox"/> How strong is the local market?
<input checked="" type="checkbox"/> To what extent is there any challenge to the principle of development?	<input checked="" type="checkbox"/> Does the site tap into local demand from one or more existing neighbourhoods?
<input checked="" type="checkbox"/> Is the site already allocated for development? Does it need to be in order for release?	<input checked="" type="checkbox"/> Is the density and mix of housing to be provided consistent with higher rates of delivery?
<input checked="" type="checkbox"/> Does an SPD, masterplan or development brief help resolve key planning issues?	<input checked="" type="checkbox"/> What proportion of affordable housing is being delivered?
<input checked="" type="checkbox"/> Is the masterplan/development brief consistent with what the developer will deliver?	<input checked="" type="checkbox"/> Are there other forms of housing – such as build to rent – included?
<input checked="" type="checkbox"/> Is there an extant planning application or permission?	<input checked="" type="checkbox"/> When will new infrastructure – such as schools – be provided to support the new community?
<input checked="" type="checkbox"/> Are there significant objections to the proposal from local residents?	<input checked="" type="checkbox"/> Are there trigger points or phasing issues that may affect the build rate achievable in different phases?
<input checked="" type="checkbox"/> Are there material objections to the proposal from statutory bodies?	
<input checked="" type="checkbox"/> Are there infrastructure requirements – such as access – that need to be in place before new homes can be built?	
<input checked="" type="checkbox"/> Are there infrastructure costs or other factors that may make the site unviable?	
<input checked="" type="checkbox"/> Does the proposal rely on access to public resources?	
<input checked="" type="checkbox"/> If planning permission is secured, is reserved matters approval required?	
<input checked="" type="checkbox"/> Does the scheme have pre-commencement conditions?	
<input checked="" type="checkbox"/> Is the scheme being promoted by a developer who will need time to dispose of the site to a house builder?	







# Appendix 2: Small Sites Reviewed

Site Name	Local Planning Authority	Site Size
Holme Farm, Carleton Road, Pontefract	Wakefield	50
Part Sr3 Site, Off Elizabeth Close, Scotter	West Lindsey	50
Former Downend Lower School, North View, Staple Hill	South Gloucestershire	52
Fenton Grange, Wooler	Northumberland	54
Land at the Beacon, Tilford Road, Hindhead	Waverley	59
Land To Rear Of 28 - 34 Bedale Road, Aiskew	Hambleton	59
Hanwell Fields Development, Banbury	Cherwell	59
Land at Prudhoe Hospital, Prudhoe	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Clewborough House School, St Catherines Road	Cherwell	60
Land south of Pinchington Lane	West Berkshire	64
Land Off Cirencester Rd	Stroud	66
Springfield Road Caunt Road	South Kesteven	67
Land off Crown Lane	Wychavon	68
Former Wensleydale School, Dent Street, Blyth	Northumberland	68
Land at Lintham Drive, Kingswood	South Gloucestershire	68
Hawthorn Croft (Off Hawthorn Avenue Old Slaughterhouse Site), Gainsborough	West Lindsey	69
Land to the North of Walk Mill Drive	Wychavon	71
Watermead, Land At Kennel Lane, Brockworth	Tewkesbury	72
North East Area Professional Centre, Furnace Drive, Furnace Green	Crawley	76
Land at Willoughbys Bank, Clayport Bank, Alnwick	Northumberland	76
The Kylins, Loansdean, Morpeth	Northumberland	88
MR10 Site, Caistor Road, Market Rasen	West Lindsey	89
OS Field 9972 York Road Easingwold	Hambleton	93
Land At Green Road - Reading College	Reading	93
North East Sandylands	South Lakeland	94
Auction Mart	South Lakeland	94
Parcel 4, Gloucester Business Park, Brockworth	Tewkesbury	94
Former York Trailers Yafforth Road Northallerton Scheme 1/2	Hambleton	96
Poppy Meadow	Stratford-on-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Land South of Station Road	East Hertfordshire	111
Former Bewbush Leisure Centre Site, Breezehurst Drive, Bewbush	Crawley	112
Land West Of Birchwood Road, Latimer Close	Bristol, City of	119
Land Between Godsey Lane And Towngate East	South Kesteven	120
Bibby Scientific Ltd	Stafford	120
Kennet Island Phase 1B - E, F, O & Q, Manor Farm Road	Reading	125
Primrose Mill Site	Ribble Valley	126
Land Rear Of Mount Pleasant	Cheshire West and Chester	127
Land to the east of Efflinch Lane	East Staffordshire	130
North of Douglas Road, Kingswood	South Gloucestershire	131
Land at Farnham Hospital, Hale Road, Farnham	Waverley	134
Bracken Park, Land At Corringham Road, Gainsborough	West Lindsey	141
Doxey Road	Stafford	145
Former York Trailers Yafforth Road Northallerton Scheme 2/2	Hambleton	145



Site Name	Local Planning Authority	Site Size
London Road/ Adj. St Francis Close	East Hertfordshire	149
MR4 Site, Land off Gallamore Lane, Market Rasen	West Lindsey	149
Queen Mary School	Fylde	169
Sellars Farm, Sellars Road	Stroud	176
Land South of Inervet Campus Off Brickhill Street, Walton	Milton Keynes	176
Notcutts Nursery, 150 - 152 London Road	Cherwell	182
Hoval Ltd North Gate	Newark and Sherwood	196
Hewlett Packard (Land Adjacent To Romney House), Romney Avenue	Bristol, City of	242
128-134 Bridge Road And Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
GCHQ Oakley - Phase 1	Cheltenham	262
Land off Henthorn Road	Ribble Valley	270
Land Between A419 And A417, Kingshill North, Cirencester	Cotswold	270
Hortham Hospital, Hortham Lane, Almondsbury	South Gloucestershire	270
Land At Canons Marsh, Anchor Road	Bristol, City of	272
M & G Sports Ground, Golden Yolk and Middle Farm, Badgeworth	Tewkesbury	273
Long Marston Storage Depot Phase 1	Stratford-on-Avon	284
Land at Brookwood Farm, Bagshot Road	Woking	297
Land at, Badsey Road	Wychavon	298
Land At Fire Service College, London Road, Moreton in Marsh	Cotswold	299
Land At Dorian Road	Bristol, City of	300
Kennet Island Phase 1 - H, M, T, U1, U2 Manor Farm Road	Reading	303
Chatham Street Car Park Complex	Reading	307
Former NCB Workshops, Ellington Rd, Ashington (aka Portland Park)	Northumberland	357
Former Masons Cerement Works and Adjoining Ministry of Defence Land, Gipping Road, Great Blakenham	Mid Suffolk	365
Woolley Edge Park Site	Wakefield	375
Luneside West	Lancaster	403
Radyr Sidings	Cardiff	421
New World House, Thelwall Lane	Warrington	426
Land at former Battle Hospital, 344 Oxford Road	Reading Borough Council	434
New Central (Land at Guildford Road and Bradfield Close including Network House, Merrion House, Bradford House and Coronation House	Woking Borough Council	445
Kingsmead South	Milton Keynes Council	450
Bleach Green, Winlaton	Gateshead	456
Farington Park, East of Wheelton Lane	South Ribble	468
Bickershaw Colliery, Plank Lane, Leigh	Wigan	471
Farnborough Business Park	Rushmoor	476
Horfield Estate, Filton Avenue, Horfield	Bristol City Council	485
Stenson Fields	South Derbyshire	487
Cookridge Hospital	Leeds	495

# About NLP

Nathaniel Lichfield & Partners (NLP) is an independent planning, economics and urban design consultancy, with offices in Bristol, Cardiff, Edinburgh, Leeds, London, Manchester, Newcastle and Thames Valley.

We are one of the largest independent planning consultancies in the UK and we offer the broadest range of skills of any specialist planning firm. This includes services in economics, spatial analytics, heritage, sustainability, urban design, graphics and sunlight and daylight, as well as a full range of planning skills. NLP was RTPI Planning Consultancy of the Year for three years running to 2014.

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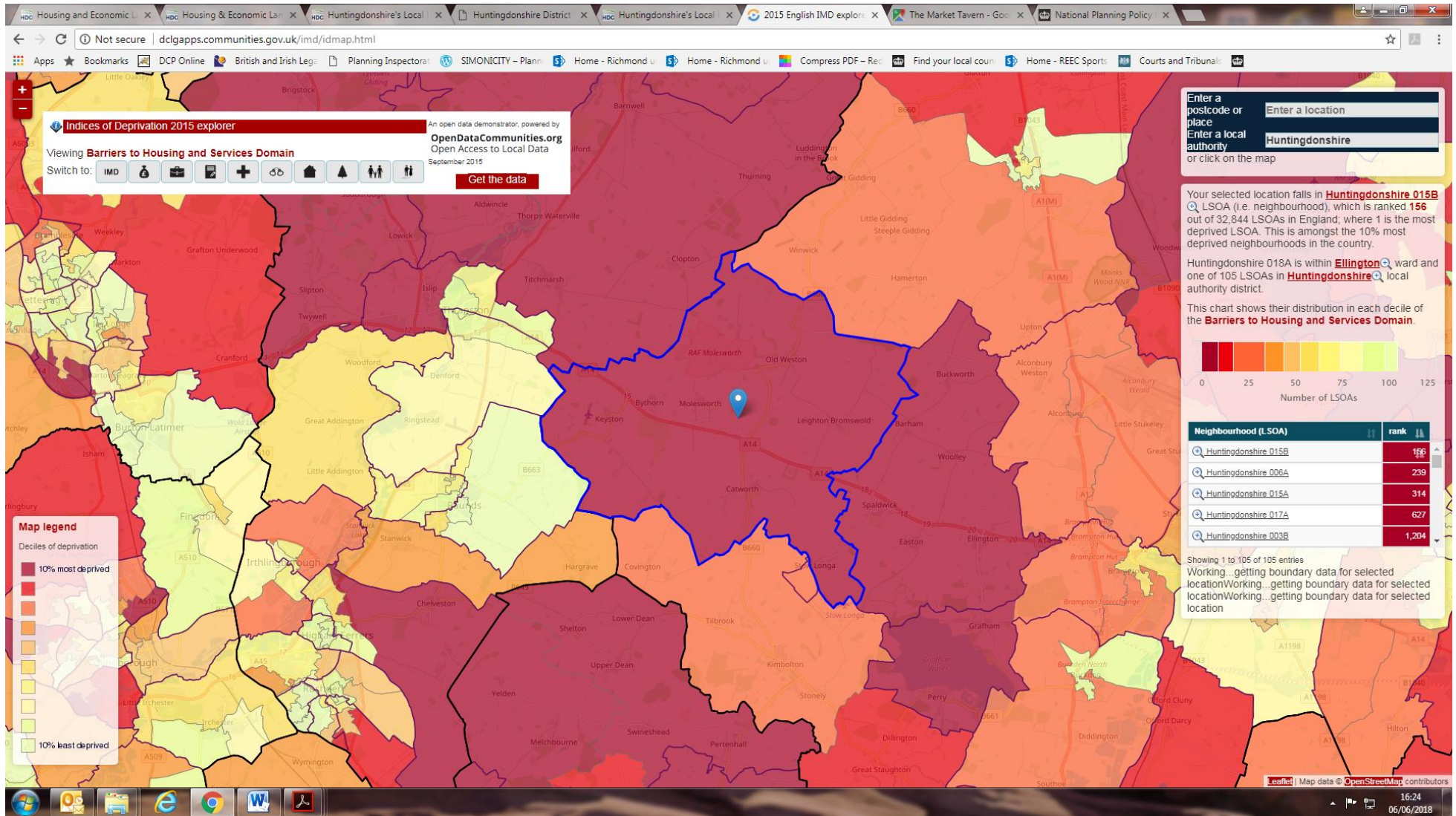
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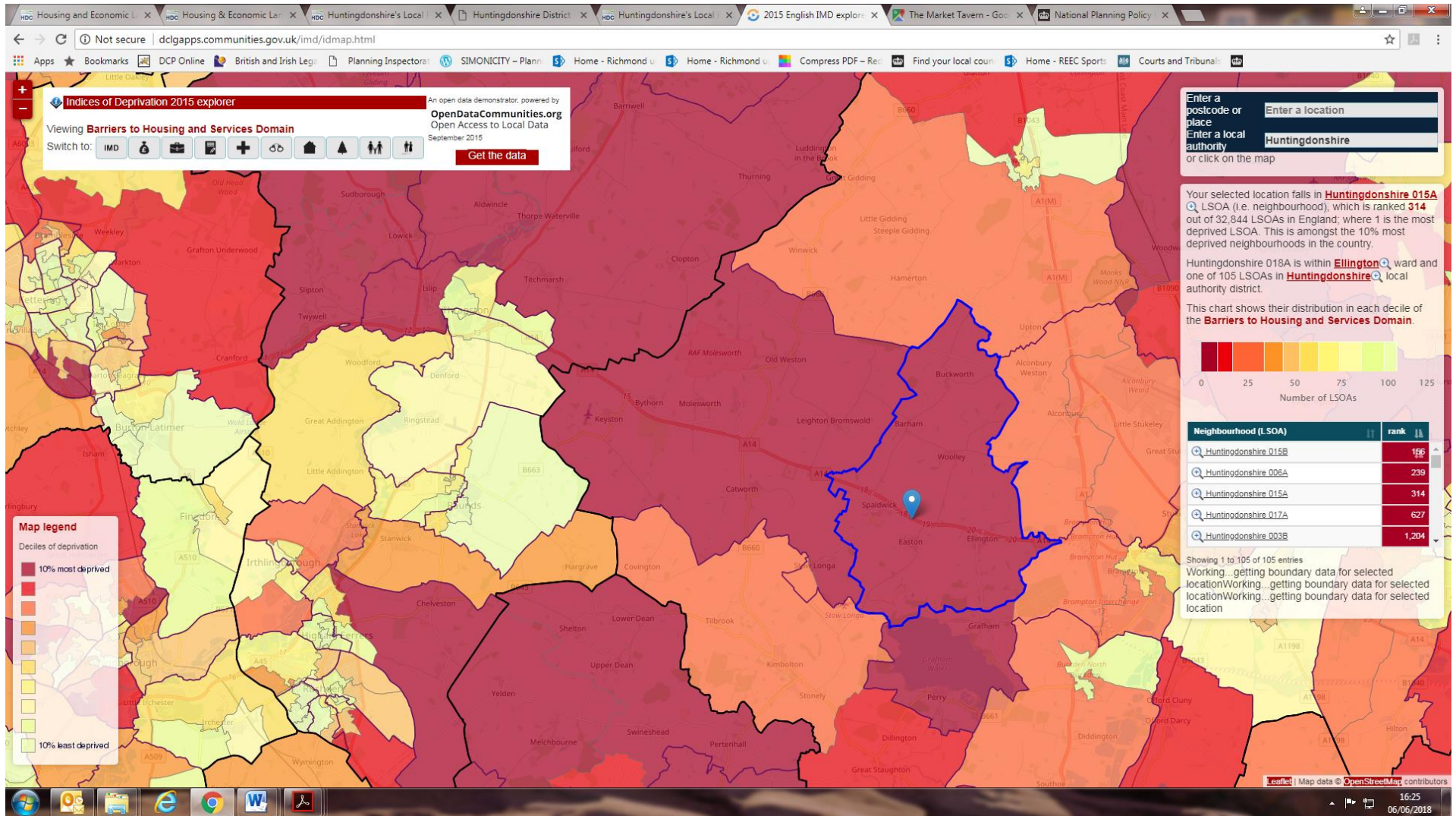
# APPENDIX D – INDICES OF DEPRIVATION 2015

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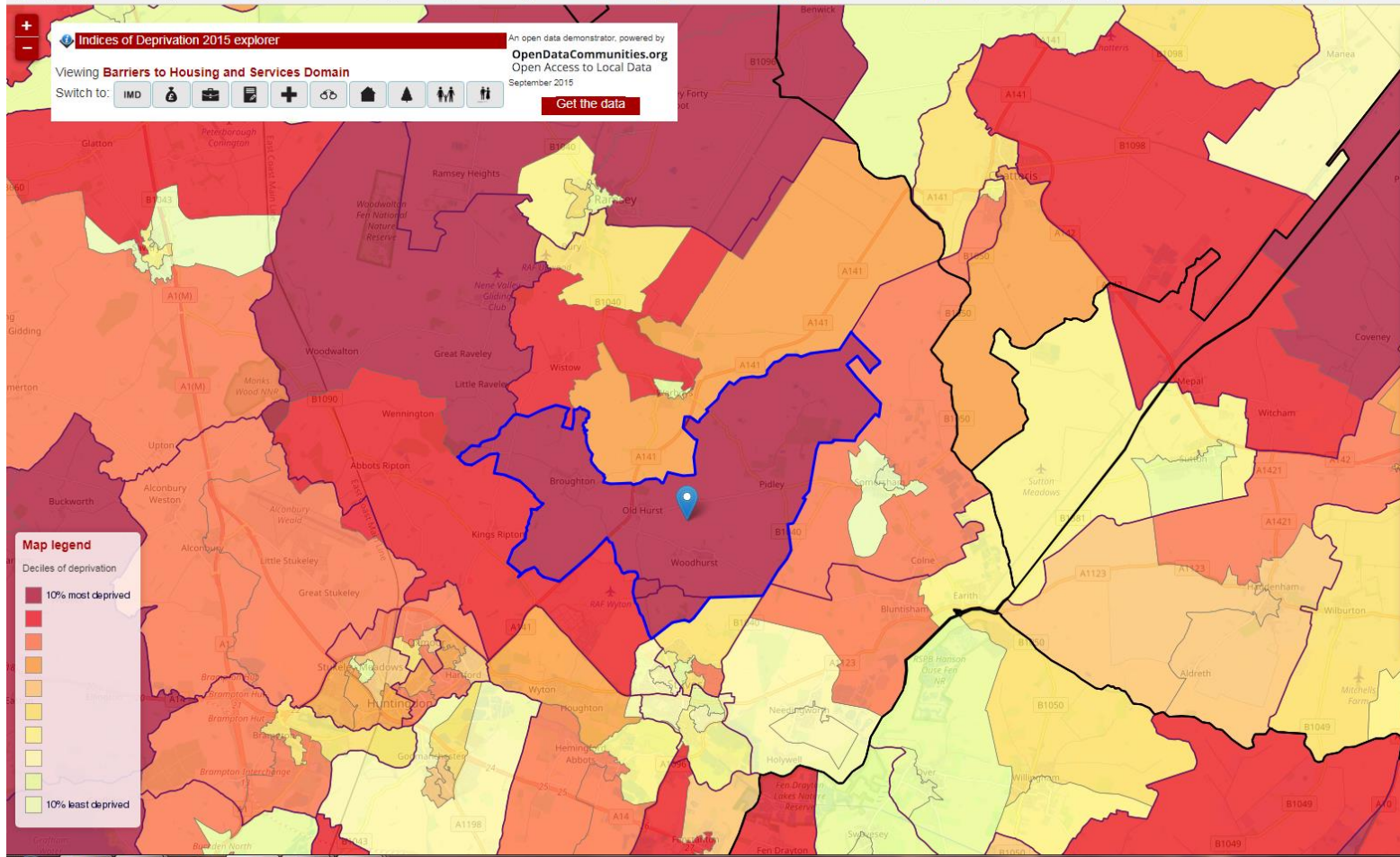


**Indices of Deprivation 2015 explorer**  
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 September 2015

Viewing **Barriers to Housing and Services Domain**

Switch to: **IMD** | | | | | | |

[Get the data](#)



Enter a postcode or place:

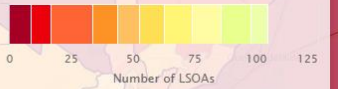
Enter a local authority:

or click on the map

Your selected location falls in **Huntingdonshire 006A** LSOA (i.e. neighbourhood), which is ranked **239** out of 32,844 LSOAs in England; where 1 is the most deprived LSOA. This is amongst the 10% most deprived neighbourhoods in the country.

Huntingdonshire 018A is within **Somersham** ward and one of 105 LSOAs in **Huntingdonshire** local authority district.

This chart shows their distribution in each decile of the **Barriers to Housing and Services Domain**.



Neighbourhood (LSOA)	rank
<a href="#">Huntingdonshire 015B</a>	166
<a href="#">Huntingdonshire 006A</a>	239
<a href="#">Huntingdonshire 015A</a>	314
<a href="#">Huntingdonshire 017A</a>	627
<a href="#">Huntingdonshire 003B</a>	1,204

Showing 1 to 105 of 105 entries  
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**Map legend**

Deciles of deprivation

- 10% most deprived
- ...
- 10% least deprived

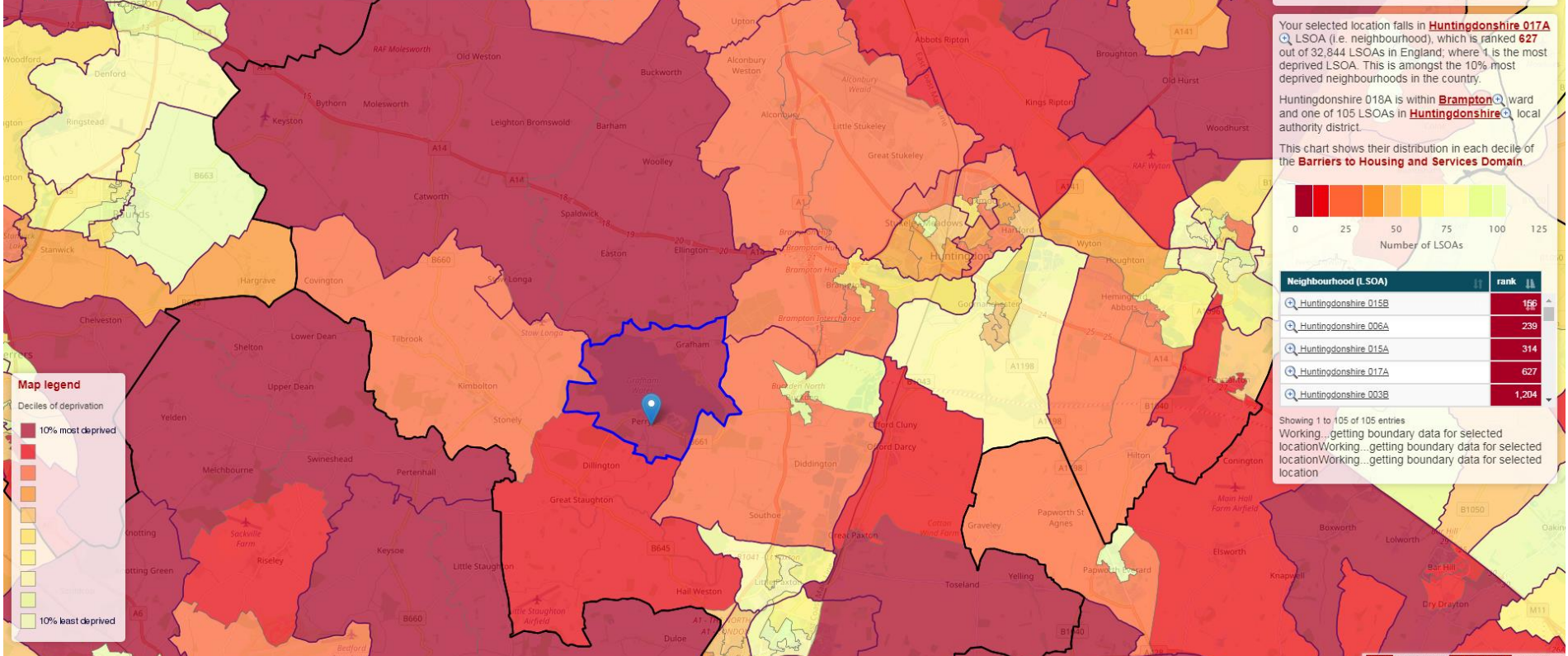


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Viewing **Barriers to Housing and Services Domain**

Switch to: **IMD** | | | | | | | | | |

[Get the data](#)



**Map legend**

Deciles of deprivation

- 10% most deprived
- 20%
- 30%
- 40%
- 50%
- 60%
- 70%
- 80%
- 90%
- 10% least deprived

Enter a postcode or place:

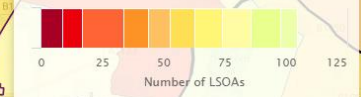
Enter a local authority:

or click on the map

Your selected location falls in **Huntingdonshire 017A** LSOA (i.e. neighbourhood), which is ranked **627** out of 32,844 LSOAs in England; where 1 is the most deprived LSOA. This is amongst the 10% most deprived neighbourhoods in the country.

Huntingdonshire 018A is within **Brampton** ward and one of 105 LSOAs in **Huntingdonshire** local authority district.

This chart shows their distribution in each decile of the **Barriers to Housing and Services Domain**



Neighbourhood (LSOA)	rank
Huntingdonshire D15B	166
Huntingdonshire 006A	239
Huntingdonshire D15A	314
Huntingdonshire D17A	627
Huntingdonshire 003B	1,204

Showing 1 to 105 of 105 entries

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**APPENDIX E – OFFICER’S REPORT ON APPLICATION**

**17/01687/OUT**

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**Case No:** 17/01687/OUT (OUTLINE APPLICATION)

**Proposal:** OUTLINE PLANNING APPLICATION FOR THE DEMOLITION OF THE BUNGALOW, SIX POULTRY SHEDS AND OTHER OUTBUILDINGS AND THE ERECTION OF UP TO 120 DWELLINGS WITH PUBLIC OPEN SPACE, LANDSCAPING AND SUSTAINABLE DRAINAGE SYSTEM (SUDS) AND A VEHICULAR ACCESS POINT FROM BLUNTISHAM ROAD. ALL MATTERS RESERVED EXCEPT FOR MEANS OF ACCESS.

**Location:** LAND SOUTH OF THE A1123 AND WEST OF BLUNTISHAM ROAD NEEDINGWORTH

**Applicant:** GLADMAN DEVELOPMENTS

**Grid Ref:** 534695 272719

**Date of Registration:** 10.08.2017

**Parish:** HOLYWELL-CUM-NEEDINGWORTH

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**RECOMMENDATION - APPROVE**

This application is referred to the Development Management Committee in accordance with the Scheme of Delegation as it is a Departure from the Development Plan, and Needingworth Parish Council's recommendation of refusal is contrary to the Officer recommendation of approval.

**1. DESCRIPTION OF SITE AND APPLICATION**

1.1 This application relates to 6.44 hectares of land situated to the north of the settlement of Needingworth. The land forming the application site is within various uses. The northern third of the application site comprises a poultry farm with poultry sheds, associated outbuildings and a bungalow, occupied by the manager of the poultry farm. To the south of this, the land forming the central third of the application site is used for the grazing of animals whilst the southern third of the site comprises a small holding and a disused orchard.

The site

1.2 None of the site is publicly accessible. There are no footpaths or other rights of way within or bounding the site. However, a public footpath is located to the north-east of the site, extending from the eastern side of Bluntisham Road and connecting to the A1123. In addition, there is a bridleway leading east from Bluntisham Road which gives pedestrian access to the new Ouse Fen RSPB reserve; situated to the south-east of the application site, to the opposite side of Bluntisham Road.

- 1.3 To the north of the application site is an agricultural field, beyond which is the A1123. As a result of the road alignment, the A1123 also runs immediately adjacent to the north-western boundary of the application site. To the west of the site are agricultural fields; whilst to the east of the site, on the opposite side of Bluntisham Road are several residential properties. With the exception of these dwellings, the land to the east of the application site is predominantly within agricultural use. To the south of the application site are two residential dwellings, currently separated by an agricultural field. This agricultural field benefits from planning permission for the erection of 14 dwellings as a rural exception site (ref: 17/01077/FUL).
- 1.4 The site is broadly level with no significant undulations and has hedgerows extending along the southern, eastern and western site boundaries. Three distinct lines of hedgerow run from east to west across the width of the site, with further sections of hedging also situated within the site.
- 1.5 Vehicular access is proposed from Bluntisham Road, adopting a broadly similar location to the existing access point into the poultry farm and associated dwellinghouse. Pedestrian access points along the eastern site boundary to Bluntisham Road are also proposed.
- 1.6 This application is in outline with 'access' the only matter to be considered in detail at this stage. The final layout, scale, appearance and landscaping are 'Reserved Matters' to be considered at a future date (should outline permission be granted). The application is accompanied by a 'Development Framework Plan' and an 'Illustrative Masterplan' (included within the Design and Access Statement) showing how the application site could be developed and demonstrating that the site is capable of accommodating the scale of development proposed (up to 120 dwellings). However, the illustrative layout shown on these plans is not necessarily the way the development will be carried out; as this would be established at reserved matters stage.
- 1.7 The planning application is supported by the following reports:
- \* Air Quality Screening Assessment
  - \* Design and Access Statement
  - \* Ecological Impact Assessment (including Bat and Reptile Surveys)
  - \* Flood Risk Assessment and Outline Surface Water Drainage Strategy
  - \* Foul Drainage Analysis
  - \* Heritage Desk Based Assessment
  - \* Infiltration Test Results
  - \* Landscape and Visual Impact Assessment
  - \* Noise Assessment (including addendum)
  - \* Planning Statement
  - \* Preliminary Risk Assessment
  - \* Statement of Community Involvement
  - \* Sustainability Statement
  - \* Transport Assessment (including addendum entitled Transport Note)
  - \* Travel Plan
  - \* Tree Survey
  - \* Utilities Statement

## **2. NATIONAL GUIDANCE**

- 2.1 The National Planning Policy Framework (NPPF) (2012) sets out the three dimensions to sustainable development - an economic role, a social role and an environmental role - and outlines the presumption in favour of sustainable development. Under the heading of Delivering Sustainable Development, the Framework sets out the Government's planning policies for : building a strong, competitive economy; ensuring the vitality of town centres; supporting a prosperous rural economy; promoting sustainable transport; supporting high quality communications infrastructure; delivering a wide choice of high quality homes; requiring good design; promoting healthy communities; protecting Green Belt land; meeting the challenge of climate change, flooding and coastal change; conserving and enhancing the natural environment; conserving and enhancing the historic environment; and facilitating the sustainable use of minerals.
- 2.2 Planning Practice Guidance

For full details visit the government website

<https://www.gov.uk/government/organisations/department-for-communities-and-local-government>

## **3. PLANNING POLICIES**

- 3.1 Saved policies from the Huntingdonshire Local Plan (1995)
- H31: "Residential privacy and amenity standards"
  - H37: "Environmental Pollution"
  - H38: "Noise Pollution"
  - T18: "Access requirements for new development"
  - T19: "Pedestrian Routes and Footpath"
  - T20: "Cycle Routes"
  - T21: "Public transport services"
  - R1: "Recreation and Leisure Provision"
  - R2: "Recreation and Leisure Provision"
  - R3 "Recreation and Leisure Provision"
  - R7 "Land and Facilities"
  - R8 "Land and Facilities"
  - R12: "Land and Facilities"
  - En12: "Archaeological Implications"
  - En13: "Archaeological Implications"
  - En18: "Protection of countryside features"
  - En19: "Trees and Landscape"
  - En20: "Landscaping Scheme"
  - En22: "Conservation"
  - En23: "Conservation"
  - En24: "Access for the disabled"
  - En25: "General Design Criteria"
  - CS8: "Water"
  - CS9: "Flood water management"
- 3.2 Saved policies from the Huntingdonshire Local Plan Alterations (2002)
- HL5 - Quality and Density of Development
  - HL6 - Housing Density

- HL10 - Housing Provision
  - OB2 - Maintenance of Open Space
- 3.3 Huntingdonshire Local Development Framework Core Strategy (2009)
- CS1: "Sustainable development in Huntingdonshire"
  - CS2: "Strategic Housing Development"
  - CS4: "Affordable Housing in Development"
  - CS10: "Contributions to Infrastructure Requirements"
- 3.4 Huntingdonshire's Local Plan to 2036: Proposed Submission 2017 (as amended March 2018 for submission)
- LP 1: "Amount of development"
  - LP 2: "Strategy and principles for development"
  - LP 3: "Green Infrastructure"
  - LP 4: "Contributing to Infrastructure Delivery"
  - LP 5: "Flood Risk"
  - LP 6: "Waste Water Management"
  - LP 10: "Small Settlements"
  - LP 11: "The Countryside"
  - LP 12: "Design Context"
  - LP 13: "Design Implementation"
  - LP 14: "Placemaking"
  - LP 15: "Amenity"
  - LP 16: "Surface Water"
  - LP 17: "Sustainable Travel"
  - LP 18: "Parking Provision and Vehicle Movement"
  - LP 25: "Affordable Housing Provision"
  - LP 26: "Housing Mix"
  - LP 31: "Health Impact Assessment"
  - LP 32: "Biodiversity and Geodiversity"
  - LP 33: "Trees, Woodland, Hedges and Hedgerows"
  - LP 36: "Heritage Assets and their Settings"
  - LP 39: "Ground Contamination and Groundwater Pollution"
- 3.5 Policy Weighting
- Paragraph 215 of the NPPF advises that due weight should be given to Development Plan policies which pre-date the NPPF according to their degree of consistency with the Framework. Paragraph 216 of the NPPF advises that policies in emerging plans can be given weight from the day of publication according to:
- \* the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
  - \* the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
  - \* the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
- 3.6 The LPA consider the Local Plan to 2036 to be a sound plan and it was submitted for examination on the 29th March 2018. The plan has therefore reached an advanced stage and is consistent with the policies set out within the NPPF.



- 3.7 Housing Supply Policies - In order to satisfy the requirements of the NPPF to boost housing supply the Council must demonstrate an up-to-date five year supply of deliverable housing sites to meet its objectively assessed need, with an additional buffer to ensure choice and competition in the market for land; this requirement is set out in paragraph 47 of the NPPF. Due to under delivery in recent years the buffer to be applied for the District is 20%. The December 2017 Annual Monitoring Review applies the 20% buffer and demonstrates that the Council has a five year supply of housing land.
- 3.8 The Development Plan policies relevant to the supply of housing (En17 and H23 of the Huntingdonshire Local Plan (HLP) and CS2 and CS3 of the Huntingdonshire Core Strategy (HCS)) were set against a lower Objectively Assessed Need figure. Therefore strict application of these policies would result in failure to achieve the objectively assessed housing need figure that the Council currently has identified as part of the emerging Local Plan to 2036, and these policies taken in isolation could be considered not to be up-to-date.
- 3.9 These policies are therefore no longer fully up-to-date or consistent with the NPPF and, at this time and until the Council adopts the Local Plan to 2036 with up-to-date policies, the 'tilted balance' as set out within the 4th bullet point of para. 14 is engaged. For decision-taking this means granting permission in instances where the Development Plan is absent, silent or relevant policies are out-of-date unless any adverse impacts would significantly and demonstrably outweigh the benefits (having regard to the Framework policies taken as a whole), or specific policies of the Framework indicate development should be restricted.
- 3.10 Countryside Policies - Policies H23, En17 and CS3 have environmental objectives which are all firmly aimed at protecting the environment and landscape character. Core principles of the NPPF are to recognise the intrinsic character and beauty of the countryside and differing roles and character of the areas whilst supporting local communities in rural areas. The NPPF therefore has a slightly more positive approach to development in the countryside than the restrictive development plan policies, and this partial inconsistency requires a reduction in weight.
- 3.11 Whilst there is some difference in the wording between the policies written before the NPPF publication and the precise wording of the NPPF, the countryside policies are considered to accord with one of the overarching aims of the NPPF. As such, having regard to paragraph 215 of the NPPF it is considered that when assessing impacts of development upon the countryside these policies can be afforded significant (reduced from full) weight.
- 3.12 Sustainable Development - Policy CS1 of the adopted Core Strategy 2009 sets out the criteria for sustainable development and is broadly consistent with the NPPF. Having regard to the NPPF paragraph 215, this policy is considered to have full weight, given the NPPF requirement for development to be sustainable and jointly and simultaneously achieve economic, social and environmental gains.

- 3.13 Developer Contributions - Having regard to policies relating to contributions - Saved policy OB2 of the HLPAs advises that financial contributions for the maintenance of open space may be sought to benefit the development. This is consistent with the social dimension of the NPPF which requires developments to contribute to healthy communities and a high quality environment and NPPF para 73 specifically highlights the contribution that high quality open spaces can make to the health and well-being of communities. The degree of consistency between saved policy OB2 and the NPPF in this regard warrants giving policy OB2 significant weight.
- 3.14 Policy CS4 of the HCS seeks to secure a target of 40% affordable housing provision for residential development (of above 15 or more homes) subject to, amongst other considerations, viability. Chapter 6 of the NPPF 'Delivering a wide choice of high quality homes' notes that LPAs should significantly boost the supply of housing and refers to the need to provide market and affordable housing and states that policies should be set to meet the identified need for affordable housing. CS4 is based upon identified need and it is therefore considered that policy CS4 can be given significant weight. Policy LP 25 of the Local Plan to 2036 also seeks to secure affordable housing provision within developments. This policy targets 40% affordable housing and requires a mix of tenure splits and dispersal across sites, in line with Core Strategy policy CS4, it does however change the threshold for qualifying sites to 11 homes or more, or 1,001m<sup>2</sup> or more of residential floorspace. The policy acknowledges that the target provision may not always be viable due to specific site conditions or other material considerations. As such this policy can be afforded significant weight; whilst there is a difference between the threshold for affordable housing in the adopted and emerging policies, it is noted that this does not affect the consideration of major developments such as this application.
- 3.15 Policy CS10 of the HCS is the relevant policy for securing contributions to infrastructure requirements, including affordable housing, open space, transport, community facilities, education, health, and waste recycling facilities. This policy is consistent with the NPPF policies and paragraphs 203 and 204 which relate to planning obligations and therefore carries significant weight. This policy relates to the Developer Contributions SPD 2011, which sets out the standards and formulae for calculating developer contributions. Policy LP 4 of the Local Plan to 2036 relates to Infrastructure Delivery and relates to the Developer Contributions SPD 2011 which sets out the standards and formulae for calculating developer contributions. Policy LP 17 of the Local Plan to 2036 relates to sustainable travel and seeks to secure appropriate mitigation measures for likely transport impacts. These policies can be afforded significant weight also.
- 3.16 Supplementary Planning Guidance / Other relevant documents:
- Huntingdonshire Design Guide SPD (2017): Place Making Principles - Part 3.3 Walkable Places, Parts 3.5 Parking and Servicing, 3.7 Building Form.
  - Huntingdonshire Landscape and Townscape Assessment (2007)
  - Strategic Flood Risk Assessment for Huntingdonshire (2017)
  - Developer Contributions SPD (2011)

- RECAP CCC Waste Management Design Guide (CCC SPD) 2012

Local policies are viewable at <https://www.huntingdonshire.gov.uk>

#### 4. PLANNING HISTORY

##### Application Site:

- 4.1 7800279FUL - Replace Boiler House With Building. Permission Granted, 03.04.1978.
- 4.2 8601421FUL - Redevelopment of existing poultry broiler site. Permission Granted, 20.10.1986.
- 4.3 8901921OUT - By-Pass proposal with residential development, open space and petrol filling stations, Land north of Needingworth. Withdrawn.
- 4.4 9001295CCC - Construction of By-Pass. Land to North West,(A1123) Needingworth. Permission Granted, 21.12.1990.
- 4.5 16/00745/P3MPA - Prior Approval for the proposed change of use from an agricultural building to a flexible use under Class R. Approved, 06.07.2016.

##### Land to the south of the application site:

- 4.6 17/01077/FUL - 14 New homes on land adjacent to Fair View, Bluntisham Road, Needingworth. Permission Granted, 16 February 2018.

#### 5. CONSULTATIONS

- 5.1 **Needingworth Parish Council** - First Comments - recommend REFUSAL - due to concerns in relation to the principle of the development due to the location of the site outside of the built up area and local housing need being met through a rural exception site, the scale of development and inability of existing services to support a development of this scale (including the primary school and St Ivo Secondary School), loss of agricultural land, noise impacts, odour, intrusive light pollution arising from the development, highway safety and inadequacy of the existing footpaths to serve the development, the scale and appearance of the development and detrimental visual impacts arising from the drainage scheme. HDC can demonstrate a five year supply of housing land and its current policies are up to date, therefore there is no reason why the site should be given approval. The Parish Council has set out a list of improvements and recommendations which it considers should be included within a Section 106 Agreement if the application is recommended for approval (COPY ATTACHED).
- 5.2 **Needingworth Parish Council** - Following Re-consultation - recommend REFUSAL - The Parish Council have considered the amendments to the original plans and also the additional resident comments. Council consider that the amendments have not

addressed any of their original concerns and therefore the original comments objecting to the proposed development dated 20/9/17 still stand (COPY ATTACHED).

- 5.3 **Cambridgeshire Constabulary** - NO OBJECTION from a crime and disorder perspective. No crime prevention strategy at this stage but would wish to comment on reserved matter details and measures to mitigate crime and disorder.
- 5.4 **Cambridgeshire Fire and Rescue** - NO OBJECTION subject to securing provision for fire hydrants through Section 106 or a planning condition.
- 5.5 **Cambridgeshire County Council Archaeology** - NO OBJECTION subject to condition securing an archaeological evaluation as the site is located in a landscape of high archaeological potential.
- 5.6 **Cambridgeshire County Council Education** - There is a shortfall of early years places at Needingworth Community Pre-School. It is acknowledged that there is plentiful pre-school provision in St Ives. The primary school is close to full capacity (total capacity of 210 places. It had 202 pupils on roll in September 2017). However the school is forecast to have sufficient capacity in the future if out-catchment options are excluded. St Ivo Secondary school is close to full capacity (total capacity of 1500 places. It had 1423 pupils on roll in September 2017). There may be a need to expand the school in the long term, given the continuing growth in St Ives. However, there is no current project in the capital programme to do so and the catchment forecasts do not show a pressing need for this in the short to medium term. In conclusion, there will be a need to mitigate the impact from this development at early years level but not primary or secondary levels. It is noted that the development is under 200 dwellings and therefore S106 contributions cannot be sought.
- 5.7 **Cambridgeshire County Council as Lead Local Flood Authority (LLFA)** - NO OBJECTION - The applicant has demonstrated that surface water can be dealt with on site by using swales and an infiltration pond in a Sustainable Drainage System (SuDS) management train, restricting surface water discharge to QBAR at a rate of 13.1 l/s. The LLFA is supportive of the use of swales and an infiltration pond as in addition to controlling the rate of surface water leaving the site it also provides water quality treatment which is of particular importance when discharging into a watercourse. The topography of the site falls to the north, a SuDS management train of swales perpendicular to this gradient will capture surface water and control conveyance across the site in a cascade model. Surface water flood risk is medium or high in parts of the site, however SuDS features have been positioned in these locations to provide storage and controlled conveyance.
- 5.8 **Anglian Water** - Needingworth Water Recycling Centre will have available capacity for these flows. The sewerage system has available capacity for the anticipated flows. The proposed method of surface water drainage does not relate to Anglian Water operated assets. The LLFA/Internal Drainage Board (IDB)/Environment Agency (EA) should be consulted accordingly.

- 5.9 **Environment Agency** - no comment to make on this application.
- 5.10 **Cambridgeshire County Council as Local Highways Authority** - NO OBJECTIONS - subject to conditions/obligations in relation to:
- provision of a shared footway/cycleway on the eastern side of Bluntisham Road.
  - provision of a footway including bus hard standing and dropped kerb crossings on the western side of Bluntisham Road.
  - a new bus stop on the western side of Bluntisham Road, to include a new shelter, raised kerbs, real time passenger information and a maintenance contribution.
  - upgrading of the existing bus stop on the eastern side of Bluntisham Road, to include a new shelter, raised kerbs, real time passenger information and a maintenance contribution.
  - provision and implementation of a Residential Welcome Pack for sustainable transport, to include six months free bus travel with the relevant local public transport operator.
  - provision and implementation of a Residential Travel Plan.

In relation to access, the proposed access to the development is indicated as being 5.5m in width with 7.5m radii which is sufficient for the proposed number of dwellings. The vehicle to vehicle visibility splays (both vehicle to vehicle and pedestrian have been derived from the recorded traffic speeds in the location and are therefore acceptable. Offsite works, the connecting footways from the village to the development have been indicated and include a connection to the existing footway to the north of the site. The proposed offsite works have been put forward and a stage1 (in principle) safety audit has been carried and has found no issues. Therefore with regards to the access arrangements and the offsite works, no objections to the proposal subject to conditions relating to: maintenance and management arrangements for the roads and footpaths, the minimum width of the vehicular access being 5.5m for the first 50m into the site, the access being constructed with 7.5m radius kerbs, the provision of temporary facilities for the parking, turning and unloading of vehicles during construction, the provision of visibility splay as shown the plans submitted and the maintenance of these free obstruction, adequate drainage measures being incorporated to prevent surface water run-off to the adjacent public highway, construction of the road in accordance with CCC specification, details of the route for construction traffic being agreed and wheel washing facilities being provided on site.

- 5.11 **HDC Environmental Health** - NO OBJECTIONS - Subject to conditions regarding noise and contamination.
- 5.12 **HDC Housing** - NO OBJECTIONS - If the application is acceptable in broader planning policy terms, the affordable housing that would be provided would be welcomed. However the affordable housing should be secured by S106.
- 5.13 **HDC Operations Green Space** - NO OBJECTIONS - The layout is much better than the previous plan with the proposed children's play area more accessible to the rest of the development and a better road layout. The maintenance rates for the open space on site provision would be in line with the Developer Contributions SPD.



- 5.14 **NHS England** - NO OBJECTIONS - Additional patients generated by the development will likely have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. There are 3 GP Practices within a 3km radius of the site. These practices do not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. CIL funding may be sought in the future to assist with the delivery of new infrastructure for the provision of primary healthcare services in the GP Catchment Area. It is noted that the development is not of a size and nature that would attract a specific S106 planning obligation.
- 5.15 **Natural England** - NO OBJECTIONS - With regards to the impact upon Statutory Nature Conservation Sites. Based on the information submitted, the proposal is unlikely to affect any statutorily protected sites or landscapes. With regards to protected species, Natural England Standing Advice should be applied to this application.
- 5.16 **RSPB** - The reserve being created through the Hanson RSPB Wetland Project is within easy access of the site. This should not substitute high quality, accessible and wildlife rich green space that should be provided alongside new developments. It is noted that 43% of the site is to be green space. The opportunity to discuss the matter of managing potential consequences of the application for the Ouse Fen Reserve would be welcomed. Attention is drawn to guidance to inform the detailed design stage.
- 5.17 **Wildlife Trust** - NO OBJECTIONS - I am pleased to see that the RSPB has been consulted for their views on potential impacts on RSPB Ouse Fen. Provided the RSPB are satisfied with the proposed mitigation measures, I have no further comments to make on this issue. The outstanding survey information has now been provided. The bat survey identified further mitigation measures and the need for an EPS licence (see section 5.28 of the amended EclA). As I had previously advised, these additional measures will need to be added to the existing mitigation proposals and secured by way of a suitably worded planning condition. I welcome the commitment to the production of a site-wide biodiversity/ecological mitigation and management strategy.

## 6. REPRESENTATIONS

- 6.1 15 OBJECTIONS have been received from 14 residents. The objections can be summarised as:

### Policy Matters -

\* Within policy CS3 of the Core Strategy 2009 Needingworth is identified as a Small Settlement where residential infilling within the built up area of up to three dwellings is appropriate. The development is contrary to this policy.

\* According to Policy CS3, the development is 'large scale development'. Insufficient justification has been provided to permit the development as an exception.

\* Needingworth is identified as a Smaller Settlement because it has a limited range of services and facilities and is not therefore a sustainable location for the size of development proposed.

- \* The development would increase the size of Needingworth by over 10%, harming the character of the village.
- \* The level of development taking place in Needingworth, proposed under this application and on adjacent land 17/01077/FUL is too great.
- \* Only 40% of the dwellings would be affordable, defeating the need for affordable housing.
- \* The proposal would extend beyond current village boundary and would act as a precedent for further such expansion.
- \* A need for the proposed development on land outside the Needingworth village boundary has not been demonstrated. If a larger number of homes are needed locally, there are probably suitable infill sites within the village boundary.
- \* Insufficient detail provided regarding dwelling numbers.
- \* The density of the development would be different to the rest of the village.
- \* The site is greenfield and not suitable for development.

#### Flooding and Drainage -

- \* Local sewage arrangements are at capacity and cannot cope with further development; major works may be needed to accommodate the scale of development proposed.
- \* The site is prone to flooding. Development of the land will exacerbate this.
- \* Insufficient detail provided regarding drainage.

#### Highways -

- \* The traffic survey undertaken was completed at the start of the summer holiday and is therefore inaccurate and not representative of a typical day.
- \* The traffic assessment must have been undertaken outside of peak traffic periods, when there were no issues with the A14 and when Earith Bridge was open as it does not reflect the traffic experienced in these situations.
- \* Within the Transport Assessment, the assumptions made regarding the numbers of cars resulting from the development are inadequate and result in an underestimation of vehicles and vehicle movements resulting from the development.
- \* Changes to the current status of the road and pathways will be required given the two vehicular and pedestrian accesses proposed.
- \* Will increase the traffic on local road network by approx. 240 cars, exacerbating existing congestion on A1123, often queuing back from St Ives to Needingworth and associated junctions.
- \* Has the capacity of the A1123 been tested?
- \* The development is located a dangerous junction where fatalities have occurred.
- \* Within the Transport Assessment, the number of vehicles from the development turning right from Bluntisham road onto A1123 is not representative. Higher numbers of vehicles would likely turn right to avoid congestion in St Ives.
- \* Highway safety concerns regarding A1123/Bluntisham Road junction and business of this junction.
- \* Proportion of vehicles turning right out of the development underestimated as Bluntisham Road/A1123 junction is difficult to negotiate.
- \* The Traffic Assessment does not take account of the existing excessive congestion.

- \* Access into the site from a 60mph road would be dangerous. Traffic calming would be required.
- \* Residents of the development will rely on cars for transport unless improvements are made to public transport. Bus services are limited and their future is uncertain. The cycle times quoted in the Travel Plan are ambitious; underestimating the length of time journeys would likely take.
- \* Would increase traffic parking outside/near the primary school, exacerbating existing parking problems.
- \* Existing transport infrastructure, including the junction of the A1123 and Bluntisham Road, requires modification to accommodate the number of cars resulting from the development.
- \* The Transport Assessment does not take account of the opening of Morrisons/Mcdonalds developments at the Compass Point/Marsh Harrier roundabout at the western end of the A1123. In addition, it does not take account of developments at Giffords Farm. These developments will worsen the situation.
- \* There could be a conflict with quarry traffic (sand & gravel lorries) and vehicles from the development.
- \* Would increase traffic through Needingworth village.
- \* Would create additional traffic through St Ives and villages trying to access A14.
- \* There should be no further development to the north of the Great Ouse until traffic issues through St Ives and surrounding villages is resolved.
- \* There is not a designated cycle path to the other end of Needingworth such to access the cycle path to St Ives.
- \* Existing bus services are not adequate to access local services and get to work; therefore all occupiers will require cars.
- \* The proposed access is close to a bend in the road.
- \* The Transport Assessment does not provide passenger numbers for the bus services.
- \* Car parking within the scheme is inadequate, making it difficult for pedestrians and emergency vehicles.
- \* There are no public pavements that extend from the development to facilitate access to services and facilities within the village.

#### Infrastructure-

- \* The development will place a considerable load on local infrastructure.
- \* There are insufficient facilities in the village to sustain the scale of development proposed.
- \* The Travel Plan and Transport Assessment misrepresents healthcare facilities within the village; there is not a GP practice, only a private physiotherapy clinic. The nearest medical services are in St Ives and these are at capacity or oversubscribed.
- \* Holywell Primary School cannot accommodate the number of children resulting from the development. Children will therefore have to travel to other villages to school.
- \* The Primary School is situated on a constrained site and is too small to cope with the additional children from 120 households.
- \* St Ivo secondary school is oversubscribed and is unlikely to provide sufficient places. The catchment is also changing.
- \* Insufficient capacity at local dentists practices.
- \* Insufficient capacity at local doctors surgeries.

\* Permission has been granted for 14 dwellings in the village. Existing infrastructure and services will not be able to cope with further development of the scale proposed.

\* Mix of dwellings supported but adequate infrastructure must be put in place first.

\* The existing bus services are inadequate and are under threat so occupiers would have to use cars routinely.

#### Amenity & Community -

\* An alternative to the Cambridge News for advertisement of the consultation event should have been used such as a free paper or leaflet as residents do not purchase this paper.

\* Appendix A of the Statement of Community Involvement is not visible online.

\* The proposed play area is not located in accordance with ROSPA guidelines or the Open Space SPD. There is insufficient opportunity for surveillance and may lead to anti-social behaviour and children feeling/being unsafe.

\* The development would be overbearing and out of character with the undeveloped character of the area which includes the RSPB Ouse Fen Reserve.

\* The development would not benefit Needingworth.

\* The development would turn Needingworth into a large settlement.

\* The location of the development will tend to isolate the new homes from the main part of the village, affecting children going to the school and prevent residents from feeling a sense of belonging to the community of Needingworth.

\* Insufficient detail provided regarding the potential for integration of the development into the village.

\* The site is far away from the rest of the village so will be isolated.

\* The amount of affordable housing will turn out to be a much smaller percentage than has been proposed.

#### Environment & Ecology -

\* The development would significantly alter the green character of the north-east end of the village.

\* Despite the findings of the Ecological Impact Assessment Report, brown hares live in the area and should be taken into account.

\* Loss of habitat

\* The application makes inadequate provision for wildlife

#### Other (non-planning) Matters -

\* The proposal is generic and does not seem to be what is needed for Needingworth.

\* The development is just the tip of the iceberg should Gifford's Farm be developed too.

\* Comments have taken a notable period of time to appear on the Council's website.

## **7. ASSESSMENT**

7.1 As set out within the Planning and Compulsory Purchase Act 2004 (section 38(6)) and the Town and Country Planning Act 1990 (section 70(2)) in dealing with planning applications the Local Planning Authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material

considerations. This is reiterated within paragraphs 2, 11, 196 and 210 of the NPPF. The development plan is defined in section 38(3)(b) of the 2004 Act as "the development plan documents (taken as a whole) that have been adopted or approved in that area".

- 7.2 In Huntingdonshire the Development Plan consists of:
- Saved policies from the Huntingdonshire Local Plan 1995 (Parts 1 and 2)
  - Saved policies from the Huntingdonshire Local Plan Alteration 2002
  - Adopted Core Strategy 2009
  - Huntingdon West Area Action Plan 2011
  - Cambridgeshire & Peterborough Minerals and Waste Development Plan Core Strategy
  - St Neots Neighbourhood Plan
  - Godmanchester Neighbourhood Plan
  - Houghton and Wyton Neighbourhood Plan

- 7.3 The statutory term 'material considerations' has been broadly construed to include any consideration relevant in the circumstances which bears on the use or development of land: *Cala Homes (South) Ltd v Secretary of State for Communities and Local Government & Anor* [2011] EWHC 97 (Admin); [2011] 1 P. & C.R. 22, per Lindblom J. Whilst accepting that the NPPF does not change the statutory status of the Development Plan, para 2 confirms that it is a material consideration and significant weight is given to this in determining applications.

- 7.4 The main issues to consider in assessing this application are if this development is considered sustainable development, having considered the economic, environmental and social elements of this case. With that in mind the matters for further discussion are those of the principle of development (including loss of agricultural land, proposed use and amounts), indicative layout, access and transport, heritage assets, trees and landscape, ecology and biodiversity, ground conditions and contamination, noise and pollution, flooding and drainage, waste, infrastructure requirements and planning obligations.

#### **Principle Of Development:**

##### Development Plan

- 7.5 Needingworth is defined as a 'Smaller Settlement' in Policy CS3 of the Core Strategy (2009). The Core Strategy sets out that further to Market Towns and Key Service Centres, "Huntingdonshire has a great many other villages of varying size and character all offering different levels of services and facilities to their residents. These are classed as Smaller Settlements in the third tier of the hierarchy". It is outlined that "the main distinction between these Smaller Settlements and the Key Service Centres is that none offer a sufficient range of services and facilities to sustain daily living without the need to access services and facilities elsewhere". As a result, policy CS3 of the Core Strategy sets out that for Smaller Settlements "residential infilling will be appropriate within the built-up area"; with 'residential infilling' indicated as being up to 3 dwellings within the built-up area. The policy also provides that development proposals of a larger scale



may be allowed where specific circumstances demonstrate that this secures the most sustainable option for the site.

- 7.6 The Development Plan policies seek to ensure that development is located in places well served by public transport and accessible to services so that the need to travel is minimised, thus helping to tackle climate change at a district level. For this reason, and to restrict the loss of high quality agricultural land and to help protect the character of the countryside, development outside the built up area is carefully controlled. Development outside the built up area is restricted, for example to dwellings required for the efficient management of agriculture, forestry or horticulture enterprises (policies En17 and H23 of the 1995 Local Plan apply). Building on this, Policy CS3 of the Adopted Core Strategy continues the strategic aim of concentrating development in the larger sustainable settlements and protects the character and scale of smaller villages and the countryside through limiting general housing development outside of the built up area (with the exception of essential needs housing and specific allocations). Policy CS2 of Core Strategy 2009 which operates at a higher level than CS3, does not provide for housing development on the application land.
- 7.7 Paragraph 49 of the NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development and paragraph 55 of the NPPF gives importance to promoting sustainable development in rural areas. However, the NPPF has a slightly more positive approach to development in the countryside than the restrictive development plan policies on housing in the countryside. Furthermore, an overall aim of the NPPF is to significantly boost housing supply. As such, there is an inconsistency with policies H23, En17 and CS3, and the thrust of the NPPF. In accordance with paragraph 215 of the NPPF the weight to be given to these policies should be reduced. Paragraph 14 of the NPPF requires that where relevant policies are out of date, permission should be granted unless 'any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole: or specific policies indicate development should be restricted.'

#### Emerging Plan

- 7.8 Huntingdonshire's Local Plan to 2036: Proposed Submission 2017 (as amended March 2018 for submission) Needingworth is defined as a 'Small Settlement' within the emerging Local Plan to 2036. Policy LP 11 of the Local Plan to 2036 Proposed Submission 2017 sets out that development within the countryside will be restricted to the limited and sporadic opportunities as provided for in other policies of the plan. Amongst other requirements, this policy outlines that development must protect the intrinsic character and beauty of the countryside and not give rise to noise, odour, obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others.
- 7.9 Policy LP 10 of the Local Plan to 2036: Proposed Submission 2017 (as amended March 2018 for submission) sets out that residential development would be supported within a Small Settlement where it is appropriately located within the built-up area and where the amount

and location of the development proposed is sustainable in relation to the:

- level of service and infrastructure provision within the settlement;
- opportunities for users of the proposed development to access everyday services and facilities by sustainable modes of travel including walking, cycling and public transport;
- effect on the character of the immediate locality and the settlement as a whole.

7.10 With regards to development on land well-related to the built-up area, it is set out that development may be supported where it accords with the specific opportunities allowed for through other policies within the plan.

7.11 In taking account of Paragraph 216 of the NPPF, the LPA considers that at this point in time, in considering policies for the delivery of housing, greater weight should be attributed to policies within the Development Plan than to emerging policies within Huntingdonshire's Local Plan to 2036: Proposed Submission 2017 (as amended March 2018 for submission).

#### Application Site - Policy Assessment

7.12 Having regard to paragraph 55 of the NPPF, the application site is not considered to be 'isolated' by virtue of its location within 250m of Needingworth (from the proposed access point to the edge of the settlement) and the presence of dwellings immediately east of the site to the opposite side of Bluntisham Road. However, the application site is outside of the built-up area of Needingworth and is not allocated for development within the Local Plan 1995/2002 or the Core Strategy 2009. The site is therefore considered to be in the countryside for the purposes of the Development Plan. Being within the countryside, development of the site, as proposed, is contrary to Development Plan policies H23 and En17 of the Local Plan (1995) and policy CS3 of the Adopted Core Strategy (2009). The application has been advertised as a departure from the Development Plan as it is contrary to the Development Plan currently in place for Huntingdonshire, due to the application site being outside of the built up area of Needingworth and forming part of the countryside.

7.13 It is noted that residential development on the site is also contrary to policy LP10 of Huntingdonshire's Local Plan to 2036: Proposed Submission 2017, by virtue of the location of the application site, outside of the built up area.

7.14 As referred to above, applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. It therefore needs to be established whether there are any material considerations that indicate that the application should be approved as a departure from the Development Plan.

#### Housing Supply and Tilted Balance

7.15 In order to satisfy the requirements of the NPPF to boost housing supply the Council must demonstrate an up-to-date five year supply of deliverable housing sites to meet its objectively assessed need,

with an additional buffer to ensure choice and competition in the market for land; this requirement is set out in paragraph 47 of the NPPF. Due to under delivery in recent years the buffer to be applied for the District is 20%. The December 2017 Annual Monitoring Review applies the 20% buffer and demonstrates that the Council has a five year supply of housing land. Whilst the Council has a five year supply of housing land, it is acknowledged that the 5 year supply is a minimum amount of land to be made available and does not seek to represent a cap on development.

7.16 As previously identified, the Development Plan policies relevant to the supply of housing (En17 and H23 of the Huntingdonshire Local Plan (HLP) and CS2 and CS3 of the Huntingdonshire Core Strategy (HCS)) were set against a lower Objectively Assessed Need figure such that strict application of these policies alone would result in failure to achieve the objectively assessed housing need figure that the Council currently has identified as part of the emerging Local Plan to 2036. As a result, the aforementioned policies within the development plan are no longer considered to be fully up-to-date or consistent with the NPPF and, at this time and until the Council adopts the Local Plan to 2036 with up-to-date policies, the 'tilted balance' as set out within the 4th bullet point of para. 14 of the NPPF is engaged. For decision-taking this means granting permission in instances where the Development Plan is absent, silent or relevant policies are out-of-date unless any adverse impacts would significantly and demonstrably outweigh the benefits (having regard to the Framework policies taken as a whole), or specific policies of the Framework indicate development should be restricted. It is however noted that the aforementioned policies within the Development Plan relevant to the supply of housing should not be disregarded; on the contrary, even 'out-of-date' policies remain part of the Development Plan, and the weight attributed to them is a judgment for the decision maker and will vary according to the circumstances.

7.17 To address the identified shortfall in housing delivery, Huntingdonshire's Local Plan to 2036 contains a significantly revised strategy from the Adopted Core Strategy (2009). The strategy for development in the District is set out in Policy LP 2 of the emerging Local Plan to 2036 and focuses on concentrating growth in the four identified Spatial Planning Areas, with approximately three quarters of the objectively assessed need for housing being focused within these areas. Working down the settlement hierarchy identified within Policy LP2, seven Key Service Centres are designated, reflecting the concentration of services and facilities in these settlements; serving not only residents of these settlements but also residents of other nearby communities. Following on from this, three Local Service Centres are identified, reflecting the level of service provision available to residents. Working further down from this, the role of small settlements is identified. Policy LP 2 notes that "Approximately a quarter of the objectively assessed need for housing, together with a limited amount of employment growth, will be permitted on sites dispersed across the key service centres, local service centres and small settlements to support the vitality of these communities and provide flexibility and diversity in the housing supply". Policy LP 10 provides support for development proposals within the built-up area of a Small Settlement. The emerging Local Plan to 2036 has been submitted for examination and as such, in accordance with paragraph

216 of the NPPF, it is considered that moderate weight can be attributed to housing supply policies within the emerging Local Plan. It is acknowledged that the application site is not identified for allocation within the emerging Local Plan to 2036 and falls outside the built-up area of a Smaller Settlement. As such, the proposals would not accord with policies within the emerging Local Plan to 2036.

- 7.18 It is accepted that the NPPF supports a genuinely plan-led approach, and that this has been reinforced by a 2016 Court of Appeal decision. However, as set out above, it is also a core principle of the Framework that plans are kept up-to-date. As such, the above-noted countryside protection policies are not capable of meeting the level of housing need that is now identified by the Local Planning Authority. These factors significantly reduce the weight that can be afforded to the above-noted policy conflicts in the present proposal.
- 7.19 The application proposes affordable housing provision at 40% to be secured through Section 106 Agreement. Although the 40% affordable housing provision is welcomed, it is highlighted that it is a policy compliant provision and therefore accords with what should be expected on all qualifying sites. Notwithstanding this, it is acknowledged that the LPA has not achieved target levels of affordable housing in the past and there is a substantial backlog of need. Therefore, whilst this development is only seeking to provide policy compliant levels of affordable housing, this does equate to up to 48 units (as the development seeks up to 120 dwellings) and would provide over 15% of the annual target for the District. This therefore adds significant weight in favour of the proposal.
- 7.20 As can be seen from the above paragraphs, the proposed 40% affordable housing provision does have social benefits, however the proposed development must be considered alongside the three dimensions of sustainable development as set out within the NPPF; economic, social and environmental. The economic and environmental factors are considered in detail within the proceeding sections of this report.

#### Loss of Agricultural Land

- 7.21 The NPPF advises in para. 112 that the economic and other benefits of best and most versatile agricultural land (BMV land) should be taken into account and that where significant development of agricultural land is demonstrated to be necessary, LPAs should seek to use areas of poorer quality land in preference to that of higher quality. Annex 2 of the NPPF defines BMV land to be land in Grades 1, 2 and 3a of the Agricultural Land Classification.
- 7.22 Policy LP 11 of Huntingdonshire's Local Plan to 2036: Proposed Submission 2017 sets out that: "Development in the countryside will be restricted to the limited and specific opportunities as provided for in other policies of this plan. All development in the countryside must:
- a. seek to use land of lower agricultural value in preference to land of higher agricultural value:
    - i. avoiding the irreversible loss of the best and most versatile agricultural land (Grade 1 to 3a) where possible, and

- ii. avoiding Grade 1 agricultural land unless there are exceptional circumstances where the benefits of the proposal significantly outweigh the loss of land;
- b. protect the intrinsic character and beauty of the countryside; and
- c. not give rise to noise, odour, obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others".

- 7.23 The Council's Local Plan to 2036 - Sustainability Appraisal (SA) Scoping Report, sets out that there is little brownfield land in the District and that some 79% of the brownfield land within the District is located at former RAF bases at Alconbury and Upwood, which are proposed allocations for development of mainly housing, with the land at Alconbury benefitting from outline planning permission. This Scoping Report explains the strong agricultural history of the District, with most of Huntingdonshire comprising of good quality agricultural land, mostly classed as grade 2 with only small areas classed as grade 4.
- 7.24 Para. 3.11 of the SA Scoping Report sets at that 98% of all agricultural land in the District is classed as grades 1, 2 or 3, with 15% classed as grade 1. The SA scoping report does not differentiate between grades 3a and 3b, and therefore to determine a percentage for BMV land some assumptions have to be made. The proportion of BMV land is estimated at 77%, derived as follows: take 15% off 98% to give the percentage of land within grades 2 and 3 (83%), assume an equal split between grades 2 and 3 (41.5% each) and between grades 3a and 3b (20.75% each), take the grade 3b away from the overall 98% gives 77.25%.
- 7.25 The proposal seeks a permanent change in land use and the subsequent loss of agricultural land. The Council's mapping system classifies the application site as a combination of grade 2 and grade 3 agricultural land. The proposal would entail the loss of approximately 6.44 hectares of agricultural land; approximately 2.84 hectares of Grade 2 agricultural land and approximately 3.6 hectares of Grade 3 agricultural land. Of the land classed as Grade 3, approximately 2.4 hectares of this consists of a poultry farm, formed of a number of poultry sheds, related buildings and an associated agricultural dwelling. In considering the proposal against Policy LP 11 of the emerging Local Plan to 2036, the proposed development would not lead to the loss of any Grade 1 agricultural land.
- 7.26 It is considered that the loss of agricultural land is largely inevitable if housing is to be provided within this rural district and as such has to be considered in the planning balance. In this regard, it is accepted that the proposal would lead to loss of BMV land, however due to the size of the site (approx. 6.44 ha), it is not considered that the proposed development is 'significant' in the context of the para. 112 of the NPPF when taking into account the threshold for consultation with Natural England is 20ha of BMV land proposed for development. Consequently, the proposal is not considered to conflict significantly with part a. of policy LP 11 of Huntingdonshire's Local Plan to 2036: Proposed Submission 2017. Notwithstanding this, the site has few physical constraints and so may be considered technically suitable, the site is also available, the proposed development achievable, and therefore it can be reasonably assumed it is deliverable.



### **Indicative Layout And Scale Parameters:**

- 7.27 Whilst the application is in outline only, to allow full evaluation and consideration of the development, to determine whether the proposed amount of development can be satisfactorily accommodated on the site, an indicative Development Framework Plan has been provided to demonstrate the potential location of residential development, routes and open spaces. In addition to this, an 'Illustrative Masterplan' (included within the Design and Access Statement) has also been submitted, providing additional detail of how development could be arranged within the site. The submitted indicative Development Framework Plan and Illustrative Masterplan are attached to this report.
- 7.28 The illustrative Development Framework Plan provides an indication as to how land uses within the site could be laid out in order to achieve both the quantum of development and necessary supporting infrastructure e.g. roads, open space and drainage. Although only indicative at this time, the Illustrative Masterplan provides further details, demonstrating how the proposed quantum of development could be achieved through a mix of detached, semi-detached and terraced properties, accessed via a mix of adopted and private roads. A spine street is shown which would form a 'loop' arrangement, with secondary streets and private drives extending from this. Dwellings along the western boundary are looser knit to respect the transition into open countryside with a tighter grouping of houses set centrally and through the site.
- 7.29 The indicative Development Framework Plan indicates the retention of existing vegetation, as well as additional tree planting and hedgerow planting along the boundaries of the site; maintaining the current enclosed and screened character of the site.
- 7.30 Cycle routes and recreational routes are indicated within the site which could encourage walking and cycling. Proposed new cycle and pedestrian routes are also shown, linking into the site from Bluntisham Road, which would assist with connectivity and permeability to the services and facilities within Needingworth. These links are shown on the submitted access plans and a condition can ensure these links are provided within an appropriate timescale of the development.
- 7.31 The indicative Development Framework Plan also demonstrates that 2.73 hectares of open space could be satisfactorily provided alongside the quantum of development proposed and areas for biodiversity enhancements could also be secured within the open space and around the perimeter of the site; including the planting of new hedgerows and trees.
- 7.32 The submitted plan within the Design and Access Statement 'Layout Principles' indicates that 120 units could be accommodated within a scheme of low and medium density housing of predominantly 2 storey properties, with some 2.5 storey units. Notwithstanding this,

the scale would be carefully considered in detail as part of the relevant reserved matters submission and alongside details such as the housing mix, design and levels. The density of development as shown on the indicative plan within the Design and Access Statement is around 32 dwellings per ha, based on the indicative layout and quantum of development proposed. One of the aims of the NPPF and local policy is to provide a mix of housing to meet a range of needs, whilst having regard to local need. To enable this, Policy HL6 of the Huntingdonshire Local Plan Alteration (2002) supports housing densities ranging from 30 to 50 dwellings per hectare. It is noted that the adjacent scheme recently consented on 'Land between Victoria House and Fairview Bluntisham Road' to the south of the application site (ref: 17/01077/FUL) is around 31 dwellings per hectare and that the density of development varies throughout the village, with some areas being of much lower density than proposed, whilst others are broadly comparable. The proposal for an average of 32 dwellings per hectare would accord with Policy HL6, whilst enabling the development to respond to rural setting of the site. As such, whilst the variation in housing densities within Needingworth village is noted, it is considered that the proposal of 32 dwellings per hectare is not uncharacteristic to the area.

- 7.33 The indicative layout shown on the Development Framework Plan and Indicative Masterplan within the Design and Access Statement could benefit from the widening of the green corridors running from east to west across the site, such to form useable amenity spaces rather than being formed of predominantly hedging and meaningfully contribute to the overall on site open space provision, as well as acting as valuable ecological features. However, it is concluded that the general layout could be made to be acceptable for reserved matters applications, and would adequately achieve the quantum of development proposed and the associated infrastructure. Therefore, whilst the indicative layout shown on the Development Framework Plan is not fully supported, the quantum of development and necessary supporting infrastructure is considered to be achievable. The 'appearance', 'landscaping', 'layout' and 'scale' and would be considered in detail as part of reserved matters should outline permission be granted.

#### **Trees, Open Space and Landscape and Visual Impact Assessment:**

- 7.34 Paragraph 17 of the NPPF states that planning should take account of the different roles and character of different areas, including recognising the intrinsic beauty of the countryside. Paragraph 58 of the NPPF states that planning policies and decisions should respond to local character and history.

#### Trees:

- 7.35 The application is supported by a Tree Survey including an Indicative Tree Retention and Removal Plan undertaken by CSA Environmental. The Indicative Tree Retention and Removal Plan submitted within the Tree Survey Report has not been updated during the lifetime of the application, with the most up to date proposals for tree removal being shown on the Development Framework Plan.

- 7.36 It is noted that none of the trees within the application site are protected by Tree Preservation Orders. The submitted Tree Survey identifies that there are a number of tree groups located within the northern part of the site as well as a numerous hedgerows running across the interior of the site. These are classified as Category B. A number of single trees and groups of trees are dispersed throughout the site and the presence of fruit trees within linear rows, within the southern part of the site, is noted as potentially forming a remnant orchard. The application site is also bound by lengths of hedgerow running around the perimeter, with a number of large trees interspaced with the hedge along the eastern site boundary to Bluntisham Road.
- 7.37 The submitted Tree Survey advises that the hedgerows defining the outer boundary of the site do not necessarily pose a constraint to the proposals, although it is noted that their retention (with appropriate management and restocking) would help provide a strong landscape buffer to the application site. With regards to the trees within the site, the Tree Survey concludes that most of the Category B trees in the site's interior are relatively small and their loss could be readily mitigated through new tree planting. Three sizeable trees are present along the eastern site boundary, immediately adjacent to the existing access point to the poultry farm. These trees consist of a Weeping Willow (Category C1) and two large Hybrid Black Poplar trees (Category B1). The Tree Survey notes that a number of large limbs to the Black Poplar trees had recently failed and that due to the age and growth strategy of poplars, it is likely that such failures would occur more frequently in the future. The submitted Development Framework Plan indicates that these trees would be removed to facilitate provision of the vehicular access point. The Tree Survey also sets out that T27; a large, mature Horse Chestnut located in the far south of the site should be retained and adequately accommodated such to prevent construction impacts to the tree.
- 7.38 Development of the site would also necessitate the removal of a number of existing single trees and groups of trees within the site, as well as the loss of some of the hedging running from east to west across the site. In addition, as aforementioned, the proposal would necessitate the removal of three sizeable trees along the eastern site boundary to facilitate the proposed vehicular access point.
- 7.39 The Council's Tree and Landscape Officer considers that the submitted arboricultural documents are acceptable, but has relayed that the retention of Willow T1, proposed for removal to facilitate the proposed access point, would be preferential. Within the submitted Tree Survey, the Willow tree (T1) is identified as category C1. Whilst the loss of any trees is regrettable, the tree is not considered to be of particular merit, such to warrant protection and resist its loss. On balance, it is therefore considered that the proposal is acceptable with regards to the impact upon trees, subject to the imposition of a condition requiring the submission of an Arboricultural Method Statement; given that the submitted Indicative Tree Retention and Removal Plan is out of date. The Arboricultural Method Statement (AMS) will be required to include final tree surveys, schedule and timing of works, details of tree/hedge protection, methods of construction close to trees and the location of service trenches. Whilst the precise extent of tree removal is yet to be determined, Officer

would anticipate that development coming forward at reserved matters stage would accord with the principles set out within the submitted Development Framework; such to ensure the retention of vegetation around the periphery of the site and within the site, in the interests of visual amenity and biodiversity. The AMS would be required alongside any reserved matters submission for layout, landscape or scale, to ensure that the trees and hedges would be satisfactorily protected to facilitate their retention.

#### Open Space:

- 7.40 Based on the submitted Development Framework Plan, 2.73 hectares of formal and informal open space would be provided on site; including approximately 0.5 hectares of attenuation areas. This is a significant over-provision from the Developer Contributions SPD requirements of 0.572 hectares. To compensate for the loss of hedges and trees, an orchard, replacement planting and the strengthening of retained hedges are proposed. These would largely be accommodated within the areas of public open space within the site.
- 7.41 During the lifetime of the application, the layout of the development (as shown by the Development Framework Plan and Illustrative Masterplan) was revised in response to comments from consultees, including those of the Council's Green Spaces Officer and within the representations from neighbouring properties. Following revisions to the layout, it has been indicatively shown that sufficient land for a children's play area could adequately be accommodated and be accessible within the development. It has therefore been demonstrated that the open space requirements of the Developer Contributions SPD could readily be achieved alongside the amount of development proposed. The precise open space details would be established through the S106 agreement and reserved matters details. In accordance with the Developers Contributions SPD (2011) and as this scheme is not a large scale major residential development of 200 units or above, it is not necessary for an on-site equipped play area to be provided (but the necessary quantum of space should be secured).
- 7.42 The trees and open space proposed as part of the development is considered to be compliant with the NPPF and policies R1, R2, R3, R7, R8, R12, En18, En19 and En20 of the Local Plan 1995, policy CS10 of the Core Strategy 2009 and LP3 and LP 33 of the Proposed Submission 2017 Local Plan to 2036.

#### Landscape and Visual Impact Assessment:

- 7.43 The immediate setting to the site is defined by the A1123 to the north and Bluntisham Road to the east.
- 7.44 The application is supported by a Landscape and Visual Impact Assessment prepared by CSA Environmental in July 2017.
- 7.45 The site is located just within the Central Claylands Landscape Character Area (LCA) but also on the border of the Ouse Valley LCA, as defined by the Huntingdonshire Landscape and Townscape

Assessment (2007). The local landscape in and around the site takes its characteristics from both of these LCAs.

- 7.46 The Landscape and Visual Appraisal has been assessed by Officers and is found to be acceptable in terms of methodology and conclusions, namely;
- \*The Site is very well contained in views from the surrounding area, particularly in views from the north, east and south. The mature vegetation to the site boundaries is a positive feature, providing screening of the application site.
  - \*There are no public footpaths which cross the application site and there will be no direct effects on the rights of way network.
  - \*The proposal would be a major alteration to the character of the site, but there would be a limited impact on the surrounding area, with a slight adverse effect when considered in the context of Bluntisham Road and a neutral effect when considered in the context of the surrounding countryside.
  - \*The proposal to develop the site constitutes a high magnitude of change, which would have a moderate adverse effect, but reducing to a slight adverse effect as landscape enhancements mature.
  - \*The removal of two internal field hedgerows and sections of hedgerows within the site constitute a high magnitude of change; resulting a moderate adverse effect on the landscape. The loss of hedgerow would however be mitigated by new planting.
  - \*The removal of trees and vegetation within the site constitute a medium magnitude of change; resulting in a slight adverse effect on the landscape, but altering to beneficial effect as new and replacement landscaping matures.
  - \*The effect on the Landscape Value would be neutral.
  - \*There would be views of the rooflines of the development in the southern part of the site, over the retained hedgerow, from the two neighbouring properties to the south. The development would be partly visible but given the intervening vegetation and separation distances, uninterrupted views would broadly be from first floor windows only.
  - \*In views from the two properties located to the north east of the site on Bluntisham Road, some roof lines of the development would be visible above the existing tall hedgerows. Filtered views of housing would be available in the winter months when the deciduous vegetation has dropped its leaves. There would also be oblique views towards the vehicular access point.
  - \*One of the main receptor groups outside the site is passing traffic; along the A1123 and Bluntisham Road.
  - \*Perimeter vegetation and the lack of public vantage points mean that the site is usually only glimpsed by visual receptors, with very limited direct views available from the A1123. Glimpsed, filtered views of the development would be possible from vehicles traveling along the A1123, generally during the winter months when the vegetation is out of leaf. These views will be transitory. The proposal would have an insignificant adverse visual effect on views from along the A1123.
  - \*In views from Bluntisham Road, the development would be well screening by the existing hedgerow and trees, with the exception of the points of access. There would be glimpsed views of rooflines above the hedgerow and filtered views in winter when the vegetation is out of leaf. These views will be transitory. At the proposed access points (vehicular and pedestrian) the proposal would have a moderate adverse visual effect on views from the approach along



Bluntisham Road. Along the remainder of the boundary, a slight adverse visual effect would result.

\*Views from the Public Right of Way leading from Bluntisham Road to the RSPB Ouse Fen Nature Reserve are limited to the tree hedgerow which extends alongside the western edge of Bluntisham Road.

\*There would be heavily filtered views of rooflines within the Site from the bridleway which crosses the countryside to the east. These will be seen in the context of existing housing on the edge of the village and will largely be screened by vegetation along the route of Bluntisham Road.

\*Views of the site from within the Ouse Fen Nature Reserve are unavailable owing to intervening vegetation.

\*There are no views of the site from the footpath extending to the north west of Needingworth due to intervening vegetation.

\*Views of the site from Lowndes Drove are prevented by vegetation along the route of the A1123.

\*In long distance views, there is a panoramic view available from higher ground on Bluntisham Heath Road, west of Bluntisham, however the site is not discernible.

\*The site is well contained and landscape and visual effects would be very localised.

- 7.47 It is noted that the HDC Trees and Landscape Officer has raised concerns that the submitted LVIA seemingly underplays the extent of vegetation loss; with large areas of scrub, hedgerow and relic orchard proposed for removal. As such, whilst new planting would help to compensate for this loss, in landscape terms, it is considered that the loss of the hedgerows within the site is a more adverse effect that identified in the submitted LVIA. In addition, it considered that it would be quite some time before the loss of ecological habitat is replaced.
- 7.48 The HDC Trees and Landscape Officer has advised that whilst they disagree with some of the detailed impact assessments, in general terms, it is accepted that the site is well contained. It is also agreed that there would not be significant visual and landscape effects from the residential development of the site of the scale proposed.
- 7.49 It is therefore concluded that with regard to effects on the landscape and visual amenity, the greatest visual effect will be in views on the approach from along Bluntisham Road. The effect would be greatest at the points of access which would afford direct views into the site; resulting in a moderate adverse visual effect. It is however noted that majority of boundary trees and hedgerows are to be retained and as a result, the development would result in a slight adverse visual effect along the remainder of the eastern site boundary. As such, the level of visual effect classed as moderate or more is restricted to views from along Bluntisham Road, at the points of access into the site. The transient nature of these views is noted.
- 7.50 With regards to the impact upon nearby residential properties, it is identified that the development would result in a slight adverse visual effect. Such effects are inevitable given the proposals seeks to urbanise what is a greenfield site, and the limited number of existing properties in the vicinity will therefore experience a marked change in outlook. The extent of these effects are however short term and temporary, this is because in the medium to long term, the effects would reduce through appropriate mitigation planting and sympathetic

offset of proposed residential properties secured as part of reserved matters.

- 7.51 The site is located on the fringes of the settlement of Needingworth, close to existing residential development, such that the proposed development would appear as a continuum of the existing village northward within the confines of the existing road network, rather than as an awkward addition which intrudes upon the open countryside. As such, it is considered that the development of this site will not have an unacceptable impact upon visual amenity and would protect the intrinsic character and beauty of the countryside; in accordance with the aims of the NPPF, policy HL5 of the Local Plan Alterations 2002, policy CS1 of the Core Strategy and criterion b. of Policy LP11 of the Draft Local Plan to 2036: Proposed Submission.
- 7.52 Ultimately, the proposal is considered, in visual impact terms, to comply with the NPPF, policy CS1 of the Core Strategy and criterion b. of Policy LP11 of the Draft Local Plan to 2036: Proposed Submission.
- 7.53 In terms of policy weighing, Policy En25 of the Local Plan 1995; HL5 and HL6 of the Local Plan Alteration 2002; CS1 of the Core Strategy 2009 are all broadly consistent with the NPPF as they support dwellings where the scale, form, materials and design will be sympathetic to the locality; where they achieve an efficient use of land and respect the local pattern of streets and spaces.
- 7.54 These policies can therefore be afforded full weight owing to their consistency with the NPPF. Policies LP2, LP11, LP12, LP13 and LP14 of the Draft Local Plan to 2036: Proposed Submission follow a similar vein and are also considered to be broadly consistent with the NPPF. The policies within the emerging local plan are yet to be subjected to Examination, however when taking account of paragraph 216 of the NPPF, it is considered that the policies can be attributed moderate weight.

### **Residential Amenity**

- 7.55 Policies within the Development Plan, the emerging Local Plan to 2036 and the NPPF seek to ensure developments do not have an unacceptable impact upon residential amenity for both existing and future occupiers/uses.

### Future Occupants:

- 7.56 The application site is in close proximity to the A1123 (to the north of the site) and to Bluntisham Road (to the east of the site) which has subsequent impacts with regards to air quality and noise. In relation to these matters, the application is supported by an Air Quality Screening Assessment undertaken by Wardell Armstrong (dated 10 July 2017), a Noise Assessment undertaken by Wardell Armstrong (dated July 2017) and an Addendum Noise Report (dated January 2018).
- 7.57 Air Quality - The Air Quality Screening Assessment outlines that the site is not within an Air Quality Management Area (AQMA), with the nearest AQMA being located approximately 5.5km south-west of the

site in Fenstanton. Therefore, the site is not located within an area of known poor air quality. In assessing air quality, background air pollutant concentrations should be as low as possible. The Air Quality Screening Assessment has reviewed current air quality within the locality and found that the background air pollutant concentrations are notably below the annual mean objectives. As such, the traffic generated by the proposed development would not cause air quality objectives to be approached or exceeded at existing or proposed receptor locations. The impact arising from the development is therefore identified to as 'not significant'.

- 7.58 Odour - In relation to odour, the Air Quality Screening Assessment notes the location of the site approximately 650 metres north of a Sewage Treatment Works (STW). Based on the Council's records, no odour complaints have been received relating to this facility. It is also noted that there are properties situated notably closer to the STW than the proposed development. Overall, it is therefore considered unlikely that there would be any odour impacts on future residents.
- 7.59 Dust - The Air Quality Screening Assessment notes that site specific mitigation measures should be adopted to reduce dust during construction, such to ensure the residual effect falls within the 'not significant' category. The report therefore recommends the submission of a Construction Management Plan to include dust mitigation measures, as recommended in the Institute of Air Quality Management guidance (2014), to prevent dust affecting surrounding sensitive receptors. The Environmental Health Officer agrees with this recommendation and has recommended that a condition is imposed to secure the submission of a Construction Environmental Management Plan, to include a dust mitigation plan, to be agreed in writing by the Local Planning Authority. Subject to the imposition of this condition, the proposed development is considered to be acceptable with regards to air quality impacts.
- 7.60 It is noted that current advice from public health experts advises that the health impacts of Air Quality should be minimised, even if there is no risk that air quality standards will be breached. To take account of this, it is considered that layout of the site to be determined at reserved matter stage, takes account of the proximity of the development to the A1123 through the application of good design and good practice measures, such to reduce the potential impact of current road use on new receptors.
- 7.61 Noise - The application is supported by a Noise Assessment which considers the impacts of noise from adjacent sources, both within the proposed houses and within external amenity areas. Noise modelling based on the Development Framework Plan has been undertaken.
- 7.62 With regard to 'adverse impacts' the NPPF refers to the 'Noise Policy Statement for England' (NPSE), which defines three categories, as follows:  
'NOEL - No Observed Effect Level  
o This is the level below which no effect can be detected. In simple terms, below this level, there is no detectable effect on health and quality of life due to the noise.  
LOAEL - Lowest Observed Adverse Effect Level

- o This is the level above which adverse effects on health and quality of life can be detected.

SOAEL - Significant Observed Adverse Effect Level

- o This is the level above which significant adverse effects on health and quality of life occur'.

7.63 The first aim of the NPSE states that significant adverse effects on health and quality of life should be avoided. The second aim refers to the situation where the impact lies somewhere between LOAEL and SOAEL, and it requires that all reasonable steps are taken to mitigate and minimise the adverse effects of noise. However, the requirement to mitigate and minimise the adverse effects of noise does not mean that such adverse effects cannot occur.

7.64 The Planning Practice Guidance provides further detail about how the effect levels can be recognised. It is identified that above the NOEL, noise becomes noticeable, however it has no adverse effect as it does not cause any change in behaviour or attitude. Once noise crosses the LOAEL threshold it begins to have an adverse effect and consideration needs to be given to mitigating and minimising those effects, taking account of the economic and social benefits being derived from the activity causing the noise. Increasing noise exposure further might cause the SOAEL threshold to be crossed. If the exposure is above this level the planning process should be used to avoid the effect occurring by use of appropriate mitigation such as by altering the design and layout.

7.65 The Noise Policy Statement for England refers to the World Health Organisation (WHO) when discussing noise impacts. The WHO Guidelines for Community Noise

1999 suggest guideline values for internal noise exposure which take into consideration the identified health effects and are set, based on the lowest effect levels for general populations. Guideline values for annoyance which relate to external noise exposure are set at 50 or 55 dB(A), representing day time levels below which a majority of the adult population will be protected from becoming moderately or seriously annoyed respectively. The following guideline values are suggested by WHO:

- o 35 dB LAeq (16 hour) during the day time in noise sensitive rooms
- o 30 dB LAeq (8 hour) during the night time in bedrooms
- o 45 dB LAmax (fast) during the night time in bedrooms
- o 50 dB LAeq (16 hour) to protect majority of population from becoming moderately annoyed
- o 55 dB LAeq (16 hour) to protect majority of population from becoming seriously annoyed

7.66 The British Standard 8233 "Guidance on sound insulation and noise reduction for buildings" 2014 bases its advice on the WHO Guidelines and draws further upon the guideline values with regards to internal and external noise levels. For internal noise, the British Standard 8233 sets out: "Where development is considered necessary or desirable, despite external noise levels above WHO guidelines, the internal target levels may be relaxed by up to 5 dB and reasonable internal conditions still achieved".

7.67 With regards to external noise, the BS8233, 2014 sets out: "For traditional external areas that are used for amenity space such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB LAeq, T with an upper guidance value of 55 dB LAeq, T which would be acceptable in noisier environments. However, it is also recognised that these guideline values are not achievable in all circumstances where development might be desirable. In higher noise areas, such as city centres or urban areas adjoining the strategic transport network, a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met, might be warranted. In such a situation, development should be designed to achieve the lowest practicable levels in these external amenity spaces, but should not be prohibited". In regard to the BS, whilst adjacent to the strategic transport network, Officers do not consider the application site to be an urban area.

7.68 Within the Addendum Noise Report, noise modelling based on the Development Framework Plan has been undertaken to determine internal and external noise levels.

Noise levels within Houses:

Daytime:

7.69 In accordance with BS8233, the internal noise level in living rooms and bedrooms during the daytime should be no more than 35dB LAeq,16Hour.

7.70 The Addendum Noise Report advises that based on the Development Framework Plan, the daytime external sound level at the majority of proposed facades would be less than 50 dB LAeq, 16h. This indicates for these properties that it would be acceptable to open windows, assuming 15dB attenuation is provided by an open window. However, the daytime external sound level at the facades to properties located along the edge of the built form (to the northern, eastern, southern and north-western edges of the built form) would range from around 50dB to 70dB LAeq,16Hour. The report identifies for properties in these locations, "mitigation measures will be required to achieve guidance noise levels in living rooms and bedrooms during the daytime".

Night-time:

7.71 In accordance with BS8233, the internal noise level in bedrooms at night should achieve 30dBA LAeq,16Hour or less and 45dBA LAMax,F.

7.72 The Addendum Noise Report advises that based on the Development Framework Plan, the calculated noise levels at the facades of the properties, in bedrooms at night, would be less than 45dB LAeq,8Hour 16Hour (or less than Less than 60dB LAMax,F) for the majority of properties. This indicates for these properties that it would be acceptable to open windows, assuming 15dB attenuation is provided by an open window.



- 7.73 The noise levels at the facades of the properties, in bedrooms at night, to properties located along the edge of the built form to the northern, eastern, southern and north-western edges of the built form) would range from around 45dB to 65dB LAeq,8Hour (or around 60 to 80dB LAMax,F ). The report identifies for properties in these locations, "mitigation measures will be required to achieve guidance noise levels in bedrooms during the night-time where orange occurs on the façade map".
- 7.74 The submitted Addendum Noise Report identifies that mitigation measures would consist of thermal double glazing and alternative ventilation to opening the windows for noise sensitive rooms; namely bedrooms and living/dining rooms. The report goes on to state that "the implementation of the recommended glazing together with appropriate acoustic ventilation should ensure that the required internal daytime and night-time noise limits are achieved" but notes that "the requirement for acoustic ventilation can be confirmed on a plot by plot basis at the reserved matters stage once detailed layout and elevations plans are available".
- Noise levels in external amenity areas:
- 7.75 With regards to external amenity areas, the BS8233 set out "For traditional external areas that are used for amenity space such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB LAeq. T with an upper guidance value of 55 dB LAeq. T which would be acceptable in noisier environments."
- 7.76 The Addendum Noise Report advises that the lower guideline noise level of 50dB would be achieved in all gardens through the development.
- 7.77 Overall, the Environmental Health Officer concurs with the findings of the Addendum Noise Report; that a noise mitigation scheme is required given the noise levels experienced within the site as a result of the proximity to the local highways network. Consequently, the Council's Environmental Health Officer has recommended that a condition is imposed to secure the submission of a noise mitigation scheme. This should form part any reserved matters submission pursuant to layout, scale or appearance. Subject to the imposition of this condition, the proposed development is considered to be acceptable and complies with the NPPF in this regard, policy H37 of the Local Plan 1995 and policy LP15 of the Local Plan to 2036: Proposed Submission 2017.

#### Contamination

- 7.78 The application is supported by a Preliminary Risk Assessment. This report identifies the potential for asbestos to be encountered within the soils and stockpiles located on the site, as well as highlighting the presence of fuel tanks on the site. It is also identified that the use of a part of the site for poultry sheds also suggests the potential for pathogens and potentially formaldehyde within the soils in the vicinity of the poultry sheds. Given the potential contaminant sources identified, the Council's Environmental Health Officer has recommended that a condition is imposed to secure site investigation for potential contamination and remediation where required. Subject to the imposition of this condition, the proposed development is

considered to be acceptable and complies with the NPPF in this regard, policy H38 of the Local Plan 1995 and policy LP 15 of the Local Plan to 2036: Proposed Submission 2017.

#### Existing Occupants/Users:

- 7.79 The existing dwellinghouse within the application site would be demolished to accommodate the proposed development. As a result, the closest neighbouring properties to the application site are Longacre, Enterprise House and The Laburnums; situated approximately 17 metres east of the application site. These properties are separated from the application site by Bluntisham Road. The dwellinghouse 'Fairview' is also situated approximately 25 metres south of the application site, with the rear garden of this property abutting the application site.
- 7.80 The closest residents to the application site will experience a change in outlook, but it should be noted that change does not necessarily equate to harm. In terms of built development, the reserved matters application(s) will fully assess the impacts of matters such as overlooking, overshadowing and loss of privacy. It is however accepted that the quantum of development sought could be accommodated by the application site without significant harm to residential amenity, by virtue of the separation distances to neighbouring properties and boundary planting.
- 7.81 Policies H31, H37 and H38 seek to ensure residential amenity is not harmed as a result of development; the NPPF within the core principles states that planning should "always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings". These policies are therefore considered compliant with the aims of the NPPF and can be given full weight. Policy LP 15 of the emerging Local Plan to 2036: Proposed Submission also seeks to protect the amenity of future occupiers and the amenities of neighbouring users. Having regard to paragraph 216 of the NPPF, it is considered that significant weight should be attributed to Policy LP 15 of Huntingdonshire's Local Plan to 2036.

#### **Sustainability, Access And Transport:**

- 7.82 The NPPF requires all developments that generate significant amounts of movement to be supported by a Transport Assessment (TA) (Para 32). National and local planning policy relating to transport and access promotes sustainable and mixed use development which should give priority to pedestrian and cycle movements, have access to high quality public transport initiatives, create safe and secure layouts and minimising journey times.
- 7.83 Paragraph 32 of the NPPF states that where developments generate significant amounts of movement, decisions should take account of whether opportunities for sustainable transport modes have been taken up, safe and suitable access to the site can be achieved for all people and improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. It goes on to state that development should only be

prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

- 7.84 The application is accompanied by a Transport Assessment (TA) prepared by Icen Projects Limited (which has been amended during the consideration of the application following discussions with the County Council, as Local Highway Authority (LHA)). An addendum was also submitted.
- 7.85 The application seeks vehicular and pedestrian access to the site from Bluntisham Road. The proposed vehicular access into the site is detailed as being 5.5m wide with a 2m wide footpath on the southern side. A new footway is detailed to the south of the proposed access on the western side of Bluntisham Road, as well as dropped kerbs and tactile paving areas to provide pedestrian crossing points to either side of Bluntisham Road. This would provide for pedestrian accessibility to the existing footway on the eastern side of Bluntisham Road. The upgrading of the existing footway on the eastern side of Bluntisham Road to a 3m wide shared footway/cycleway to connect the development with the village centre is also proposed as shown on Drawing 12 Rev. C. The LHA has advised that the proposed vehicular access point into the site, with pedestrian footpath to the southern side and visibility splays to be achieved are acceptable, subject to conditions to secure these and their retention. The LHA has also recommended conditions with regards to the specification for the construction of the roads and footways as well as details of proposed management and maintenance arrangements. With regards to the construction process, the LHA has recommended conditions with regards to the provision of wheel wash facilities, facilities for the parking, turning and unloading of vehicles and details of the route for traffic associated with the construction process. The imposition of conditions relating to these matters is considered relevant and necessary. It is noted that the LHA has requested a condition relating to surface water drainage details for the roads and footpaths. This will be addressed through the condition recommended by the Lead Local Flood Authority and therefore need not be repeated.
- 7.86 In considering the impact of the development upon the local highways network, in agreement with the Local Highways Authority, junction capacity assessments were undertaken at the following junctions forming the study area:
- \*A1123 Station Road/Bluntisham Road priority junction
  - \*St Ives Golf Club/A1123/High Street Roundabout
  - \*Stocks Bridge Way/A1123/Harrison Way Roundabout
  - \*B1040 Somersham Road/A1123/A1123 St Audrey Lane Roundabout
  - \*Parsons Green Lane/ Hunts Sailing Club/Harrison Way Roundabout
  - \*A1096 Harrison Way/ Meadow Lane Roundabout
  - \*A1096 Harrison Way/ Low Road/ A1096 London Road Roundabout
  - \*A1096 London Road/ St Ives Road priority junction
  - \*St Ives Road/ Lakes Business Park /A14 Slips Roundabout
- 7.87 With regards to the proposal, modelling has been undertaken to enable an accurate representation of how the junctions operate in both existing and future year scenarios. An increase of +10% in peak hour traffic is widely regarded as material in terms of the impact on highways capacity and represents typical day-to-day variation in traffic flows. The highways impact assessment demonstrates that no

junction within the study area is expected to be impacted by traffic arising from the proposed development by over 7.5%. As such, it is unlikely that the additional traffic generated by the proposed development would be discernible from daily fluctuations on the network.

- 7.88 The assessment undertaken shows that the following will operate above theoretical capacity in the 2022 Base scenario without any additional traffic associated with the proposed development:  
\*Stocks Bridge Way / A1123 / Harrison Way roundabout,  
\*B1040 Somersham Rd / A1123 / A1123 St Audrey Ln roundabout,  
\*A1096 Harrison Way / Meadow Lane, and  
\*A1096 Harrison Way / Low Road / A1096 London Road roundabout junctions.
- 7.89 The highways assessment shows that when the proposed development traffic is added to these junctions, the impact is minimal.
- 7.90 In terms of the actual number of vehicles trips impacting on junctions operating above practical capacity, the development is forecast to send less than one trip per minute to three of the junctions, less than two trips per minute for another three of the junctions, and less than one trip every two minutes for the remaining three junctions. It is concluded that this level of impact is unlikely to be noticeable across the peak hours.
- 7.91 It is noted that the junction capacity models naturally show an increase in queuing when comparing the 2022 Base and 2022 Development case scenarios, due to the increased traffic flows. However, given that four of the nine junctions are expected to operate above theoretical capacity in both scenarios, it is considered that the queue results should be treated with caution.
- 7.92 CCC Highways as LHA advise that although the development will have an impact on the highways network, its impact would be minimal. CCC Highways advise that as an example, the impact of the development on the Stocks Bridge Way Roundabout would be one car every 1.3 minutes; therefore the impact is not severe.
- 7.93 Overall, LHA Officers have assessed the proposal and accept the findings and conclusions of the amended Transport Assessment and Transport Addendum in terms of network peaks, accident data, trip generations and junction capacity assessments. It is considered that the proposed development will not result in a material impact at the junctions assessed and any increase in traffic is unlikely to be discernible from daily fluctuations on the network. It is therefore concluded that the development impact is not severe. The LHA acknowledge that there are existing capacity issues at the Stocks Bridge Way Roundabout, but these are existing issues and it would not be reasonable to expect the developer to fix these issues given the minimal impact arising from the development. It is noted that a more strategic solution is required to address this issue; outside the remit of this application.
- 7.94 As a result, the LHA does not object to the proposals subject to the following mitigation:

\*A 3 metre wide shared footway / cycleway being provided on the eastern side of Bluntisham Road, to start opposite the site access and connecting south to join the existing footway adjacent 96 High Street.

\*A 2 metre wide footway, including 3 metre wide bus hard standing and dropped kerb crossings being provided on the western side of Bluntisham Road.

\*A new bus stop being provided on the western side of Bluntisham Road to include a new shelter, raised kerbs, Real Time Passenger Information (RTPI) and maintenance contributions for the future maintenance of the shelter and RTPI system.

\*The existing bus stop on the eastern side of Bluntisham Road, closest to the site being upgraded to include a new shelter, raised kerbs, RTPI system and maintenance contributions for the shelter and RTPI system.

\*The developer being responsible for the provision and implementation of a Residential Welcome Packs for sustainable transport, approved by Cambridgeshire County Council, to include six months free bus travel with the relevant local public transport operator.

\*The developer being responsible for the provision and implementation of a Residential Travel Plan. The Travel Plan should include the provision of a Travel Plan Co-ordinator to give advice and is to be monitored annually, with all measures reviewed to ensure targets are met.

- 7.95 These mitigation measures are considered acceptable and should be secured by conditions and through a S106 Agreement where appropriate.

#### Sustainability

- 7.96 With regards to sustainability, Needingworth is identified as a 'Smaller Settlement' in the Core Strategy (2009) which notes that certain services and facilities will need to be accessed in other locations. Needingworth is also identified as a 'Small Settlement' within Policy LP10 of the Huntingdonshire's Local Plan to 2036: Proposed Submission 2017 (as amended). The emerging Local Plan notes that some of the Small Settlements are more sustainable than others due to the variation in the level of services and facilities.
- 7.97 The Institute of Highways and Transportation (IHT) provide guidance on desirable walk distances in their publication 'Providing for Journeys on Foot' which recommends suggested acceptable walking distances of between 500m (6 minutes, "Desirable") and 2km (25 minutes, "Preferred Maximum") for commuting and journeys to school. For non-commuter journeys the guidance suggests that a walk distance of up to 1,200 metres can be 'considered', with the 'acceptable' and 'desirable' distances being 800 and 400 metres respectively. Similarly, acceptable cycling distances vary between individuals and circumstances but trips up to 5km (3.1miles) are accepted as having the potential to substitute car trips.
- 7.98 There are bus stops to either side of Bluntisham Road approximately 300m south of the site; approximately a 4 minute walk. The bus stops are served by Service 21 operated by Go Whippet which provides three daily services (Monday to Friday) to and from St Ives. Service



21 also provides three services per day (Monday to Friday) to and from Ramsey. Route A of the Guided Busway also serves the aforementioned bus stops, providing for limited bus journeys to and from Cambridge from Monday to Saturday. There are two services per day in each direction from Monday to Friday and one service in each direction on Saturdays.

7.99 As referred to above, as part of the proposed development new bus stops are to be provided on both sides of Bluntisham Road to include new shelters, raised kerbs and Real Time Passenger Information (along with a maintenance contribution for future upkeep).

7.100 The TA notes that the closest footway begins approximately 70m north of the proposed main access, on the eastern side of Bluntisham and connects to the centre of Needingworth. It is noted that the footway is approximately 1m in width and is of poor quality, with some sections of lighting, but overall it is poorly lit. Needingworth also benefits from an existing designated cycle route from the edge of Needingworth village to St Ives. This is accessible by turning right out of the site and routing through Needingworth to the south west exit onto the A1123 which leads to St Ives.

7.101 The table below provides a summary of distances from the application site to nearby facilities, including walking and cycling times based upon walking times of 5 kph and 14 kph respectively.

Facility	Distance from Entrance to Development	Walking Time (in minutes – approx.)	Cycle Time (in minutes – approx.)
Bus stops (to either side of Bluntisham Road)	300 metres	4 min.	1 min.
One Stop and Post Office	850 metres	10 min.	2/3 min.
Queens Head Pub	1.1 kilometres	13 min.	3 min.
Overcote Lane Playing Fields	1.25 kilometres	15 min.	4 min.
Overcote Lane Village Hall	1.25 kilometers	15 min.	4 min.
Holywell Primary School	1.5 kilometers	18/19 min.	4 min.
Needingworth Pre-School	1.5 kilometers	18/19 min.	4 min.
Needingworth Industrial Estate	2.8 kilometers	35 min	8 min.
Tesco Express, St Ives	3.3 kilometers	-	10 min.
Somersham Road Industrial Estate	3.8 kilometers	-	12 min.
Parsons Green	3.8 kilometers	-	12 min.
St Ives Nursery	3.9 kilometers	-	12 min.
Eastfield Infant and Nursery School	4.2 kilometers	-	13 min.
Cromwell Place Surgery, St Ives	4.5 kilometers	-	14 min.
Westfield Junior School	4.7 kilometers	-	14 min.
St Ives Library	4.8 kilometers	-	15 min.

St Ives Town Centre (includes retail outlets, banks, hair dressers, pubs, coffee shops, and fast-food outlets)	5 kilometers	-	15 min.
One Leisure St Ives, Indoor Centre	5 kilometers	-	15 min.
St Ivo Secondary School	5 kilometers	-	15 min.

- 7.102 In this instance, the existing bus stop (to be improved) and new bus stop would be within 400m of the application site. Needingworth One Stop and Post Office and the Queens Head Pub are the closest amenities. It is noted that the relevant distances to services and facilities are greater than those set out in the IHT guidance and in the Huntingdonshire Design Guide Supplementary Planning Document (SPD) 2017, which refers to walking distances of 400m (5 minutes) to bus stops and 800m (10 minutes) to local shops and primary schools. However, these are not framed as absolute requirements: the SPD states that 'ideally' new homes will be built to be within those distances and the IFT guidance acknowledges that acceptable walking and cycling distances will vary between individuals
- 7.103 The level of existing facilities and services within Needingworth is greater than many of the villages identified as a 'Small Settlement' and given the location of the site adjacent to the built up area of Needingworth it is considered that occupiers would have a reasonable level of access to services and facilities within the village; either on foot or by cycle.
- 7.104 Despite the rural nature of the village of Needingworth, as highlighted within the table above, the site is well located in regards to the level of services and amenities within the village, and with regards to the accessibility of services and facilities within the nearby town of St Ives. As outlined within the IHT's guidance, it is recognised that many people will cycle to services/amenities outside of the 25-minute walk distance, but which are located within 5 kilometres (approximately a 15-minute cycle time). St Ives Market Town falls within this radius, hosting a range of retail outlets, banks, hair dressers, pubs, coffee shops, schools, nurseries, GP surgeries, dental practices and fast-food outlets. Future occupiers of the proposed development could instead opt to use bus links to St Ives to access this range of facilities and services. As a result, the site is considered well located to take advantage of existing local services, amenities and to access sustainable transport modes. It is therefore considered that the amount and location of the proposed development is sustainable when having regard to the level of service and infrastructure provision within Needingworth and when taking account of the opportunities for future occupiers of the proposed development to access everyday services and facilities by sustainable modes of travel (including walking, cycling and public transport) within the nearby Market Town of St Ives.
- 7.105 As aforementioned, off-site highways works are proposed. These include the provision of a footway/cycleway on the eastern side of

Bluntisham Road as well as a footway to the western side of Bluntisham Road. Uncontrolled crossing points formed of tactile paving are proposed to enable pedestrians to cross Bluntisham Road. A new bus stop to the western side of Bluntisham Road is proposed and improvements are proposed to the existing bus stop to the eastern side of Bluntisham Road. These measures would promote the use of sustainable modes of travel to access services and facilities within Needingworth and within the towns accessible by bus (including St Ives, Ramsey and Cambridge). In the interests of sustainability, these off-site works are considered necessary and should be secured through the imposition of conditions and through a Section 106 Agreement where appropriate.

- 7.106 A Construction Traffic Management Plan is required to ensure the construction traffic is managed and does not harm free flow of traffic during the construction phase. This can be secured by condition.

Parking:

- 7.107 Precise details will be looked at during the Reserved Matters application stage, it is however anticipated that the site can accommodate the quantum of development sought with sufficient parking provision.

Framework Travel Plan:

- 7.108 A Framework Travel Plan has been submitted alongside the application. The Framework Travel Plan sets out objectives and targets for the implementation of measures which will reduce reliance upon the use of private vehicles and encourage safe and viable alternatives for accessing the site for residents. The Framework Travel Plan includes a range of measures to encourage sustainable travel to and from the site. The FTP represents a commitment to ensure a Travel Plan Welcome Pack is adopted by the occupiers of the site. CCC as Local Highways Authority has advised that they raise no objection the proposed development subject to:

\*The developer being responsible for the provision and implementation of Residential Welcome Packs for sustainable transport, approved by Cambridgeshire County Council, to include six months free bus travel with the relevant local public transport operator, and,

\*The developer being responsible for the provision and implementation of a Residential Travel Plan. The Travel Plan should include the provision of a Travel Plan Co-ordinator to give advice and is to be monitored annually, with all measures reviewed to ensure targets are met.

In the interests of sustainability and as CCC have advised that their support for the scheme is provided on the basis of these mitigation measures, these should be secured by condition.

Summary:

- 7.109 Taking all the above into account, it is considered that the proposed means of accessing and circulating this site is acceptable and that the proposal complies with policies T18 and T19 of the Local Plan and LP17 and LP18 of the emerging Local Plan to 2036: Proposed Submission (as amended). As the Local Plan policies are compliant with the NPPF they can be given full weight. The emerging policies,

having regard to paragraph 216 of the NPPF, can be given significant weight.

- 7.110 Moreover, it is considered that the access details proposed are acceptable for the scale of development sought and opportunities to promote sustainable transport modes can be achieved. Therefore, it is Officer opinion that the application can be supported in highway terms, subject to a number of conditions and obligations.

**Heritage Assets:**

- 7.111 The application is accompanied by a Heritage Desk-Based Assessment to fulfil the requirements of paragraph 128 of the NPPF.
- 7.112 The NPPF recognises the importance of preserving heritage assets and supports sustainable development. Paragraph 7 of the NPPF confirms the three strands of sustainability. In relation to environmental matters this confirms that this includes protecting our natural, built and historic environment. Section 12 of the NPPF (paragraphs 126 to 141) sets out principles and policies for conserving and enhancing the historic environment. Paragraph 132 also advises that great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be.
- 7.113 Needingworth village does not have a Conservation Area. It does however host a number of Listed Buildings. The nearest Listed Building, The Chestnuts (Grade II\* Listed) is located approximately 345 metres south-west of the application site. Further Listed Buildings are also located within Needingworth village. Given the lack of historic or functional relationship and the lack of inter-visibility between the application site and the closest Listed Buildings, as a result of modern residential development between the site and these designated heritage assets, it is considered that the proposed development would not impact upon the settings of these heritage assets.
- 7.114 The closest Scheduled Monument are the eight bowl barrows, part of the Over round barrow cemetery which are located over 2.2km from the application site. Due to this significant separation distance, a lack of intervisibility, and a lack of historic or functional relationship between the application site and the nearest Scheduled Monument, it is concluded that the proposed development would not impact upon the Scheduled Monument or its setting.
- 7.115 With regards to archaeology, Cambridgeshire County Council has advised that the site is located in a landscape of high archaeological potential; situated to the north of the historic core of Needingworth. Archaeological investigations to the east at Barleycroft Farm have revealed evidence of Prehistoric settlement remains (CB15515), Bronze Age field system (CB15514) and ring ditches (CB15643) and Roman occupation evidence (11942A). Surrounding the application area is artefactual evidence of Roman occupation (for example, 00881, 03735, 03734, 03632a) and Iron Age occupation (03632). In open land to the north east (MCB23256) and south east (MCB23254) of the proposed development area is cropmark evidence of enclosures and boundaries. In addition, archaeological investigations to the south at Silver Lane revealed evidence of medieval occupation

(CB14642) and cropmark evidence of ridge and furrow (CB15347) on land adjacent to the site indicates that medieval activity extended towards the proposed development area.

- 7.116 The Archaeological Officer does not object to the proposed development subject to securing a programme of archaeological investigation. This is considered reasonable and necessary and should therefore be secured by condition.
- 7.117 Taking all the above into account, it is considered that subject to the imposition of a condition with regards to archaeology, the proposed development is acceptable with regards to the impact upon heritage assets and that the proposal complies with policies En2, En12 and En13 of the Local Plan, 1995 and policy CS1 of the Core Strategy. These policies do not allow for the balancing exercise to be undertaken, therefore the weight that can be attributed to them is slightly reduced. With regards to paragraph 216 of the NPPF, it is considered that Policy LP36 of the emerging Local Plan to 2036: Proposed Submission can be attributed significant weight.

### **Biodiversity:**

- 7.118 Paragraph 109 of the NPPF states that 'the planning system should contribute to and enhance the natural and local environment by:  
\*protecting and enhancing valued landscapes, geological conservation interests and soils;  
\*recognising the wider benefits of ecosystem services;  
\*minimising impacts on biodiversity and providing net gains in biodiversity where possible.'
- 7.119 Local Plan (1995) Policy En22 requires appropriate account be taken of nature and wildlife conservation and policy LP32 of the emerging Local Plan to 2036: Proposed Submission aims to conserve and enhance biodiversity and advises that opportunities should be taken to achieve beneficial measures within the design and layout of development and that existing features of biodiversity value should be maintained and enhanced.
- 7.120 The application is supported by an Ecological Impact Assessment undertaken by CSA Environmental dated November 2017. During the application, additional and amended ecological information was submitted in response to comments received from Consultees.
- 7.121 Ecological Designations - the site itself is not subject to any statutory or non-statutory nature conservation designations. There are three internationally important statutory designations Ouse Washes SPA, SAC and Ramsar, all approximately 4.5km northeast of the Site. A single local statutory designation is present within 3km of the application site: Mare Fen LNR (approximately 2.9km to the south-east of the Site). With regards to non-statutory designations, the River Great Ouse County Wildlife Site (CWS) is located approximately 1.8km east of the Site). Ouse Fen RSPB Reserve is located approximately 20m east of the site.
- 7.122 The Ecological Impact Assessment acknowledges that the proposed development has the potential to increase visitor numbers to the Ouse Washes. The Ouse Washes benefit from purpose built visitor

centres and footpaths. Given the scale of the development and distance (4.5km) between the site and the Ouse Washes, it is anticipated that any increase in footfall to this designated site would be limited. In addition, any increase in recreational pressures would likely be limited to a small portion of the washes, around the visitor centre and along footpaths, which are designed for visitors. The proposal is not therefore anticipated to result in significant adverse effects to the Ouse Washes SPA, SAC, or Ramsar.

- 7.123 The proposal has the potential to increase recreational pressure on Mare Fen LNR, although any increase in footfall is anticipated to be limited, given the scale of development. The application site will also host public open space, limiting any increase in recreational pressure on Mare Fen LNR. It is noted that Mare Fen LNR is managed for the benefit of wildlife and public amenity, and as such, any resultant increase from the development is not anticipated to result in significant adverse effects to the LNR.
- 7.124 The development of the site has the potential to impact upon the River Great Ouse CWS through potentially impacting water quality. The submitted Ecological Impact Assessment sets out that the development would include appropriate surface water drainage arrangement to ensure the development would not result in adverse impacts on water quality. A scheme for surface water drainage will be secured by condition.
- 7.125 Ouse Fen RSPB Reserve is located within walking distance of the application site; being located approximately 20m east of the site. It is therefore noted that the proposed development would place increased recreational pressure on the reserve. Within the submitted Ecological Impact Assessment it is outlined that discussions have taken place with the RSPB and it is highlighted that the principal concern with regard to the impact on Ouse Fen Reserve relates to social pressures, most notably increased dog walking, rather than threats to specific bird species. Therefore, the Assessment proposes appropriate mitigation to be the provision of a bin for dog waste (to be installed and managed) within the Reserve Car Park and bins for dog waste within the application site as part of the development. These measures could be secured through the imposition of a Grampian condition given the Reserve owners agreement and a further condition with regards to the provision of bins on site.
- 7.126 Overall, it is concluded that subject to the provision of bins for dog waste within the car park of the Ouse Fen RSPB reserve and within the application site, these ecological designations are unlikely to be adversely affected by the proposed development.
- 7.127 Habitats - The site consists of a variety of habitats including: poor semi-improved grassland, hedgerows, tall ruderal vegetation, broad leaved plantation woodland, dense scrub, remnant orchard, amenity grassland, numerous buildings, hardstanding/bare ground and a dry ditch (bounding the site to the north). Of these habitats, it is identified that the hedgerows at the site are of ecological importance significant at the Local level and the remnant orchard is also considered to be of ecological importance, significant at the Local level, primarily in respect of its resource for invertebrates and other associated fauna.



The other habitats are all identified to fall below the threshold of ecological significance.

- 7.128 The mature trees and hedgerows that bound the site and run across the centre of the site provide opportunities for a range of wildlife and measures and recommendations are set out in order to safeguard and enhance these features. A replacement orchard is also proposed to mitigate the loss of the remnant orchard.
- 7.129 Flora - It is noted that there are 28 records of 15 notable plant species from within the search area. Those of potential relevance to the site include annual knawell and green-winged orchid. These species were not seen during the Phase 1 survey or during any of the subsequent surveys undertaken. As such, it is not considered that the proposed development would have an adverse impact upon important flora.
- 7.130 Fauna - Presence and absence surveys in relation to Great Crested Newts were undertaken due to the potential habitat provided by a nearby pond. The surveys confirmed the absence of Great Crested Newts. The surveys undertaken also identify the presence of reptiles (grass snakes) and bats (long brown eared bats roosting within an existing building on the site),
- 7.131 Birds, nesting birds and invertebrates were all noted within the site as part of the preliminary ecological assessment.
- 7.132 Whilst not identified as being present, the Ecological Impact Assessment identifies that that the habitats within the site also provide potential opportunities to support badgers and hedgehogs.
- 7.133 Accordingly, a number of recommendations and measures are set out in regard to faunal species in order to ensure that they are safeguarded under the proposals. The imposition of these could be secured by condition. It is noted that due to potential impact upon bats, it is necessary for an EPS licence to be sought from Natural England. A note can be added to any consent granted to make the applicant aware of this requirement.
- 7.134 Enhancements - A number of enhancements for the benefit of biodiversity are available under the proposals with a range of recommendations, including the provision of plant species of known wildlife value within the planting scheme, a community orchard to replace the remnant orchard, bird boxes, bat boxes and the inclusion of holes within timber fencing to facilitate hedgehog movements, to maximise opportunities for wildlife at the site.
- 7.135 The Wildlife Trust has confirmed they agree with the ecological assessment provided and conclude that the current ecological interest of the site is not likely to be significantly impacted by the proposals. Subject to necessary conditions, the proposal is therefore considered to comply with the NPPF and local policies; given the broad consistency of these policies with the NPPF, En22 can be given full weight and LP32 significant weight, in taking account of paragraphs 215 and 216 of the NPPF.

#### **Flooding, Drainage, Ground Conditions And Contamination:**

- 7.136 The overall approach to flooding is given in paragraphs 100-104 of the NPPF and these paragraphs set out a sequential, risk-based approach to the location of development. This approach is intended to ensure that areas at little or no risk of flooding are developed in preference to areas at higher risk. It involves applying a Sequential Test to steer development away from medium and high flood risk areas (FZ2 and FZ3 land respectively), to land with a low probability of flooding (FZ1).
- 7.137 The vast majority of the application site falls within FZ1 as designated within the Strategic Flood Risk Assessment 2017, which represents the lowest flood risk of flooding from rivers and sea. A very small portion of the site (approximately 0.1 hectares) falls within FZ3a. The site is not located within a Groundwater Source Protection Zone (SPZ). Notwithstanding this, given the scale of development proposed, the application is supported by a site specific Flood Risk Assessment (FRA).
- 7.138 Given only a small portion of the site within FZ3a it is considered that the quantum of development could be achieved on land designated as FZ1.
- 7.139 CCC as the Lead Local Flood Authority (LLFA) has commented on the application and raises no objection in principle to the proposed development. The LLFA note that the applicant has demonstrated that surface water can be dealt with on site using swales and an infiltration pond, to adequately control the rate of flow into a nearby ditch. The LLFA acknowledge that surface water flood risk is medium or high in parts of the site; however, they advise that SuDS features could be positioned in these locations to provide storage and controlled conveyance (this is shown on the indicative Development Framework Plan). Consequently, conditions are recommended by the LLFA to secure details of the surface water drainage scheme (including the use of sustainable drainage systems (SuDS) and longterm maintenance arrangements. These are considered acceptable and meet the statutory tests. The ditch to which the surface water from the site will drain is under the authority of the Bluntisham Internal Drainage Board (IDB); managed by the Middle Level Commissioners (MLC). The MLC on behalf of Bluntisham IDB have not raised any objection to the application but have requested that an informative is appended to any permission granted to provide notification of their requirements.
- 7.140 The Environment Agency has reviewed the information provided and has advised that they have no comment to make on the application.
- 7.141 Anglian Water (AW) has commented on the application raising no objections to the scheme, advising that there are no AW assets within the development area. AW also advises that there is capacity at their Needingworth Water Recycling Centre for foul drainage and capacity within the foul sewerage network. AW has also advised that having reviewed the submitted Foul Drainage Analysis (by Utility Law Solutions dated July 2017), they are satisfied with the foul drainage strategy detailed. AW has advised that no conditions are required with regards to foul drainage arrangements as this will be dealt with under separate legislation through Building Regulations.

- 7.142 AW also note that the current surface water drainage arrangements do not relate to AW operated assets, however they have advised that should the development rely on AW systems for surface water disposal, further discussion should take place to ensure the most appropriate scheme is designed. The condition recommended by the LLFA to secure details of the surface water drainage scheme (including the use of sustainable drainage systems (SuDS) will ensure that clarity with regards to proposed surface water drainage arrangements is provided and that adequate provision is made for the drainage of surface water.
- 7.143 It is therefore considered that subject to conditions, the development can be made acceptable in flood risk terms.
- 7.144 Third party comments have been received that despite the formal flood designation, the site does flood and concerns have been raised that development of the site would exacerbate this. It has also been highlighted that insufficient detail has been provided with regards to drainage. These comments are noted and details of surface water run-off would be secured through condition. Third party comments have also raised concerns with regards to sewage capacity. These comments are noted, however as set out above, Anglian Water has advised that there is capacity within the foul sewerage network to accommodate needs arising from the development.

**Other Matters:**

Infrastructure -

- 7.145 Concerns have been expressed that local doctors surgeries, dentists and schools (Holywell Primary School and St Ivo Secondary School) cannot cope with the additional development proposed. As this application is a small-scale major development for less than 200 dwellings, S106 contributions for education and health cannot be sought as these should be funded through the Community Infrastructure Levy. Notwithstanding this, advice has been sought from Cambridgeshire County Council Education to establish whether there are capacity issues and how this may impact upon the wider sustainability considerations of the scheme.
- 7.146 In terms of education provision, Cambridgeshire County Council has advised that Holywell C of E Primary School has a Planned Admission Number (PAN) of 30 (30 new entrants each year school) and a total school capacity of 210 places (30 pupil intake x 7 years). The school had 202 pupils on roll in September 2017 so is close to full capacity. However, based on catchment forecasts, the school is forecast to have sufficient capacity in the future if out-catchment options are excluded. With regards to Secondary education, CCC has advised that St Ivo has a PAN of 300 and a total 11-15 capacity of 1500 places. There were 1423 pupils on roll in September 2017. CCC note that although there may be a need to expand the school in the long term, given the continuing growth in St Ives, the catchment forecasts do not show a pressing need for this in the short to medium term.

Parish Comments -

- 7.147 It is noted that within their representation the Parish Council has set out a list of improvements and recommendations which it considers should be included within a Section 106 Agreement if the application were recommended for approval. These are considered in turn:
- 7.148 - Roundabout at junction of Bluntisham Road and A1123/ Turn left only out of new site entrances to prevent excess traffic via High Street which was removed by the bypass.  
The Local Highways Authority has reviewed the supporting information submitted as part of the application and has concluded that the access arrangements proposed and impact upon the local highways network is acceptable, subject to the matters to be secured by condition and through a Section 106 agreement as aforementioned within this report. Provision of a roundabout as requested is not necessary to make the development acceptable in planning terms. The implementation of a restriction with regards to the flow of traffic exiting the site is not necessary to make the development acceptable in planning terms.
- 7.149 - Sufficient money to employ staff and maintain public areas for minimum of 10 years.  
Financial contributions for the maintenance of Green Space would be secured through the associated Section 106 Agreement, in accordance with the rates set out within the Developers Contribution SPD for a period of 15 years.
- 7.150 - Contribution to allow improvements to village hall which is the only public building in the village.  
This is not necessary to make the development acceptable in planning terms. The development would be CIL liable. Any CIL receipts would be spent in accordance with the CIL Regulations and cannot be solely for the Holywell-cum-Needingworth area. Notwithstanding this, it should be noted that the Parish Council will receive a meaningful proportion of the CIL receipts in accordance with the Regulations and this should fund:  
1. The provision, improvement, replacement, operation or maintenance of infrastructure; or  
2. Anything else that is concerned with addressing the demands that development places on an area.  
It is therefore advised that a certain amount of CIL receipts will be used by the Parish Council to address local needs.
- 7.151 - New community allotment land  
The precise details for on-site open space would be established through the S106 agreement and reserved matters details. This may include allotments subject to demand.
- 7.152 - New burial ground.  
The provision of a new burial ground is not necessary to make the development acceptable in planning terms; therefore it is not reasonable to require the proposed development to provide this.
- 7.153 - Subsidy to provide daily bus service to St Ives at regular intervals throughout the day.  
For the reasons given above in the highways section of this report a bus subsidy is not necessary to make the development acceptable in planning terms.

- 7.154 - New bus stop (Near development)  
The LHA has advised that a new bus stop to the western side of Bluntisham Road and the upgrading of the existing bus stop to the eastern side of Bluntisham Road is required to make the development acceptable. The provision of these would be secured by condition.
- 7.155 - Improvements to footpath into village.  
The LHA has advised that improvements to the footpath into the village are required. These are shown on the 'Proposed Footway Widening' Plan (Drawing 12 Rev. C). The implementation of these improvements, prior to the occupation of the development, would be secured by condition.
- 7.156 - Improved street lighting along footpath.  
The submission of details relating to the improvement works required to footpaths to the eastern and western sides of Bluntisham Road would be secured by condition, as recommended by the LHA. These details should include details of proposed lighting.
- 7.157 - 30pmh speed limit to be moved to take in development  
Drawing 12.3 Rev. A demonstrates that based on the findings of the speed survey undertaken, adequate visibility splays can be achieved without a reduction to the speed limit along Bluntisham Road. The LHA have confirmed that the visibility splays shown are acceptable. A reduction to the speed limit along Bluntisham Road is not therefore necessary to make the development acceptable in planning terms.
- 7.158 - Shop  
This is not necessary to make the development acceptable in planning terms. It is noted that provision of a shop would likely threaten the viability of the existing shop within the village.
- 7.159 - Doctors  
As referred to above, this application is a small-scale major development for less than 200 dwellings, S106 contributions for health cannot be sought as these could be funded through the Community Infrastructure Levy.
- 7.160 - Review of village school's capability to deliver an education to the children based on ability to absorb the intake. It may require an extension to the school.  
As set out above, CCC as the Local Education Authority have advised that the primary school is close to full capacity, however, the school is forecast to have sufficient capacity in the future if out-catchment options are excluded. As this application is a small-scale major development for less than 200 dwellings, S106 contributions for education cannot be sought as these could be funded through the Community Infrastructure Levy.
- 7.161 - Noise and dust suppression by limiting the hours of working to Monday to Friday 9am to 17.00 and Saturday 9am to Noon. No work on Sundays.  
These concerns are noted. The restriction of construction hours to reduce the noise impact for neighbours will be secured with the Construction Environmental Management Plan.

- 7.162 Fire Hydrants -  
Cambridgeshire Fire and Rescue Service require the provision of fire hydrants be secured through an appropriately worded planning condition; this is considered acceptable.
- 7.163 Environment Impact Assessment (EIA) -  
In accordance with the EIA Regulations 2017 the proposal has been screened. The proposed development is not EIA development.

**Infrastructure Requirements And Planning Obligations:**

- 7.164 The Infrastructure Business Plan 2013/2014 (2013) was developed by the Growth and Infrastructure Group of the Huntingdonshire Local Strategic Partnership. It helps to identify the infrastructure needs arising from development proposed to 2036 through the Core Strategy.
- 7.165 Statutory tests set out in the Community Infrastructure Regulations 2010 (Regulation 122) require that S.106 planning obligations must be necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonable related in scale and kind to the development. S.106 obligations are intended to make development acceptable which would otherwise be unacceptable in planning terms.
- 7.166 Without prejudice to the eventual determination of the planning application, negotiations have been held with the applicants in order to determine the extent of the obligations required to make the development acceptable. These negotiations have been held in line with the advice within the Regulations and the outcome is summarised below. Other relevant matters will be addressed via specific planning conditions.
- 7.167 The Planning Obligations SPD sets out within Part 2 that in determining infrastructure needs, the Council and partners have had to translate dwelling numbers into population generation. This has been undertaken utilising the anticipated change in average household sizes. For the purposes of calculating the likely infrastructure requirements, the 2016 average household size has been used (2.25 people per household). With the development description stating up to 120 dwellings this equates to (120 x 2.25) 270 people.

Community Infrastructure Levy (CIL):

- 7.168 As this application site is for a small-scale major development (under 200 dwellings) the development will be CIL liable in accordance with the Council's adopted charging schedule; CIL payments could cover infrastructure relating to footpath and access, health, community facilities, libraries and lifelong learning, and education.

Affordable Housing:

- 7.169 The site is over 0.5 hectares in size and Core Strategy Policy CS4, the Developer Contributions SPD (part A) and Draft Local Plan 2036



policy LP25 seek to achieve a target of 40% affordable housing on sites of this size. With the proposed number of dwellings up to 120 this would equate to a maximum total of 48 units. The policies indicate that provision should be made on site and should seek to achieve a target tenure split of 70% social rented and 30% shared ownership. Policy does however acknowledge that, in determining the amount and mix of affordable housing to be delivered, site specific considerations and other material considerations, including viability, will be taken into account.

- 7.170 In this instance no site specific considerations have been submitted and therefore the proposal shall provide policy compliant affordable housing provision.

Residential Wheeled Bins:

- 7.171 Each dwelling will require the provision of one black, blue and green-wheeled bin. The current cost of such provision is £73.65 per dwelling. For flats within the development, communal 1100 litre bins could be provided rather than individual bins for each dwelling. The current cost for communal bins in is £669.00 per communal bin. As such a formula based approach is suggested with the scheme and details to be secured through the S106 Agreement.

**Planning Balance & Conclusion:**

- 7.172 This proposal would result in development outside of the built-up area of the settlement and would conflict with policies H23, En17 of the HLP and CS3 of the CS. Para. 215 of the NPPF is clear that the Framework can override Development Plan policies which are not consistent with provisions of the NPPF and this is a material consideration in the determination of the application. Given the inconsistencies of the adopted housing supply policies with the NPPF, the 'tilted balance' set out in para. 14 of the NPPF is engaged and shifts the planning balance in favour of the grant of consent, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 7.173 The presumption in favour of sustainable development requires proposals to achieve economic, social and environmental gains; as such a balancing exercise has to be undertaken to weigh the benefits of the scheme against its disadvantages.
- 7.174 In terms of the economic dimension of sustainable development, the proposal would contribute towards economic growth, including job creation - during the construction phase and in the longer term through the additional population assisting the local economy through spending on local services/facilities. There will also be Council Tax receipts arising from the development. The loss of this relatively small parcel of agricultural land and the existing poultry farm may result in a slight loss to the economy, however in the context of the District, this is considered to be low. The loss of agricultural land and the existing employment use is outweighed by the positive economic benefits of this development, in this location.
- 7.175 Regarding the social dimension, the site appears to have no significant constraints and is deliverable. It would also increase the

supply of housing, including a policy compliant provision of affordable housing at 40%; this should be afforded significant weight. There is a local identified need for both private and affordable housing and whilst the weight this need can be given is lessened given the NPPF compliant supply of housing, there would be a net benefit in social terms. Whilst the Council can demonstrate a 5 year supply of deliverable housing land, the provision of market housing on the application site would amount to a benefit in terms of providing a greater flexibility to the supply of housing.

- 7.176 In terms of the environmental dimension of sustainable development, the proposal offers potential for the incorporation of energy efficiency measures (to be considered in detail at reserved matters stage) as well as additional planting and habitat enhancement through Sustainable Urban Drainage features and the incorporation of bat and bird boxes which weigh in its favour. The proposal would result in the permanent loss of BMV land but this loss is not considered to be significant. The visual impacts of the development are considered to be acceptable given the limited harm arising from the development and the net benefits arising from the additional landscaping. The impacts from adjacent road noise would be made satisfactory for new residents. It is therefore considered that there will be a net benefit in environmental terms. The application site constitutes a sustainable location for the scale of development proposed in respect of access to local employment opportunities, services and facilities within the village of Needingworth and within the nearby market town of St Ives; accessible by sustainable transport mode. This is a further factor in support of the proposal.
- 7.177 Having fully assessed all three dimensions of sustainable development; economic, social and environmental within this report it is concluded that the development of this site will:
- provide a supply of affordable and market housing to meet current and future generations;
  - promote healthy, active lifestyle through green space provision;
  - maximise opportunities for use of public transport, walking and cycling;
  - minimise pollution;
  - manage flood risk and drainage effectively;
  - have less than substantial harm on archaeological interest which is outweighed by the community benefits, particularly the provision of affordable housing;
  - have no significant adverse impacts on features of landscape or ecological value;
  - provide appropriate infrastructure to meet the needs generated by the development.
- 7.178 It is accepted that the proposed development would result in some harm as the proposal would not accord with development plan policies that seek to restrict development in the countryside. It is also noted that there is local opposition to the proposal.
- 7.179 However when considered in the round, the proposal would contribute significantly to the economic and social dimensions of sustainability. The scheme offers some environmental benefits but there would also be moderate harm to the character and appearance

of the area. Overall, the harm identified is not considered to significantly and demonstrably outweigh the scheme's benefits when assessed against the policies in the NPPF taken as a whole. This is a significant material consideration which outweighs the conflict with the Development Plan and therefore it is recommended that permission should be granted.

- 8. RECOMMENDATION - APPROVAL** subject to the prior completion of a Section 106 obligation relating to affordable housing, provision of open space and maintenance contribution, wheeled bins, maintenance contributions for bus shelters and Real Time Passenger Information system, and subject to conditions to include those listed below.

OR

- 8. RECOMMENDATION - REFUSAL** in the event that the obligation referred to above has not been completed and the applicant is unwilling to agree to an extended period for determination, or on the grounds that the applicant is unwilling to complete the obligation necessary to make the development acceptable.

#### CONDITIONS

- Timing of permission and submission of Reserved Matters
- Scale parameters - maximum of 120 dwellings
- Finished floor levels
- Affordable housing provision at 40%
- Surface water drainage scheme
- Details of maintenance arrangements for the surface water drainage scheme
- Provision of a shared footway/cycleway on the eastern side of Bluntisham Road.
- Provision of a footway including bus hard standing and dropped kerb crossings on the western side of Bluntisham Road.
- Provision of a new bus stop on the western side of Bluntisham Road and upgrading of the existing bus stop on the eastern side of Bluntisham Road (to include provision of Real Time Passenger Information system to comply with LHA specification).
- Provision and implementation of a Residential Welcome Pack for sustainable transport
- Provision and implementation of a Residential Travel Plan
- Access width and radii
- Visibility Splays
- Road adoption details, construction specification, and maintenance and management arrangements
- Archaeological investigation
- Fire Hydrants
- Contamination Site Investigation and Remediation Strategy
- Ecological Mitigation and Enhancement
- Acoustic Mitigation Scheme as part of reserved matter applications
- Arboricultural Method Statement

- Construction Environment Management Plan (to include details of dust mitigation, wheel wash facilities, temporary parking/turning/unloading arrangements during construction, routes for traffic associated with construction and construction hours)
- Provision and management of bins for dog waste

If you would like a translation of this document, a large text version or an audio version, please contact us on 01480 388388 and we will try to accommodate your needs.

**CONTACT OFFICER:**

Enquiries about this report to **Laura Nuttall Senior Development Management Officer 01480 388331**

## Huntingdonshire DC Public Access

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**From:** developmentcontrol@huntingdonshire.gov.uk  
**Sent:** 19 September 2017 12:25  
**To:** DevelopmentControl  
**Subject:** Comments for Planning Application 17/01687/OUT

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 12:24 PM on 19 Sep 2017 from Miss Jane Bowd - Needingworth PC.

### Application Summary

**Address:** Land South Of The A1123 And West Of Bluntisham Road  
Needingworth

**Proposal:** Outline planning application for the demolition of the bungalow, six poultry sheds and other outbuildings and the erection of up to 120 dwellings with public open space, landscaping and sustainable drainage system (SuDS) and vehicular access points from Bluntisham Road. All matters reserved except for means of access

**Case Officer:** Laura Nuttall

[Click for further information](#)

### Customer Details

**Name:** Miss Jane Bowd - Needingworth PC  
**Email:** needingworthpc@btconnect.com  
**Address:** Village Hall Overcote Lane, Needingworth,  
Cambridgeshire PE27 4TU

### Comments Details

**Commenter Type:** Town or Parish Council

**Stance:** Customer objects to the Planning Application

#### Reasons for comment:

**Comments:** Following a Public open meeting attended by 70 residents The Parish Council unanimously objected to this application at an Extra Ordinary meeting on 18th September 2017 for the following reasons:  
LP7 - Smaller settlements.  
Needingworth has been identified by HDC as a smaller settlement in both the current and emerging Local Plan based on its inability to sustain large scale development such as that proposed in this application.  
Council does not consider that this site is located within the built up area of the current village.  
No mention is made in the application of it being a rural exemption site and therefore cannot be supported via other policies.  
The current infrastructure cannot support a development of this size and scale.

The village is served by a local convenience store, a primary school and a public house. The bus service is to be subsidised for 12 months by CCC but is then being removed so there is no alternative but to access other facilities such as medical services/clothing retailers/supermarkets/recreation facilities than by using a car to travel to the nearest town.

The local housing need as identified in the housing need survey is to be met by a planning application which is currently pending decision by the local authority.

At the current time the village primary school has very limited scope to accept more pupils.

The local secondary school St Ivo in St Ives is at capacity.

LP8- The Countryside.

The site is currently used for agricultural purposes and developing the site would therefore result in an irreversible loss of good quality agricultural land.

The site is directly opposite an RSPB nature reserve and noise, odour, obtrusive light or other impacts would adversely affect the use and enjoyment of the countryside by others.

As with many areas in the County this land is known to have high water table and the application identifies need for substantial drainage scheme. Drainage of the site would have dramatic impact on the intrinsic character of the area.

LP27 Community Planning proposal.

Council do not consider this site is well related to the built up area.

The site is located next to the junction with the A1123 which is an accident black spot.

The footpath to the proposed site is on the opposite side of the road and is not of a good standard neither is it adequately lit. As such this further segregates the site from the centre of the village.

The local need as identified is to be met by a rural exemption site development.

Five Year Land Supply:

The Parish Council is aware that Huntingdonshire District Council (HDC) has an obligation to demonstrate an up to date five year supply of deliverable housing sites under the conditions imposed by the NPPF. From HDC's Annual Monitoring Report published in December 2016 this is currently set at 5.24 years and incorporates a 5% buffer applied to both the requirement and the shortfall on delivery from 2011 - 2016. Since 2006 HDC have exceeded the housing requirement in six of the last ten years and predicted completions over the next five years indicate that the achievable supply is more than sufficient to both meet the current requirement and make up any previous shortfall. To further bolster this claim HDC have carried out an interim review of its land supply and now include a buffer of 20% with a five year supply of deliverable housing sites of 5.31 years.

Therefore as HDC can fully demonstrate a five year supply of housing land and its current policies are fully up to date there is no reason why this site should be given approval.



Scale and Appearance: HDC Local Plan policies En25, HL5 and LP5 seek to ensure that development respects and enhances its local setting and responds and improves the character of the local built environment. Design is also identified as a core principal of sustainable development in the NPPF. The Council consider that this application fails to meet the requirements of all of these policies for reasons already stated.

In spite of the reasons for the Parish Council objections above if HDC is mindful to recommend approval or if the proposal is subsequently subject to a planning appeal against its refusal the PC would wish the following to be included as minimum Section 106 requirement:

- Roundabout at junction of Bluntisham Road and A1123
- Turn left only out of new site entrances to prevent excess traffic via High Street which was removed by the bypass.
- Sufficient money to employ staff and maintain public areas for minimum of 10 years.
- Contribution to allow improvements to village hall which is the only public building in the village.
- New community allotment land
- New burial ground.
- Subsidy to provide daily bus service to St Ives at regular intervals throughout the day.
- New bus stop.(Near development)
- Improvements to footpath into village.
- Improved street lighting along footpath.
- 30pmh speed limit to be moved to take in development.
- Shop
- Doctors
- Village hall expansion/improvements to accommodate additional resident's requirements.
- Review of village school's capability to deliver an education to the children based on ability to absorb the intake. It may require an extension to the school.
- Noise and dust suppression by limiting the hours of working to Monday to Friday 9am to 17.00 and Saturday 9am to Noon. No work on Sundays.

## Huntingdonshire DC Public Access

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**From:** developmentcontrol@huntingdonshire.gov.uk  
**Sent:** 07 February 2018 07:25  
**To:** DevelopmentControl  
**Subject:** Comments for Planning Application 17/01687/OUT

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Comments were submitted at 7:25 AM on 07 Feb 2018 from Miss Jane Bowd - Needingworth PC.

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Needingworth

**Proposal:** Outline planning application for the demolition of the bungalow, six poultry sheds and other outbuildings and the erection of up to 120 dwellings with public open space, landscaping and sustainable drainage system (SuDS) and a vehicular access point from Bluntisham Road. All matters reserved except for means of access. (AMENDMENT TO APPLICATION DESCRIPTION. ADDITIONAL AND AMENDED DOCUMENTS AND PLANS RECEIVED. OBSERVATIONS TO BE MADE BY 14TH FEBRUARY 2018).

**Case Officer:** Laura Nuttall

[Click for further information](#)

### Customer Details

**Name:** Miss Jane Bowd - Needingworth PC  
**Email:** [needingworthpc@btconnect.com](mailto:needingworthpc@btconnect.com)  
**Address:** Village Hall Overcote Lane, Needingworth,  
Cambridgeshire PE27 4TU

### Comments Details

**Commenter Type:** Town or Parish Council  
**Stance:** Customer objects to the Planning Application  
**Reasons for comment:**  
**Comments:** Ref amendments.  
The Parish Council have considered the amendments to the original plans and also the additional resident comments.  
Council consider that the amendments have not addressed any of their original concerns and therefore the original comments objecting to the proposed development dated 20/9/17 still stand.

# Development Management Committee



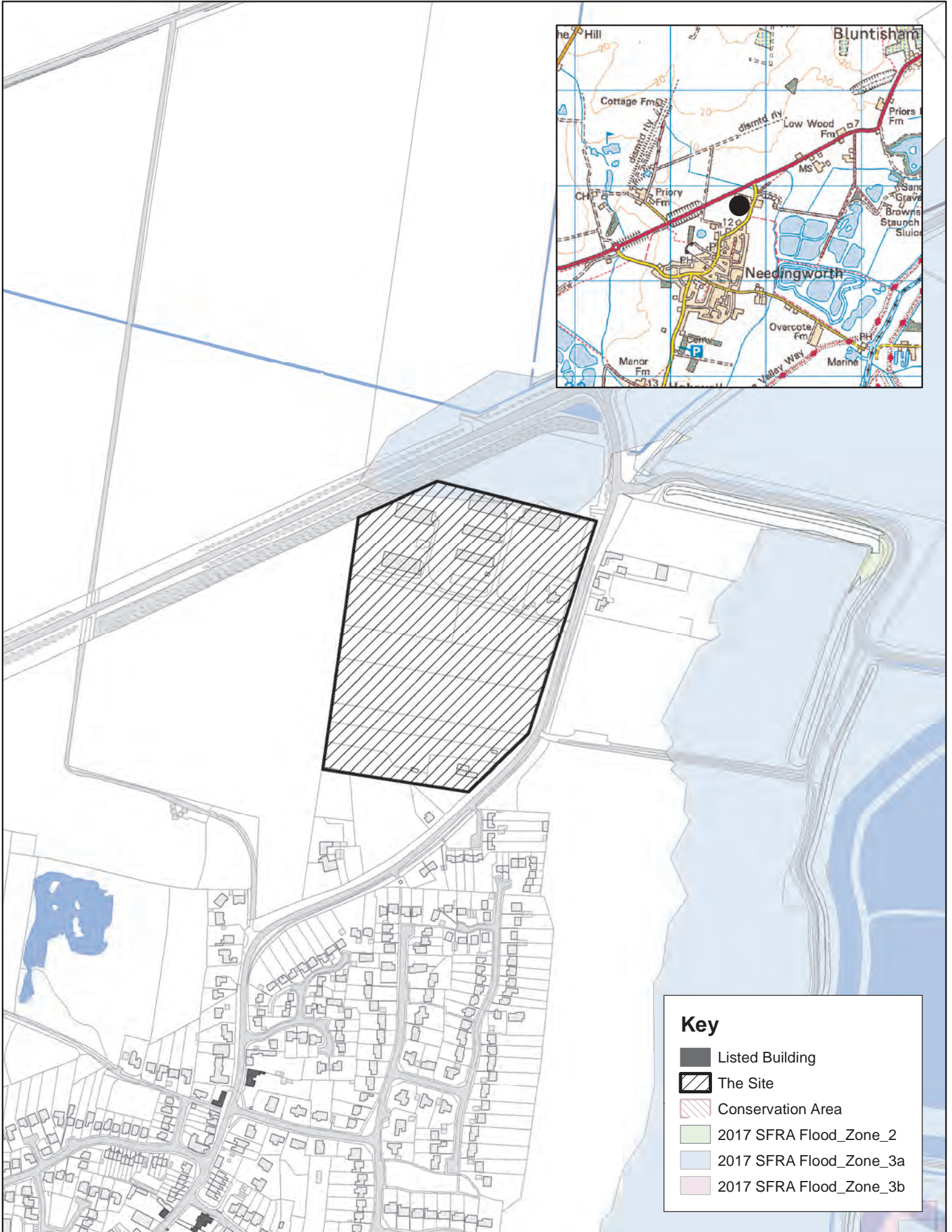
Scale =1:5,000

Date Created: 09/05/2018

Application Ref: 17/01687/OUT

Location: Needingworth

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Ordnance Survey HDC 10002322



## Key

- Listed Building
- ▨ The Site
- ▨ Conservation Area
- 2017 SFRA Flood\_Zone\_2
- 2017 SFRA Flood\_Zone\_3a
- 2017 SFRA Flood\_Zone\_3b






 Site boundary: **6.44ha**









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Rev	Date	By	Description
 <b>CSA</b> environmental Dixies Barns, High Street, Ashwell, Hertfordshire SG7 5NT t 01462 743647 e ashwell@csaenvironmental.co.uk w csaenvironmental.co.uk			
<b>Project</b>	Land off Bluntisham Road, Needingworth		
<b>Title</b>	Site Location Plan		
<b>Client</b>	Gladman Developments Ltd		
<b>Scale</b>	1:2500 @ A3	<b>Drawn</b>	AS
<b>Date</b>	19.07.2017	<b>Checked</b>	CA
<b>Drawing No.</b>	CSA/3272/111	<b>Rev</b>	-



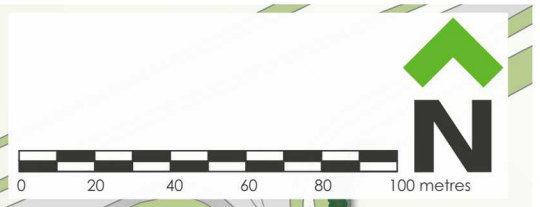
-  Site Boundary: **6.44ha**
-  Proposed residential area: **3.7ha**  
(Up to 120 dwellings @ 32 dph)
-  Proposed informal and amenity green space

**Movement & Infrastructure**

-  Proposed vehicular access point
-  Proposed spine street through development
-  Proposed secondary streets and lanes/private drives
-  Proposed recreational route
-  Proposed cycle route
-  Proposed new pedestrian and cycle links
-  Existing public rights of way
-  Key spaces with priority for pedestrian movements

**Green Infrastructure & Recreation**

-  Existing vegetation
-  Existing vegetation to be removed
-  Proposed location for children's play area
-  Proposed locations for SuDS features
-  Proposed tree and hedgerow planting
-  Proposed orchard



Proposed new boundary landscaping to filter views of the development from the A1123

Sustainable Drainage Features (SuDS)

Children's play area

Road crossing points designed for pedestrian priority

Proposed vehicular access point

Tactile paving at crossing area

Footway widened to 3m to accommodate bus stop for northbound services

Footway along eastern side of Bluntisham Road to be widened to 3m

Proposed new recreational route through development

Tactile paving at crossing area

Proposed orchard and wildflower grass to compensate for the loss of the existing low quality trees and hedgerows

Full Planning application for 14 new homes on land adjacent to Fair View, Bluntisham Road, Needingworth - decision: pending

Footway to tie into existing

G	01/02/18	SM	Amendments to pedestrian routes
F	05/10/17	SM	Amended to reflect client's comments
E	24/07/17	AgB	Tree survey added
D	19/07/17	AS	Site boundary amended
Rev	Date	By	Description



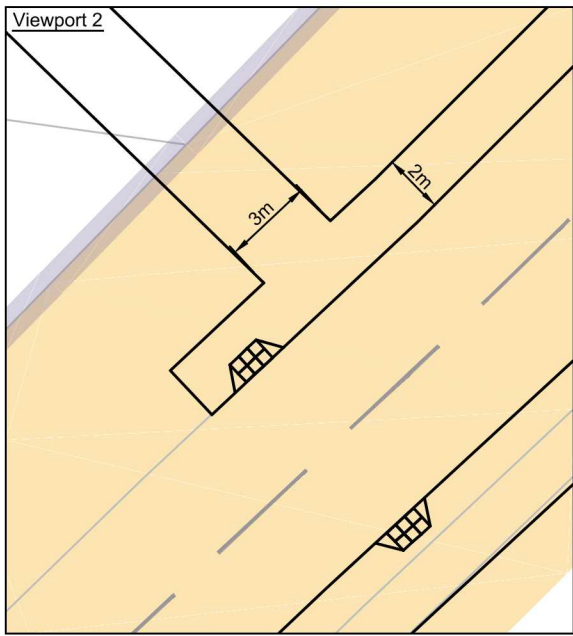
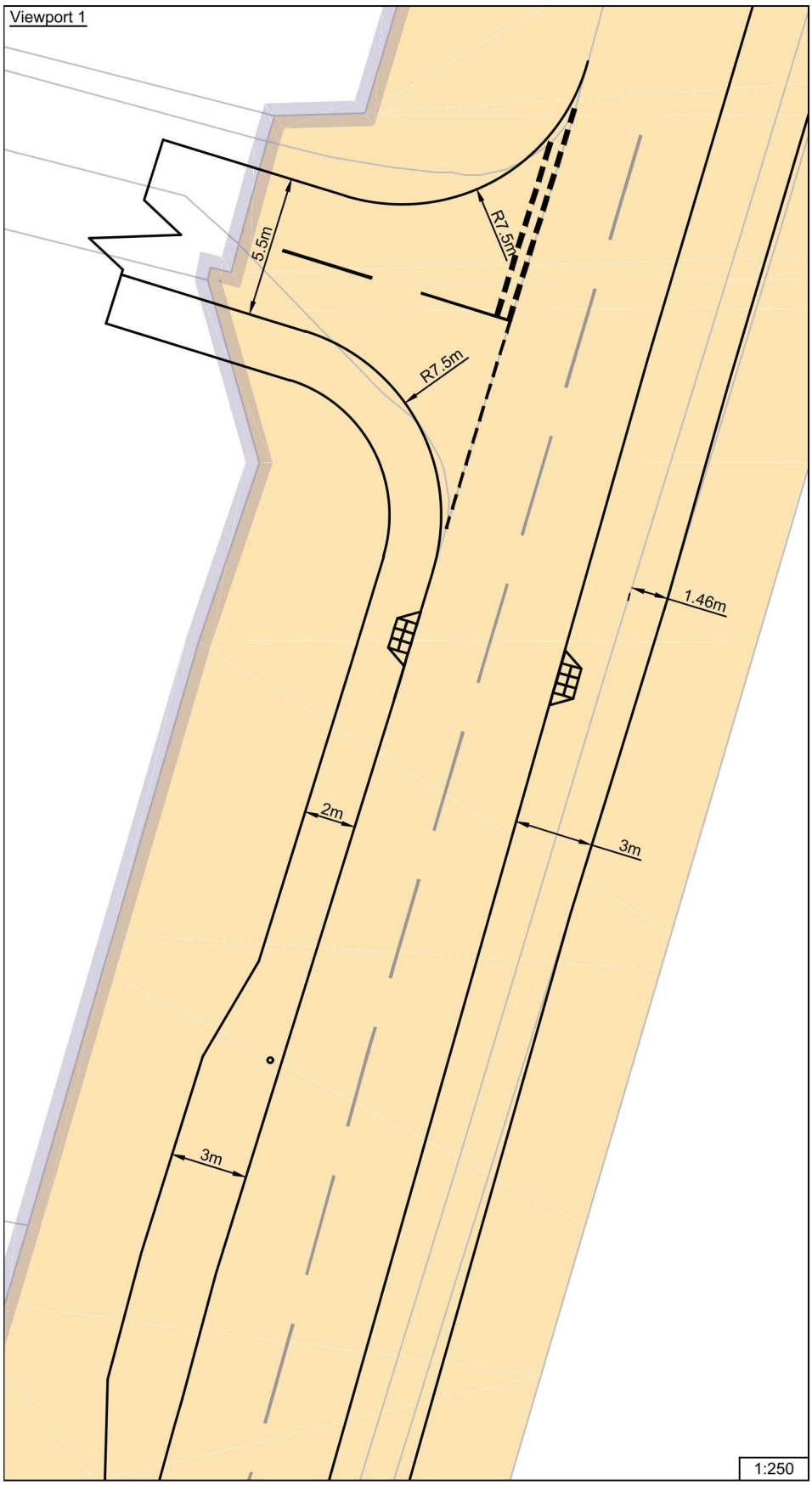
Dixies Barns, High Street,  
Ashwell, Hertfordshire SG7 5NT  
t 01462 743647  
e ashwell@csaenvironmental.co.uk  
w csaenvironmental.co.uk

Project	Land off Bluntisham Road, Needingworth		
Title	Development Framework Plan		
Client	Gladman Developments Ltd		
Scale	1:2000 @ A3	Drawn	AgB
Date	June 2017	Checked	SG
Drawing No.	CSA/3272/105	Rev	G





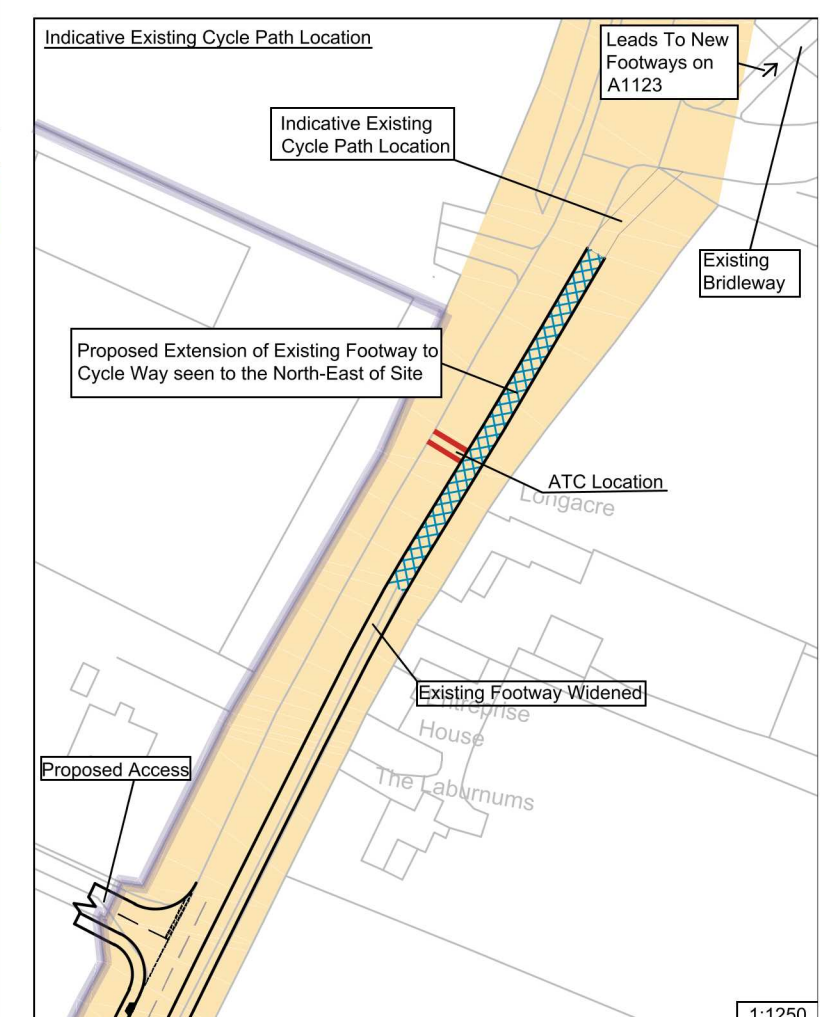
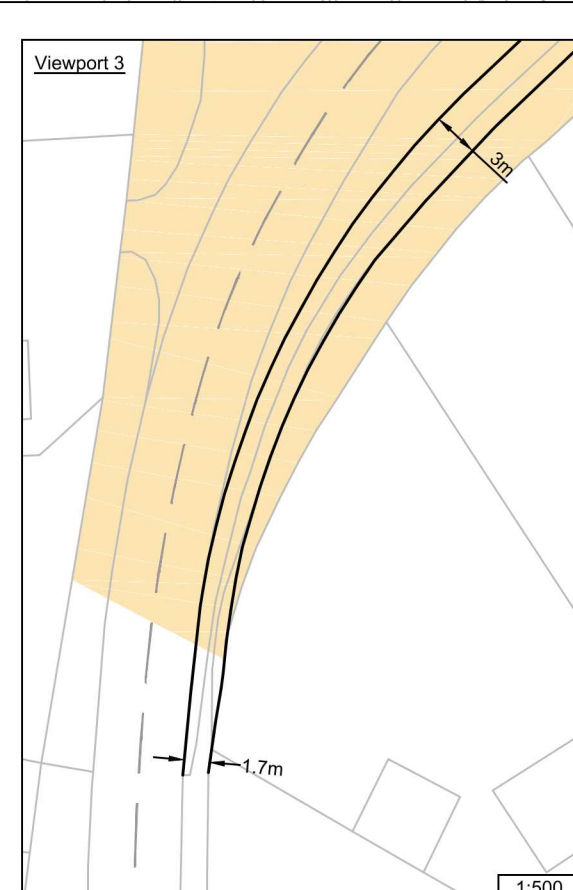
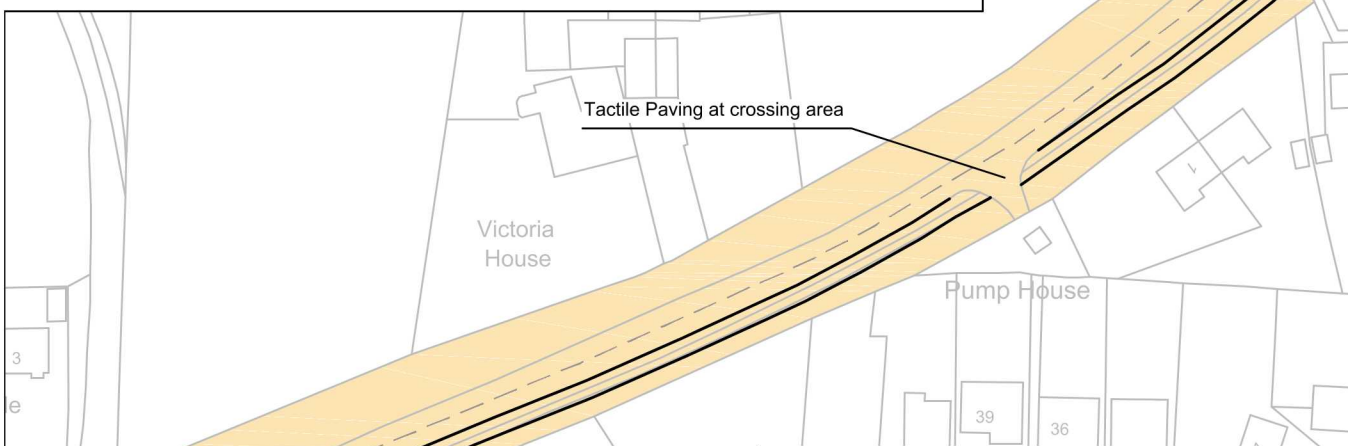
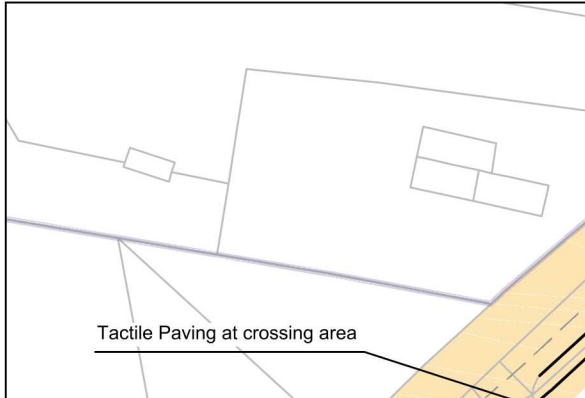
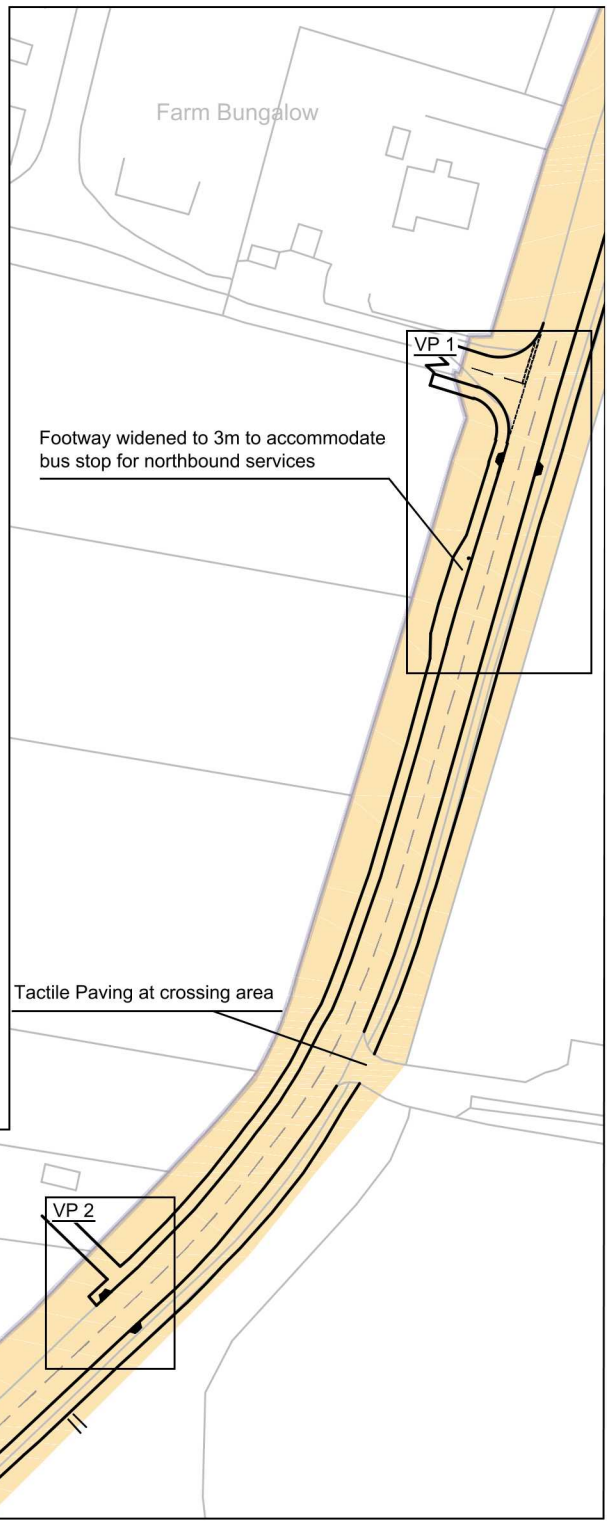




**Key;**

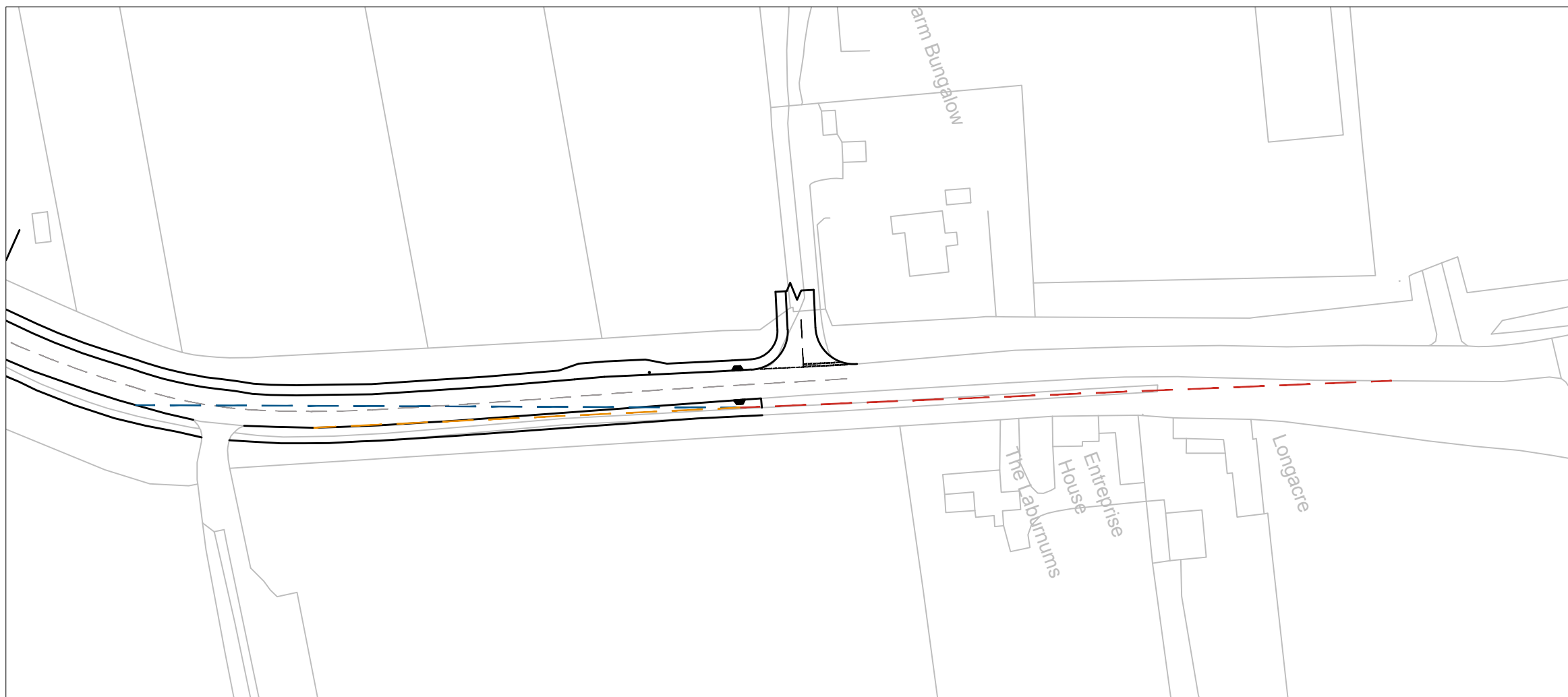
- Footway Extension
- Highway Boundary
- Site Boundary

Highway Boundary transcribed from 'OS' Base mapping supplied by Cambridgeshire County Council. Icen Projects Ltd. are not responsible for it's accuracy and advise that boundary is verified by solicitors.



<b>Client</b>	Gladman Developments	FLITCROFT HOUSE, 114-116 CHARING CROSS ROAD LONDON WC2H 0JR		
<b>T.</b>	+44(0)20 3640 8508			
<b>W.</b>	mail@iceniprojects.com			
<b>Project</b>	Bluntisham Road, Needingworth			
<b>Job Ref.</b>	17-T046	<b>Drawn</b>	FA	
<b>Drawing Title</b>	Proposed Footway Widening (3m Widening Southward)	<b>Scale</b>	As Shown	
		<b>Date</b>	05/12.2017	
	<b>Drawing no.</b>	12	<b>Rev.</b>	C





Notes;

1.This drawing is based upon drawing number DWG No 101 supplied by Gladman Developments and Icen Projects Ltd. shall not be liable for any inaccuracies or deficiencies.

2.This drawing is indicative and subject to discussions with local & national highway authorities. This design is also subject to confirmation of land ownership, topography, location of statutory services, traffic flows and traffic modelling.

Key;

DMRB Calculated Visibility Splay of 1.5m x 128m\* looking North  
(Based on 85th %ile Speeds of 41.9mph recorded in vicinity of Access 1\*\*)

DMRB Calculated Visibility Splay of 1.5m x 119.5m\* looking South  
(Based on 85th %ile Speeds of 39.4mph recorded in vicinity of Access 1\*\*)

Visibility Splay to Tangential Points

Note:

\* Distance inclusive of bonnet length (2.4m)

\*\*Speeds have been adjusted to include wet weather reduction of 2.5mph

X distance in accordance with DMRB TA 90/05

<b>A</b>	05.12.2017	Revised Visibility	FA	NM	EF
Rev	Date	Amendments	Drawn	Chk	App

**Iceni Projects**  
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 mail@iceniprojects.com



Client \_\_\_\_\_

Gladman Developments

Project \_\_\_\_\_

Bluntisham Road, Needingworth

Title \_\_\_\_\_

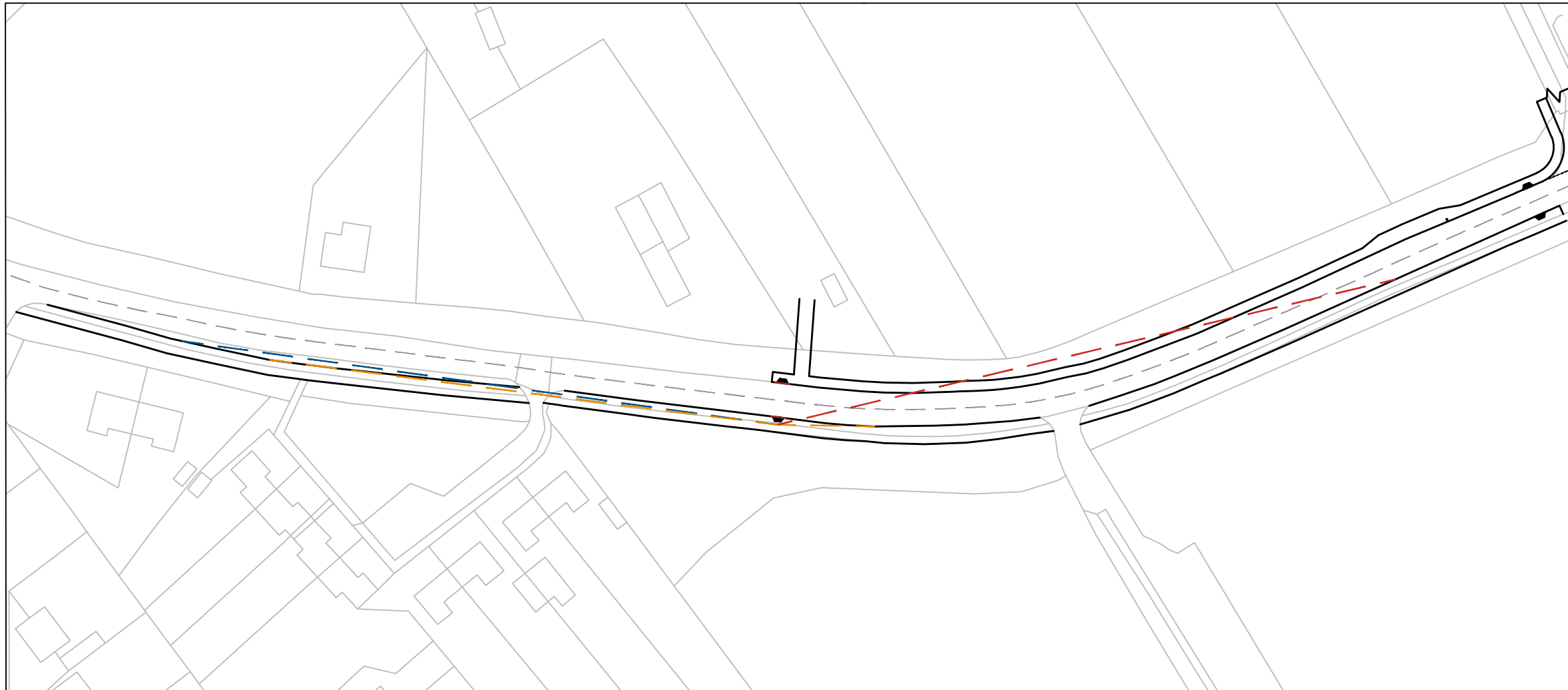
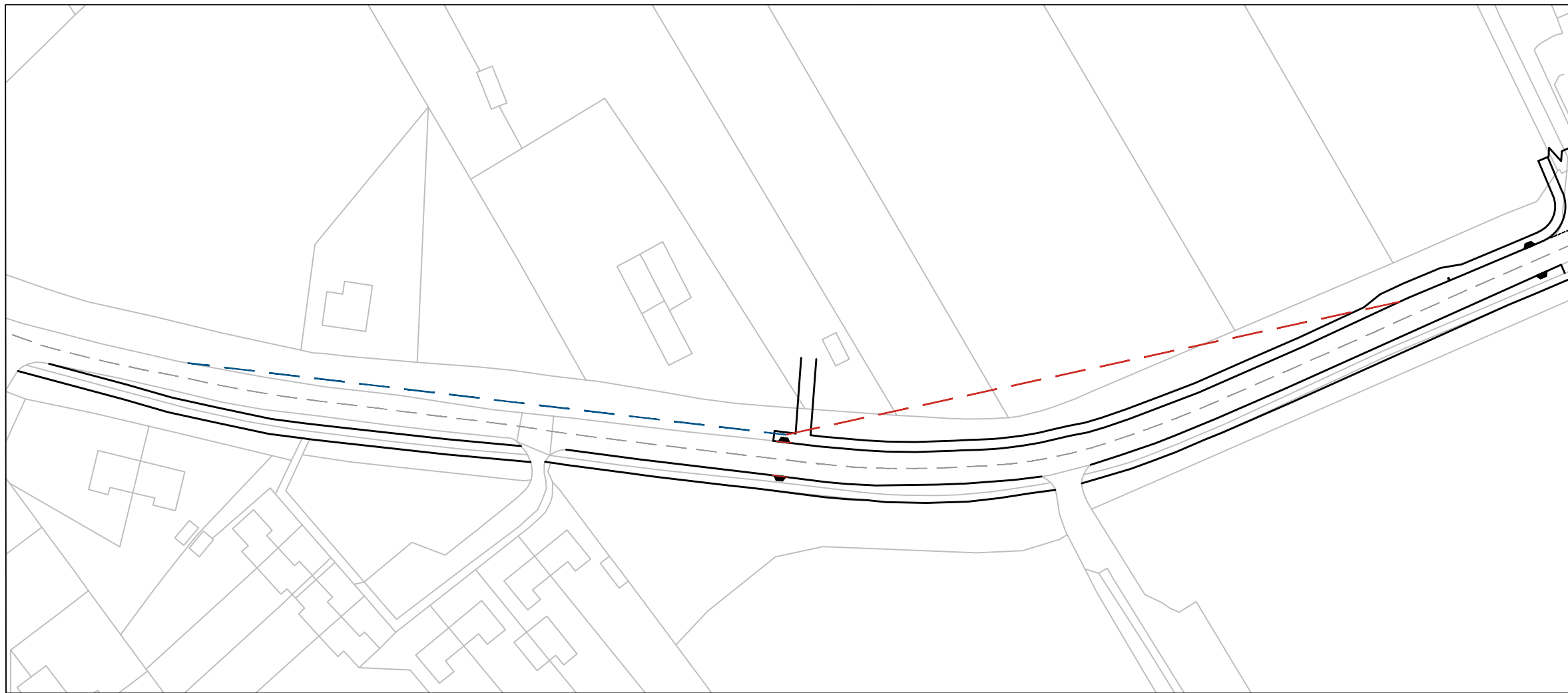
Visibility Splay

Pedestrian Visibility Splays




Drawn By FA	Checked By NM 13/11/2017	Approved By FP 13/11/2017
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Scale @ A3 1:1000	Date 13/11/2017
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Project No. 17-T046	Drawing No. 12.1	Rev. A
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Notes;  
 1.This drawing is based upon drawing number DWG No 101 supplied by Gladman Developments and Icen Projects Ltd. shall not be liable for any inaccuracies or deficiencies.  
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Key;  
  
 DMRB Calculated Visibility Splay of 1.5m x 128m\* looking North (Based on 85th %ile Speeds of 41.9mph recorded in vicinity of Access 1\*\*)  
  
 DMRB Calculated Visibility Splay of 1.5m x 119.5m\* looking South (Based on 85th %ile Speeds of 39.4mph recorded in vicinity of Access 1\*\*)  
  
 Visibility Splay to Tangential Points

Note:  
 \* Distance inclusive of bonnet length (2.4m)  
 \*\*Speeds have been adjusted to include wet weather reduction of 2.5mph  
 X distance in accordance with DMRB TA 90/05

Rev	Date	Amendments	Drawn	Chk	App
A	05.12.17	Revised Visibility	FA	NM	EF

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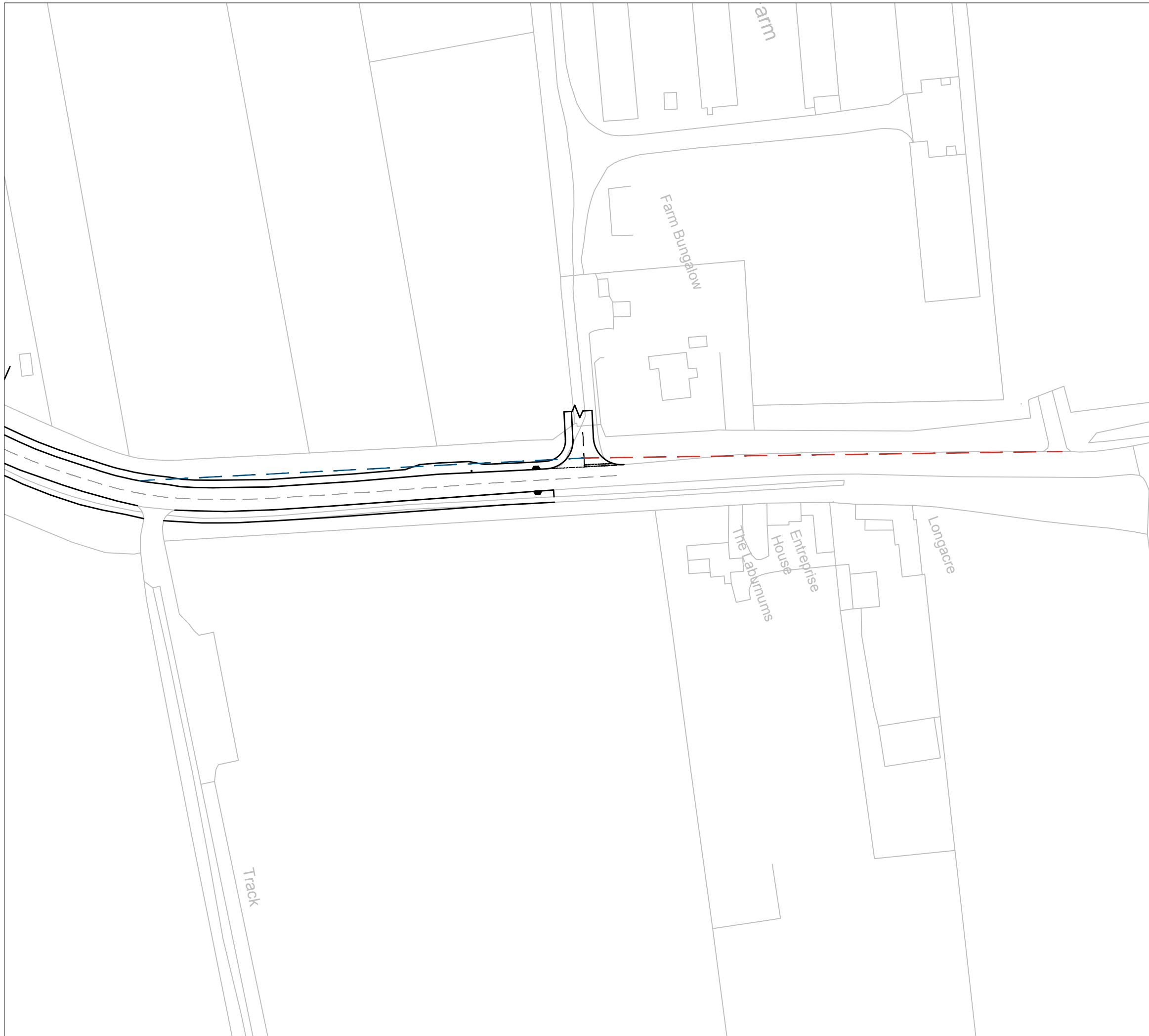
Client  
 Gladman Developments

Project  
 Bluntisham Road, Needingworth

Title  
 Visibility Splay  
 Pedestrian Visibility Splay

Drawn By FA	Checked By NM 13/11/2017	Approved By FP 13/11/2017
Scale @ A3 1:1000	Date 13/11/2017	
Project No. 17-T046	Drawing No. 12.2	Rev. A

Iceni Projects accept no responsibility for any unauthorised amendments to this drawing. Only figured dimensions are to be worked to.



Notes;

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Key;

DMRB Calculated Visibility Splay of 2.4m x 128m\* looking North  
(Based on 85th %ile Speeds of 41.9mph recorded in vicinity of Access 1\*\*)

DMRB Calculated Visibility Splay of 2.4m x 119.5m\* looking South  
(Based on 85th %ile Speeds of 39.4mph recorded in vicinity of Access 1\*\*)

Visibility Splay to Tangential Points

Note:  
\* Distance inclusive of bonnet length (2.4m)  
\*\*Speeds have been adjusted to include wet weather reduction of 2.5mph

Rev	Date	Amendments	Drawn	Chk	App
A	05.12.17	Revised Visibility	FA	NM	EF

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Client \_\_\_\_\_

Gladman Developments

Project \_\_\_\_\_

Bluntisham Road, Needingworth

Title \_\_\_\_\_

Visibility Splay

Vehicle Visibility Splays

Drawn By FA	Checked By NM 13/11/2017	Approved By FP 13/11/2017
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Scale @ A3 1:1000	Date 13/11/2017
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Project No. 17-T046	Drawing No. 12.3	Rev. A
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