Local Plan Examination
Hearing Statement – Week 1
Matter 3

On behalf of Catesby Estates Plc Respondent Ref. 1117645



Local Plan Examination Hearing Statement - Week 1 / Matter 3



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Catesby Estates Plc

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1. Introduction

- 1.1. This Hearing Statement has been prepared by Savills (UK) Limited on behalf of Catesby Estates Plc ('Catesby').
- 1.2. These representations are submitted in the context of Catesby's outline planning application for housing development in Great Gransden (LPA Ref: 17/01375/OUT). A site location plan of the land in question is attached to these representations (see Appendix 1). The site was reviewed in the HELAA (December 2017), as 'Site 203', and found to be suitable for residential development, available and achievable.
- 1.3. Savills have requested to attend the Hearing session on Matter 3 to expand on the representations submitted on behalf of Catesby to the Regulation 19 Pre-Submission Local Plan (PSLP) consultation, and the content of this Statement.

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2. Matter 3: Development Strategy

Issue 1: Whether the Development Strategy is justified, effective and consistent with national policy.

Overall

Question 1: What is the basis for the overall strategy for development and the broad distribution of growth set out in Policy LP2? What options were considered and why was this chosen? Is it justified?

- 2.1. Policy LP2 explains the development strategy for Huntingdonshire, which seeks to concentrate new development in locations which provide, or have the potential to provide, the most comprehensive range of services and facilities. Therefore, approximately three quarters of the District's housing requirement is to be accommodated in the four 'Spatial Planning Areas' of Huntingdon (including Brampton, Godmanchester, and the strategic expansion location of Alconbury Weald, St Neots (including Little Paxton and the strategic expansion location of St Neots East), St Ives and Ramsey (including Bury). The remainder of the housing requirement is directed to the 'Key Service Centres' and the 'Local Service Centres'.
- 2.2. Any other size of settlement which has a single built up area of more than 30 dwellings is defined as a 'Small Settlement' in the settlement hierarchy. However, whilst the policy states 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", the draft Plan allocates no sites within any Small Settlement.
- 2.3. Paragraph 4.6 states that the purpose of the Strategy for Development is to "set out the distribution of growth [and to] support social and economic sustainability". We consider that a failure to allocate any sites within the Small Settlements will serve to undermine the social and economic sustainability of these communities.
- 2.4. The impact of no planned growth in the Smaller Settlements will over time negatively affect the sustainability of these settlements as a result of new housing delivery. Data from the 2011 Census shows that the number of people aged over 65 has risen significantly. A lack of suitable and affordable alternatives means that many of these retirement age households remain in their homes, occupying housing that would otherwise be suitable for younger working people and families. This perpetuates a demographic imbalance and directly contributes to a reduction in the settlement population that is of school age. An ageing population has a direct impact on social capacity and on the vitality of settlements and communities. New housing can help to rebalance communities by attracting younger people and working families, and by providing a means for them to bring and use their skills and energy to revitalise communities.
- 2.5. By failing to propose any residential allocations in the in the Small Settlements, the draft Plan singularly fails to facilitate what it purports to, and hence it is our view that the draft Policy is neither positively prepared, justified nor consistent with national policy, and is therefore unsound.

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Conclusion

- 2.6. For the reasons set out above, we consider that Policy LP2 as currently drafted is neither positively prepared, justified nor consistent with national policy, and is thus unsound.
- 2.7. In order to make the draft Local Plan sound, suitable sites in sustainable Small Settlements should be allocated for residential development. This includes the site known as 'Rear of 16-32 Mandene Gardens, Great Gransden' (HELAA site 203) which is considered in detail at Section 5 of these representations.

Local Service Centres / Small Settlements

2.8. Our representations include that Great Gransden should be identified as a Local Service Centre, rather than as a Small Settlement. As the questions are the same for both types of settlement, we have combined our commentary thereon.

Questions 9 & 12: Are the Local Service Centres / Small Settlements appropriately defined, what is the basis for them?

- 2.9. Draft Policy LP10 identifies the Small Settlements. These are any other size of settlement with a single built up area of more than 30 dwellings. This 'catch-all' category is neither justified nor positively prepared and is therefore considered to be unsound.
- 2.10. Since the previous consultation between 3rd July and 25th August 2017, an additional tier in the settlement hierarchy 'Local Service Centres' has been introduced. It is our view that the Small Settlements require comprehensive review. The more sustainable sites should be re-categorised into a higher band, distinguishing them from the smaller, less sustainable sites. The larger more sustainable settlements should also have appropriate allocations.
- 2.11. Draft Policy LP9 was not included in the 2017 Consultation Draft (Regulation 18) Plan and has been introduced to bridge a gap in the settlement hierarchy between Key Service Centres and Small Settlements.
- 2.12. Draft Policy LP9 defines Local Service Centres as settlements that are "larger villages, outside of spatial planning areas, that offer a range of services and facilities to meet the daily needs of their residents and to some extent the residents of other villages nearby." In order for a settlement to be defined as a Local Service Centre, the draft Plan explains that the settlement must contain at least the following facilities: primary school, doctor's surgery, public hall, public house and convenience shop. Those settlements not identified as a Local Service Centre all remain identified as Small Settlements.
- 2.13. We agree with the definition of a 'Local Service Centre', but it is our view that Great Gransden should be classified as such, rather than as a Small Settlement. It provides similar services as found in other settlements that are identified as Local Service Centres. No explanation is provided in the draft Plan as to why Great Gransden has not been classified as a Local Service Centre.
- 2.14. Whilst many Small Settlements identified in draft Policy LP10 do have very few, if any, services and/or facilities, Great Gransden instead benefits from a wide range of services and facilities that include:





- Primary School Barnabas Oley C of E Primary School
- Branch Doctor's Surgery on Tuesdays at the Reading Room
- Convenience Store with Post Office
- Place of Worship Church of St Bartholomew
- Public Hall Reading Room
- Public House The Crown and Cushion
- Nursery Greenfields
- Recreation Ground
- Bus Service to surrounding larger settlements such as Cambridge and St Neots
- 2.15. Bluntisham has a comparable level of services to Great Gransden, but is categorised as a local Service Centre.
- 2.16. Compared with other Small Settlements, Great Gransden also contains a significant quantum of employment floorspace. This floorspace is situated at the Sand Road Industrial Estate which is identified in the Council's Employment Land Study (2014) and is included in draft Policy LP19 as an 'Established Employment Area (EEA)'. Firms operating from the Estate include:
 - Mass Racing (Engine Rebuilding Service);
 - Welding and Auto Engineering Ltd;
 - All Above Autocentre:
 - D C Norris and Company Ltd (Engineering);
 - Food Industry Technology Ltd;
 - Remediation Technical Services;
 - Hallmark Equipment Service Ltd; and
 - 2020 Furniture Design.
- 2.17. In addition to the EEA at Sand Road, Great Gransden also has another EEA at Hardwicke Road Industrial Estate. Along with Houghton and Wyton, Great Gransden is the only Small Settlement to have two EEAs.
- 2.18. Great Gransden is therefore well served by existing services and facilities which cater to the needs of the residents of the village and the neighbouring settlement of Little Gransden (which falls within the administrative boundary of South Cambridgeshire), and it satisfies the criteria to be defined as a Local Service Centre. Great Gransden offers more facilities and services than many of the other settlements identified in draft Policy LP10 (Small Settlements) and the same level of facilities and services as those identified in draft Policy LP9 (Local Service Centres).
- 2.19. By failing to correctly identify Great Gransden as a Local Service Centre, it is our view that the draft Policy is not justified, and is therefore unsound.

Conclusion

2.20. For the reasons set out above, we consider that draft Policy LP9 as drafted is not justified and is therefore unsound. We further explain our reasoning in our response to draft Policy LP10 below.





2.21. In order to make the Policy LP9 sound, Great Gransden should be reclassified from a Small Settlement to a Local Service Centre.

Questions 10 & 13: Is the approach to the scale and type of development set out in Policies LP2 and LP9 justified?

Questions 11 & 14: What is the scale of development actually planned (including commitments) in and is this in line with the distribution set out in Policy LP2?

- 2.22. The Small Settlements vary vastly in terms of size (i.e. population) as well as the range of facilities and services available, (as acknowledged in Paragraph 4.105 of the draft Plan). No allocations of land for residential development are proposed in any of the Small Settlements. Whilst some allowance is made for minor infill development, this does not allow for the sufficient, or planned, growth necessary to help maintain the vitality, viability and sustainability of these communities. As a consequence, benefits, such as affordable housing associated with new residential development, risk not being delivered in sufficient quantity.
- 2.23. The draft Plan recognises that opportunities for development vary. For a Small Settlement offering a wider range of services and facilities, it explains that there are far greater opportunities, albeit only in principle, for additional small-scale development. For a Small Settlement that has few or even no services or facilities, there are fewer justifiable opportunities for development. This demonstrates that the classification is too much of a 'catch-all' and we suggest that the larger, more sustainable villages should be reclassified into a higher band on the settlement hierarchy e.g. 'Large Village' as opposed to 'Other Small Settlements'. Clearly, we cannot undertake such an extensive exercise, however if this exercise were to be undertaken then we suggest that there would be justification for residential development allocations within the 'Large Villages'. At present, the Sustainability Appraisal does not consider any sites in Small Settlements, whatever sustainability justifications might exist to support their allocation (many have received favourable commentary in the HELAA). If further new tiers are introduced into the settlement hierarchy, then the need for the Appraisal to consider these smaller sites should be reconsidered.
- 2.24. Whilst we strongly support this policy in that it allows for development proposals 'within the built-up area' of a Small Settlement and also on 'land well-related to the built-up area', we consider that by failing to propose any residential allocations in the Small Settlements, the draft Plan singularly fails to facilitate what it purports to, and hence it is our view that draft Policy LP10 is neither positively prepared, justified nor consistent with national policy, and is therefore unsound.

Conclusion

- 2.25. For the reasons set out above, we consider that Policy LP10 as currently drafted is neither positively prepared, justified nor consistent with national policy, and is thus unsound.
- 2.26. In order to make the draft Local Plan sound, suitable sites in sustainable Small Settlements should be allocated for residential development. This includes the site known as 'Rear of 16-32 Mandene Gardens, Great Gransden' (HELAA site 203).

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