

Huntingdonshire Local Plan to 2036 Examination

Hearing Statement Matter 3:

Development Strategy

Huntingdonshire District Council

June 2018

Issue

Whether the Council development strategy is justified, effective and consistent with national policy.

1. 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?

- 1.1. Huntingdonshire has followed a reasonably consistent development strategy since the Cambridgeshire Replacement Structure Plan (1989) was implemented through the Huntingdonshire Local Plan (1995). This strategy is to concentrate strategic scale growth in and around the four historic market towns of Huntingdon, St Neots, St Ives and Ramsey, and then to a lesser degree in the larger villages with higher service levels. After consideration of alternatives this was continued through the Core Strategy (2009) as forming the most sustainable approach to delivering the level of growth required at that time. This was informed by an assessment of the levels of population, infrastructure, employment and service level provision in all settlements in the district.
- 1.2. The strategy for the distribution of growth was tested through the Sustainability Appraisal (CORE/07). Paragraphs 4.25ff and Table 4.5. Three strategic approaches were tested first: a high concentration of development, growth in larger settlements and a dispersed growth option. The growth in larger settlements option performed best in the sustainability appraisal and was taken through as the preferred option into the first consultation on the full draft HLP2036 in May – July 2013.
- 1.3. Following further consultation four possible packages of sites were identified capable of delivering this broad distribution of growth. The Strategic Transport Study (INF/09) was commissioned to analyse the highway network implications of the four possible ‘development scenarios’ and to establish the transport mitigation packages necessary to deliver them in transport terms. The modelling approach was based on highway assignment runs of the Cambridge sub-region model 2 (2016) to provide consistency with surrounding areas and with a forecast year of 2036. This was complemented by testing the same development scenarios through the Infrastructure Delivery Plan.
- 1.4. The Strategic Transport Study (INF/09) tested five potential mitigation packages against each development scenario ranging from junction improvements alone to implementation of major infrastructure schemes including a realignment of the A141 around the north of Huntingdon and construction of a third bridge crossing the River Great Ouse near Huntingdon. Testing identified that all four scenarios required a mitigation package involving significant new infrastructure to avoid substantial detrimental impacts on the highway network. The potential costs of these are set out in the Strategic Transport Study: Development Scenario Comparative Assessment (2017) (INF/09) paragraphs 3.4ff and Table

19. None of the development scenarios could be delivered without substantial funding beyond developer contributions, the availability of which could not be confirmed.
- 1.5. A fifth development scenario was then tested distributing growth in locations in close proximity to known highway infrastructure improvements, away from peak points of congestion and reducing pressure on cross-river movements. Modelling demonstrated that this can be delivered with a mitigation package comprising junction improvements at a cost of just over £5.2million. It is anticipated that this is deliverable through developer contributions hence ensuring that the development strategy is justified and effective.
- 1.6. A final amendment was made to the development strategy in autumn 2017 and a Strategic Transport Study Addendum (December 2017) (INF/11) was completed to ascertain their likely highway impact. All sites were in locations not reliant on cross-river movements and testing demonstrated that severe cumulative transport impacts are unlikely and mitigation could be proposed through a planning application.
- 1.7. The overall development strategy was tested through the draft Final Sustainability Appraisal as this was considered to be a significant change. Details of this assessment are presented in the Final Sustainability Appraisal (CORE/07) paragraphs 7.44ff and Table 7.3. This concludes that the development strategy presented in the submission HLP2036 is a better approach than that previously tested as it has broadly the same benefits but is likely to provide more support for the rural economy, will broaden the range of locations where development is planned further supporting inward investment and providing affordable housing and opportunities for 'down-sizing' in more diverse communities. Thus, the approach is considered to be both sustainable and justified.

2. Spatial Planning Areas

Question 2: Are the Spatial Planning Areas appropriately defined, what is the basis for them?

- 2.1. The Spatial Planning Areas (SPAs) represent an evolution of the settlement hierarchy that has evolved over centuries. Their basis lies in the strong functional, economic and social linkages between Huntingdonshire's historic market towns and their adjacent settlements. Each SPA provides a critical mass of residents to support its level of service provision.
- 2.2. Huntingdon, St Neots and St Ives all have significant physical constraints to their further growth in some directions, yet form the most sustainable locations for growth given their greater levels of infrastructure and service provision. The definitions of each SPA provided in the HLP2036 (CORE/01, page 53) are intended to focus attention on the wider spatial relationships to provide flexibility in the strategy and ensure it does not artificially constrain sustainable development. They are considered to be appropriately defined as they facilitate a balance between promoting development in Huntingdonshire's most sustainable locations and retaining the separate identity of smaller nearby villages.

Question 3: Is the approach to the scale and type of development set out in Policies LP2 and LP7 justified?

- 2.3. The development strategy set out in policy LP2 focuses on distributing the scale of growth required around Huntingdonshire to locations which are or can be made sustainable. It fundamentally concurs with the core planning principles of the NPPF to meet growth needs, respond positively to opportunities, take account of the different roles and characters of different areas, support thriving rural communities and promote mixed use developments. Policy LP2 seeks to provide approximately three quarters of all housing development and the majority of employment and retail development within the Spatial Planning Areas. The majority will be delivered through allocated sites; the role of LP7 is to guide additional unallocated development in these locations.
- 2.4. The distribution of growth across different settlement categories in LP2 is shaped by two key factors. The designation of Alconbury Enterprise Zone in 2011 provided a trend breaking employment opportunity; permission for development of a scheme for 5,000 dwellings and associated facilities on the remainder of the disused airfield provided an opportunity to introduce a major mixed use scheme on previously developed land offering co-location of homes, jobs and services. The remainder of the growth proposed seeks to broadly maintain the existing distribution of growth between spatial planning areas and the rest of the district. This is considered justified as it seeks to balance directing higher levels of growth to settlements with greater service provision whilst ensuring sufficient development in small settlements to sustain population levels in the light of decreasing average household sizes and to support current service provision.
- 2.5. The approach is justified through the Sustainability Appraisal of policy LP2 which demonstrates potentially beneficial effects for 16 of the 21 sustainability objectives (CORE/07, page 792). The approach of designating Spatial Planning Areas (incorporating two strategic expansion locations) within LP2 strongly promotes growth in locations which provide the greatest opportunities for co-location of homes, jobs and services.
- 2.6. The approach is also justified through the Housing and Economic Land Availability Assessment (HOUS/02). Environmental, economic and social issues affecting each settlement were considered first, followed by assessment of broad locations surrounding each settlement and finally site specific assessments were completed of all sites put forward by landowners and agents for consideration for potential development. The suitability, availability and achievability of the sites have helped to shape the strategy.
- 2.7. Policy LP2 is intended to provide a flexible response to employment provision focussing the majority of growth in the SPAs as these provide the greatest concentrations of labour supply and so offer the most sustainable opportunities for co-location of homes and jobs. Alconbury Enterprise Zone is expected to deliver around 8,000 jobs by 2036. Additional employment growth is dispersed around the SPAs to ensure choice within the employment land market and to provide local employment opportunities across the district. This is supported by the Sustainability Appraisal through its contribution towards achieving objectives focussing on

improving access to work appropriate to the place of residence, improving the vitality and viability of the local economy and reducing the need to travel.

Question 4: What is the scale of development actually planned (including commitments) in [SPAs] and is this in line with the distribution set out in Policy LP2?

2.8. Monitoring has not yet been completed for 2017/18 so planning permissions granted on unallocated sites and any completions between 1/4/17 and 31/3/18 are not yet available. This affects the data available for all the following tables as completions 2018/18 and planning permissions granted on sites not proposed for allocation are not included. Table 1 below shows the scale of development anticipated in SPAs

Table 1: Dwellings progress within SPAs

Progress	Dwellings	Running total
Completions by 31/03/17	2,712	2,712
Commitments on allocations at 31/03/17	7,816	10,528
Other commitments at 31/03/17	601	11,129
Proposed allocations granted permission 1/4/17 onwards	355	11,484
Proposed allocations without planning permission	6,993	18,477

2.9. The total development completed, committed and planned through proposed allocations represents 82% of the 22,500 identified in HLP2036 paragraph 4.10. The long term distribution set out in policy LP2 is for SPAs to contribute approximately three quarters of the district’s overall growth. It is reasonable that the current figure slightly exceeds this proportion as the SPAs benefit from a higher contribution from proposed allocations and a lower reliance on small and windfall sites.

Question 5: Are the strategic expansion locations at Alconbury Weald and St Neots East justified in principle? What alternative strategies for accommodating development were considered and why was this approach preferred? (Detailed issues concerning these site allocations are dealt with under Matters 6 and 7)

2.10. Both of the strategic expansion locations are justified in principle by their ability to contribute to the sustainability objectives identified for the Local Plan. The Sustainability Appraisal for Alconbury Weald highlights its status as primarily previously developed land, the incorporation of the enterprise zone offers substantial employment opportunities and the scale of the site allows infrastructure and mixed uses to be provided internally reducing the need to travel. An additional sustainability objective was incorporated following consultation seeking to maximise the benefits for Huntingdonshire of the Alconbury enterprise zone. The Sustainability Appraisal for St Neots East highlights its low flood risk, green infrastructure opportunities and access to a range of employment opportunities.

- 2.11. Three potential SELs were identified early in the Local Plan preparation process. A 150ha enterprise zone was designated on part of the former Alconbury Airfield in August 2011. A planning application for the accompanying development (as set out in SEL1.1) was approved in October 2014. St Neots Eastern Expansion was identified as a direction of growth for 2,500 dwellings in the Core Strategy (2009), policy CS2, which acknowledged that this was to be the first phase of a significant mixed use urban extension to the east of the town. Building on this, planning applications for a second phase of Love's Farm and for Wintringham Park have been considered by the Council's Development Management Committee and have resolutions to approve, subject to completion of a S106 agreement, or refuse in the event the applicant is unwilling to complete the obligations necessary to make the development acceptable and is unwilling to agree an extension of time. Wyton Airfield was included as a potential SEL in Regulation 18 consultation documents after being declared redundant by the MOD although military use of the RAF Wyton technical base will remain and expand.
- 2.12. Three alternative strategies for distributing growth were appraised during preparation of the plan:
- growth to be highly concentrated in a limited range of the most accessible locations focusing on provision of high density development to minimise the amount of greenfield land to be taken
 - growth to be distributed to larger settlements at development densities appropriate for the individual locations
 - growth to be dispersed around a wider range of settlements across the district with fewer sites and more development in key service centres than the other options and allocation of sites in small settlements as well.
- 2.13. The detailed appraisals are set out in the Sustainability Appraisal (CORE/07) on pages 153ff. The appraisal indicates that the proposed strategy for accommodating growth was the most likely to lead to development that positively responds to all three strands of sustainability. At this point the Alconbury Weald scheme already benefitted from planning permission.
- 2.14. As set out above in paragraphs 1.3-1.6 Alconbury Weald and St Neots East SELs were tested through the Strategic Transport Study (INF/09) along with a series of alternative strategic scale sites including 4,500 dwellings at Wyton Airfield, 3,820 dwellings at Lodge Farm Huntingdon, 1,300 dwellings at Sapley Park Farm Huntingdon, 1,980 dwellings at Gifford's Park St Ives and 1,680 dwellings at RAF Alconbury all accompanied by appropriate supporting uses. The Council's aspiration had been to incorporate the previously developed Wyton Airfield as a third SEL but the transport modelling indicated that substantial additional highway infrastructure would be required to deliver this and the necessary scale of funding could not be identified to demonstrate its deliverability, hence this was removed from the last Regulation 18 consultation Local Plan of July 2017 (PREP/02).
- 2.15. The SELs at Alconbury Weald and St Neots East have benefitted from public support throughout preparation of the plan as demonstrated in the Statement of Consultation (CORE/05). Concerns have focussed on matters of detail not principle or sought allocation of

additional small and medium sized sites contending that these would reduce reliance on delivery at the SELs.

- 2.16. The approach to the SELS at Alconbury Weald and St Neots East is preferred as it represents a sustainable approach to development in Huntingdonshire. It maximises opportunities for co-location of homes, employment and community facilities and services. Alconbury Weald is in very close proximity to the A1, the existing and the realigned A14 so can benefit from ongoing Highways England investment in these strategic routes. St Neots East is in close proximity to the A428 on which consultation to dual the route from Caxton Gibbet to the Black Cat roundabout on the A1 was completed in 2017, a preferred route announcement is due in 2018 and subject to approval construction anticipated to start in 2020. Alconbury Weald already benefits from a series of planning permissions with both commercial and residential developments already being occupied on the site. St Neots East is a long standing commitment and will support national aspirations for growth in the Oxford to Cambridge corridor.

3. Key Service Centres

Question 6: Are the Key Service Centres appropriately defined, what is the basis for them?

- 3.1. The Key Service Centres (KSCs) are considered to be appropriately defined as they fulfil a clear role in the settlement hierarchy and comprise a discrete group of settlements meeting the specified criteria. They are defined by the level of service provision they offer, both to their own residents and those of smaller nearby communities. First designated through the Core Strategy 2009 the level of service provision available in the KSCs has been monitored since to ensure that each settlement in the category still meets the minimum level of service provision required and that no other settlement has benefitted from a sufficiently increased level of services to warrant addition to this category. The minimum level of services includes a primary school, doctor's surgery, public hall, bus service operating Monday to Saturday, public house, a convenience store and at least one other shop. Each also offers at least some of: other shops, a library, food and drink establishments and local employment opportunities.

Question 7: Is the approach to the scale and type of development set out in Policies LP2 and LP8 justified?

- 3.2. Policy LP2 seeks to provide approximately a quarter of all housing development and a limited amount of employment and retail development within the Key Service Centres, Local Service Centres and Small Settlements. The approach is justified through the Housing and Economic Land Availability Assessment (HOUS/02). Environmental, economic and social issues affecting each settlement were considered first, followed by assessment of broad locations surrounding each settlement and finally site specific assessments were completed of all sites put forward by landowners and agents for consideration for potential

development. The suitability, availability and achievability of the sites have helped to shape the strategy.

- 3.3. A minimum threshold of 0.2ha and 10 dwellings has been used for proposed allocations; given the scale and built form of the KSCs additional residential sites are expected to come forward that are below this threshold. Thus, a higher proportion of development is expected to be delivered through small-scale and windfall sites in KSCs than is anticipated in SPAs.
- 3.4. Iterative sustainability appraisals have been undertaken of policies LP2 and LP8 throughout the preparation of the plan. Policy LP2 is addressed above in the response to question 3. LP8 has potentially beneficial effects for eight of the sustainability objectives in those relating to maximising the use of previously developed land, protecting high value agricultural land, minimising the need to travel, reducing social exclusion and facilitating access to basic services and jobs.

Question 8: What is the scale of development actually planned (including commitments) in [KSCs] and is this in line with the distribution set out in Policy LP2?

- 3.5. Table 2 below shows the scale of development anticipated in KSCs.

Table 2: Dwellings progress within KSCs

Progress	Dwellings	Running total
Completions by 31/03/17	447	447
Commitments on allocations at 31/03/17	240	687
Other commitments at 31/03/17	353	1,040
Proposed allocations granted permission 1/4/17 onwards	688	1,728
Proposed allocations without planning permission	790	2,518

- 3.6. The total development completed, committed and planned through proposed allocations represents 11% of the 22,500 identified in HLP2036 paragraph 4.10. The long term distribution set out in policy LP2 is for KSCs together with LSCs and Small Settlements to contribute approximately a quarter quarters of the district’s overall growth. Together they currently contribute 17% with proposed allocations being concentrated in the KSCs and to a lesser extent the LSCs. This grouping of settlement categories is expected to see a higher proportion of development on small, windfall and rural exceptions sites. Due to this it is reasonable that the current figure is slightly below the long term aspiration of contributing a quarter of all residential as it allows flexibility for delivery of additional dwellings through policy LP8.

4. Local Service Centres

Question 9: Are the Local Service Centres appropriately defined, what is the basis for them?

- 4.1. Identification of Local Service Centres (LSCs) is a response to the increased emphasis in the White Paper 'Fixing our broken housing market' on supporting small and medium sized sites and thriving rural communities.
- 4.2. As part of the last round of Regulation 18 consultation undertaken in July 2017 a formal Call for Sites was issued seeking potential development sites located in or adjacent to SPAs, KSCs and Small Settlements with a range of services including at least four of the following: primary school, doctor's surgery, public hall, food shop or public house excluding land of grade 1 agricultural value, in flood zone 3b, designated as being a Site of Special Scientific Interest (SSSI) or other important nature designation such as a Special Area of Conservation (SAC), a Special Protection Area (SPA) or Ramsar Site or within the 400m safeguarding area of a waste water treatment works in accordance with Policy CS31 of the Cambridgeshire and Peterborough Minerals & Waste Core Strategy 2011.
- 4.3. Following assessment of the sites received the three proposed LSCs were identified as the only settlements where land was proposed which benefitted from all five of the identified services and thus offered a slightly higher level of sustainability than other locations.

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

- 4.4. Policy LP2 seeks to provide approximately a quarter of all housing development and a limited amount of employment and retail development within the Key Service Centres, Local Service Centres and Small Settlements. The approach is justified through the Housing and Economic Land Availability Assessment (HOUS/02) in the manner set out in response to question 7.
- 4.5. Much housing in LSCs is still expected to be brought forward on small and windfall sites through policy LP10. However, it was considered appropriate to boost the supply and mix of housing by identifying a limited number of allocations of sufficient size to incorporate some affordable housing provision.
- 4.6. The approach is also justified through the Final Sustainability Appraisal (CORE/07, pages 780ff) which concludes that the revised development strategy including the LSCs category provides additional support for the rural economy and by broadening the range of locations where development is planned will be beneficial in supporting inward investment, providing affordable housing and potentially offering opportunities to 'down-size' within a resident's existing community.

Question 11: What is the scale of development actually planned (including commitments) in [LSCs] and is this in line with the distribution set out in Policy LP2?

4.7. Table 3 below shows the scale of development anticipated in LSCs.

Table 3: Dwellings progress within LSCs

Progress	Dwellings	Running total
Completions by 31/03/17	22	22
Commitments on allocations at 31/03/17	0	22
Other commitments at 31/03/17	6	28
Proposed allocations granted permission 1/4/17 onwards	0	28
Proposed allocations without planning permission	309	337

- 4.8. The level of completions and commitments of new homes within the LSCs in the plan period so far has been constrained by use of Core Strategy policy CS3 which limits growth within Small Settlements primarily to residential infilling of up to 3 dwellings on a site unless site specific circumstances demonstrate that a larger scale of development secures the most sustainable option for the site.
- 4.9. Policies LP2 and LP9 should facilitate a slightly higher level of growth within LSCs, particularly when implemented in combination with policies LP29 and LP30 to encourage community planning proposals and rural exceptions housing supported by 40% market housing. Together these should assist in achieving the distribution of growth set out in policy LP2.

5. Small Settlements

Question 12: Are the Small Settlements appropriately defined, what is the basis for them?

- 5.1. It is acknowledged that the Small Settlements category includes a diverse range of villages with some including almost sufficient services to fall within the LSCS category and others having no services but comprising a sufficient cluster of homes to have a distinct identity as a village. The basis for the Small Settlements category lies in surveys of village facilities carried out between 2008 and 2014. The Small Settlements offer a lower level of service provision within the village and thus represent a less sustainable location in which to focus growth.
- 5.2. At the highest end of the range some Small Settlements have all of the following services primary school, public hall, food shop or public house. The exception to this is Earith which also has a doctor's surgery but was omitted from identification as a LSC as no sites were submitted for consideration in response to the Call for Sites in July 2017.

- 5.3. At the lowest end of the range of Small Settlements a lower threshold of 30 dwellings has been used to define the built up area and applied to distinguish Small Settlements from the open countryside. The few hamlets below this threshold typically have a dispersed settlement pattern with no clearly identifiable core; a small amount of sporadic or isolated development is to be expected within a healthy rural economy.

Question 13: Is the approach to the scale and type of development set out in Policies LP2 and LP10 justified?

- 5.4. The scale and type of growth anticipated in Policy LP2 for Small Settlements will be delivered through implementation of two policies. Policy LP10 Small Settlements is intended to facilitate growth within the built up area of any Small Settlement and is expected to be primarily small-scale proposals and redevelopment sites. Policy LP30 Rural Exceptions Housing is intended to facilitate much needed affordable housing within Small Settlements coupled with some market housing growth both to promote the viability of such developments and to widen the choice of new housing types and tenures available in Small Settlements.
- 5.5. The Cambridgeshire SHMA (HOU/07) identifies a trend towards decreasing average household size throughout the plan period. The approach is considered to be justified as a response to this challenge as it should facilitate sufficient new homes to at least maintain population levels to support local services and allow for a limited amount of organic growth of settlements. It also supports sustainability objectives from the SA (CORE/07) in particular those relating to climate change and energy, population and housing and transport infrastructure and commuting.

Question 14: What is the scale of development actually planned (including commitments) in [Small Settlements] and is this in line with the distribution set out in Policy LP2?

- 5.6. Table 4 below shows the scale of development anticipated in Small Settlements.

Table 4: Dwellings progress within Small Settlements

Progress	Dwellings	Running total
Completions by 31/03/17	494	494
Commitments on allocations at 31/03/17	0	494
Other commitments at 31/03/17	344	868
Proposed allocations granted permission 1/4/17 onwards	0	868
Proposed allocations without planning permission	0	868

- 5.7. The level of completions and commitments of new homes within the Small Settlements in the plan period so far has been constrained by use of Core Strategy policy CS3 which limits growth primarily to residential infilling of up to 3 dwellings on a site unless site specific

circumstances demonstrate that a larger scale of development secures the most sustainable option for the site.

- 5.8. Policy LP2 recognises the need to protect the character of existing settlements. Given the range of sizes and service levels available in Small Settlements some will be able to make a greater contribution to sustainable development than others. There are, however, 70 Small Settlements defined altogether which provide the opportunity to cumulatively make a significant contribution to the district's development needs. Policies LP2 and LP10 are expected to be implemented in combination with policies LP29 and LP30 to encourage community planning proposals and rural exceptions housing supported by 40% market housing. Together these should assist in achieving the distribution of growth set out in policy LP2.

6. Countryside and definition of built up areas

Question 15: Is the approach to the countryside in Policy LP11 justified, effective and consistent with national policy?

- 6.1. Policy LP 11 specifically relates to the protection of high value agricultural land and countryside within the District not otherwise covered by policy LP3: Green Infrastructure. This is consistent with paragraph 112 of the NPPF.
- 6.2. The policy recognises the intrinsic character and beauty of the countryside (National Planning Practice Guidance – Landscape: Paragraph: 001 Reference ID: 8-001-20140306) and ensures that any proposed development would not give rise to adverse impacts such as pollution from light, noise and odour which would affect the enjoyment of the countryside by others.
- 6.3. The policy does accept that some development may be necessary to support and maintain a thriving rural economy, traditional agriculture and other land-based businesses, but balances this with the requirement to protect high value agricultural land and countryside by minimising impact and requiring good design.
- 6.4. The policy was informed by the Huntingdonshire Landscape and Townscape Assessment SPD 2007 (ENV/02), which identifies topographic and drainage characteristics of the District, the grading of agricultural land and ecology. Landscape character areas are examined in detail (ENV02: Section 3 – Landscape Character, Pages 14) and identify key issues, including guidance on the future management and protection of areas. This document is identified in the policy (paragraph 4.117) as a tool for the formulation and determination of planning applications. The Assessment also draws upon the cross-boundary Cambridgeshire Landscape Guidelines and was developed with stakeholder participation in the form of workshops for interest groups and was subject to public consultation from the 15 December 2006 to 9 February 2007.

Question 16: Is the definition of built up areas appropriate and justified?

- 6.5. The built up area definition derived from the Huntingdonshire Core Strategy 2009 which sought to define the built up area in words, not through a defined spatial boundary. This was to be expanded upon through the Development Management DPD which reached proposed submission in 2010 but ceased in favour of a full plan review following designation of the enterprise zone at Alconbury Weald. The definition has now been incorporated into the Huntingdonshire Local Plan to 2036.
- 6.6. As part of the Houghton and Wyton Neighbourhood Plan examination (<http://www.huntingdonshire.gov.uk/planning/neighbourhood-planning/>) a built up area boundary was proposed, this was considered and the Plan 'made' on 26 March 2018.
- 6.7. The methodology used to inform the boundary sets out guiding principles coupled with notes to assist implementation to determine whether a site should be in the built up area or the countryside. This was submitted to the Examiner as an appendix to the alternative modifications which were published for consultation.
- 6.8. This approach is considered to be the most appropriate strategy as, among other benefits, it avoids the perception that any form of development on any land within a drawn boundary would be acceptable and the pressure for every piece of land within the boundary to be developed, thus damaging the loose knit character of many settlements in Huntingdonshire by creating harder, more regular edges to settlements.
- 6.9. The limit of 30 dwellings has been determined through a survey of the number of dwellings per parish. Below thirty dwellings, areas do not form a cohesive settlement pattern such as a hamlet and are generally instead formed of a series of farmsteads where although landholding may be contiguously linked, the distance from residential units is distant. Examples of these can be found in paragraph 4.83 of the Local Plan. Due to the nature of this 'settlement' pattern, further development would not be conducive, especially as there would be no nearby access to services and facilities to sustain a larger development population. This is in line with the paragraph 55 of the NPPF.

7. Flood risk

Question 17: How has flood risk been taken into account in arriving at the strategy and distribution of growth?

- 7.1. The strategy and distribution of growth has taken full account of flood risk through application of the sequential approach in the plan-making process (as recorded in the Sequential Test and Exception Test report (FLO/01)) as informed by an Environment Agency endorsed Level 1 and 2 Strategic Flood Risk Assessment (FLO/02).

Question 18: What was the approach to the sequential and exception tests when considering the distribution of growth and site allocations? Has the sequential test been applied correctly? Is the approach justified and consistent with national policy? What concerns have been raised and what is the Council's response to these?

- 7.2. The approach to the sequential and exceptions tests is recorded in the Sequential Test and Exception Test report (FLO/01).
- 7.3. The sequential test has been applied correctly and is consistent with national policy (NPPF paragraph 100) and the guidance in the national Planning Policy Guidance, as recorded in the Sequential Test and Exception Test report (FLO/01). The tests were correctly informed by the Level 1 and 2 Strategic Flood Risk Assessment (FLO/02) of June 2017.
- 7.4. The Environment Agency in its representation on policy LP5 is pleased the sequential test and approach are at step one of the policy, reflecting the primacy of the sequential approach in National Policy.

Question 19: Is Policy LP5 justified, effective and consistent with national policy?

- 7.5. Policy LP5 is justified, effective and consistent with national policy. It is drafted to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. It ensures that a development proposal does not increase flood risk to third party land and it requires all reasonable opportunities to be taken to reduce flood risk.
- 7.6. The policy has been soundly prepared to take account of the 1 and 2 Strategic Flood Risk Assessment (FLO/02) of June 2017 and the Cambridgeshire Flood and Water SPD 2016 (FLO/10), and in response to engagement and cooperation with the Environment Agency and other relevant flood risk management bodies.

8. Infrastructure

Question 20: What are the implications/requirements for transport infrastructure and how have these been taken into account? How will improvements be delivered and funded?

- 8.1. In accordance with NPPF para 162, the Council has worked with infrastructure partners to assess the impact of the growth projections. Increasing the infrastructure provision to support the growth has been examined in detail in the Local Plan Infrastructure Delivery Plan June 2017 (INF/01); Transport infrastructure is assessed in Chapter 5.
- 8.2. Chapter 3 of the Local Plan identifies the need to improve strategic transport infrastructure to support sustainable development. (NPPF para 31).The Cambridgeshire County Council

Long term Transport Strategy 2015(LTTS) identified high and increasing road traffic densities on some of the key routes and trunk roads in the District. Huntingdonshire Strategic Transport Study (HSTS) 2017 (INF/10)by Mott Macdonald modelled the impact of the growth through the Local Plan period and identified a package of costed road improvements to mitigate the growth. The study examined several development scenarios. Many of these scenarios revolved heavily around the delivery of a new improved A141 Northern Bypass, and an additional river crossing between Wyton-on-the-Hill and the A14. The large indicative cost and wider viability issues surrounding these schemes, meant that it would be doubtful whether certain scenarios could be delivered within the stated Local Plan period.

- 8.3. The development scenario taken forward for the final Local Plan was one which required neither a new improved A141 Northern Bypass or an additional river crossing . The HSTS identified a series of junction improvements on key strategic and local routes which would need be resolved; the costing of these was such that this order of investment could be deliverable through appropriate developer contributions.
- 8.4. The LTTS identified the A428 and A14 as key improvements which are underway or at the design stage. The new A14 under construction will ease congestion around the Spittals interchange. As suggested in the HSTS, the key enablers of growth revolve around the new A141 Northern Bypass, and additional river crossing. While these are not being considered for this submission, feasibility studies are currently being commissioned by the Combined Authority on these schemes; and it should be noted that schemes to mitigate future growth have not yet been exhausted.
- 8.5. The Cambridgeshire Transport Investment Plan 2017 highlights ongoing improvements to the above-mentioned roads- namely the A1, A14, A141 and A428.
- 8.6. Para 29 of the NPPF emphasises the need to provide alternative more sustainable modes of transport. The rural nature of much of the District places difficult demands for running efficient bus services and providing meaningful commuter cycle routes.
- 8.7. Rail capacity and connectivity via the ECML have been identified as areas to improve. A scheme to increase capacity through laying an extra line alongside the existing twin track at Woodwalton is likely to commence in 2018. An interchange with the proposed east west 'Varsity line' in or near to the District is currently at the design stage. A proposed new ECML station at Alconbury Weald is currently being examined. The Council has supported the business case for delivery through the recent consultation process with Network Rail.
- 8.8. The LTTS sets out that bus services will be reviewed as major developments come forward. The market town transport strategies (MTTS) for Huntingdonshire's four market towns identified a number of services that would need improving to accommodate the planned growth. These are included in the Cambridgeshire Transport Investment Plan; the plan is updated regularly and schemes are submitted for delivery as and when funding becomes available.

- 8.9. In line with the Governments Cycling and Walking Investment Strategy, the LTTS identifies walking and cycling as a key long term part of tackling congestion. The County has ambitions to increase the culture of cycling beyond Cambridge by providing greater opportunities to walk. The pedestrian and cycle network within Huntingdon and Godmanchester has been improved recently with new routes and safety measures. The LTTS identifies a number of improvement schemes required to directly support major development allocations.
- 8.10. Part 2 of the IDP included a schedule to prioritise infrastructure to meet the planned growth. Transport was included as well as schools and leisure facilities. Where possible, cost estimates of the proposals have been included.
- 8.11. Infrastructure has been prioritised into:
- Critical-must happen in order for development to proceed
 - Essential- necessary to mitigate impacts
 - Desirable- to achieve sustainable growth and place making objectives
- 8.12. Transport infrastructure not supported by Central Government or County funding will in many cases be funded by developer contributions. Since 2012, HDC has charged Community Infrastructure Levy and used receipts to fund transport initiatives, e.g. the Inner Relief Road, Huntingdon. Site specific needs are also met through using S106 agreements. Generally, S106 agreements are primarily used to deliver affordable housing with the exception of large scale major developments. To avoid undue burden on developers, viability assessments are undertaken and review mechanisms are sometimes employed.
- 8.13. Developer contributions alone will not meet the costs of transport needs of the Local Plan. Alternative funding streams will continue to be used and alternative new streams explored. HDC will continue to work with partnering the Highways Agency, CCC, Homes England and the Cambridgeshire and Peterborough Combined Authority (CPCA)-now administering the former GCGP LEP Growing Places Funding. For example, a bid the Cambridgeshire and Peterborough Combined Authority(CPCA) submitted an application to the 'Forward Fund' element of the 2017 Housing Infrastructure Funding. In the interim the CPCA has agreed to fund a feasibility study into the delivery of the crossing.
- 8.14. Project delivery will be addressed in a number of ways. The majority of projects, infrastructure will be provided by the developers and the timing will be controlled via S106 agreements. For strategic road transport, the Council will work with CCC, the Highways Agency and GPGC to deliver the projects. For smaller scale improvements, the Council is working with Parish and Town Councils to focus CIL income on infrastructure improvements to enable schemes to proceed.

Question 21: What are the implications for waste water infrastructure and capacity? What improvements are needed and how will these be put in place and funded? Is Policy LP6 justified, effective and consistent with national policy?

- 8.15 In accordance with NPPF 162, the Council has assessed the capacity for waste water through appointment of consultants ARUPS who have worked with local utility providers Anglia Water Services (AWS) and Cambridge Water (CW).
- 8.16 The strategy for the provision of waste water treatment was tested through the Sustainability Appraisal (CORE/07 page 64). Projected growth will cause localised shortfalls in water treatment capacity within the Plan period. Consequently, it is recognised that infrastructure upgrades at four waste water treatment works in the area- Oldhurst, Ramsey, Somersham and St Neots will need to be implemented with consultation with the EA and AWS prior to any early phasing of development. Contributions will have to be assessed as development schemes which exceed the local capacity come forward. The technical upgrades necessary have been identified and are achievable with conventional technology and so treatment capacity is not a barrier to growth (Huntingdonshire Water Cycle Study 2014). However, a pre-development enquiry with AWS will be required to determine capacity at the sites identified requiring upgrades. An increase in flows into the Middle Level Catchment will require agreement between AWS and the Middle Level Commissioners. ARUPS have confirmed that additional sites were considered in the 2017 IDP addendum and no additional treatment plants will require an upgrade.
- 8.17 Funding will consist of investment required under legislation by AWS in accordance with their existing Business Plan 2015 and the new Business Plan 2015 to 2020 will take account of the growth identified in the Local Plan. A developer contribution may also be required. In accordance with NPPF (173), the costs of provision will be taken into account in viability evidence submitted by developers in accordance with the Councils Developer Contribution SPD 2011 para 4.27. Should either of these funding options not be available, the Council can resolve to invest CIL receipts to enable development (LP4).
- 8.18 The provision of water efficiency measures to reduce waste water volumes generated by new development is supported under Policy 6 of the Sustainability Appraisal (CORE/07).

Question 22: Is the approach to Green Infrastructure set out in Policy LP3 justified, effective and consistent with national policy?

- 8.19 LP3 is an appropriate and consistent strategy delivering sustainable development in accordance with national policy. The NPPF (para 114) requires a strategic approach to planning and enhancing green infrastructure and improving biodiversity. In accordance with this and taking into account the Districts predominantly rural nature, the Council requires that new development will be counter- balanced through creation, protection and enhancement of green infrastructure to provide recreational and bio-diversity opportunities. The policy includes promotion of several long term Priority Areas that will be supported over

the life of the Local Plan including the Great Fen. The Great Fen Masterplan 2010 for example emphasises the need to balance tourism demand with nature conservation need.

- 8.20 LP para 4.36 highlights that the Policy recognises there will be some green infrastructure projects that extend beyond the District's boundaries (for example, the Nene Valley Nature Improvement Area). Collaborative joint-working arrangements will help ensure the policy is effective.
- 8.21 The Developer Contributions SPD 2011 sets out the greenspace contributions required by development. The policy is justified –without the Local Plan, opportunities for a particular green infrastructure enhancement could be lost. The Local Plan IDP has examined existing green infrastructure provision alongside the evidence base which was informed by the Cambridgeshire Green Infrastructure Strategy 2011, which identified the amount and quality of provision of greenspace and bio-diversity required. (Policy 7 of Core07 refers) Green Infrastructure requirements are identified in the IDP schedule. The policy allows flexibility for replacement provision where there is harm or loss to existing green space, provided there is a net benefit. Delivery will be through determining planning applications, requirement of developer contributions and reference to Neighbourhood Plans.

Question 23: What are the implications/requirements for other forms of infrastructure and how have these been taken into account? How will improvements be delivered and funded? Is Policy LP4 justified, effective and consistent with national policy?

- 8.23 The Infrastructure Delivery Plan (IDP) sets out at Chapter 4 the methodology used for assessing the requirements for other forms of infrastructure. The Infrastructure Delivery Plan Schedule and Addendum Report takes the evidence and analysis from the IDP and sets out the infrastructure requirements, indicative costs and timeframes to meet the infrastructure delivery requirements. Requirements for other forms of infrastructure have been taken into account by focussing most growth in the urban areas where there is already a critical mass of infrastructure provision to utilise and build on.
- 8.24 Improvements will be delivered and funded through a range of means depending on specific circumstances and type of infrastructure. Infrastructure meeting the tests of Regulation 122 and the Developer Contributions SPD (2011) will be secured through developer contributions and timed appropriately within S106 agreements. Site specific utility requirements will also be met, in part, through developer contributions and through direct developer requirements with the utility companies and the appropriate infrastructure provider strategic Management Plans.
- 8.25 Huntingdonshire is also a Community Infrastructure Levy (CIL) charging authority. As such funding from developments will help to support the delivery of wider infrastructure needs in line with the legislation.
- 8.26 Funding is also anticipated through a range of other sources including government programmes (such as the Housing Infrastructure Fund), Combined Authority funding,

Cambridgeshire Transport Plan, LEP funding, partner capital funding programmes and the CIL 'meaningful proportion'.

- 8.27 Policy LP4 is considered justified as, along with the Developer Contributions SPD, it sets out the requirements for infrastructure including transport (see response to Question 20). Whilst a difference in assumptions in household size is noted, the IDP takes a higher level and, as such, is potentially an overestimation of the infrastructure needs.
- 8.28 It is effective because a Schedule has been prepared with the IDP setting out the partner arrangements, costs, timing and funding opportunities for delivery.
- 8.29 The Council's approach has been consistent with NPPF Paragraphs 157 and 162 through working with partners in the development of the IDP and associated Schedule including costs, timeframes and known funding options.
- 8.30 It is consistent with national policy including PPG which states that for CIL setting, LPAs must consider what additional infrastructure is needed in their area to support development, and what other sources of funding are available, based on appropriate evidence. It is considered that current and appropriate evidence has also been taken into account in developing the IDP. PPG Paragraph: 016 Reference ID: 25-016-20140612 goes on to note that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term. Mechanisms and partnership working are in place to continually address and review this.
- 8.31 The Charging Schedule and Developer Contributions SPD have been through the necessary processes to comply with all policy and legislative requirements.

Question 24: Overall, what mechanisms will be in place to ensure essential/critical infrastructure will be provided and funded in a timely fashion? How will other organisations be involved in delivering infrastructure and what commitments to delivery/funding are there?

- 8.32 The IDP, Schedule & Addendum considers the infrastructure requirements and what is critical, essential or desirable noting timing for delivery and funding as required.
- 8.33 The Council has also produced an IDP (Part 3) Infrastructure Prioritisation, Funding and Programme management document as a final in the suite of infrastructure documents. The document provides a programme management tool to assist the Council and its partners to deliver the necessary infrastructure to support growth in the district. Infrastructure delivery has been further prioritised to take account of whether a clear project has been identified and what funding sources there are. The document also provides advice with regard to potential opportunities to rectify funding gaps where they are shown to exist. The final schedule identifies the critical and essential infrastructure within the further prioritised categories noting scheme status, costs, potential funding, delivery partners, funding gap and timescales.

8.34 The Council has a collaborative approach to delivery with infrastructure partners and funders. A Growth & Infrastructure (G&I) Group exists to act as a Project Board for the timely delivery and funding of the infrastructure needs for the district, to consider the priorities for spending of CIL and to ensure smooth working between the Council and partner organisations in relation to infrastructure. Partners involved include, but are not limited to:

- Cambridgeshire County Council
- Cambridgeshire & Peterborough Combined Authority
- Cambridgeshire & Peterborough Clinical Commissioning Group
- Environment Agency
- Highways England
- Parish Councils
- NHS England

8.35 Through membership of this group, partners are signed up to supporting the delivery of the necessary infrastructure for the Local Plan. Regular meetings take place with these partners as part of a package of initiatives to enable more focussed discussion with regards any critical or essential infrastructure needs.

8.36 As outlined in the IDP (Part 3) the funding arena continues change and the IDP 3 will be a tool for the Council to use with partners to ensure it is positioned to respond to this positively to support the timely delivery of critical and essential infrastructure. In addition, infrastructure partners have their own investment and management plan opportunities and there are new and evolving ways of funding, such as private sector academy sponsors and GP practice investment in facilities. The collaborative working with partners will maximise opportunities to deliver the necessary infrastructure.

8.37 The Development Management process along with S106 negotiations will also be key to meeting critical and essential infrastructure needs. Infrastructure providers and partners are consulted where appropriate following the submission of a planning application to review current infrastructure needs and any mitigation required in relation to that development.