

15 June 2018

Annette Feeney
Local Plan Programme Officer, c/o
Huntingdonshire District Council,
Pathfinder House,
St Mary's Street,
Huntingdon,
PE29 3TN
Sent by Email

Dear Annette Feeney

RE: Matter 3 (Development Strategy) Afternoon Session of Tuesday 17th July

On behalf of Homes England, this written hearing statement responds to three questions contained within the Matters and Issues Paper, Matter 3, due to be heard during the afternoon session on Tuesday 18th July. The statement is related to matters of detail and should not be read as an objection to the plan as a whole. In most cases it seeks minor modifications that will provide greater utilisation of existing allocations in line with the overall strategy for development and the broad distribution of growth.

Homes England would be pleased to discuss these representations in greater detail in advance of the examination in public if anything else is required.

Yours sincerely,



David Carlisle
Associate
AECOM Limited, on behalf of Homes England
david.carlisle@aecom.com

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?

The proposed submission Local Plan states that “social and economic priorities have influenced the development strategy through concentrating new growth in areas accessible to services, facilities and employment opportunities” concluding that “the spatial planning areas offer some of the best opportunities for promoting sustainable development in Huntingdonshire and meeting the everyday needs of residents in one place thereby reducing the need to travel”¹. The four historic market towns of Huntingdon, St Neots, St Ives and Ramsey are the largest centres of population and services in the district and Homes England agrees with the view that they represent the most sustainable locations for development across the Huntingdonshire District.

Notwithstanding any potential challenges to the Objective Assessed Need (OAN) within the Local Plan targets, notably arising from the revised household projections and the results of the Standard Methodology for Assessing Housing Need considered under Matter 4, Homes England seek to understand the proportionally low total allocations within the St Ives Spatial Planning Area (SPA).

The development strategy seems to be overly dependent on strategic expansion locations in Huntingdon (Alconbury Weald) and St Neots (St Neots East) SPAs and based on comparatively high completion rates and therefore an inflated housing trajectory compared with previous years. To supplement these strategic allocations, there is a necessity to utilise the potential of the existing site allocations to realise the local plan targets and act as reserve sites in the ongoing five year housing land supply.

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

Proposed Submission Policy LP2² states that “approximately three quarters of the objectively assessed need for housing and the majority of employment and retail growth will be focused in the spatial planning areas.” Whilst Homes England agrees with the approach of this development strategy, the St Ives SPA contains only 480 allocated homes despite its prominence in the settlement hierarchy, located in the top tier below only Huntingdon and St Neots.

Despite the Ramsey SPA being identified as containing approximately half the total population of the St Ives SPA (16,384 compared to 8,479³), the Ramsey SPA is allocated 415 more homes; a total of 895 homes. As a result the St Ives SPA contains below 2.5% of the Local Plan target despite being approximately 9.3% of the district population⁴. As a comparator and using the same figures, the St Neots SPA contains 17.2% of Local Plan target and 17.5% of the district population, with Ramsey 4.5% of the Local Plan target and 4.5% of the district population.

This comparatively low level of allocations fails to represent the high level of evidence which suggests that St Ives is a sustainable location for development. The Cambridge guided busway, opened in 2011, provides a dedicated route running from St Ives to the north of Cambridge and linking services elsewhere, allowing resident access to a wide range of employment opportunities across the sub-region. On a much more localised scale, there are five Industrial areas or business parks within the St Ives Parish⁵, with the Sustainability Appraisal showing that St Ives also has 17% of Huntingdon District’s office space⁶. In addition, the HELAA also demonstrates that “nowhere in the (St Ives) SPA is beyond 2kms from an employment area”⁷. The Proposed Submission Local Plan also states that whilst “Huntingdon, St Neots and St Ives provide reasonably vibrant centres, Ramsey has limited provision”⁸. As a result, the true potential of the St Ives SPA has not been fully utilised.

¹ Proposed Submission Local Plan. P33

² Proposed Submission Local Plan. P32

³ Proposed Submission Local Plan. P13

⁴ Based on the 176,100 mid-year estimate (2016) for Huntingdonshire

⁵ Proposed Submission Local Plan. P84

⁶ Huntingdonshire’s Local Plan to 2036: Final Sustainability Appraisal Report. P91

⁷ Huntingdonshire Local Plan to 2036 | Housing & Economic Land Availability Assessment (HELAA). P315

⁸ Proposed Submission Local Plan. P82

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

Over 80% of the development allocated in the St Ives SPA is contained within a single allocation; SI 1: St Ives West. This allocation accounts for approximately 400 homes over an area of 54ha. Whilst there is a need to avoid duplication of issues considered under Matter 8, the dominance and early delivery of the allocation is pertinent to the overall distribution of growth across the St Ives SPA.

The St Ives West allocation is split into four separate development parcels, three of which have outline planning permission including 184 homes contained within one, now implemented, outline permission on the former golf course⁹: The Spires. This development (184 dwellings) is identified in the housing trajectory to be completed in 2021/22, alongside: Houghton Grange (90 homes) by 2021; the How (8 homes) by 2021/22; the St Ives Football Club (30 homes) by 2020; the Former Car Showroom (trajectory shows 45 homes, although with an allocation of approximately 50 homes) by 2021. As a result, the St Ives SPA is projected to receive a significant proportion of its development over the next five years. The remainder of the St Ives West allocation, known as 'The Field' site, provides the only remaining allocated growth across the St Ives SPA for the remaining 15 years of the plan, currently approximately only 118 homes under the current Proposed Submission Local Plan wording. This represents less than a quarter of the total allocated development over three quarters of the plan period. This distribution of growth is not proportionate and undermines the sustainable and organic growth of St Ives over the entire plan period.

The Cambridgeshire Surface Water Management Plan identifies St Neots and St Ives as being at particular risk from surface water flooding, although the Strategic Flood Risk Assessment Table 12-1¹⁰ shows that only 2% of the St Ives West allocation is outside of Flood Zone 1. In addition, the proposed submission Local Plan's Sustainability Appraisal report shows that the St Ives West allocation was assessed during the Huntingdonshire Environmental Capacity Study (2013), although then described as comprising of approximately 500 homes alongside 22 ha of green space. The Sustainability Appraisal summarised that the St Ives West allocation was an area which "offers a sustainable opportunity for growing St Ives together with providing additional green infrastructure"¹¹, with "significant capacity for new residential accommodation in this location"¹².

The overall capacity and site specific considerations of allocation SI 1 relating to anti-coalescence and detailed urban design work will be more appropriately contained within a supplementary hearing statement submitted under Matter 8; demonstrating the potential for significantly increased capacity for the future development within the St Ives West allocation.

⁹ Proposed Submission Local Plan. Appendix B P285

¹⁰The Cambridgeshire Surface Water Management Plan. P79

¹¹ Huntingdonshire's Local Plan to 2036: Final Sustainability Appraisal Report. P398

¹² Huntingdonshire's Local Plan to 2036: Final Sustainability Appraisal Report P397