Huntingdonshire Local Plan to 2036 Examination

Hearing Statement Matter 6:

Proposed site allocations – Huntingdon Spatial Planning Area

Huntingdonshire District Council

July 2018



Contents	
Strategic Expansion Location: Alconbury Weald	
SEL1.1 – Former Alconbury Airfield and Grange Farm	1
SEL1.2 – RAF Alconbury	11
Huntingdon	
HU1- Ermine Street	18
HU2- Former Forensic Science Laboratory	25
HU3- Former Police HQ site	30
HU4- West of Railway, Brampton Road	36
HU5- West of Edison Bell Way	41
HU6- George Street	46
HU7- Gas Depot, Mill Common	52
HU8- California Road	58
HU9- Main Street	63
HU10 – Hinchingbrooke Country Park Extension	68
HU11- Huntingdon Racecourse	72
Brampton	
HU12- Dorling Way	77
HU13- Brampton Park	82
HU14- Brampton Park Golf Club Practice Ground	90
HU15- Park View Garage	94
Godmanchester	
HU16- Tyrell's Marina	99
HU17- RGE Engineering	105
HU18- Wigmore Farm Buildings	112
HU19- Bearscroft Farm	115

Appendices

Appendix 1 – Extract from NLP Start to Finish

Appendix 2 - HWAAP

Appendix 3 - RAF Brampton Urban Design Framework



Huntingdonshire Local Plan Policies Map: Huntingdon Spatial Planning Area Allocated Sites

Scale 1:40,000 Date: 02/07/2018



Issue

Whether the proposed site allocations for the Huntingdon Spatial Planning Area are justified, effective and consistent with national policy.

1. Strategic Expansion Location: Alconbury Weald

SEL1.1 – Former Alconbury Airfield and Grange Farm

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 1.1. This site comprises Huntingdonshire's largest parcel of previously developed land and is located in close proximity to the A1 (M), the A14 and the East Coast mainline railway.
- 1.2. This piece of land was put forward following designation of the Alconbury Airfield Enterprise Zone in 2011 and originally assessed in the Environmental Capacity Study: Huntingdon Spatial Planning Area document consulted upon between August 2012 and November 2012 (HOUS/02: Availability, page 131). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 128-131 for full assessment).
- 1.3. This site is considered suitable for a mixed density mixed use development focused around the 150ha enterprise zone which is expected to provide around 8,000 jobs by 2036. The amount of residential development and employment uses will influence the amount of land required for services to meet the needs arising from the development, this results in some flexibility over the capacity of the site (HOUS/02: Suitability, page 131).
- 1.4. It has the opportunity to provide a new neighbourhood in conjunction with the enterprise zone designated in 2011 and is of sufficient size to provide services and facilities to meet demand created on site with easy access to Huntingdon for other services. Its attractiveness to the market is demonstrated by the fact that a series of planning permissions have already been gained and development commenced for employment, residential, educational and open space uses.

Question 2: What is the scale and type/mix of uses proposed?

1.5. The site is allocated for a mixed use development comprising of 5000 homes (including 400 units of supported housing some of which may be classed as residential institutions) with potential for more homes to be supported subject to capacity. At least 290,000m² of business floor space (class 'B') is proposed on the designated 150ha Alconbury Enterprise Zone. Approximately 7,000m² retail floor space (class 'A') is proposed including approximately 4,500m² shop floor space (class 'A1'), with a maximum of 1,500m² floor space in any one store. Educational and community facilities are also proposed including a secondary school, at least 3 primary schools and day care/ nursery provision, indoor and

outdoor sports facilities and strategic green infrastructure incorporating publicly accessible natural green space. Transport infrastructure improvements proportionate to the scale of development are required and land should be safeguarded to facilitate provision of a realigned A141.

1.6. The type and mix will be determined through the application of policy LP 26 Housing Mix once adopted.

Question 3: What is the basis for this and is it justified?

- 1.7. A representation by SFHL Ltd/ Bloor Homes (South Mids.) (ID: 1118804) objecting to paragraph 9.10 of the Local Plan (CORE/01) expresses concern at the suggestion that the allocation has the potential to accommodate 6,500 dwellings, when the planning application approved a maximum of 5,000 homes in principle and there is a requirement for additional transport modelling to demonstrate that highway impacts beyond the detailed modelling for 879 homes can be overcome. The objector contends that the amount of development allocated in the Local Plan has not been properly tested and the evidence base to support the draft Local Plan does not support this commentary.
- 1.8. Ms Ramune Mimiene (ID: 1054786) of the Stukeleys Parish Council objects in particular to the supporting policy text in paragraph 9.10 which identifies a potential for a further 1500 dwellings on Alconbury Weald.
- 1.9. In response to these objections the Council makes clear that the site comprises Huntingdonshire's largest parcel of previously developed land and is located in close proximity to the A1 (M), the A14 and the East Coast mainline railway. Assessment through the HELAA (HOUS/02 page 131) determined a scale of development of 6,475 dwellings if developed at a lower density of 35 dph or 7,400 if developed at a mixed density of 40 dph. These figures were estimated on the basis of the total site area of 575 ha from which 150ha is deducted for the enterprise zone, a further 20ha is deducted for community, educational and retail uses, a further 25ha is deducted for a further education and sports campus and a further 10ha is deducted for energy, waste and transport uses. This gives a balance of 370ha for residential development at 50% net developable area. For employment uses the HELAA references the existing 150ha enterprise zone which is expected to provide around 8,000 jobs by 2036. The scale of development and the mix of uses is based on evidence and justified.
- 1.10. Policy LP 26 is justified through the application of Cambridge Sub-Region SHMA (HOUS/07) and Peterborough SHMA (HOUS/08) and local housing need and strategies (including HOUS/06). By referring to up-to-date evidence the policy ensures that the most appropriate strategy is employed in line with local demand and settlement type and location, or proximity to the most appropriate housing market area consistent with paragraph 50 of the NPPF and NPPG Housing and economic development needs assessments.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

- 1.11. Outline planning permission for 5,000 dwellings (planning reference 1201158OUT) was approved in October 2014 and has had subsequent Reserved Matters applications submitted.
- 1.12. 1401979REM for a primary school was approved in April 2014, the development commenced in April 2015. The primary school opened in September 2016.
- 1.13. 15/01117/REM (application for 128 dwellings) approved in December 2015. As of May 2017 48 homes had been built and a further 42 were under construction.
- 1.14. 16/00752/REM for the construction of a mixed use Innovation, Manufacturing, Engineering Building (iMET) including office, research and development and a training facility (Use Class B1(a)/B1(b)) was approved in June 2016. The development commenced in January 2017.
- 1.15. 16/01329/REM (application for 165 dwellings of which 15 will be affordable) approved in December 2016. As of May 2017, 7 homes were under construction.
- 1.16. 16/02013/REM (application for 200 dwellings of which 15 will be affordable) approved February 2017. Construction started in May 2017.
- 1.17. 16/02663/REM (application for a business incubator unit comprising of 1,710m² of 'B1' use) was approved in March 2017 and commenced on the 23rd August 2017.
- 1.18. 17/00079/REM (application for 101 dwellings, 6 of which will be affordable) approved May 2017 and commenced on the 30th May 2017.
- 1.19. 17/00434/FULL (application for the change of use of the former airfield watch office to community use (class 'D1') was approved in June 2017 and commenced on the 29th January 2018.
- 1.20. 17/00802/REM (application for 6 houses and 31 flats of which 6 will be affordable) approved August 2017 and commenced on the 8th January 2018.
- **1.21.** Housing development has commenced on three parcels of land within the site and several buildings for employment and leisure uses have been completed.

Question 5: What are the benefits that the proposed development would bring?

1.22. The HELAA (HOUS/02 – page 131) identifies that the site will be home to a substantial new community on Huntingdonshire's largest parcel of previously developed land. Taking the Framework policies into account, and in accordance with its Section 1, the development would have important economic benefits through provision of significant employment development and provision of large scale housing development and associated employment in the construction of the housing (including in the supply chains of materials, fittings and furnishings) and in the local economic contribution from future residents. There would be

important social benefits from the provision of market and affordable homes for the residents in accordance with Section 6 of the Framework and in the creation of public recreational land on the open space in accordance with Section 8. The laying out of the parkland and other landscaping, and green infrastructure links to the Ouse Valley and Great Fen would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11.

1.23. In accordance with Section 4 of the Framework the site would also be sustainably located close to the A1 and A14 trunk roads, and future residents will have access to on site employment and other facilities like schools, and community and sports facilities. Opportunities exist to incorporate a new railway station in coordination with Network Rail's proposed upgrading of the East Coast Mainline; and extensions to the Cambridgeshire Guided Busway route should be explored fully to facilitate links to Huntingdon and further afield to Cambridge and Peterborough.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 1.24. The proposed allocation for potentially 6,500 dwellings and 290,000 sqm of employment floor space and other associated development would, as assessed by the HELAA (HOUS/02) have potential adverse impacts on landscape, heritage, roads, competition with Huntingdon Town centre, and impacts on drainage infrastructure, the SSSI alongside the railway, heritage (the site contains high grade listed buildings and a scheduled ancient monument), water quality, noise and light pollution.
- 1.25. Ms Ramune Mimiene (ID: 1054786) of the Stukeleys Parish Council objects in particular to the supporting policy text in paragraph 9.10 which identifies a potential for a further 1500 dwellings on Alconbury Weald due to potential adverse impacts from additional traffic movements through the villages and the uncertainty in the policy on where the additional 1500 homes will be accommodated on the site and how this may affect land already secured for green space to act as a buffer between new development and the villages.
- 1.26. The outline planning permission for 5,000 dwellings and 290,000 sqm of employment floor space demonstrated that the adverse impacts of developing the site can be satisfactorily mitigated and the site allocation policy SEL1.1 builds upon this and the Council's knowledge and experience gained during consideration of the outline planning permission, and it sets the criteria for successful development of the site and guidance for developing the site to mitigate against the potential adverse impacts.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

1.27. The site has been assessed in the Sequential Test for Flood Risk (FLO/01, page 12) which identified 98% of the site is within Flood zone 1 with 1% in Flood zone 3a and 1% in Flood zone 3b.

1.28. Given the size of the site, development can be placed away from Flood Zones 2 and 3, with the area affected by flood risk left undeveloped. There is approximately 577 hectares of land available outside of the Flood Zones and therefore most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 1.29. There are development constraints to consider set out in HOUS/02 (pages 130-131). Being a former airfield, existing infrastructure is limited; new infrastructure in terms of education, leisure and community uses is required to enable a sustainable cohesive community to develop. In addition there are listed airfield structures, a scheduled monument (a wood), some contamination and extensive demolition is required. New road junctions and a new link to the A141 is also required.
- 1.30. Infrastructure costs have been identified in the IDP schedule (INF/02).
- 1.31. Development is underway. Infrastructure contributions will be met through S106 agreements. The developer has invested heavily in early infrastructure and utility provision to enable early phases. Take up of loan funding from Homes England has helped finance these upfront costs.
- 1.32. The outline planning permission considered the infrastructure requirements anticipated to enable the development to proceed in a sustainable manner. Given the long term nature of the full development, flexibility will need to be retained to respond to changing circumstances, technologies and methods of service provision (HOUS/02: Achievability, page 131).

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

1.33. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 1.34. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Huntingdon will be served by the Huntingdon Wastewater Treatment Works. The Water Cycle Study acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.
- 1.35. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and off-site reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 1.36. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 1.37. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 1.38. The site is viable and deliverable for the approved planning permissions.
- 1.39. The first phase of development is underway with three housebuilders currently on site. A viability appraisal was submitted with the planning application to determine the viable level of affordable housing. An agreement was reached which set a minimum level of affordable housing of 12.5% and a maximum of 40% with review mechanisms in place. The 'floor' level agreed reflects the relatively high costs of providing education facilities, road and utility infrastructure, the required demolition work and significant land remediation work.

Question 11: What is the expected timescale and rate of development and is this realistic?

- 1.40. Proposals for development at Alconbury Weald first came forward through an outline planning application in 2012 after the enterprise zone was designated in August 2011. The lead-in time for development on this site has been short and completions are underway. The first 'Incubator' building for employment use was completed in 2013 and the Alconbury Weald Club (providing offices, café, public meeting space/ gym) was completed in 2016, the Church Street Academy primary school opened in 2016 and the first 48 homes were completed in 2016/17.
- 1.41. The site is progressing well with reserved matters agreed on five residential parcels for development by four different house-builders. The Council works in close co-operation with Urban&Civic who are the master developers for the site and discussions on bringing forward the next two development parcels for 381 dwellings by Crest Nichols and Hopkins Homes are at an advanced stage.
- 1.42. The first 48 homes were completed in 2016/17 and a further 102 homes are expected to be completed in the year 2017/2018. The site is expected to be built out across the plan period. The timescale for delivery is set out below:

No. units in years 1-5					21/22 Yr. 5		23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35		Total 17/36
1087	102	220	260	260	245	250	250	250	250	250	250	300	300	300	300	300	300	285	280	4952

The first three years (including 2016/17) see a steady increase in the numbers of dwellings completed as infrastructure is put in and the site opened up. After this, an annual rate of between 245 and 260 dwellings is anticipated for the next 9 years followed by peak delivery rates in 28/29 to 33/34 of 300 dwellings per year and completions slowing slightly in the last 2 years as the site reaches completion of its currently permitted 5,000 dwellings.

1.43. Research by Nathaniel Lichfield (Start to finish, pages 12-17, attached as Appendix 1) published in 2016 and based on sites of over 500 dwellings being developed mainly from 2004 onwards considered the influences of site size and number of developers on site on peak and annual average build out rates. This concluded that sites for over 2,000 dwellings average 161 dwellings per year. However, the top five such sites averaged 245 dwellings per year with peak rates between 409 and 620 dwellings. Of the top five sites Cambourne is within the same Cambridge housing market area, the first homes were competed in 1997 with 4,114 completions by March 2017. The peak delivery rate was 620dpa achieved in 2003/04, delivery continued throughout the recession with build out rates in excess of 250dpa being achieved in four years and in excess of 200dpa in ten years. The Hamptons is on the southern edge of Peterborough and immediately adjoins the north of Huntingdonshire. Again the first completions were delivered in 1997 with peak completions

of 548 dwellings and an annual average of 224. The report also noted that a key influence on build out rates was the number of housebuilders on site.

- 1.44. The anticipated delivery rates for Alconbury Weald are not unprecedented and other equally ambitious councils are now seeking to boost housing delivery.
- 1.45. South Cambridgeshire district proposes 1,655 dwellings at Cambourne West for 2011-31 with a further 695 dwellings post 2031 and 1,360 dwellings at Bourn Airfield for 2011-31 and a further 2,140 beyond 2031. After the first couple of years the Housing Trajectory in the AMR 2016/17 sets out a steady completion rate of 150dpa for each site. Cambourne West is contiguous with the western edge of Cambourne and Bourn Airfield adjoins the eastern edge of Cambourne; they are located just 2.4kms apart. In comparison, the first phase of homes at Alconbury Weald is 3.3kms from the eastern end of the site by the East Coast mainline. Therefore, separate phases of development could potentially be brought forward concurrently at Alconbury Weald facilitating a build out rate of 300dpa.
- 1.46. Also nearby are the four councils which work collectively as the North Northamptonshire Joint Planning and Delivery Unit: Kettering, Corby, East Northamptonshire and Wellingborough. Together they are pursuing a series of strategic urban extensions to provide a significant boost to their housing delivery. After initial lower rates over the first 4 to 5 years of development the housing trajectories presented in each relevant Annual Monitoring Report¹ anticipates substantial delivery with the lowest projected to deliver 250dpa at Wellingborough East, then Hanwood Park 280dpa, West Corby and Priors Hall Park 300dpa each. Urban&Civic became master-developers at Priors Hall Park in 2017 and have the same role at both Alconbury Weald and the Wintringham Park element of the St Neots eastern expansion location. Urban&Civic are now bringing forward schemes totalling 20,000 dwellings, they have a further 10,000 on strategic sites in the planning pipeline and a further 10,000 dwellings on smaller sites promoted by group subsidiary Catesby.
- 1.47. Further afield Winchester City Council and Fareham Borough Council are promoting North Whitely urban extension for 3,500 dwellings and Welborne Garden Village for 6,000 dwellings respectively which are located approximately 3kms apart. The 2016/17 housing trajectories for North Whitely indicates alternate ongoing delivery rates of 300 and 350 dwellings per year from 2022/23. Following adoption of the Welborne Plan in 2015 and to support preparation of the draft Fareham Borough Plan 2017 Lichfields were commissioned to prepare 'Welborne Garden Village: A Delivery Trajectory for Welborne' (October 2017). This assumes an average build out rate of 300dpa over a 20 year period delivered across five tranches of development with Buckland acting as master-developer. However, a more cautious 250dpa has been included by Fareham BC in their 2016/17 housing trajectory. Together these are anticipated to deliver alternate annual completions of 550 and 600 dwellings in close proximity, similar to Alconbury Weald and other nearby sites within the Huntingdon spatial planning area.

¹ North Northamptonshire Authorities' Monitoring Report (AMR) 2016/17 Assessment of Housing Land Supply (2018-23) January 2018 and each authorities accompanying site schedule.

- 1.48. The research by Nathaniel Lichfield (cited above) highlighted Cranbrook in Devon as achieving an average of 321 dwellings per year from 2012/13 onwards and a peak of 419 dwellings but with only three years' of data available. Cranbrook is a key element of Exeter and East Devon's 'West End' proposals for substantial growth including a new town, enterprise zone, airport business park and two other strategic housing sites supported by a new railway station and major highway infrastructure improvements. All sites are within 2.5kms of Cranbrook. The East Devon Schedule of Sites in the Housing Monitoring Return for the Year Ending 31 March 2017 (March 2018) sets out delivery expectations for Cranbrook of 350 dwellings a year for 2018-19-2019/20 and then in excess of 400 dwellings every year to 2030/31. The West End as a whole seeks to deliver an annual average of 641 dwellings a year from 2018/19 through to 2030/31 which is the end of their plan period.
- 1.49. The above examples demonstrate that although ambitious, the timescale and rate of development at Alconbury Weald is realistic and is not unprecedented both within the Cambridge and adjoining Peterborough housing market areas as well as further afield. The Council has worked positively with the developers putting in place a Planning Performance Agreement (PPA) to provide a dedicated officer for this scheme and to ensure the application was determined in a timely fashion. That PPA remains in place post-decision to ensure planning conditions are discharged, subsequent applications are considered within shorter timescales, and that we continue to work collaboratively to maintain speed of delivery at Alconbury Weald. That approach has been replicated on other sites including Wintringham Park. Furthermore, post-decision delivery agreements between the Council and developers are being considered on other schemes with a view to ensuring continuous delivery of housing.
- 1.50. It is considered that the delivery as set out above is achievable as regard is also had to the proximity of Huntingdon to the A14 and A1, both strategic trunk roads in the East of England, providing connectivity to London and the north, as well as Cambridge, Bedford and beyond which will include the proposed expressway between Oxford and Cambridge.
- 1.51. Planning permission 1201158OUT for Alconbury Airfield (Alconbury Weald) also includes a reserve site for a railway station. In the event this does come forward this would further reinforce the opportunities to accelerate delivery both for the site and surrounding area as not only would the railway station be on the East Coast Main Line but also provide an opportunity for future residents to access the East West rail line proposed by the NIC as part of the Oxford Cambridge growth corridor as it will intersect with the East Coast Main Line.
- 1.52. The scale of Alconbury Weald allows for variety in the size, design and context in house types and character areas which are being addressed through the use of design codes in setting the vision for the area. Four different developers already have sales outlets and are building homes on the site and another is forthcoming. The trajectory has been prepared in partnership with the developers of the site. It is considered that based on the partnership approach being followed and the progress made, the timescale and proposed rate of delivery for this development are realistic.

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

1.53. The boundary of the site coincides with that for the outline planning permission and so is considered to be appropriate.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 1.54. The detailed policy requirements are justified and based on the Council's experience and knowledge gained during consideration of the outline planning application (1201158OUT), and on a proportionate evidence base including the HELAA (HOUS/02), the Huntingdonshire Local Plan Viability Study (INF/04), Employment Land Study (ECON/01) and Huntingdonshire Strategic Transport Study (HSTS) (INF/11).
- 1.55. The site owner Urban & Civic (ID 1118661) objects to criterion 'g' of the detailed policy requirement owing to a lack of clear justification for the safeguarding of land to facilitate provision of a realigned A141.
- 1.56. The modelling done in support of the HSTS indicates that the inclusion of a re-routed A141 northern bypass is fundamental in transport terms to delivering future growth to the north of the A141 and River Great Ouse. The headline results of the various packages of mitigation measures can be seen in the Huntingdonshire Strategic Transport Study (INF/09) at:
 - Development Scenario 1 4.2.1 Table 20 (pg.50)
 - Development Scenario 2 4.3.1 Table 26 (pg. 56)
 - Development Scenario 3 4.4.1 Table 32 (pg.61)
 - Development Scenario 4 4.5.1 Table 38 (pg.68)
 - Development Scenario 5 5.4.1 Table 48 (pg.81)
- 1.57. The results of the modelling undertaken indicate that all of the original four development scenarios put forward for testing by the Council require the provision of either a realigned A141 or a third river crossing to alleviate the resulting congestion on the existing routes. As a result of this the Council put forward further development scenarios for assessment. The results of the modelling undertaken indicate that Development Scenario 5 only requires the package of junction mitigation measures (as set out in test 1) to mitigate the impact of the proposed development sites, rather than the significant infrastructure investment required by the other scenarios
- 1.58. It is in this context that the Council has decided to safeguard the land to provide for a realigned A141. The Council is supported in this decision by the County Council including the scheme in its Long Term Transport Strategy 2015 (page 4-8) for delivery in 2020-2030. The policy commitment contains the following proviso: "[a new A141] (INF/13) would only be delivered if conditions on the network required it, or if it were needed to support growth."

The Council understands this, and the results of the Huntingdonshire Strategic Transport Study indicate that future growth will necessitate the delivery of this scheme.

- 1.59. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, pages 104-105, 446-447) and Statement of Representations (CORE/04, Pages 79-83).
- 1.60. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG². The site is developable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development is available now can be completed the plan period.

SEL1.2 – RAF Alconbury

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 1.61. The site is currently occupied by the United Stated Air Force and is an operational military base.
- 1.62. This site has been declared redundant by the Ministry of Defence. Recent engagement with the Station Commander indicated that it is expected to be released in the early 2020s. The site has been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 132-135 for full assessment).
- 1.63. The site is well related to the designated enterprise zone which has potential to provide significant employment; also, there are currently significant services and facilities within the site many of which have potential for reuse. Therefore, the land is considered suitable for a mixed density residential led development across a net developable area of 50% of the site resulting in an estimated capacity of 1,680 dwellings (HOUS/02: page 134).

Question 2: What is the scale and type/mix of uses proposed?

- 1.64. The site is allocated for a mixed use development comprising of approximately 1,680 dwellings, a primary school and social and community facilities to meet the needs arising from the development.
- The type and mix of residential units will be determined through the application of policy LP 26 Housing Mix.

² Housing and economic land availability assessment

Question 3: What is the basis for this and is it justified?

- 1.66. Initial assessment in the HELAA (HOUS/02 page 134) identifies that the site comprises previously development land that is currently occupied by the USAF but is considered likely to become available for redevelopment within the next ten years as it has been declared redundant by the Ministry of Defence. The land is considered potentially suitable for a mixed density residential led development across a net developable area of 50% of the site. This results in an estimated capacity of 1,680 dwellings. The site is adjacent to the Alconbury Weald allocation in the Local Plan (SEL1.1) and it is expected that the two developments will be integrated and will share services and facilities, albeit there are currently significant services and facilities on the site, many of which have potential for reuse; for example a medical and dental centre (built 2012), a primary school and social and sporting facilities.
- 1.67. Representations submitted by Mr Tom Thornewill (ID: 1118661) of Hallam Land Management, the Fairfield Partnership (ID: 1140352) and Gladman Developments (ID: 1118265) express doubt as to when the site will be vacated by the MoD, and the knock-on effect on delivery. The Ministry of Defence supports the allocation and makes a representation (ID 1149721) that it is expected to be available for development from around 2024 and it welcomes the incorporation of the site into the Alconbury Weald Strategic Expansion Location to promote comprehensive redevelopment and assist with integrating the site with the adjacent former airfield site into a single new community.
- 1.68. Urban & Civic (ID: 992844) the owner of Alconbury Weald (Local Plan site allocation SEL1.1) objects to the policy for reasons including the need to strengthen the policy aspiration for the two sites to be integrated and to clarify the acceptable range of uses. The Council considers that whilst integration with Alconbury Weald (Local Plan site allocation SEL1.1) is the most desirable outcome, it is not the only satisfactory outcome for development of the site. The policy is therefore justified in making provision for the allocation to be built out and occupied independently from Alconbury Weald.
- 1.69. Policy LP 26 is justified through the application of Cambridge Sub-Region SHMA (HOUS/07) and Peterborough SHMA (HOUS/08) and local housing need and strategies (including HOUS/06). By referring to up-to-date evidence the policy ensures that the most appropriate strategy is employed in line with local demand and settlement type and location, or proximity to the most appropriate housing market area consistent with paragraph 50 of the NPPF and NPPG Housing and economic development needs assessments.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

1.70. No planning application has yet been submitted.

Question 5: What are the benefits that the proposed development would bring?

1.71. Taking the Framework policies into account, and in accordance with its Section 1, the development would use previously developed land, have important economic benefits through employment in the construction of the housing (including in the supply chains of materials, fittings and furnishings) and in the local economic contribution from future residents. There would be important social benefits from the provision of market and affordable homes for the residents, and open space in accordance with Section 6 of the Framework. In accordance with Section 4 of the Framework the site would also be sustainably located with access to employment and facilities by means other than the car including cycling facilities, with opportunities to integrate with the adjacent Alconbury Weald allocation (Local Plan allocation SEL1.1).

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 1.72. The HELAA (HOUS/02 page 134) identifies potential adverse impacts with regards to capacity in the waste water treatment works, transport impacts, noise and light pollution, impacts on the Little Stukeley Conservation Area, Listed Buildings on Pringle and Church Way, and possible impacts on protected species which may inhabit the site.
- 1.73. Ms Ramune Mimiene (ID: 1054786) of the Stukeleys Parish Council objects and is concerned about traffic impacts, and considers that there should be increased green separation between the allocation and Little Stukeley, and that opportunities to reduce traffic using Ermine Street by utilising existing and planned routes within Alconbury Weald, and enhancing pedestrian and cycle routes should be considered along with reusing some of the existing buildings and infrastructure. They also consider that the scale and function of the retail and services elements of the Alconbury Weald development will need to be reviewed so that they are adequate for a significantly larger catchment population.
- 1.74. Mr Colum Fitzsimons (ID: 1150302), Cambridgeshire County Council objects on the basis that the wording in paragraph 9.29 of the Local Plan (CORE/01) be strengthened to make clear that "Secondary education provision is expected to be provide on the adjacent SEL 1.1 Former Alconbury Airfield and Grange Farm site and capacity must be provided to meet the additional need generated by SEL1.2. The respective developers of SEL1.1 and SEL1.2 will be expected to work cooperatively and constructively to ensure this is facilitated". The Council is satisfied that its wording in paragraph 9.29: "Secondary education provision is expected to be provide on the adjacent SEL 1.1 Former Alconbury Airfield and Grange Farm site. 1.1 Former Alconbury education provision is expected to be provide on the adjacent SEL 1.1 Former Alconbury Airfield and Grange Farm site, which may necessitate further capacity than has been planned thus far" is sufficient and retains appropriate flexibility to account for changing circumstances.
- 1.75. In response to potential adverse impacts as identified in the HELAA and raised in representations, mitigation measures are identified in the HELAA (HOUS/02 page 134) and within SEL1.2 in the Local Plan and include the requirement for a public masterplannning exercise, enhancement of the significance of affected heritage assets and their settings,

landscape design recognising vistas, long distance views, boundaries and green infrastructure networks, satisfactory integration with the former Alconbury Airfield and Grange Farm, provision of a sustainable transport network for pedestrians, cyclists and vehicles incorporating links to the surrounding area, satisfactory resolution of any impact caused by traffic generated from the allocation on the surrounding local road network having regard to a transport assessment and travel plan and provision of primary and early years education facilities, in agreement with Cambridgeshire County Council (CORE/01, criteria a, b, d, e, f, g and k).

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

1.76. The site is in Flood zone 1 (FLO/01, page 9). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 1.77. Similar to Alconbury Weald, the site will require extensive demolition, preservation of heritage assets and new educational, social and community facilities. However, there are some existing community, health, education and social facilities that could be retained to partially meet the needs of the residential development. The key constraints are set out in detail in HOUS/02 page 132 and 134. In summary, constraints are primarily around protection of nearby conservation area, listed buildings, ancient monuments, tree preservation orders, SSSI's, a wildlife area and rights of way. The internal road network will need to link with the neighbouring Alconbury Weald development to reduce local traffic generation.
- 1.78. INF/02 identifies details of the infrastructure that will be required. There may be opportunities to re-use existing educational provision.
- 1.79. All costs will be met by a combination of S106 contributions, CIL investment, Council investment, County investment or other grant funding sources when a planning permission is implemented.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

1.80. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 1.81. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Huntingdon will be served by the Huntingdon Wastewater Treatment. The Water Cycle Study acknowledged Huntingdon as reaching capacity, with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.
- 1.82. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and offsite reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 1.83. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 1.84. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 1.85. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6). The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).
- 1.86. The Study is not site specific, as this is not a requirement for the local plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 1.87. Policy LP25 (affordable housing provisions) seeks a target of 40%. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is not viable due to specific site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal. The viability work within INF/04 indicates that the typology that this site falls into will generally indicate strong viability.

Question 11: What is the expected timescale and rate of development and is this realistic?

- 1.88. In September 2017 the United States Embassy formally updated the Ministry of Defence that their intended departure from RAF Alconbury was to be delayed by two years and will now occur no earlier than 2024. The projections set out in the Annual Monitoring Report 2017 (MON/01, pages 81-82) have been deferred accordingly, which means 360 dwellings are now anticipated to be delivered post 2036.
- 1.89. The first 50 homes are expected to be completed in the year 2028/2029, the timescale for delivery is set out below:

No. units in years 1- 5		29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total 17/36
0	50	180	185	185	180	180	180	180	1320

- 1.90. This timeline is realistic. The MoD is supportive of the allocation and would be expected to engage in an early proactive exercise of site promotion to choose a developer of the site. If an application was submitted in 2024/2025 following early promotion of the site to developers and approved in 2025/2026, it is anticipated that partial site clearance could take place concurrently with the submission and approval of reserved matters for homes in 2026/2027 with first completions in the year 2028/2029 as per the table above. The Council has worked with DIO in the redevelopment of other redundant MOD land, namely Alconbury Airfield and RAF Brampton. In both cases houses were delivered within 4 years. This timeline therefore compares favourably to the actual delivery timeline of housing on the considerably larger development at Alconbury Weald as reported in the paragraph below.
- 1.91. For Alconbury Airfield, now known as Alconbury Weald, the outline planning application (ref. 1201158OUT) was submitted in August 2012 and was approved in October 2014. The first housing reserved matters application (ref. 15/01117/REM) was approved in December 2015. The December 2016 Annual Monitoring Review records that whilst no dwellings were completed by 31 March 2016, 12 were under construction, following the prompt discharge of the (few) pre-commencement planning conditions. The December 2017 Annual Monitoring Review records that 48 dwellings were completed between 1st April 2016 and 31 March 2017 and a further 50 were under construction. This means the timescale from submission of the outline planning application to the first housing completion was 4 years.
- 1.92. Council officers and consultees have considerable experience of working with developers to deliver large housing sites. The Council reasonably anticipates that the delivery timeline for homes on allocation site SEL1.2 from the submission of an outline planning application to the completion of first homes is capable of being shorter than for Alconbury Weald.
- 1.93. The development will need to satisfactorily integrate with the adjoining areas of Alconbury Weald and provides the opportunity to increase the number of house builders on the wider site at the same time.

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

1.94. The boundary of the site is appropriate as it represents the land submitted as available for development. No representations were received to the proposed submission Local Plan consultation suggesting that the boundary should be amended.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 1.95. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA (HOUS/02), the Huntingdonshire Local Plan Viability Study (INF/04) and Huntingdonshire Strategic Transport Study (INF/11).
- 1.96. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways

England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 104 and 446) and Statement of Representations (CORE/04, Pages 7, 73, 77, 79, 82 – 83).

1.97. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG³. The site is developable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development can be completed within the plan period.

2. Huntingdon

HU1- Ermine Street

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 2.1. In the Housing and Economic Land Availability Assessment 2017 (HELAA) (HOUS/02), this site has been assessed as two development areas. The northern part of the site is referred to as Washingley Farm, an area currently used for agricultural purposes and is accessible from Washingley Road (HOUS/02: Pages 136-139 for full assessment). The southern part of the site is referred to as South of Ermine Street and is currently being used for agricultural purposes (HOUS/02: Pages 226-229 for full assessment).
- 2.2. Washingley Farm was put forward during production of the Core Strategy 2009 and originally assessed at Stage 3 in 2013 for the Local Plan to 2036 in the Environmental Capacity Study: Huntingdon Spatial Planning Area document consulted upon between August 2012 and November 2012 (HOUS/02: Availability, page 139).
- 2.3. The site is in reasonably close proximity to the expected services and employment opportunities at Alconbury Weald and has few environmental constraints and already has planning permission for employment development. Therefore, in addition to its approved use wholly for employment, the site is considered suitable for mixed density residential led development along with 2ha of employment land adjoining Ermine Business Park. Approximately 8ha of land should be reserved for a potential realignment route for the A141 and green infrastructure to ensure a buffer between this and the Stukeleys. This would result in an estimated capacity of 460 dwellings based on 50% of the remaining net developable area (HOUS/02: Availability, page 138-139).
- 2.4. South of Ermine Street was allocated for development in the Local Plan Alteration 2002 and originally assessed for the Local Plan to 2036 in the Environmental Capacity Study: Huntingdon Spatial Planning Area document consulted upon between August 2012 and November 2012 (HOUS/02: Availability, page 229).

³ Housing and economic land availability assessment

2.5. The site is situated on the north western edge of Huntingdon with limited access to services and facilities; however, it provides an opportunity to assist with integrating the permitted Alconbury Weald development with Huntingdon. The site is therefore considered suitable for mixed density mixed use development across a net developable area of 50% of the site following deduction of 2.8ha of land for a primary school. This results in an estimated capacity of 980 dwellings (HOUS/02: Suitability, page 228).

Question 2: What is the scale and type/mix of uses proposed?

2.6. The proposed site is allocated for mixed use development, comprising approximately 1,440 dwellings, a potential realignment route for the A141, 1,000m² of shop floorspace (class 'A1'), food and drink retail (class 'A3' to 'A5'), a primary school and other social community facilities and strategic green infrastructure.

Question 3: What is the basis for this and is it justified?

- 2.7. Representations submitted by SFHL Ltd/ Bloor Homes (South Mids.) (ID: 1118804) and St John's College, Cambridge (ID: 991822) confirm that the allocation land is in their control and capable of delivery early in the plan. A planning application by Bloor is anticipated in summer 2018, and in that regard positive pre-application engagement with the Council has been ongoing since Autumn 2017.
- 2.8. The only qualification submitted by John's College, Cambridge (ID: 991822) is that a figure of 1440 homes should be increased to "approximately 1600 homes" in order to provide an element of flexibility when delivering the district's overall housing requirement. The HELAA (HOUS/02 page 229) sets the criteria for realisation of the site capacity.
- 2.9. The mix of uses is considered appropriate in order to meet the basic daily needs of the residents on the site as per page 228 of the HELAA (HOUS/01).
- 2.10. Having regard to the site constraints and site history it is considered that allocation HU1 is justified

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

- 2.11. An Outline planning application on the Southern part of the site for approximately 1,021 dwellings has been submitted (planning reference 1001712OUT), the application is under consideration.
- 2.12. The northern part of the site has an existing planning permission 1300730OUT for employment use due to expire on the 13th November 2018. No planning application has been submitted for residential use.

Question 5: What are the benefits that the proposed development would bring?

2.13. Taking the Framework policies into account, and in accordance with its Section 1, the development would have important economic benefits through employment in the construction of the housing (including in the supply chains of materials, fittings and furnishings) and in the local economic contribution from future residents. There would be important social benefits from the provision of a primary school, market and affordable homes for the residents in accordance with Section 6 of the Framework and in the creation of public recreational land on the open space in accordance with Section 8. Landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11. In accordance with Section 4 of the Framework the site would also be sustainably located with access to employment and facilities by means other than the car including cycling facilities and proximity Huntingdon, while safeguarding land for realignment of the A141.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 2.14. The HELAA (HOUS/02 page 228) identifies potential adverse impacts on highways, landscape, drainage, noise and light pollution, air quality issues and limitations on the Anglian Water Waste Water Treatment Works. The need to assess these impacts is noted in the HELAA and the mitigation measures are listed in allocation policy HU1 (CORE/01).
- 2.15. Having regard to comments raised by the Environment Agency (ID: 1146949) and Mr. Colum Fitzsimons (ID 1150302) of Cambridgeshire County Council with regard to surface water drainage it is considered the development of this site provides opportunities to introduce sustainable drainage systems to manage flood risk. These can be secured by criterion (j) of policy HU1 (CORE/01) requiring submission of a flood risk assessment and provision of sustainable drainage systems.
- 2.16. The Stukeleys Parish Council (the allocated lies within The Stukeleys Parish and not Huntingdon Town Council) raises highway impacts, lack of clarity in terms of the realignment of A141, scale of development and relationship to Huntingdon and Stukeleys, impacts on local amenity and local landscape amenity particularly on the rising land to the north of Ermine Street and the continued erosion of the separation between Huntingdon and Great Stukeley which is harmful to the local environment and the character and setting of the village.
- 2.17. The adverse impacts could be satisfactorily mitigated by development complying with the allocation policy HU1 (CORE/01) which sets out the likely necessary mitigation.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

- 2.18. The northern part of the site is in Flood zone 1. The majority of the southern part of the site is in Flood zone 1, although a portion on the western edge is in flood zones 2 and 3a. Therefore, residential development will be focused on areas within Flood zone 1.
- 2.19. As development will be focused within Flood zone 1, which is at the lowest risk of flooding the development is in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 2.20. INF/02 ref HT16 highlights a need for a Primary School within the site (estimated at £8.6m with developer contributions of £5.7m required as a proportionate contribution).
- 2.21. HOUS/02 highlights additional infrastructure which will include pedestrian and cycle links into Huntingdon and the Stukeleys. Social and community uses will be needed and noise attenuation measures. A green infrastructure network which also serves as a noise barrier from the A14 and A141 is required. Potential re-alignment of the A141 will be taken into account.
- 2.22. Key constraints are outlined in HOUS/02 which includes traffic generation and noise pollution and flood zones 2 and 3a on the western fringe. Development must be integrated around gas and electric easements. Development of the site and in particular cycle and pedestrian links will help integrate Alconbury Weald with Huntingdon.
- 2.23. The infrastructure costs will be met from S106 payments or provided directly by the developer.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

2.24. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different

distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 2.25. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Huntingdon will be served by the Huntingdon Wastewater Treatment Works. The Water Cycle Study acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.
- 2.26. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and offsite reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 2.27. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 2.28. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

2.29. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances

(INF/04, para 3.6). The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).

- 2.30. The Study is not site specific, as this is not a requirement for the local plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 2.31. Policy LP25 (affordable housing provisions) seeks a target of 40%. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is not viable due to specific site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal. The viability work within INF/04 indicates that the typology that this site falls into will generally indicate strong viability.

Question 11: What is the expected timescale and rate of development and is this realistic?

2.32. In response to the Council's Annual Monitoring Report housing trajectory survey the respondent confirmed that completions on the development are expected between 2022/23 and 2033/34. The first 50 homes are expected to be completed in the year 2022/2023, the time scale is set out below:

No. units	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	Total
in years 1-5													17/36
0	50	50	100	100	100	100	100	100	100	100	100	40	1,040

- 2.33. This is considered to be reasonable because an Outline application has been submitted for the Southern portion of the site. The site is known to be available but there are constraints on development due to the potential rerouting of the A141. Therefore, the agent's projections have been deferred by 3 years given the transport mitigation required in advance of development.
- 2.34. The site's agent for Washingley Farm has stated the site can be viably developed for housing within the Local Plan period. It is considered housing development on the site could be delivered post 2022. This is realistic and takes into account the phasing of development across the whole site.
- 2.35. The first 80 homes are expected to be completed in the year 2022/2023, the timescale for delivery is set for below:

No. units in years 1-5	22/23	23/24	24/25	25/26	26/27	Total
ŕ						17/36
0	80	80	80	80	80	400

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 2.36. The boundary of the site is appropriate as it represents the land submitted as available for development. No representations were received to the proposed submission Local Plan consultation suggesting that the boundary should be amended.
- 2.37. The defined boundary allows for a comprehensive mixed use development that brings benefits to the wider area.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 2.38. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA and the Huntingdonshire Local Plan Viability Study and Strategic Flood Risk Assessment. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 209, 323, 396/7, 455/6/7) and Statement of Representations (CORE/04, Page 99/100).
- 2.39. Having regard to the objections from Urban & Civic (ID 1118661) and St Johns College (ID 991822) on the absence of a rationale for the safeguarding of land for the provision of a realigned A141 (criterion 'c' of the allocation policy), the Council advises that the recent Huntingdonshire Strategic Transport Study (2017) (INF/09 INF/011) tested the provision of the re-routed A141 northern bypass.
- 2.40. Having regard to the objection from Hallam Land (ID 1151924) expressing concern that this site is currently undeliverable it is considered that the responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG. The site is developable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that the site is available now and can be completed within the period set out in the table above.

HU2- Former Forensic Science Laboratory

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 2.41. The site was a former Science Laboratory.
- 2.42. It was identified in 2012 and originally assessed in Stage 2 of the Local Plan to 2036 in the Environmental Capacity Study: Huntingdon Spatial Planning Area document, consulted upon between August and November 2012. The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 65-68 for full assessment).
- 2.43. Due to the nature of the site it was considered suitable for medium density residential development across a net developable area of 80% of the site. The site is situated in a primarily residential area, in close proximity to Hinchingbrooke Country Park with good access to services and facilities (HOUS2: Suitability, page 67).

Question 2: What is the scale and type/mix of uses proposed?

2.44. The proposed use is for approximately 105 dwellings with a mix of single storey to 2.5 detached, semi-detached and terraced housing of 2, 3, 4, and 5 bedroom units.

Question 3: What is the basis for this and is it justified?

- 2.45. The closure of the Forensic Science laboratory in 2012 provides opportunity for the site to be redeveloped. The surrounding land use is predominantly residential and the sites location within the built-up area of Huntingdon and close to major employment sources means that residential development is the preferred land use.
- 2.46. The net developable area and amount of development accounted for in the allocation largely reflects the density of development within the Hinchingbrooke estate.
- 2.47. Planning application 16/00304/FUL was refused in February 2017 due to transport and education concerns; following resubmission and further transport investigations with additional surveys, planning permission has been approved for 103 dwellings which achieves a satisfactory development in terms of the balance of unit numbers, open space and access requirements and relationship with neighbours. Representations from Persimmon as landowner (ID: 1044765) support the allocation but request that the policy refer to 103 units to reflect the planning approval and the requirement for additional landscaping on the western boundary (point d.) and that the reference in paragraph 9.47 is removed due to the approved landscaping scheme. Whilst these points are noted it is considered that the policy as written is justified and should an alternative scheme come forward these will be considerations for a new application.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

- 2.48. A Full planning application for 103 dwellings (planning reference 17/01597/FUL) was approved in November 2017 and secured 40% affordable housing.
- 2.49. The demolition of the forensic laboratory commenced on the 23rd February 2018.

Question 5: What are the benefits that the proposed development would bring?

- 2.50. The development would contribute to the Council's housing land supply and provide market and affordable housing in an area which is has good access to local services and facilities.
- 2.51. Demolition of the existing buildings and removal of security fencing will be a positive benefit to this environment and redevelopment provides an opportunity to improve the townscape. The HELAA acknowledges the need to integrate with existing land uses but this is achievable with a well-designed scheme.
- 2.52. The provision of open space and landscaping would also have benefits for the environment and biodiversity
- 2.53. Residential development will also secure land remediation to minimise risks for end users arising from contaminated land.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 2.54. The proximity of the development to Cromwell Park Primary School means that development will need to secure appropriate separation distances and screening to minimise the impacts of the development. This potential impact can be mitigated through careful design and landscaping, as evidenced by the planning permission granted.
- 2.55. Due to features found on the site and within the vicinity, both the HELAA and policy HU 14 (CORE/01 paragraph 9.47, page 152) note that protected species may be a constraint to development. The planning application was supported by an Ecological Appraisal Report and this proposed recommendations to mitigate the impacts. The Wildlife Trust agreed with the Report findings and that the recommendations would adequately mitigate the impacts and this demonstrates that this potential adverse impact can be overcome.
- 2.56. The Hinchingbrooke residential estate is constrained by one access which also serves the Hospital, Police and Fire Headquarters and Country Park and this area does suffer from congestion at peak times. Re-use of the site will increase traffic from the current situation and cause the loss of frontage parking, but prior to its closure the Forensic Science Laboratory had up to 400 employees and 230 dedicated parking spaces. A well-designed scheme with appropriate car parking provision (number, size and locations), provision for

on-street parking, and suitable site access is considered to mitigate the impacts of traffic and access.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

2.57. The sequential test advises that new development should be steered towards areas with the lowest probability of flooding. The site is in Flood zone 1 and is therefore at the lowest risk of flooding (FLO/01, page 9) and suitable for residential development in accordance with Paragraph: 019 Reference ID: 7-019-20140306 of the NPPG and paragraph 101 of the NPPF.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 2.58. The infrastructure requirements are identified in HOUS/02 page 67. In summary these are:
 - Access provision
 - Additional landscaping on western boundary
 - Separation of education and housing mix with landscaping
 - Contamination assessment
 - Flood risk assessment
- 2.59. The planning application, now granted meets the above requirements.
- 2.60. Specific costs for the infrastructure have not been assessed but the requirements are not considered to adversely affect viability. The requirements will be addressed through the implementation of the planning permission. Site clearance for the development has commenced.
- 2.61. The main site constraints are identified in HOUS/02 page 67. In summary these are:
 - Proximity to park and school will need an appropriate landscape scheme
 - Continuation of linkages into the cycle network
 - Proximity to SAC and SSSI will require an ecological survey and a need to mitigate development impact
- 2.62. The constraints will be mitigated through implementation of the planning permission.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

2.63. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 2.64. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Huntingdon will be served by the Huntingdon Wastewater Treatment Works. The Water Cycle Study acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.
- 2.65. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and off-site reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 2.66. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 2.67. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

2.68. The planning approval for the site has demonstrated a strong level of viability. A S106 has subsequently been completed, delivering the policy compliant level of affordable housing.

Question 11: What is the expected timescale and rate of development and is this realistic?

- 2.69. A Full planning application for 103 dwellings (planning reference 17/01597/FUL) was approved in November 2017.
- 2.70. In response to the Council's Annual Monitoring Report housing trajectory survey the developer confirmed that there are no constraints on delivery (MON/01, page 66) and that completion of the first 30 dwellings is expected in 2018/19 with all dwellings expected to be completed within years 1-5. The site is deliverable. The timescale for delivery is set out below:

No. units in Years 1-5	17/18	18/19	19/20	20/21	21/22	Total
	Yr. 1	Yr. 2	Yr. 3	Yr. 4	Yr. 5	17/36
103	0	30	60	13	0	103

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 2.71. The boundary of the site is appropriate as it represents the land submitted as available for development and the planning application. No representations were received to the Local Plan proposed submission suggesting the boundary should be amended.
- 2.72. The defined boundary allows for comprehensive redevelopment of the site and reflects the natural boundaries formed by the existing developments.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 2.73. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA and the Huntingdonshire Local Plan Viability Study and Strategic Flood Risk Assessment.
- 2.74. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments

to the policy can be found in the Statement of Consultation (CORE/05, Pages 28, 53, 77, 188, 307, 386, and 480) and Statement of Representations (CORE/04, Page83, 85, and 151).

- 2.75. There are also no objections raised on technical grounds on the planning application from Anglian Water, Cambridgeshire County Council Archaeology, Cambridgeshire County Council as Local Education Authority, Environmental Health, Lead Local Flood Authority, Local Highway Authority, Highways England, or the Wildlife Trust.
- 2.76. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG. The site is deliverable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development is available now can be completed within a five year time period.

HU3- Former Police HQ site

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 2.77. The site comprises of former playing fields associated with the adjacent Police Headquarters to the east.
- 2.78. The land was previously assessed and consulted on through the local plan and Housing & Economic Land Availability Assessment 2017 (HELAA)/ environmental capacity study process in conjunction with land at Hinchingbrooke Hospital (HOUS/02: Pages 73-76 for full assessment). The NHS has advised that they are unable to commit to redevelopment of the Hinchingbrooke Hospital site within the Plan period and therefore the site was reduced to just include the Police Headquarters land for a mix of uses as part of the HELAA.
- 2.79. Representations to the Local Plan Proposed Submission made by the Agent for Cambridgeshire Police (ID: 1118112) has advised that if site is developed in its entirety for C3, housing it has a potential yield of 140 houses based on an average density of 35 units per hectare accounting the physical constraints on the site. The Police request that the housing threshold for the site be raised to 95 dwellings with the balance of the land being available for D1 which have potential synergy with the hospital uses such as Doctors Surgery, specialised residential care unit (e.g. Dementia or Autism), specialised private clinic, supported living accommodation ranging from assisted living, care home, through to extra care and other specialist care, Multi-discipline related practice (health and wellbeing services). The Police consider there is a perceived need for such uses and are also interested in a style of development that could produce a revenue stream so are keen to embrace the potential for mixed uses; it is however requested that the policy be flexible to reflect market conditions at the point of potential implementation.
- 2.80. The site has excellent access to services and facilities and is therefore considered suitable for mixed use development across a net developable area for built development at approximately

50% of the site resulting in an estimated capacity of approximately 75 dwellings and other supporting uses for the adjoining hospital (HOUS/02: Suitability, page 76).

Question 2: What is the scale and type/mix of uses proposed?

- 2.81. The proposed site is allocated for mixed use development, comprising of approximately 75 dwellings, supported housing or care home and/or supporting health care issues, structural open space and landscaping including retention of tree belts between the hospital and the former police playing field, facing Hinchingbrooke Park Road and between Views Common and the former police playing field.
- 2.82. The type and mix of residential units will be determined through the application of policy LP 26 Housing Mix.

Question 3: What is the basis for this and is it justified?

- 2.83. The site is surrounded by a mix of uses with good access to transport links and a wide range of services including employment, shops and community uses. As such the proposed allocation is considered to be in a sustainable location where residential development with complimentary uses to the adjacent hospital is an appropriate form of development.
- 2.84. As referred to in Question 1, the Police seek an amendment to the allocation to increase the housing numbers from 'approximately 75' to 'up to 95'. Having regard to the site constraints with the landscaping, the location within the Conservation Area, and proximity to Hinchingbrooke House which is Grade 1 listed it is considered that the allocation is justified and use of the word "approximately" provides some flexibility.
- 2.85. Policy LP 26 is justified through the application of Cambridge Sub-Region SHMA (HOUS/07) and Peterborough SHMA (HOUS/08) and local housing need and strategies (including HOUS/06). By referring to up-to-date evidence the policy ensures that the most appropriate strategy is employed in line with local demand and settlement type and location, or proximity to the most appropriate housing market area consistent with paragraph 50 of the NPPF and NPPG Housing and economic development needs assessments.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

2.86. No planning application has yet been submitted.

Question 5: What are the benefits that the proposed development would bring?

- 2.87. Development of the site would allow for release of public sector owned land and the uses proposed could also provide a revenue stream for the Police.
- 2.88. The development would contribute to the Council's housing land supply and provide residential accommodation in an area which is highly accessible to local services and facilities.

- 2.89. The development would allow for connections to the wider Public Right of Way of network to promote wider walking connections to strategic green spaces such as Views Common and Hinchingbrooke Country Park, as well as links to Huntingdon Town Centre and nearby employment.
- 2.90. Access is identified as a constraint at present but a new link road forming the eastern boundary of the site is due to be constructed as part of the A14 upgrade works which are currently under construction. This could provide alternative access options and help to relieve traffic in this location which would be a wider benefit to people living and working in the locality. A proportionate Transport Assessment will be required to demonstrate that safe, appropriate access can be provided from the road network, and that any adverse offsite transport impacts can be adequately mitigated.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 2.91. The HELAA identifies potential adverse impacts with regards to access, impacts upon the designated heritage assets, protected species and the protected trees.
- 2.92. The site's proximity to View's Common and the setting provided by the historic parkland of Hinchingbrooke House, mean that landscape impact and impact on heritage assets are development constraints. Representations from Historic England (ID: 56252) say that development in this location would impact upon the Conservation Area and has the potential to impact upon the settings of the listed buildings and suggest that reference should be made specifically to the fact that Hinchingbrooke House is Grade I listed and the need for careful design to protect the heritage assets and their settings. The Huntingdon Conservation Area Character Statement (CACS) (2007) (see Appendix 1, Matter 14) identifies the Police HQ land as Area J on Figure 1 (page 36) and recognises at page 37 that the area was partly subdivided by fences and had the estate's home farm in the northern corner and that the 'outer park' has "long ceased to be associated with Hinchingbrooke House and is now separated from its immediate grounds by the modern road given access to Hinchingbrooke Hospital" it is however noted that the perimeter belt of planting is recognised as being of historic importance, and that it also provides screening of the hospital site from Views Common to the north. The design of any development proposal and its landscaping scheme should demonstrate how it will mitigate and minimise negative impacts on the landscape and on heritage assets, including in particular: retaining and enhancing where necessary the substantial protected tree belt on the northern boundary; and retaining the protected trees that exist on site. When all policies, including policy LP36 (Heritage Assets and their Settings) are considered in the planning balance the protection sought by Historic England already exists within the Plan currently being examined.
- 2.93. It is understood that protected species may be present on this Greenfield site as it is within the threshold for a SSSI and protected species (Great Crested Newts) have been found in the locality of the site. An ecological survey should be undertaken, and development should ensure that any impacts on protected species are avoided, mitigated, or compensated for, and that opportunities are taken to enhance biodiversity.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

2.94. The site is in Flood zone 1 (FLO/01, page 10). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 2.95. Constraints and infrastructure requirements are set out in HOUS/02 page 76. To summarise, a transport assessment will be carried out to demonstrate the site can be safely accessed from the public road. There is a protected tree-belt on the north-eastern boundary that should be retained and open space will be required. The design and setting will need to address the proximity of Grade I listed Hinchingbrooke House and the right of way passing through the site. An ecological survey will be needed to identify if crested newts are present.
- 2.96. The site is well served by local amenities and there are unlikely to be any significant infrastructure costs though a site assessment has not been made. Infrastructure is anticipated to be delivered through appropriate developer contributions.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

- 2.97. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 2.98. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in
Huntingdon will be served by the Huntingdon Wastewater Treatment Works. The Water Cycle Study acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.

- 2.99. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and off-site reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 2.100. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 2.101. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 2.102. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6). The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).
- 2.103. The Study is not site specific, as this is not a requirement for the local plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).

2.104. Policy LP25 (affordable housing provisions) seeks a target of 40%. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is not viable due to specific site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal. The mixed-use nature of development will be taken into consideration when assessing viability appraisals put forward by developers.

Question 11: What is the expected timescale and rate of development and is this realistic?

- 2.105. In response to the Council's Annual Monitoring Report housing trajectory survey 2017, the agent for the site has confirmed that the site could be deliverable within 1-3 years. The capacity has been reduced to 75 in line with the draft Local Plan allocation
- 2.106. However, delivery may be easier to achieve once the link road along the eastern boundary is completed (MON/01, page 80). The opportunity to access directly onto the proposed access road connecting the realigned A14 to Hinchingbrooke Park Road is not expected to be completed until late 2021, and would therefore delay development, so the agent's projections have been deferred.
- 2.107. The first 25 homes are expected to be completed in the year 2023/2024, the timescale for delivery is set out below:

No. units in years 1-5	23/24	24/25	25/26	Total 17/36
0	25	40	10	75

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 2.108. The boundary of the site is appropriate as it represents the land submitted as available for development within Cambridgeshire Police control. The NHS advised prior to the HELAA Assessment that they were unable to commit to redevelopment of the Hinchingbrooke Hospital site within the Plan period and therefore the site was reduced to just include the Police Headquarters land for a mix of uses.
- 2.109. The defined boundary allows for comprehensive redevelopment of the site and would not prejudice any future development of the Hospital site.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 2.110. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA and the Huntingdonshire Local Plan Viability Study and Strategic Flood Risk Assessment.
- 2.111. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 105, 386, 448, 470, and 495) and Statement of Representations (CORE/04, Page85).
- 2.112. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG. The site is developable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development can be completed within the plan period.

HU4- West of Railway, Brampton Road

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 2.113. Part of the site is currently used as a car park that serves users of the railway station, the East Coast Mainline Railway runs adjacent to the eastern boundary of the site.
- 2.114. The site was allocated for development in the Huntingdon West Area Action Plan 2011 and originally put forward during Stage 2 of the Local Plan. It was assessed for the Local Plan to 2036 in the Environmental Capacity Study: Huntingdon Spatial Planning Area document, consulted upon between August 2012 and November 2012 (HOUS/02: Availability, page 79). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 77-80 for full assessment).
- 2.115. Due to the site's location adjacent to the railway and its configuration, the site is deemed unsuitable for residential development but is instead suitable for business uses (class 'B1a' and/or 'B1b') as it is in close proximity to services, public transport and employment opportunities as well as the planned developments in the George St/Ermine St area (HOUS/02: Suitability, page 79).

Question 2: What is the scale and type/mix of uses proposed?

2.116. The proposed use is for business use (class 'B1a' and/or 'B1b').

Question 3: What is the basis for this and is it justified?

- 2.117. Having regard to the location of the site and its proximity to the railway station (0.2 miles, ECON/01, pages 124-126 for site assessment) to it is considered a sustainable location for employment development. The site is also in close proximity to planned developments in the George St/Ermine St area enabling the minimisation of journey lengths for employment (para 37 NPPF).
- 2.118. The Employment Land Study also identified that Huntingdon and St Ives are the only office locations within the district that consultees actively stated as their preferred future location for office accommodation (ECON/01, page 5). The study also highlighted that the site was classified as having a high likelihood of meeting qualitative and quantative employment need (ECON/01, page 8)
- 2.119. The overall strategy for development and broad distribution for growth was derived from the Huntingdonshire Employment Land Study (2014) (ECON/01). Site HU4 is part of the Council's Development Strategy to meet overall employment need in the District (further information included in the Council's response to Matter 5, questions 1 to 3). Employment sites have been distributed across the district which allows for choice and diversity in the employment market by creating a sustainable pattern of employment development based around key services and population.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

2.120. Part of the site has the benefit of planning permission for conversion of the former water tower to offices (planning reference 1000720REP), which the Council accepts has been part implemented by engineering works to the access, which prevent it lapsing, although no further progress has been made on site.

Question 5: What are the benefits that the proposed development would bring?

- 2.121. The HELAA (HOUS/02 page 79) identifies an estimated capacity of 6,300m² of employment floor space in a location that the Employment Land Study (ECON/01, pages 8 and 124-126) concluded would have a high likelihood of meeting identified employment needs. The site has good access to the A1, A14, railway station, bus stops and town centre. The development would also be considered complimentary to growth at Alconbury Enterprise zone.
- 2.122. Redevelopment of the site will also conserve an identified heritage asset in the form of the disused water tower through refurbishment and establishing its function as an alternative use, securing its future.
- 2.123. In a response to the Local Plan Proposed Submission Consultation Natural England (ID: 56252) suggested that the wording relating to Conservation Areas be strengthened as follows: "Development should preserve or where opportunities arise, enhance the

Conservation Area and its setting". The Council feels that reference to the Conservation Area in criterion d of the policy and paragraph 9.56, in combination with policy LP 37 Heritage Assets and their Settings, is strong enough to ensure development meets this criteria.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 2.124. The HELAA (HOUS/02, pages 77-80) identifies potential adverse impacts with regards to its impact upon and proximity to the Views Common, noise from the railway and proximity to an AQMA.
- 2.125. These issues have been identified in criteria a to g of the allocation (CORE/01, page 156) and mitigation measures addressed, such as the requirement to produce an air quality assessment and low emissions strategy, provision of appropriate noise mitigation, design that is appropriate for its setting reflecting Views Common
- 2.126. The existing planning permission (1000720REP) already addresses many of these development constraints for the whole site.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

2.127. The site is in Flood zone 1 (FLO/01, page 29). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 2.128. Site constraints are set out in detail in HOUS/02. In summary, the viaduct will be removed by Highways England as part of the A14 upgrade works, which is scheduled for 2020/21.
- 2.129. The existing planning permission (1000720REP) already addresses many of these development constraints for the whole site.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

2.130. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this, a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes

proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken; Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 2.131. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Huntingdon will be served by the Huntingdon Wastewater Treatment Works. The Water Cycle Study acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.
- 2.132. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and offsite reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 2.133. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 2.134. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

2.135. The Employment Land Study (ECON/01) considers the need to make employment sites available. Additional housing, without additional employment could lead to unsustainable development (page 3). Site HU4 is identified as meeting qualitative and quantitative

employment needs. The likelihood of the site meeting local employment needs is assessed as high. The site will therefore contribute to creating a sustainable pattern of development as highlighted in Matter 5 Question 3.

- 2.136. In terms of viability, ECON/01 paragraph 2.54 recognises that Huntingdonshire remains more affordable than other neighbouring locations. The report highlights a significant strong inflow of workers to Huntingdon (ECON/01, Page 56) and that additional employment land will enable the area to maximise its strengths. The site does not have any adverse constraints of significance. No high infrastructure cost requirements have been identified so the site is considered viable for employment development.
- 2.137. The viability of the site has also been addressed through the approval of planning application 1000720REP, as referred to previously. Delivery of infrastructure is through appropriate developer contributions.

Question 11: What is the expected timescale and rate of development and is this realistic?

2.138. Development of the site will have to wait until A14 viaduct is taken down as part of the A14 upgrade works; this will enable the site to reach its full potential. The current work programme includes taking down of the viaduct in 2020/21, realistically the development would not start before this (HOUS/02: Achievability, page 79), however engineering works have been implemented to the site access for planning reference 1000720REP (conversion of the former water tower to office). This demonstrates the applicants continued intention to develop the site within the plan period.

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

2.139. The boundary is considered satisfactory having regard to the justification and benefits of the allocation described above, removal of the A14 viaduct will enable further comprehensive redevelopment of the site taking into account the surrounding area and improving the sites setting in context with Views Common.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 2.140. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA and the Strategic Flood Risk Assessment and the Employment Land Study. Reasonable alternatives such as the allocation of the site for wholly supported housing were dismissed (see question 1).
- 2.141. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments

to the policy can be found in the Statement of Consultation (CORE/05, Pages 105, 189, 308, 387, and 448) and Statement of Representations (CORE/04, Page 83 and 86).

2.142. Responses to the questions above demonstrate that site is developable as defined through paragraph 47 of the NPPF and has planning permission on part of the site.

HU5- West of Edison Bell Way

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 2.143. The land is currently unused, and is comprised of hardstanding and scrub.
- 2.144. The site is part of the George Street/ Ermine Street allocation for mixed use development in the Huntingdon West Area Action Plan 2011 which was originally assessed for the Local Plan to 2036 in the Environmental Capacity Study: Huntingdon Spatial Planning Area document, consulted upon between August 2012 and November 2012 (HOUS/02: Availability, page 83). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 81-83 for full assessment).

Question 2: What is the scale and type/mix of uses proposed?

2.145. The proposed use is for a long stay public car park of approximately 80 spaces.

Question 3: What is the basis for this and is it justified?

- 2.146. This site is situated in close proximity to the east coast mainline railway where car parking is required and is constrained by noise, also the site is of a narrow configuration limiting its development potential; consequently, it was deemed suitable to use the site for a long stay public car park (HOUS/02: Suitability, page 83).
- 2.147. Representations submitted by Mr James Croucher on behalf of the landowner (ID: 1106132) consider the costs associated with the creation of a car park in this location would be unviable and proposed alternative land uses instead.
- 2.148. Since then two applications were simultaneously submitted:
 - 17/01950/FUL was submitted on the site HU5 for 41 apartments including access, parking, landscaping and associated works and;
 - 17/00733/FUL was submitted on both the adjacent site HU6 George Street, Huntingdon and HU5 for phased mixed-use development comprising flexible-use commercial units (Use Class A1 (shop)/A2 (financial/professional services)/A3 (food & drink)/A5 (hot food takeaway)/D1 (non-residential institutions) and; 304 dwellings in a mix of houses and apartments. Commercial units are proposed on site HU5.

- 2.149. Both applications were considered by the Development Management Committee in June 2018 and there is a resolution to grant permission subject to prior completion of the S.106 Agreement.
- 2.150. The Council acknowledges the resolution to grant permission for alternative site uses and considers that in light of recent events it would be pertinent to propose a modification which allocates the site for residential development or flexible-use commercial units in accordance with the submitted planning application.
- 2.151. This modification would be in keeping with the requirements for plan-making in that it is positively prepared, justified and effective. The allocation is deliverable for residential development, or flexible-use commercial units, as demonstrated by the resolution to grant permission on the site, meaning that the site is no longer deliverable as car parking.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

2.152. See response to question 3.

Question 5: What are the benefits that the proposed development would bring?

- 2.153. The redevelopment of this visually prominent site presents a rare opportunity for positive enhancement to the setting of the Conservation Area as identified in Paragraph: 004 Reference ID: 18a-004-20140306 of the NPPG through criterion b, which requires development proposals to take appropriate account of the site's location within the Conservation Area with enhanced landscaping (para 9.63 of the Local Plan CORE/01).
- 2.154. Representations submitted by Historic England (ID: 56252) welcome reference to the surrounding Conservation Area and requirement for the enhancement of the Conservation Area but question if it should refer to the setting of the conservation area instead; when all policies, including policy LP36 (Heritage Assets and their Settings) are considered in the planning balance the protection sought by Historic England already exists within the Plan currently being examined.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 2.155. Noise from the adjacent railway could be a source of nuisance; however a noise assessment and acoustic treatments could mitigate/minimise these impacts.
- 2.156. Within the Representations from Mr Croucher (ID: 1106132) it is noted that development of the site will incur costs of alterations to Edison Bell Way for the access, including amendments to the existing redundant signalised junction and other site access costs, including creating a new entranceway over the existing high-pressure gas main. It is considered that satisfactory access to the site can be achieved with standard highway

requirements for a development site; an application would be expected to be supported by a proportionate Transport Assessment.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

2.157. The site is in Flood zone 1 (FLO/01, page 29). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 2.158. The site now potentially forms part of a larger development on the adjacent land (ref 17/00733/FUL). Infrastructure and constraints are set out in HOUS/02. A significant amount of expenditure is for highway improvements to allow access from Edison Bell Way. The site is constrained by noise from the road at the front of the site and the mainline railway at the rear. There is identified asbestos and heavy metal contamination requiring partial removal and soil import and capping measures will be needed.
- 2.159. Infrastructure costs have been submitted by the developer and have been assessed by the Council in its analysis of the viable level of affordable housing.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

- 2.160. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 2.161. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the

Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Huntingdon will be served by the Huntingdon Wastewater Treatment Works. The Water Cycle Study acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.

- 2.162. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and offsite reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 2.163. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 2.164. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 2.165. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6). The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).
- 2.166. The Study is not site specific, as this is not a requirement for the local plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development

size typologies, dwelling densities, value areas and whether greenfield or previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).

2.167. As a consequence of the planning application for this site and the adjoining land, significant work has been undertaken to assess infrastructure costs. A viability appraisal has been submitted and assessed by external consultants as part of the planning application process. Given the high infrastructure costs, contamination issues and sales values achievable, an agreed package of infrastructure and planning requirements will have a level of affordable housing below the Policy level.

Question 11: What is the expected timescale and rate of development and is this realistic?

- 2.168. The Council's Annual Housing Trajectory is a snapshot in time, the most recent of assessed residential completions and commitments as at 31 March 2017, therefore the expected timescale for the delivery of recent planning applications on the site have yet to be assessed.
- 2.169. Considering the speed at which the site has progressed, from notifying the Council at the Local Plan Proposed Submission consultation of the intention to develop the site for alternative uses in January 2018 to the recent submission and resolution to grant planning permission on the site in June 2018; the Council is confident that development will be delivered within the plan period.

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 2.170. The boundary of the site is appropriate as it represents the land submitted as available for development. No representations were received to the Local Plan proposed submission suggesting the boundary should be amended.
- 2.171. The defined boundary allows for comprehensive redevelopment of the site.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 2.172. The reallocation of the site for residential development or flexible-use commercial units in accordance with the submitted planning application would ensure that the allocation of site HU5 is positively prepared, justified and effective. The allocation is deliverable for residential development, or flexible-use commercial units, as demonstrated by the resolution to grant permission on the site, meaning that the site is no longer deliverable as car parking.
- 2.173. Detailed policy requirements outlined in criteria a to d and paragraph 9.63 are still considered justified and based on a proportionate evidence base including the HELAA and the Huntingdonshire Local Plan Viability Study and Strategic Flood Risk Assessment.

2.174. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 53, 77, 105, 388, 448 and Statement of Representations (CORE/04, Pages 83 and 86).

HU6- George Street

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 2.175. The land is mostly covered by hard standing with several previous buildings having been cleared; two buildings remain on site.
- 2.176. The site was allocated in the Huntingdon West Area Action Plan adopted by the Council in 2011 and the site's current agent has confirmed its immediate availability in response to the survey for the Annual Monitoring Report 2017 (MON/01). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 84-86 for full assessment).
- 2.177. This site is situated off the new link road with very good access to services and public transport and limited constraints. It offers an exceptional opportunity to provide a new residential area close to the railway station and the town centre. Therefore, the site is considered suitable for a mixture of high and very high density residential development across a net developable area of 80% of the site resulting in an estimated capacity of 300 dwellings (HOUS/02: Suitability, page 86).
- 2.178. Due to the size of the site, provision of local services and infrastructure would be required to ensure a sustainable development.

Question 2: What is the scale and type/mix of uses proposed?

2.179. The proposed use is for approximately 300 dwellings in a mix of 71 houses, 64 1 Bed apartments and 169 2 Bed apartments.

Question 3: What is the basis for this and is it justified?

2.180. The Huntingdon West Area Action Plan (HWAAP) (Appendix 2) was adopted in 2011 and sets out a vision for the area where significant change was expected to the west of Huntingdon following the construction of a west of Town Centre link road (Edison Bell Way). Policies and objectives in this document look to address 13 issues within the action plan; the site allocation land falls within the George St/Ermine St area of the map and the vision for this was a mixed use development with "modern residential, retail and office development".

Policy HW 4, along with map 6e, sets out more detail for the redevelopment of the 6ha area with this site falling within Parcels G and I which are shown as retail/residential use and car parking on the western side of the link road. Additional aims and policies of the Area Action Plan are also relevant such as the vision for improved pedestrian and cycle links, access to open space, and securing high quality design.

- 2.181. The site had planning permission for demolition of the buildings on site, a new supermarket with petrol filling station, nine units A1-A3 uses. 28 residential units and office floorspace, along with access and car parking (planning application 1001750FUL) which reflected the aspirations of the Area Action Plan. This permission expired in May 2016 and Sainsbury's disposed of the site aborting its plans to relocate from the existing Town Centre store.
- 2.182. The allocation for residential development on the site reflects the changes in the retail position since 2011 and will provide for additional housing on the edge of Huntingdon Town Centre with some potential for limited amount of complimentary town centre uses.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

2.183. A Full application for a housing-led mixed-use development on this site and the adjacent site, George Street/Edison Bell Way, was submitted in April 2017 (planning reference 17/00733/FUL) comprising 304 dwellings, and flexible-use commercial units (class A1 (shop)/A2 (financial/professional services)/A3 (food & drink)/A5 (hot food takeaway)/D1 (non-residential institutions). This application was considered by the Development Management Committee in June 2018 and there is a resolution to grant permission subject to prior completion of the S106 Agreement.

Question 5: What are the benefits that the proposed development would bring?

- 2.184. This is a redundant brownfield site which is in a prominent location and redevelopment could greatly improve the townscape and provide a positive gateway to Huntingdon.
- 2.185. The Huntingdon Conservation Area Character Assessment (2007) (Appendix 1, Matter 14) identifies that part of the significance of this area is its historic and architectural importance but acknowledges that "the St. John's Street area has been badly affected by the insertion of the ring road and recent redevelopment of the traditional industrial quarter of Huntingdon... and with imaginative regeneration could be vastly improved". Well-designed development of the site will lead to an enhancement to the settings of nearby designated heritage assets. The redevelopment of this visually prominent site presents a rare opportunity for positive enhancement to the setting of the Conservation Area as identified in Paragraph: 004 Reference ID: 18a-004-20140306 of the NPPG through criterion b, which requires development proposals to take appropriate account of the site's relationship with heritage assets (para 9.65 of the Local Plan CORE/01).

- 2.186. The former industrial land use means that the site comprises contaminated land; redevelopment will ensure that this is appropriately cleaned up through a remediation scheme.
- 2.187. Due to the size of the development, provision of local infrastructure would be required to ensure a sustainable development and will be secured through a Section 106 agreement; this would take the form of School expansion for Early Years and Primary School provision; enhanced public transport (bus) provision through bus stop improvement and Real Time Passenger Information systems, green space enhancements (on or off-site) and library enhancements.
- 2.188. The development would be sustainably located with access to employment and facilities by means other than the car including cycling facilities, close proximity to the railway station and proximity to bus stops including services on the (part) guided busway between Huntingdon and Cambridge which represents a major investment in local transport infrastructure. The development would allow for safe signalised road crossings and connections to the wider Public Right of Way of network to promote walking connections to strategic green spaces such as Views Common and Mill Common, as well as links to Huntingdon Town Centre and nearby employment and shops.
- 2.189. The development would contribute to the Council's housing land supply and provide residential accommodation in an area which is highly accessible to local services and facilities.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 2.190. Noise from the adjacent railway could be a source of nuisance and part of the site is within the Huntingdon Air Quality Management Area. The site is considered to have high archaeological potential. Whilst not much landscaping exists on the site there are a few trees which have a positive impact upon the character and appearance of the area. The levels vary across the site and residential properties are nearby.
- 2.191. The full planning application (planning reference 17/00733/FUL) has demonstrated that adverse noise, contamination, air quality and archaeology impacts can be satisfactorily mitigated and that the high density scheme can be accommodated without being unneighbourly to the surrounding uses and maintaining the trees worthy of retention with an overall increase in biodiversity across the site.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

2.192. The site is in Flood zone 1 (FLO/01, page 9). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 2.193. The site is connected with HU5, Edison Bell Way highlighted above. Infrastructure and constraints are set out in HOUS/02. A significant amount is for highway improvements to allow access from Edison Bell Way. The site is constrained by noise from the road at the front of the site. There is identified asbestos and heavy metal contamination requiring partial removal, soil import and capping measures.
- 2.194. Infrastructure costs have been submitted by the developer and have been assessed by the Council in its analysis of the viable level of affordable housing.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

- 2.195. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 2.196. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Huntingdon will be served by the Huntingdon Wastewater Treatment Works. The Water Cycle Study acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.
- 2.197. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The

response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and offsite reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).

- 2.198. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 2.199. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 2.200. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6). The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).
- 2.201. The Study is not site specific, as this is not a requirement for the local plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas and whether greenfield or previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 2.202. As a consequence of the planning application for this site and the adjoining land, significant work has been undertaken to assess infrastructure costs. A viability appraisal has been submitted and assessed by external consultants as part of the planning application process. Given the high infrastructure costs, contamination issues and sales values achievable, an agreed package of infrastructure and planning requirements will have a level of affordable housing below the Policy level.

Question 11: What is the expected timescale and rate of development and is this realistic?

- 2.203. In response to the Council's Annual Monitoring Report housing trajectory survey 2017, the agent for the site has confirmed that the site could have a capacity of up to 350 dwellings, but has kept at 300 to reflect the draft Local Plan allocation (MON/01, page 78).
- 2.204. Development could commence early on in Plan period with the first 50 homes are expected to be completed in the year 2018/2019, the timescale for delivery is set out below:

No. units in years 1-5		18/19 Yr. 2	19/20 Yr. 3	20/21 Yr. 4	21/22 Yr. 5	22/23	Total 17/36
237	0	50	62	62	63	63	300

2.205. This deemed to be a realistic timescale as approval subject to the signing of a S106 Agreement is recommended for 17/00733/FUL. The final number of residential units will be amended in subsequent housing trajectory to 304 residential units once the S106 has been signed.

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 2.206. The boundary of the site is appropriate as it represents the land submitted as available for development and planning application 17/00733/FUL. No representations were received to the Local Plan proposed submission suggesting the boundary should be amended.
- 2.207. The defined boundary allows for comprehensive redevelopment of the site.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 2.208. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA and the Huntingdonshire Local Plan Viability Study and Strategic Flood Risk Assessment. Reasonable alternatives such as the allocation of the site for wholly supported housing were dismissed (see question 1).
- 2.209. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent

amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 77, 105, 189, 308-309, 388, 449, 480 and Statement of Representations (CORE/04, Pages 83 and 86).

- 2.210. There are also no objections raised on technical grounds to the planning application from Anglian Water; Cadent Gas; Cambridgeshire Constabulary; Cambridgeshire County Council Archaeology, Education, Libraries and Rights of Way; Cambridgeshire Fire and Rescue; Environmental Health; Highways England; Historic England; Lead Local Flood Authority; Local Highway Authority; Natural England; NHS England; Sport England; or the Wildlife Trust.
- 2.211. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG⁴. The site is developable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that 237 units can be completed within a five year time period 2021/22 with the final units provided in year six.

HU7- Gas Depot, Mill Common

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 2.212. The site was previously used as a depot for British Gas. All buildings have now been cleared and hardstanding covers almost the entire site (HOUS/02, Page 99).
- 2.213. This site was put forward during the production of the Core Strategy 2009 and assessed in the 2010 SHLAA. It was assessed for the Local Plan to 2036 in the Environmental Capacity Study: Huntingdon Spatial Planning Area document, consulted upon between August 2012 and November 2012 and May to July 2013. The site is also assessed through the Huntingdonshire Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02, Pages 99-102 for full assessment).
- 2.214. Due to the nature of the site it was considered suitable for medium density residential development limited to within the portion of the site within flood zone 1 (56%). Options tested through the Environmental Capacity Study have varied between 10 and 20 dwellings. Flooding constraints strongly shaped the proposed allocation of 11 dwellings. The option for residential development was considered the most appropriate as it will significantly increase the proportion of the site surface that is water permeable. Other uses such as employment would not allow for the release of land for improved on-site water permeability.

⁴ Housing and economic land availability assessment

Question 2: What is the scale and type/mix of uses proposed?

- 2.215. The site is suitable for medium density residential development across a net developable area of 40% of the site. This results in an estimated capacity of 11 dwellings.
- 2.216. Type and mix are determined through the application of policy LP 26 Housing Mix.

Question 3: What is the basis for this and is it justified?

- 2.217. A capacity for 11 residential units allows for development to be limited to the northern part of the site so it is only situated within flood zone 1 and allows for the release of land for improved on-site water permeability. This approach was derived from the findings of the SFRA 2017 and the HELAA 2017.
- 2.218. Policy LP 26 is justified through the application of Cambridge Sub-Region (HOUS/07) and Peterborough Strategic Housing Market Assessments (SHMA) (HOUS/08) and local housing need and strategies (including HOUS/06). By referring to up-to-date evidence the policy ensures that the most appropriate strategy is employed in line with local demand and settlement type and location, or proximity to the most appropriate housing market area consistent with paragraph 50 of the NPPF and NPPG Housing and economic development needs assessments.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

2.219. A full planning application (16/02093/FUL) was approved in January 2018 for 11 residential dwellings. As of May 2018; there has been no commencement on site.

Question 5: What are the benefits that the proposed development would bring?

- 2.220. As much of the site is covered in hard-surfacing its redevelopment provides an opportunity to significantly increase the proportion of the site surface which is water permeable. Some contamination mitigation has already been undertaken suitable for employment use. Contamination will be further reduced through mitigation measures to make the site suitable for residential use.
- 2.221. The development will contribute to the Council's five-year land supply and provide residential accommodation that is highly accessible to local services and facilities.
- 2.222. The development will improve publically accessible viewpoints and will sit comfortably within the context of the wider area.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 2.223. The HELAA identifies potential adverse impacts with regards to flood risk, transport and pedestrian access, location within an AQMA and proximity to Alconbury Brook and Portholme SCA & SSSI.
- 2.224. Mitigation measures are identified in the HELAA and within HU 7 in the Local Plan (CORE/01, page 161). These include the assessment of ecological impact with the possible need for Habitats Regulations assessment identified in para 9.73 to ensure no detrimental impact on the ecological value of the adjacent sites. Site specific flood risk assessment is required, provision of flood resilient structures specified and provision of pedestrian access providing an escape route to higher land. An air quality assessment and low emissions strategy are required to address air pollution issues. A single point of vehicle access, pedestrian access and provision of public accessible open space along the water frontage are also sought. Further requirements include agreement with the Council in liaison with the Environment Agency that the Water Framework Directive is not compromised.
- 2.225. Mitigation measures are achievable, as demonstrated through the approval of application 16/02093/FUL in January 2018. No objections were raised by Huntingdon Town Council, Brampton Parish Council, Environment Agency, Natural England, Cambridgeshire County Council as LLFA and Archaeology, Anglian Water, Highways England, or Historic England; although conditions were suggested and applied.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

- 2.226. The site is in various flood zones. 56% of the site is in Flood zone 1, 36% in Flood zone 2 and 8% in Flood zone 3b.
- 2.227. The Huntingdonshire Sequential test for flood risk assessed the site (FLO/01, page 15) and concluded that development may be placed away from flood zones 2 and 3, with the area affected by the flood zones left undeveloped. It identified that approximately 0.35 hectares of land is available for development in flood zone 1.
- 2.228. The allocation therefore requires that development should only occur across a net developable area of 40% of the site, situated in the northern part. Further requirements include the undertaking of a flood risk assessment.
- 2.229. No sites allocated within the Local Plan were classified as highly vulnerable, so, following the PPG sequential test flow chart, the exception test was not required for any site that can be allocated in flood zone 2.
- 2.230. Cambridgeshire County Council objected to the HU7 on the basis that the site is adjacent to the Alconbury Brook, with associated flood risk history; it requested that development on

this site should be required to reduce discharge rates. This will be addressed through criterion k of the allocation.

2.231. Planning permission for application 16/02093/FUL was approved in January 2018. No objections were raised by the Environment Agency, Natural England, Cambridgeshire County Council, or Anglian Water, although conditions were suggested and applied.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 2.232. A single vehicular access point is required with adequate parking; further decontamination work is needed for residential uses together with measures to combat road noise from the nearby A14. There is a gas easement running through the site. Proximity to bio-diversity assets needs addressing through assessments.
- 2.233. The infrastructure requirements and constraints have been addressed through the submission and subsequent approval of planning application 16/02093/FUL.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

- 2.234. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 2.235. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Huntingdon will be served by the Huntingdon Wastewater Treatment Works. The Water Cycle Study acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.

- 2.236. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and offsite reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 2.237. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 2.238. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 2.239. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6). The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).
- 2.240. The Study is not site specific, as this is not a requirement for the local plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 2.241. The site is viable and deliverable for the approved planning permission for 11 residential units (16/02093/FUL) granted in January 2018.

Question 11: What is the expected timescale and rate of development and is this realistic?

- 2.242. In response to the Council's Annual Monitoring Report housing trajectory survey the agent confirmed that the development is expected to be completed in the year 2018/2019.
- 2.243. This is expected to be a realistic timescale as some land contamination mitigation has already been undertaken and all buildings have already been cleared from the site.

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 2.244. The boundary of the site is appropriate as it represents the land submitted as available for development. No representations were received to the proposed submission Local Plan consultation suggesting that the boundary should be amended.
- 2.245. The defined boundary allows for comprehensive re-development of previously developed land and brings benefits to the site such as contamination mitigation and improved on-site water permeability.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 2.246. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA and the Huntingdonshire Local Plan Viability Study. Reasonable alternatives such as the allocation of the site for employment use were dismissed (see question 1).
- 2.247. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 106,191,310,389,499) and Statement of Representations (CORE/04, Page 86).
- 2.248. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG⁵. The site is deliverable as defined through paragraph 47 of the NPPF; planning permission was approved in January 2018 demonstrating the development is viable and suitable. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development is available now and can be completed within a five year time period.

⁵ Housing and economic land availability assessment

HU8- California Road

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 2.249. The site is referred to as North of Cambridgeshire Regional College in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 61-64 for full assessment).
- 2.250. The site provides low quality open space as well as part of the Regional College's car park and some offices.
- 2.251. It was originally assessed in Stage 2 of the Local Plan to 2036 in the Huntingdon Spatial Planning Area document, consulted upon between August 2012 and November 2012. The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 61-64 for full assessment).
- 2.252. The site is occupied in a primarily residential area with very good access to services and facilities and has very few constraints and is therefore considered suitable for medium density residential development across a net developable area of 90% of the site. This results in an estimated capacity of 61 dwellings (HOUS/02: Suitability, page 64).

Question 2: What is the scale and type/mix of uses proposed?

2.253. The proposed use is for 55 dwellings.

Question 3: What is the basis for this and is it justified?

- 2.254. The site formed part of a larger piece of land identified for residential development following the Oxmoor Action Plan. Outline consent was granted for Residential Development (5.4Ha) on the 16th December 2009 (planning application 0500836OUT) with reserved matters approved for the northern section subsequently granted for 180 dwellings (planning application 1201953REM) which has now been built out by Linden Homes; no reserved matters submission was made for the southern section of Regional College land pursuant to the outline consent however planning application 1201749REP to replace the outline consent was submitted prior to the legislation changes for replacement permissions and is still pending consideration. Site allocation HU8 has an alternative boundary to the historic applications and retains a building to the east for the College but includes an office on the front of the college site.
- 2.255. The site is predominantly within a residential area with the Regional College adjacent; residential development continues to be considered the most suitable land use.
- 2.256. Initial assessment through the HELAA identified that the site has few constraints and is suitable for medium density residential development with a net developable area of 90% of the site resulting in an estimated capacity of 61 dwellings (HOUS/02: Suitability, page 64).

Planning application 17/02123/OUT has been submitted which seeks consent for residential development of 50 to 60 dwellings with access committed.

2.257. Representations from Cambridge Regional College (ID: 1117881) support the allocation noting development of the site accords with the Development Strategy policies and provides a sustainable location with good access to a range of services, shops and employment.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

2.258. A Full planning application (planning reference 17/02123/OUT) for between 50 and 60 dwellings is under consideration.

Question 5: What are the benefits that the proposed development would bring?

- 2.259. The development would contribute to the Council's housing land supply and provide residential accommodation in an area which is highly accessible to local services and facilities.
- 2.260. The site comprises an area of poor quality open space which is left over following the development of the site to the north, part of the College car park and a building on the site frontage. It is considered that the development would bring an opportunity to enhance this area through a high quality development, and will provide an area of higher quality open space that currently exists.
- 2.261. The development will improve publically accessible viewpoints and will sit comfortably within the context of the wider area, including the recent development of Saxon Gardens.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 2.262. The HELAA identifies potential adverse impacts with regards to the College use adjacent the site and surface water drainage due to the geology of the site, and that the greenfield part of the site and vegetation may provide habitat for protected species.
- 2.263. The allocation also identifies the site has potential archaeological constraints. In representations from Historic England (ID: 56252) it is requested that the wording requiring archaeological investigation be changed for consistency with other policies.
- 2.264. Mitigation measures are identified in the HELAA and within HU 8 in the Local Plan and include the requirement for a detailed flood risk assessment and drainage strategy and that landscaping and building form be carefully considered to provide a visual and noise buffer with the College site, along with submission of a noise assessment (CORE/01, criteria a, b and g and 9.84, page 163-164).

2.265. These mitigation measures are achievable as demonstrated through the application 17/02123/OUT where no objections were have been raised by Huntingdon Town Council, Cambridgeshire County Council Archaeology, Cambridgeshire Fire and Rescue, Environmental Health, Lead Local flood Authority, Local Highway Authority subject to inclusion of conditions where necessary.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

2.266. The site is in Flood zone 1 (FLO/01, page 9). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 2.267. HOUS/02 p62-64 sets out the constraints and essential infrastructure
- 2.268. There are relatively few constraints. The proximity of the Regional College may cause noise issues but the site is well served by local amenities. Development for housing should incorporate some open space.
- 2.269. An archaeological survey will be needed.
- 2.270. Infrastructure required has been identified through the agreement of S106 terms with the developer.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

2.271. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 2.272. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Huntingdon will be served by the Huntingdon Wastewater Treatment Works. The Water Cycle Study acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.
- 2.273. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and off-site reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 2.274. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 2.275. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

2.276. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6). The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).

- 2.277. Policy LP25 (affordable housing provisions) seeks a target of 40%. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is not viable due to specific site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal.
- 2.278. There are relatively few constraints and infrastructure requirements with 90% of the site capable of development (HOUS/02p64). A policy level of affordable has been agreed for the S106.

Question 11: What is the expected timescale and rate of development and is this realistic?

2.279. The Annual Monitoring Report 2017 (MON/01, 82) expects the first 18 homes to be completed in the year 2018/2019, with all homes expected to be completed within years 1-5, the timescale for delivery is set out below:

No. units in years 1- 5	-	18/19 Yr. 2	19/20 Yr. 3	20/21 Yr. 4	21/22 Yr. 5	Total 17/36
55	0	18	25	12	0	55

2.280. This is deemed to be a realistic timescale as a Full application is currently under consideration, once determined the final number of residential units will be updated in the Council's future housing trajectory.

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 2.281. The boundary of the site is appropriate as it represents the land submitted as available for development. No representations were received to the Local Plan proposed submission suggesting the boundary should be amended. It is also noted that the site boundary reflects the red line of planning application 17/02123/OUT.
- 2.282. The defined boundary allows for comprehensive redevelopment of the site.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 2.283. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA and the Huntingdonshire Local Plan Viability Study and Strategic Flood Risk Assessment.
- 2.284. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways

England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 28, 53, 78, 106, 187, 307, 389, 449, 470, 495) and Statement of Representations (CORE/04, Page 83, 86, 151).

- 2.285. There are also no objections raised on technical grounds on the planning application from by Huntingdon Town Council, Cambridgeshire County Council Archaeology, Cambridgeshire Fire and Rescue, Environmental Health, Lead Local flood Authority, or the Local Highway Authority.
- 2.286. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG. The site is deliverable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development is available now can be completed within a five year time period.

HU9- Main Street

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 2.287. The site is the last undeveloped parcel of land along Hartford Road contained within the A1123 and is greenfield land.
- 2.288. It was originally assessed for the Local Plan to 2036 in the Huntingdon Spatial Planning Area document, consulted upon between August 2012 and November 2012 (HOUS/02: Availability, page 150). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 148-151 for full assessment).
- 2.289. The site is situated adjacent to a residential area with reasonable access to services, facilities, employment opportunities and good public transport links to Huntingdon town centre. The site is considered suitable for low density residential development across a net developable area of 60% of the site resulting in an estimated capacity of 32 dwellings (HOUS/02: page 150).

Question 2: What is the scale and type/mix of uses proposed?

- 2.290. The proposed use is for 30 dwellings.
- The type and mix of residential units will be determined through the application of policy LP 26 Housing Mix.

Question 3: What is the basis for this and is it justified?

2.292. The site comprises approx. 1.5ha of greenfield land on the edge of the built-up area of Huntingdon. In order to retain the character/appearance of the area in line with the

prevailing pattern of development and achieve an easily interpretable transition from the countryside to the built up area, this site is considered to be unsuitable for a higher density development. The spacious character of the immediate surroundings should influence the layout/density of a development proposal. This approach was derived from the findings in the HELAA 2017 (HOUS/02).

- 2.293. Policy LP 26 is justified through the application of Cambridge Sub-Region SHMA (HOUS/07) and Peterborough SHMA (HOUS/08) and local housing need and strategies (including HOUS/06). By referring to up-to-date evidence the policy ensures that the most appropriate strategy is employed in line with local demand and settlement type and location, or proximity to the most appropriate housing market area consistent with paragraph 50 of the NPPF and NPPG Housing and economic development needs assessments.
- 2.294. Representations submitted by Mr Nick Price (ID: 1117165) [source: PREP/01] identified that the landowners welcome and support the proposed allocation, highlighting the availability of local services/facilities and the absence of any legal complications and ecological designations.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

2.295. No planning application has yet been received for the site.

Question 5: What are the benefits that the proposed development would bring?

2.296. The development will contribute to the Council's five-year land supply and provide residential accommodation with reasonable access to local services, facilities and employment opportunities.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 2.297. The HELAA identifies potential adverse impacts with regards to flood risk (noting comments from the Environment Agency (ID: 775665) [source: PREP/02] which confirmed the site is shown to be at risk from surface water flooding); the capacity of Huntingdon WWTW; access to services and facilities (food shops, GP, primary schools). The absence of a connection to the green infrastructure network was also identified, along with the positive impact of the screening provided by the established planting along the boundaries of the site.
- 2.298. Mitigation measures are identified in the HELAA (HOUS/02) and within HU9 of the Local Plan (page 165). These include a detailed site specific flood risk assessment, a suitable vehicular access to the site, a sympathetic landscaping scheme, a development layout which respects the heritage assets located in the vicinity of the site and the facilitation/promotion of pedestrian, cycle and bus links. Representations submitted by Historic England (ID: 56252) [source: PREP/02] identified that development of the site should preserve/enhance the

Conservation Area and require an appropriately detailed archaeological investigation, which preserves any discovered assets.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

- 2.299. The site is in Flood zone 2.
- 2.300. The site was assessed in the Sequential Test for Flood Risk (FLO/01). No sites were classified as highly vulnerable in FLO/01, so, following the PPG sequential test flow chart, the exception test is not required for any site that can be allocated in flood zone 2 (FLO/01: paragraph 3.5, Page 3).
- 2.301. The site is considered suitable for low density residential development across a net developable area of 60% of the site resulting in an estimated capacity of 32 dwellings (HOUS/02: page 150). Applicants will be required to submit an appropriate flood risk assessment as part of their planning application.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 2.302. HOUS/02 sets out the constraints and infrastructure requirements. In summary the site is in flood zone 2. Given the proximity of trees and hedgerows landscape impact could be a constraint. Infrastructure will include an access point and links for cycleways and footpaths into the town centre.
- 2.303. The site is adjacent to and partially within Hartford conservation area. Design must protect the setting and character of the area.
- 2.304. The infrastructure costs will be met from S106 payments or provided directly by the developer.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

2.305. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017

a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 2.306. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Huntingdon will be served by the Huntingdon Wastewater Treatment Works. The Water Cycle Study acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.
- 2.307. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and offsite reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 2.308. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 2.309. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

2.310. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances

were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6). The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).

- 2.311. The Study is not site specific, as this is not a requirement for the local plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 2.312.Policy LP25 (affordable housing provisions) seeks a target of 40%. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is not viable due to specific site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal. The viability work within INF/04 indicates that the typology that this site falls into will generally indicate strong viability enabling policy levels of affordable housing.

Question 11: What is the expected timescale and rate of development and is this realistic?

2.313. The site is deliverable and is anticipated the site could be delivered within the first five years of the plan period. The first 15 homes are expected to be completed in the year 2019/2020, with all homes expected to be completed within years 1-5, the timescale for delivery is set out below:

No. units in	17/18	18/19	19/20	20/21	Total 17/36
years 1-5	Yr. 1	Yr. 2	Yr. 3	Yr. 4	
30	0	0	15	15	30

- 2.314. This is deemed to be realistic as the site is currently being prepared for marketing (MON/01, page 82).
- 2.315. Planning applications 16/00597/FUL and 18/00089/FUL have also been approved on neighbouring land, illustrating that development in this area is realistic.

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

2.316. The boundaries of the site comprise mature trees/hedging to the north, west and south, with an established tree belt running along the eastern edge providing screening and an easily interpretable buffer with the open countryside beyond.

- 2.317. The HELAA (HOUS/02) document identifies that an impact upon the landscape in the vicinity of the site could be a potential development constraint. Accordingly, the design of a development and associated landscaping scheme should demonstrate how these impacts are minimised and/or mitigated, through the retention and possible enhancement of the existing boundary screening.
- 2.318. The aforementioned established tree belt running along the eastern boundary has been identified as a potential acoustic buffer from traffic noise emanating from the A1123.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 2.319. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA (HOUS/02) and the Huntingdonshire Local Plan Viability Study (INF/04) and Strategic Flood Risk Assessment (FLO/02).
- 2.320. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 106, 197, 310-11, 389 and 449) and Statement of Representations (CORE/04, Page 86).
- 2.321. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG⁶. The site is deliverable as defined through paragraph 47 of the NPPF and the Statement of Representations (CORE/04, Page 86) identifies that the site is suitable and credible. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development is available now and can be completed within a five year time period.

HU10 – Hinchingbrooke Country Park Extension

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 2.322. The 44ha site is adjacent to Hinchinbrooke Country Park and lies within functional floodplain and adjacent to a conservation area. The area is designated as a County Wildlife Site. Some of the land is currently farmed.
- 2.323. This piece of land was originally allocated as an extension of Hinchingbrooke Country Park as part of the Huntingdon West Area Action Plan 2011 (HWAAP, Appendix 2). It was assessed for the Local Plan to 2036 in the Environmental Capacity Study: Huntingdon Spatial Planning Area document, consulted upon between August 2012 and November 2012 (HOUS/02, page

⁶ Housing and economic land availability assessment

211). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 209-211 for full assessment).

2.324. The site is considered inappropriate for built development as it lies within a functional flood plain and any development would present a significant impact on the landscape; however, it has great potential as an extension to the adjoining Hinchingbrooke Country Park for additional recreational opportunities. The site is easily accessible by public transport and cycling and is located close to major concentrations of housing and employment to which it could provide additional recreational opportunities (HOUS/02: page 211).

Question 2: What is the scale and type/mix of uses proposed?

2.325. The proposed use is for allocated green infrastructure, additional recreational activities and support improved biodiversity.

Question 3: What is the basis for this and is it justified?

- 2.326. The site was originally allocated as an extension to the Country Park through the HWAAP meeting objective 3 of the AAP to: "facilitate healthy and active lifestyles by contributing to a network of improved and new high quality green spaces which link to strategic green spaces and routes around the area including and improved Hinchingbrooke Country Park and Views Common". The allocation has therefore previously undergone assessment and examination through the adoption of the HWAAP.
- 2.327. The allocation also enables the Council to meet paragraph 114 of the NPPF planning positively to enhance and manage biodiversity and green infrastructure.
- 2.328. Although some of the land is currently farmed, it is not of the highest agricultural grade. The proposed use would not prevent reversion to agriculture if food production became a higher priority.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

2.329. No planning application has yet been submitted.

Question 5: What are the benefits that the proposed development would bring?

2.330. The allocation also enables the Council to meet paragraph 114 of the NPPF planning positively to enhance and manage biodiversity and green infrastructure. The site will also provide additional recreational and amenity value for Huntingdon residents as required by paragraph 123 of the NPPF, providing access to high quality open space and contributing to the health and well-being of communities (paragraph 73).
Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 2.331. There are no significant adverse impacts in relation to the site allocation. Increased visitor numbers would be catered for through the provision of a new car park off Huntingdon Road. Additional pedestrian footpaths would be required (criterion a of the policy) to allow increased footfall and adequate cycle and pedestrian access to the site and from existing and new developments to allow for sustainable means of travel. An appropriately detailed flood risk assessment and management strategy would also be required (criterion d).
- 2.332. A representation made to the Local Plan Proposed Submission Consultation by Mr Bowers (ID: 1117898) raised the issue of the need for additional car parking to be provided in advance of the Country Park extension. The Council believes this issue has been acknowledged within the allocation through criterion e and paragraph 9.94, which requires adequate parking; preventative highway measures would also be provided so that the surrounding network is not adversely affected (CORE/05, page 450).

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

- 2.333. The site was assessed in the Sequential Test for Flood Risk (FLO/01). The site is mostly within the functional floodplain, with those parts that aren't, mostly falling within either Flood zone 2 or 3a; the site was therefore considered unsuitable for built development.
- 2.334. As the site is proposed for amenity open space: the extension to Hinchingbrooke Country Park is classed as water compatible, so despite being located within an area of flood risk the sequential and exception test was not required (FLO/01: Paragraph 3.5, Page 3).
- 2.335. Cambridgeshire County Council and the Environment Agency raised issues in response to the Local Plan Proposed Submission consultation with regards to the need to reduce overall flood risk on the site through the design of recreation and green infrastructure space. As a result of these comments paragraph 9.93 was added to the allocation to address this issue (CORE/05, page 449).

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

2.336. A safe access or accesses onto the main highway will be needed and flood risk assessments to ensure the public are not exposed to the flooding risk. Additional car parking will also be required, the Council will look to lease or purchase this land when funds are available.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

2.337. Due to the nature of the site the impact on the water supply and foul sewerage networks will be minimal, although there could potentially be positive impact through the design of recreational and green infrastructure space. A pre-planning enquiry with Anglian Water Services will be required to confirm what effects this use would have.

Question 10: Is the site realistically viable and deliverable?

- 2.338. Much of the extension can be delivered through the Higher Level Stewardship (HLS) agrienvironment scheme. This scheme, run by Natural England, provides funding to deliver effective environmental management. Lease arrangements need not require significant Council funding. Works to improve the areas will enlist the support of the Friends of Hinchingbrooke Country Park, with guidance from the Council's Countryside Service.
- 2.339. Similar arrangements have been made at Little Paxton Nature Reserve where the Council has extended the reserve to 3.5 times its former size through agreements with the adjacent landowners.

Question 11: What is the expected timescale and rate of development and is this realistic?

- 2.340. The site has been assessed as being developable within the Plan period to complement development within the Huntingdon Spatial Area. This has been confirmed through its submission and allocation as a site through the Huntingdon West Area Action Plan.
- 2.341. The allocation of the site has been supported in principle by the Wildlife Trust and Natural England (ID 377145 and 34468 respectively) through their representations to the Local Plan proposed submission consultation. Both parties request that the site is brought forward ahead of new residential development to ensure its availability to new residents within the Plan period and to avoid adverse impacts to nationally and internationally designated sites nearby. The Council considers that the site is developable within the Plan period, and is realistic.
- 2.342. G.B Sewell & Partners expressed their objections to the proposed allocation and uncertainty for the future of their farming business, as any further development at Meadow View Farm may be prevented due to the conflict with the Country Park extension policy. The Council is committed to working with all landowners as the site progresses and does not consider that the current livestock operation would be jeopardised by the allocation.

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

2.343. The boundary of the site is appropriate as it represents the land submitted as available for development. An informal query was raised from a landowner regarding planning

permission 1000440FUL for cattle shed, it was considered reasonable to not include this area within the allocation and the boundary of the site was amended to reflect this (CORE/05, page 312).

2.344. The defined boundary allows for comprehensive biodiversity and recreational enhancement of the land and brings benefits to the site such as strategic green space, ecology mitigation and improved recreational access.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 2.345. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA, Strategic Flood Risk Assessment and the HWAAP. Reasonable alternatives such as the allocation of the site for wholly supported housing were dismissed (see question 1).
- 2.346. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 53, 78, 106, 198, 311, 389, 449) and Statement of Representations (CORE/04, Pages 77, 83, 87)
- 2.347. NPPF 114 requires LPAs to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; in this regard it is considered that HU10 can be given significant weight insofar as it relates to the maintenance and enhancement of Hinchingbrooke Country Park.

HU11- Huntingdon Racecourse

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 2.348. The site is agricultural land and is currently used as a horse racing course.
- 2.349. The site was put forward during the Stage 3 consultation in 2013 and originally assessed for the Local Plan to 2036 in the Environmental Capacity Study: Additional Site Assessments document, consulted upon in November 2013 (HOUS/02: Availability, page 221). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 219-222 for full assessment).
- 2.350. Development on the site is strongly restricted as it falls within a functional floodplain. The land is considered potentially suitable for a racecourse, equine support facilities and complementary recreational and leisure facilities subject to the suitability of precise

positioning within the site. Also, the current use of the site provides a valuable social and economic contribution to the Huntingdon area and can continue to do so (HOUS/02: Suitability, page 221).

Question 2: What is the scale and type/mix of uses proposed?

2.351. The proposed site is allocated for a mixed use development, comprising of the continued use of the site for the racecourse, equine support facilities and Huntingdon RFC, and the complementary conference and events facilities, outdoor recreational and leisure facilities.

Question 3: What is the basis for this and is it justified?

2.352. The site comprises approx. 72ha of land to the west of Huntingdon. Given the existing uses on the site and the significant constraints of the functional floodplain designation, it is considered appropriate to support the ongoing horse racing/equine support facilities to ensure that the recreation, leisure and entertainment facility is retained, whilst ensuring that the activities of Huntingdon Rugby Club are not prejudiced (note Sport England comment (ID: 34687) [source PREP/02).

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

2.353. No planning application has yet been received.

Question 5: What are the benefits that the proposed development would bring?

2.354. Development will play a role in the continued success of the operation of the racecourse facility, which is considered to be an important economic and social asset for the district which provides a unique recreation/leisure offering. Additional development may also result in increased employment opportunities.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 2.355. The HELAA (HOUS/02) identified that the vast majority of the site falls within the functional floodplain, the exception being an area along the eastern edge of the site and the sections of raised land which act as flood defence levees. Representations from the Environment Agency (ID: 1146949) and Cambridgeshire County Council (ID: 1150302)[source: PREP/01] identified that a) the site represents a significant recreation/green infrastructure space and that a design which reduces overall flood risk though flood storage and surface water attenuation could be achieved and b) flood risk assessments should consider the potential for overall flood risk reduction on and beyond the site, noting the direction regarding sequential testing within FLO/01 (page 3).
- 2.356. Brampton Racecourse SSSI is located within the central section of the racetrack.

- 2.357. Representations from the Historic England (ID: 56252) [source: PREP/01] outlined that a programme of investigative works should be undertaken (and any discovered assets protected) due to an identified potential archaeological interest given the proximity (approx. 45m) of the scheduled ancient monument (SAM: 1006858) to the south. Additional trip generation and vehicle movements are likely to result from development of the site and a small section of the southwest corner of the site lies adjacent to an Air Quality Management Area. Given the visibility across the site from the surrounding road network, sympathetic design is required in order to ensure the character/appearance of the site is not unacceptably impacted.
- 2.358. A proportionate transport assessment (to demonstrate that safe access can be provided and any adverse traffic impacts adequately mitigated) and a proportionately detailed flood risk assessment would be required. In addition, an ecological report to ensure that the SSSI is not detrimentally impacted along with an archaeological assessment to investigated/preserve assets (as necessary) would represent adequate mitigation measures.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

- 2.359. The site was assessed in the Sequential Test for Flood Risk (FLO/01) which identified that almost the whole site lies within the functional floodplain so is therefore unsuitable for residential development.
- 2.360. Huntingdon Race Course has not been subjected to the sequential test. Most of the site is within the functional floodplain. However, since development is proposed within an existing site for activities that could not reasonably be located anywhere else than at the existing racecourse, it is not considered that there are reasonable alternatives to development at this location. Any proposals will need to be supported by a site specific flood risk assessment appropriate to the risk category of the uses proposed (FLO/01, paragraph 3.5, Page 3).

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 2.361. HOUS/02 sets out the constraints and infrastructure requirement. In summary, an ecological survey will be needed due to the SSSI. Impact on the surrounding countryside will have to be mitigated through design and landscaping. An archaeological survey will be needed.
- 2.362. A flood risk assessment is needed to determine if development can proceed
- 2.363. The infrastructure costs will be met from S106 payments or provided directly by the developer.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

- 2.364. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 2.365. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Huntingdon will be served by the Huntingdon Wastewater Treatment Works. The Water Cycle Study acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.
- 2.366. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and off-site reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 2.367. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is

committed to making the required investment to ensure new demand can be accommodated within the network.

2.368. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

2.369. The flood risk means that the site is unsuitable for housing development. Viability of the site will be assessed as planning applications come forward and infrastructure is identified.

Question 11: What is the expected timescale and rate of development and is this realistic?

2.370. Development on site is considered realistic an is supported by the Jockey Club Racecourses who are seeking to improve and extend the facilities at the racecourse to support its role in providing a recreation, leisure and entertainment facility for the area and to help ensure its continuing vitality and viability. Although an expected timescale for delivery has not been identified, the allocation of this site ensures that the Jockey Club Racecourses can respond to market conditions and meet the growing leisure and business needs of the District throughout the duration of the Plan period.

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 2.371. The site is enclosed by established trees and hedging, although the extent of this screening is less substantial along the northeast boundary.
- 2.372. Representations submitted by Jockey Club Racecourses (ID: 34935) [source: PREP/01] identified that the hotel (positioned toward the southeast corner of the site) operates independently from the racecourse. Accordingly, this area was removed from the site following the Proposed Submission consultation. The revised boundary of the site is appropriate as it represents the land submitted as available for development.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 2.373. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA (HOUS/02) and the Huntingdonshire Local Plan Viability Study (INF/04)
- 2.374. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 106, 315, 450) and Statement of Representations (CORE/04, Page 87).

3. Brampton

HU12- Dorling Way

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 3.1. The site is referred to as West of Brampton in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 202-204 for full assessment).
- 3.2. The site is currently used for arable crops.
- 3.3. The agent for the site confirmed its availability in response to the AMR 2016 survey (HOUS/02: Availability, page 204) and the land has since been assessed in the HELAA (HOUS/02).
- 3.4. The site is situated adjacent to a residential area, the A1 immediately to the west and A14 to the north pose major constraints, however, it has reasonable access to services and facilities although is relatively remote from major employment sites. The western edge of the site has been discounted to reflect proposals for works to the A1. The remainder of the site (7.6ha) is considered suitable for low density residential development across a net developable area of 60% of the site resulting in an estimated capacity of 160 dwellings and would form an extension to the village of Brampton. There are no major employment opportunities nearby so a mix of uses is not deemed appropriate (HOUS/02: page 204).

Question 2: What is the scale and type/mix of uses proposed?

- 3.5. The proposed use is for 150 dwellings with the general arrangement being predominantly two-storey units, across the site, providing for units of a range of sizes, from 1 bed maisonettes through to 5 bed units.
- 3.6. Under 17/01879/REM in March 2018, a total of 60 units (40%) have been allocated for affordable housing. These dwellings will vary in size from 1 bedroom to 4 bedrooms. In accordance with the mix set out within the S106 Agreement, 42 of the dwellings are to be provided for social rent and 18 are to be provided for shared ownership.

Question 3: What is the basis for this and is it justified?

- 3.7. The site is situated adjacent to a residential area of Brampton, to the east and the A1 immediately to the west, and benefits from reasonable access to services and facilities. It is therefore considered that residential development of the site is an appropriate use; forming an extension to Brampton.
- 3.8. Initial assessment through the HELAA identified that the western edge of the site should be discounted to reflect proposals for works to the A1 (HOUS/06, Page 204). However, the HELAA identified that the remainder of the site (7.6ha) is suitable for low density residential

development across a net developable area of 60% of the site, with an estimated capacity of 160 dwellings. Planning permission 16/00194/OUT has been approved which grants consent for up to 150 dwellings.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

- 3.9. Outline planning permission for up to 150 dwellings was granted in January 2016 (planning reference 16/00194/OUT).
- 3.10. The subsequent Reserved Matters application (planning reference 17/01879/REM) was approved in March 2018 with condition discharge applications submitted. As of May 2018, there had been no commencement on site.

Question 5: What are the benefits that the proposed development would bring?

- 3.11. Taking the Framework policies into account, and in accordance with its Section 1, the development would have important economic benefits through employment in the construction of the housing (including in the supply chains of materials, fittings and furnishings) and in the local economic contribution from future residents.
- 3.12. There would be important social benefits from the provision of market and affordable homes for the residents in accordance with Section 6 of the Framework and in the creation of public recreational land on the open space in accordance with Section 8. The provision of on-site open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11.
- 3.13. The development would contribute to the Council's housing land supply and provide residential accommodation in an area which is reasonably accessible to local services and facilities, which could be accessed by sustainable modes of transport; in accordance with Section 4 of the Framework.
- 3.14. Access is identified as a constraint at present. A proportionate Transport Assessment will be required to demonstrate that safe, appropriate access can be provided from the road network, and that any adverse off site transport impacts can be adequately mitigated. In particular, the design of the development should provide a sustainable transport network for vehicles, cyclists and pedestrians which will facilitate integration with Brampton, but also enable existing residents to access the public open space to be provided within the development.
- 3.15. The sites proximity to the A1 and A14 is also identified as a constraint within the HELAA. It would be necessary to demonstrate that development would mitigate and minimise impacts arising from noise such to safeguard the amenity of future residents. Development of the site may also reduce noise levels experience by some existing dwellings in the locality; contributing to the amenity of these properties.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 3.16. The HELAA identifies potential adverse impacts with regards to issues with transport access for vehicles, pedestrians and cyclists, the need for noise mitigation given the proximity to the A1 and A14, its positioning adjacent to Brampton AQMA, the potential for protected species within boundary hedges, additional pressure on foul sewage network capacity and the waste water supply network and the proximity to two SSIs.
- 3.17. Mitigation measures are identified in the HELAA and within HU 12 in the Local Plan and include the requirement for appropriate noise mitigation from the A1 and A14, satisfactory resolution of additional traffic impact, provision of a sustainable transport network for vehicles, cyclists and pedestrians, and an air quality assessment and low emissions strategy. Further mitigation measures identified include the requirement for landscaping to provide noise and pollution buffers, a surface water drainage strategy, a programme of work relating to archaeological assets, confirmation that waste water flows could be accommodated and that the Water Framework Directive would not be comprised, and that appropriate account is taken of the site's relationship with adjacent residential development (CORE/01, criteria a -j, page 171 and HOUS/02, page 204). Concerns have also been raised as part of the planning application on these matters.
- 3.18. Mitigation measures are achievable, as demonstrated through the approval of application 16/00194/OUT and subsequently reserved matters application 17/01879/REM; although conditions were suggested by Statutory Consultees and applied to these consents respectively.
- 3.19. Representations at proposed submission consultation stage from Ms Debbie Mack (ID: 56252), Historic England provided support for the inclusion of wording relating to archaeological assets as part of the allocation.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

3.20. The site is in Flood zone 1 (FLO/01, page 10). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

3.21. HOUS/02 sets out the constraints and infrastructure requirements for the site. In summary the constraints are a transport assessment to demonstrate a safe access can be made and noise mitigation will be needed due to the proximity of major roads. An ecological survey will be needed and archaeological investigation.

3.22. Infrastructure requirements have not been costed but the work will be delivered through S106 requirements.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

- In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan 3.23. ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 3.24. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Brampton will be served by the Brampton Wastewater Treatment Works. The Water Cycle Study acknowledged Brampton as having capacity to accommodate the Local Plan growth.
- 3.25. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and off-site reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 3.26. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to

determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.

3.27. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 3.28. The site is viable and deliverable for the approved planning permission 17/01879/REM (March 2018) or 11 residential units (16/02093/FUL) granted in January 2018.
- 3.29. Policy LP25 (affordable housing provisions) seeks a target of 40%. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is not viable due to specific site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal. In this case, strong viability has been demonstrated and 40% affordable has been incorporated into the signed S106.

Question 11: What is the expected timescale and rate of development and is this realistic?

- 3.30. The site is considered to be achievable and the developer does not anticipate any constraints that would delay development following both Outline and Reserved Matters approvals (MON/01, page 70-71).
- 3.31. The rate of development is deemed to be realistic. The first 9 homes are expected to be completed in the year of 2018/2019 with all dwellings expected to be completed in years 1-5, the timescale of delivery is set out below:

No. units in years 1-5	17/18	18/19	19/20	20/21	21/22	Total
,	Yr. 1	Yr. 2	Yr. 3	Yr. 4	Yr. 5	17/36
150	0	9	51	64	26	150

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

3.32. The defined boundary is appropriate as it represents the land submitted as available for development and as approved under application 16/00194/OUT. It is noted that a different boundary was employed in relation to application 17/01879/REM, due to the western edge of the site now being required for works to the A1.

- 3.33. No representations were received in relation to the Local Plan consultation suggesting that the boundary should be amended.
- 3.34. The defined boundary allows for comprehensive development of the site, with natural boundaries formed by the local highway network (A1 and A14) and existing adjacent residential development.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 3.35. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA, the Huntingdonshire Local Plan Viability Study and the Strategic Flood Risk Assessment.
- 3.36. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 107 and 435) and Statement of Representations (CORE/04, Page 88).
- 3.37. There are also no objections raised on technical grounds on the planning application (16/00194/OUT) from Anglian Water, Alconbury and Ellington Internal Drainage Board, Cambridgeshire Constabulary, Cambridgeshire County Council Archaeology, Lead Local Flood Authority, Cambridgeshire County Council Rights of Way, Local Highways Authority, Environment Agency, Environmental Health, Natural England, Highways England and the Wildlife Trust. A subsequent reserved matters application has been approved.
- 3.38. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG⁷. The site is deliverable as defined through paragraph 47 of the NPPF, with outline planning permission having been approved in September 2016; demonstrating the development is viable and suitable. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development is available now and can be completed within a five year time period.

HU13- Brampton Park

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

3.39. The site is for the most part previously developed, comprising of buildings relating to its previous use as an RAF base, including offices, leisure facilities and accommodation blocks. Many buildings have now been cleared and redevelopment has commenced.

⁷ Housing and economic land availability assessment

- 3.40. This piece of land was originally assessed in Stage 2 of the Local Plan to 2036 in the Environmental Capacity Study: Huntingdon Spatial Planning Area document, consulted upon between August 2012 and November 2012 (HOUS/02: Availability, page 105). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 103-106 for full assessment).
- 3.41. Due to the size of the site, it offers the opportunity to improve sustainability in the vicinity through a mixed use, residential-led redevelopment at mixed densities. For the purposes of setting out an estimated capacity the following factors have been taken into account: the total site area is 32ha from which 0.8ha is deducted for retail and community uses and a further 1.2ha is deducted for Brampton Park House and its immediate surroundings. This gives a balance of 30ha for potential residential development at 50% net developable area resulting in an estimated capacity of 600 dwellings (HOUS/02: Suitability, page 105).

Question 2: What is the scale and type/mix of uses proposed?

3.42. The site is allocated for mixed use development comprising of approximately 600 dwellings, 560m² (gross) of shop floorspace (class 'A1'), an appropriate viable use for the grade II listed Brampton Park house, community facilities and accessible open space and green infrastructure links.

Question 3: What is the basis for this and is it justified?

- 3.43. An Urban Design Framework (UDF) (Appendix 3) was produced for the site in 2011 to describe the main planning and design factors and requirements that prospective developers must address in delivering a sustainable, mixed use re-development of land within the RAF Brampton base. The contents of the framework reflect wider visual and landscape considerations as well as site-specific opportunities and constraints on the site. These include urban design objectives and principles, the broad concept of development and detailed development guidance specifically relating to land uses, form of development, integration and movement, sustainability, Section 106 and Community Infrastructure Levy, and implementation.
- 3.44. This allocation proposes redevelopment of a brownfield site following the closure and relocation of personnel from RAF Brampton. HU13 deviates from the UDF with a reduction in employment land and increase in housing principally arising from updated Employment Land Study, response to the economic recession and change to the flood constraint on the site.
- 3.45. The allocation also reflects submitted planning applications for the site and is considered to be justified.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

3.46. The site has had a number of planning applications.

- 3.47. A Full planning application for a phased development of 30 dwellings and conversion of former Officer's Mess and Gatehouse (planning reference 15/02016/FUL) was approved in November 2016 with phase 1 demolition commencing on the 19th June 2017.
- 3.48. An Outline planning application for a phased hybrid development relates to land north of Central Avenue for 63 dwellings, 70 bed care home formal & informal open spaces 566sqm of flexible A1/A2/A3 retail space and 505sqm of B1 office space (planning reference 15/00643/OUT) was approved in February 2016.
- 3.49. Another Outline planning application for a phased hybrid development of 437 dwellings, formal and informal open spaces and new community building (D1) (planning reference 15/00368/OUT) was approved in February 2016. The development commenced on the 3rd June 2016 when the existing buildings were demolished.
- 3.50. A Reserved Matters application for 210 dwellings (planning reference 16/00789/REM, following 15/00368/OUT) was approved in September 2016 and commenced on the 31st March 2017.
- 3.51. A Reserved Matters application for 219 dwellings (planning reference 16/01319/REM, following 15/00368/OUT) was approved in December 2016 and commenced on the 22nd February 2017.
- 3.52. A Reserved Matters application for 58 dwellings (planning reference 16/00605/REM, following 15/00643/OUT) was approved in October 2016 and commenced on the 10th July 2017.
- 3.53. A Full planning application for a mixed-use building comprising 3no. flexible-use commercial units (Use Classes A1, A2 and/or A3) and 13 apartments (planning reference 16/00751/FUL) was approved on the 11th November 2016 and commenced on the 22nd September 2017.
- 3.54. A Full planning application for 56 dwellings (planning reference 16/00975/FUL) was approved in December 2016 and commenced on the 17th July 2017.
- 3.55. A Full planning application for 15 dwellings (planning reference 17/00577/FUL) was approved on the 13th December 2017; this permission has not yet commenced.
- 3.56. A Reserved Matters application for 110 dwellings (planning reference 18/00504/REM, following 15/00368/OUT) is pending consideration and seeks variations to Parcel C house types as approved under 16/01319/REM.

Question 5: What are the benefits that the proposed development would bring?

3.57. Redevelopment of this brownfield site which was redundant following the closure of the RAF Base gives an opportunity to enhance the area and integrate with the other residential properties formerly on the Base (and in separate ownership). The provision of on-site open space, formal sports and landscaping would also have benefits for the wider community, environment and biodiversity.

- 3.58. The development would contribute to the Council's housing land supply and provide residential accommodation in an area which is has good access to local services and facilities.
- 3.59. The development would allow for connections and improvements to the nearby Right of Way of network to promote walking and cycling connections to the Primary School and High Street. Cycle path enhancements are also secured to connect to the existing cycle routes and provide safer access to shops and facilities in Huntingdon including the train station, schools and employment.
- 3.60. The allocation includes a shop and community facilities; it is understood that the Village had access historically to some facilities on the Base such as the Theatre and therefore the community building approved under the hybrid element of 15/00368/OUT secures a community building with staging and facilities to support local Amateur Dramatics. These facilities will also help to minimise pressure on the existing community.
- 3.61. On the site there are two Grade II listed buildings and other listed walls; the site is adjacent the designated Conservation Area. Representations at proposed submission consultation stage from Historic England (ID: 56252) raise concerns over reference to the viability challenges associated with re-use of Brampton Park House (formerly Officers Mess) and that opportunities should be taken to preserve and enhance all designated heritage assets, and take opportunity to identify and preserve where appropriate non-designated heritage assets. Concern is also raised that the policy itself does not give consideration to the setting of the Conservation Area. As part of the redevelopment change of use of the listed buildings has been granted for residential use (planning application 15/02016/FUL) and the settings of the listed features elsewhere in the site have been considered as part of the comprehensive site masterplan. Conditions have also been attached to ensure that the ancillary features are inspected and repaired as part of the wider development, a requirement for reserved matters approvals to consider non-designated heritage assets and retention, and also to restrict development of land associated with Brampton Park House until such time as certain works have been done to the House to ensure that it is viable as a single house. The setting of the adjacent Conservation Area will always be a consideration and whilst not necessary explicit in the policy wording, it is considered that in the planning balance Policy LP36 (Heritage Assets and their Settings) would provide the protection sought by Historic England. The long-term retention and alternative use of the listed buildings is considered a benefit.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 3.62. The HELAA identifies potential adverse impacts with regards to issues with flooding, traffic and access arrangements, noise and light pollution, trees and ecology.
- 3.63. The northern and eastern parts of the site are covered by flood zones 3b, 3a and 2; it is however acknowledged that there were buildings, including Officer accommodation blocks within the flood extent. The sites geology also means that soakaways or infiltration devices are unlikely to be conducive. The redevelopment of the site allows for the siting of the

buildings to be carefully considered and no increase in footprint within Flood Zone 3, along with the finished floor levels to be appropriately set, and a comprehensive surface water drainage scheme secured with permeable paving included. No objections to the planning applications were received from the Environment Agency or the Lead Local Flood Authority.

- 3.64. Redevelopment of the site for a residential-led scheme will generate a significant amount of additional traffic and change in the nature of the movements associated with the historic RAF Base. Planning Application 16/02492/FUL secures further alterations to the secondary access junction of Park Lane with Buckden Road (different to that secured under the outline consents) and the development will extend the 30mph speed restriction to include this access. Furthermore enhancements are secured to foot and cycle paths in the locality of the site to promote non-car modes of transport.
- 3.65. Due to the sites proximity to the countryside noise and light pollution are referred to in the HELAA as a site constraint. Careful consideration to these points as part of the detailed site appraisal can ensure that these impacts are mitigated successfully; it is also acknowledged that the site was formerly an RAF Base with its associated noise and lighting.
- 3.66. The site has a large number of mature protected trees which positively contribute to the parkland setting and provide a significant constraint to the sites development. As established through the planning applications the development can satisfactorily accommodate the amount of development without unacceptable encroachment into Root Protection Areas, and also gives opportunities for replacement planting in the rare instances where the removal of protected trees has been necessary, this is alongside a high quality landscaping scheme. Ecological protection and enhancements can be secured as part of site development.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

- 3.67. The site was assessed in the Sequential Test for Flood Risk (FLO/01). The northern and eastern parts of the site lie in various flood zones, 50% in Flood zone 1, 37% in Flood zone2, 6% in Flood zone 3a and 7% in Flood zone 3b.
- 3.68. Use of the Sequential Approach means development can be placed away from Flood Zones 2 and 3, with the area affected by flood risk left undeveloped, this leaves approximately 17.3 hectares of land available for development outside of the Flood Zones (FLO/01: page 15).

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

3.69. HOUS/02 p103-105 sets out the constraints and essential infrastructure requirements. Development is underway. In summary, these encompass provision of a safe access point,

protection and enhancement of nearby heritage assets, mitigation of impact on the landscape and flood risk. Demolition of existing buildings is required.

- 3.70. A range of services and community facilities will be needed.
- 3.71. No costings are available. Development is underway.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

- 3.72. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 3.73. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Brampton will be served by the Brampton Wastewater Treatment Works. The Water Cycle Study acknowledged Brampton as having capacity to accommodate the Local Plan growth.
- 3.74. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and offsite reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).

- 3.75. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 3.76. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

3.77. The full site is under development. Viability appraisal work was carried out to assess the level of affordable housing that was viable, given the constraints of the site. The site was also subject to Vacant Building Credit. Agreement was reached that in total, 131 affordable units will be delivered on the site, representing just over 21% of the total number of residential units.

Question 11: What is the expected timescale and rate of development and is this realistic?

- 3.78. The developer has stated that the site could be developed from 2017-2023 with an anticipated build out rate of 450 in the period up to 2021 and the remaining 150 in 2021 to 2026. The Agent for the site has confirmed that the number of housebuilders on site means the bulk of delivery will be in the next 2-3 years (MON/01, page 68).
- 3.79. Construction is underway and the first 52 homes are expected to be completed in the year 2017/2018, the timescale for delivery is set out below:

No. units in years 1-5	17/18 Yr. 1	18/19 Yr. 2	19/20 Yr. 3	20/21 Yr. 4	21/22 Yr. 5	22/23	Total 17/36
573	52	224	117	84	96	30	603

3.80. No information has been supplied on the anticipated completion date for the residential care home.

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

3.81. The boundary of the site is appropriate as it represents the land submitted as available for development and. as approved under applications 15/00368/OUT and 15/00643/OUT.

- 3.82. No representations were received in relation to the Local Plan consultation suggesting that the boundary should be amended.
- 3.83. The defined boundary allows for comprehensive development of the site, with natural boundaries formed by the existing adjacent residential development and the functional floodplain.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 3.84. The site is the former RAF Brampton base, most of the site had therefore been previously developed, comprising of buildings relating to its previous use, including offices, leisure facilities and accommodation blocks. This piece of land which was originally assessed in Stage 2 of the Local Plan to 2036 in the Environmental Capacity Study: Huntingdon Spatial Planning Area document, consulted upon between August 2012 and November 2012. The whole site has the benefit of full planning permission, under various schemes, totalling 603 dwellings, and a community building. Residential development has commenced on two parcels of the site (HOUS/02: Availability, page 105).
- 3.85. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA, the Huntingdonshire Local Plan Viability Study and the Strategic Flood Risk Assessment.
- 3.86. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 29, 53, 78, 107, 124, 193, 312, 390, and 450-451) and Statement of Representations (CORE/04, Page 88, 150).
- 3.87. There were also no objections raised on technical grounds on the planning applications referred to in question 4 from Anglian Water, Alconbury and Ellington Internal Drainage Board, Cambridgeshire Constabulary, Cambridgeshire County Council Archaeology, Lead Local Flood Authority, Cambridgeshire County Council Rights of Way, Local Highways Authority, Environment Agency, Environmental Health, Natural England, Highways England and the Wildlife Trust. Subsequent reserved matters and condition discharge applications have been approved.
- 3.88. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG. The site is developable as defined through paragraph 47 of the NPPF, with outline planning permission having been approved, development has commenced on 5 residential parcels; demonstrating the development is viable and suitable. Recent responses to the Annual Monitoring Report Housing Trajectory identify that

development is progressing well and due to the number of housebuilders on site the bulk of the delivery can be completed within the plan period.

HU14- Brampton Park Golf Club Practice Ground

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 3.89. The main part of the site was previously used as a practice ground for the adjacent Brampton Park Golf Club site and was undeveloped; the north eastern part included areas of hardstanding used for car parking.
- 3.90. The site has been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 191-193 for full assessment).
- 3.91. Once development at RAF Brampton takes place the site will be reasonably well located in terms of access to services. Although constrained by flood risk, the site is considered suitable for medium density residential development across a developable area of 50% of the site. This results in an estimated capacity of 51 dwellings (HOUS/02: page 193).

Question 2: What is the scale and type/mix of uses proposed?

- 3.92. The proposed use is for approximately 65 dwellings.
- 3.93. Under Planning Application 17/01959/FUL (approved in February 2018), permission has been granted for 68 dwellings of which 40% (27 units) have been secured for affordable housing.

Question 3: What is the basis for this and is it justified?

- 3.94. Planning application 16/01484/OUT gave consent for residential Development for the erection of 56 Dwellings. Following grant of consent CALA Homes purchased the site and submitted a full application (17/01959/FUL) for the erection of 68 dwellings in September 2017 with permission granted in February 2018.
- 3.95. No objections were received to either of the planning applications from Statutory Consultees and it is considered that this amount of development in this location near to the redeveloped RAF Brampton, Garden Centre and other residential units, with good transport links is justified.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

3.96. Outline planning application (planning reference 16/01484/OUT) for 56 dwellings was approved March 2017.

3.97. A later Full planning permission (planning reference 17/01959/FUL) for 68 dwellings was approved in February 2018 and commenced on the 30th April 2018.

Question 5: What are the benefits that the proposed development would bring?

- 3.98. The development would contribute to the Council's housing land supply and provide market and affordable housing in an area which is has good access to local services and facilities.
- 3.99. The provision of open space and landscaping would also have benefits for the environment and biodiversity.
- 3.100. The development would secure construction of a suitable site access with visibility and allow for off-site highway improvements to provide safe crossing of Buckden Road and improvements to the footpath. These will benefit the residents and promote walking and cycling connections to Brampton village facilities and connect to the existing cycle routes to provide safer access to shops and facilities in Huntingdon including the train station, schools and employment.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 3.101. The site falls within Flood Zone 2 however the proposal can secure wider sustainability benefits through development of this location within the Huntingdon Spatial Planning Area and through provision of policy compliant affordable housing; it can also be achieve flood resistance and resilience through good building practice and appropriate finished floor levels. No objections were received to the planning applications from the Lead Local Flood Authority or the Alconbury and Ellington Internal Drainage Board subject to the imposition of conditions to secure detailed drainage details.
- 3.102. The site is located on the edge of the settlement which would lead to a change in character; as demonstrated through the granting of planning application 17/01959/FUL, a well-designed housing scheme with careful consideration of density, design and lighting, along with the retention and enhancement of landscaping can successfully mitigate this impact.
- 3.103. Due to features found on site and nearby the HELAA and policy HU 14 note that protected species may be a constraint to development and it is understood from the planning application that Great Crested Newt (GCN) mitigation will be required with an area of enhancements secured on the Golf Course to allow for trans-location of any GCN. The Wildlife Trust reviewed the Ecological Mitigation and Enhancement Plan submitted as part of the planning application and advised that the measures are acceptable to mitigate the impacts of development.
- 3.104. There have been archaeology investigations in the vicinity of the site which have identified significant heritage assets. Policy HU 14 acknowledges this and criterion f. sets out the need for development to require a programme of archaeological work. Representations from Historic England (ID: 56252) welcomes the changes to the policy and supporting text in

relation to archaeology. As part of the planning applications Cambridgeshire County Council Historic Environment Team have not objected in principle with conditions attached to the permissions to secure archaeological investigations and publication of the findings.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

- 3.105. 41% of the site is in Flood zone 1, 59% of the site lies within Flood zone 2. The site was assessed in the Sequential Test for Flood Risk (FLO/01, page 13).
- 3.106. Flood risk and mitigation measures were taken into account and agreed through the approval of previously mentioned planning applications. The increase in units from 56 to 68 dwellings is not considered to cause significant increase in flood risk to outweigh benefits of delivering housing and 40% affordable housing as part of the development.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

3.107. HOUS/02 sets out the main constraints and essential infrastructure. In summary, part of the site is within flood zone 2 so flood mitigation measures are required. The impact of development on the surrounding landscape will need to be mitigated. Development has commenced on site. There are no significant infrastructure requirements

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

3.108. The development will be served by existing capacity, agreed with the utility provider AWS. Sites in Brampton will be served by the Brampton Wastewater Treatment Works. The Water Cycle Study acknowledged Brampton as having capacity to accommodate the Local Plan growth.

Question 10: Is the site realistically viable and deliverable?

3.109. The site is viable and deliverable with an approved permission and signed S106 which delivers 40% affordable housing.

Question 11: What is the expected timescale and rate of development and is this realistic?

3.110. The site is deliverable, in response to the Council's Annual Monitoring Report housing trajectory survey 2017, the agent for the site foresees no constraints on development (MON/01, page 70). The first 49 homes are expected to be completed in the year 2018/2019 with all units expected to be completed in years 1-5. The timescale of delivery is set out below:

No. units in	17/18	18/19	19/20	20/21	21/22	Total
years 1-5	Yr. 1	Yr. 2	Yr. 3	Yr. 4	Yr. 5	17/36
65	0	49	16	0	0	65

- 3.111. This is deemed to be a realistic timescale as Outline permission and Full planning permission have been granted and development commenced on 30th April 2018.
- 3.112. The Council's next housing trajectory will amend the number of dwellings to 68 to reflect the now approved planning application.

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 3.113. The boundary of the site represents the land submitted as available for development. No representations were received to the Local Plan proposed submission suggesting the boundary should be amended.
- 3.114. The red line plan for planning application 17/01959/FUL was increased to include a small area of the Golf Course necessary for the trans-location of GCN as detailed in the Ecological Mitigation and Enhancement Plan, the owners of the Golf Club were included as parties to the S106 Agreement and it is understood that the mitigation works have taken place. As such, it is considered the boundary is appropriate for allocation.
- 3.115. The defined boundary allows for comprehensive redevelopment of the site and respects the site boundary with the Golf Club and does not adversely impact upon the 18th Hole or result in any direct impacts to this recreational facility.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 3.116. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA, the Huntingdonshire Local Plan Viability Study and the Strategic Flood Risk Assessment.
- 3.117. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 107 and 451) and Statement of Representations (CORE/04, Pages 88-89, and 151).

- 3.118. There were also no objections raised on technical grounds on the planning applications referred to in question 4 from Anglian Water, Alconbury and Ellington InternFal Drainage Board, Cambridgeshire Constabulary, Cambridgeshire County Council Archaeology, Lead Local Flood Authority, Local Highways Authority, Environment Agency, Environmental Health, Natural England, Highways England and the Wildlife Trust with detailed points secured by condition.
- 3.119. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG. The site is deliverable as defined through paragraph 47 of the NPPF, planning permission having been approved and development commencing demonstrates the development is viable and suitable. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development can be completed within the five year time period.

HU15- Park View Garage

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 3.120. The site is outside the built-up area of Brampton, but has been in commercial use for many years.
- 3.121. This piece of land was originally assessed in Stage 2 of the Local Plan to 2036 in the Environmental Capacity Study: Huntingdon Spatial Planning Area document, consulted upon between August 2012 and November 2012. The site's agent supported its allocation in the Stage 3 Draft Local Plan consultation (HOUS/02: Availability, page 196). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 194-196 for full assessment).
- 3.122. The site is a small one just outside the built up area of Brampton which could be suitable only as a redevelopment opportunity offering an environmental improvement over the current use. However, it is highly constrained and unsuitable for residential development. The land at Park View Garage, Brampton is therefore considered suitable for employment development to comprise light industrial (class B1c) use (HOUS/02: Suitability, page 196).

Question 2: What is the scale and type/mix of uses proposed?

3.123. The proposed use is for light industrial use (class 'B1c').

Question 3: What is the basis for this and is it justified?

3.124. Representations submitted by Mr Mohammed Datoo (ID: 1114820) [source PREP/01 and PREP/02] provided support for the allocation of this site for employment use, noting the prominent location at the gateway to Brampton from the south.

3.125. The site comprises approx. 0.4ha of land on the southern edge of the village of Brampton and whilst outside the built-up area, has been in commercial use for many years. Given the proximity of the landfill site (approx. 150m) to the southeast, the previous use of the site and the limited availability of services in the vicinity, the site is considered to be appropriate for employment use (note ECON/01 page 8).

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

3.126. No planning application has yet been submitted.

Question 5: What are the benefits that the proposed development would bring?

- 3.127. The site is previously developed land and redevelopment could provide the opportunity for an improvement in the visual amenity of the area should the existing utilitarian commercial buildings be replaced or renovated to a high standard.
- 3.128. Maximising the potential of the site for employment use could provide additional employment opportunities for both local residents and a wider labour force.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 3.129. The application site is located in a prominent position outside of the village of Brampton. The HELAA (HOUS/02) outlined that an appropriate design which incorporates a single access point from the B1514 and a sympathetic landscaping scheme (to ensure the retention of the protected trees within the site) which addresses the potential light pollution would be essential for a successful redevelopment.
- 3.130. Development proposals must ensure that a suitable land contamination assessment is undertaken, given the previous uses of the site. The HELAA (HOUS/02) identified that the site falls within the Waste Consultation Area (Station Farm, Buckden Landfill site) and complications arising from that nearby use (including potentially problematic odour) must also be considered/mitigated.
- 3.131. Consultation with Anglian Water to ensure that development of this site would not have an adverse impact on water supply/sewerage would also be required as the site was not included in the Huntingdonshire Water Cycle Study (FLO/11).

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

3.132. The site is in Flood zone 1 (FLO/01, page 29). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 3.133. HOUS/02 p196 sets out the constraints. In summary, the site is constrained by odours from a nearby landfill so unsuitable for residential use. There is potential contamination and redevelopment will need to take account of adjacent open land. There are protected trees. Access points will need to be rationalised into one safe entry/exit.
- 3.134. The costs of infrastructure have not been assessed but will be considered when a planning application is submitted.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

- 3.135. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 3.136. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Brampton will be served by the Brampton Wastewater Treatment Works. The Water Cycle Study acknowledged Brampton as having capacity to accommodate the Local Plan growth.
- 3.137. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The

response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and offsite reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).

- 3.138. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 3.139. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 3.140. The Employment Land Study ECON/01 p8 identifies the site as a high likelihood of meeting qualitative or quantitative need (page 8).
- 3.141. ECON/01 Appendix 2 sets out the constraints and concludes there is a high likelihood that the site meets employment needs.
- 3.142. In terms of viability, ECON/01 paragraph 2.54 recognises that Huntingdonshire remains more affordable than other neighbouring locations. The report highlights a significant strong inflow of workers to Huntingdon (ECON/01, page 56) and that additional employment land will enable the area to maximise its strengths.

Question 11: What is the expected timescale and rate of development and is this realistic?

- 3.143. The overall strategy for development and broad distribution for growth was derived from the Huntingdonshire Employment Land Study (2014) (ECON/01). Site HU15 is part of the Council's Development Strategy to meet overall employment need in the District (further information included in the Council's response to Matter 5, questions 1 to 3). Employment sites have been distributed across the district which allows for choice and diversity in the employment market by creating a sustainable pattern of employment development based around key services and population.
- 3.144. No planning application has been submitted for this site, although assessment of the site (see above) demonstrates that the site is suitable for employment development and is in a prominent area where there is an undersupply of the identified B uses (ECON/01, page 71).

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 3.145. To the northeast, southeast and southwest, the boundaries of the site are defined by a substantial band of mature trees, a number of which are protected by TPO 025/87. To the northwest, the edge of the site is defined by an arrangement of low level metal and high level timber post and rail fencing. Beyond the fencing lies the B1514, separated by the highway verge.
- 3.146. The boundary of the site is appropriate as it represents the land submitted as available for development. No representations were received to the proposed submission Local Plan consultation suggesting that the boundary should be amended.
- 3.147. The defined boundary allows for comprehensive re-development of an area of previously developed land and brings benefits to the site such as contamination mitigation and the potential for improved on-site water permeability.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 3.148. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA (HOUS/02) and the Huntingdonshire Local Plan Viability Study (INF/04). Reasonable alternatives such as the allocation of the site for residential use were dismissed (see question 1).
- 3.149. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 107, 194, 313, 390 and 451) and Statement of Representations (CORE/04, Page 88-89).
- 3.150. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG⁸. The site is developable as defined through paragraph 47 of the NPPF.

⁸ Housing and economic land availability assessment

4. Godmanchester

HU16- Tyrell's Marina

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 4.1. The site comprises previously developed land; all but one building has been cleared and the former hardstanding lifted and crushed.
- 4.2. This piece of land was put forward during preparation of the Core Strategy 2009 and was originally assessed for the Local Plan to 2036 in the Environmental Capacity Study: Huntingdon Spatial Planning Area document consulted upon between August 2012 and November 2012 (HOUS/02: Availability, page 109). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 107-110 for full assessment).
- 4.3. This previously developed site offers a very attractive, sustainable location for development with good access to services, facilities, open space and employment opportunities. Therefore, a mix use development is deemed appropriate. This site is also considered suitable for high density upper floor residential use across a net developable area of 60% resulting in an estimated capacity of 15 dwellings (HOUS/02: Suitability, page 109).

Question 2: What is the scale and type/mix of uses proposed?

- 4.4. The proposed site is allocated for a mixed use development to be determined through appropriate resolution of development constraints including housing (class C3) and/or food and drink, office or leisure uses (A2 to A5, B1a and D1). Re-provision of landing stages/ moorings.
- 4.5. The final type and mix of residential units will be determined through the application of policy LP 26 Housing Mix.

Question 3: What is the basis for this and is it justified?

- 4.6. Initial assessment through the HELAA (HOUS/02 page 109) identified this previously developed site as offering a very attractive, sustainable location for development with good access to services, facilities, open space and employment opportunities. Allocation HU16 identifies it as a key regeneration site that has a unique river front location where redevelopment offers the opportunity for environmental improvement and enhance of the Conservation Area.
- 4.7. The scale and uses are flexible and considered appropriate having regard to the assessment in the HELAA (HOUS/02 page 109) that identifies significant flood risk as a constraint.

- 4.8. The constraint of flood risk demands flexibility as to the scale and uses proposed and this is reflected in paragraph 9.129 of the Local Plan (CORE/01) which states that an innovative design solution may be beneficial in overcoming the significant flooding and other constraints; this should inform the exact amount and mix of uses. Whether this mix includes an amount of residential development is to be determined through application of the sequential approach so is not stated in the policy. Given the significance of the flood risk any capacity for residential uses is likely to be very limited. This approach to design could include a vertical mix of uses with less vulnerable uses, such as service uses (class A2) or food and drink uses (classes A3, A4 and/ or A5) on the ground floor and residential accommodation above. Other commercial uses within classes B1a or D1 would be supported. Given the sites separation from Huntingdon Town Centre by the river Great Ouse the site is not considered suitable for shop uses (class A1).
- 4.9. The allocation accords with the Flood Risk Sequential Test (FLO/01 page 20) as informed by the detailed site specific development guidance in the Strategic Flood Risk Assessment Appendix A Level 2 Detailed Site Assessments (FLO/03 pages 165-169 of the PDF).
- 4.10. There are no objections to the scale and type/mix of uses proposed in the allocation. The Godmanchester Town Council (ID 1150548) supports the allocation.
- 4.11. Policy LP 26 is justified through the application of Cambridge Sub-Region SHMA (HOUS/07) and Peterborough SHMA (HOUS/08) and local housing need and strategies (including HOUS/06). By referring to up-to-date evidence the policy ensures that the most appropriate strategy is employed in line with local demand and settlement type and location, or proximity to the most appropriate housing market area consistent with paragraph 50 of the NPPF and NPPG Housing and economic development needs assessments.
- 4.12. Having regard to the site constraints and site history it is considered that allocation HU1 is justified

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

4.13. Full planning application for a mixed use development (C3 and A3/A4) comprising of 16 dwellings and café (planning reference 16/00906/FUL) is under consideration. This application does not accord with the allocation policy HU16 and is the subject of an Environment Agency objection on the grounds of flood risk and for reasons including the proposed development of 'more vulnerable' and 'less vulnerable development' in the functional flood plain. The application is currently under consideration.

Question 5: What are the benefits that the proposed development would bring?

- 4.14. Redevelopment of this previously developed site will bring many benefits to the surrounding area due to its unique and highly visible riverside frontage. The existing visual appearance of the cleared site is causing harm to the character and appearance of the Conservation Area in which it sits. The redevelopment of this site presents the opportunity for positive enhancement to the setting of heritage assets and improvement of the conservation area as identified in Paragraph: 004 Reference ID: 18a-004-20140306 of the NPPG through criterion e, which asks for the development proposal to take appropriate account of the site's location within the conservation area. This would include high quality design in keeping with the scale of surrounding buildings (para 9.123 of the Local Plan CORE/01).
- 4.15. The mixture of use presents clear economic and social benefits through the opportunity for business creation and employment, and potentially the delivery of some housing.
- 4.16. The presence of the site within flood zones 2, 3a and 3b, presents the opportunity para 9.129 of the Local Plan (CORE/01) for an innovative design solution to overcome the significant flooding constraints. This meets the requirements of paragraph 94 and 99 of the NPPF by adopting a proactive strategy to mitigate and adapt to climate change by taking into account flood risk and considering the longer term implications of climate change.
- 4.17. The site was assessed as a highly sustainable location for mixed use development as it is easily accessible to the town centre on foot and is close to accessible natural green space, open space, sports, social facilities and a doctors' surgery.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 4.18. The HELAA (HOUS/02 page 109) identifies potential adverse impacts with regards to flood risk, heritage assets (listed buildings and conservation area), issues with transport access, noise pollution, light pollution, ecology and contamination.
- 4.19. Potential adverse flood risk impacts and mitigation are assessed in more detail in the detailed site specific development guidance in the Strategic Flood Risk Assessment Appendix A Level 2 Detailed Site Assessments (FLO/03 pages 165-169 of the PDF). The SFRA informed the mitigation measures that are identified in allocation policy HU16 in the Local Plan and include the requirement for a detailed flood risk assessment to explore the opportunity (para 9.129 of the Local Plan (CORE/01)) for an innovative design solution to overcome the significant flooding constraints. This approach to design could include flood plain compensation and a vertical mix of uses with less vulnerable uses, such as service uses (class A2) or food and drink uses (classes A3, A4 and/ or A5) on the ground floor and residential accommodation above.

- 4.20. The full planning application for a mixed use development (C3 and A3/A4) comprising of 16 dwellings and café (planning reference 16/00906/FUL) that is under consideration was met with no objection from Historic England or the Council's Conservation Officers, and this indicates that potential adverse impacts on heritage assets can be avoided and/or mitigated by development adhering to criterion 'e' of the policy HU16 (CORE/01).
- 4.21. The full planning application (planning reference 16/00906/FUL) has also demonstrated that adverse noise, contamination and archaeology impacts can be satisfactorily mitigated.
- 4.22. Due to the site's proximity to the River Great Ouse and the presence on site of mature trees and hedgerows development has potential to adversely impact on protected species of any are present on the site. To mitigate this risk an ecological survey will be required to assess avoidance, mitigation or compensation strategies.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

- 4.23. 12% of the site is in Flood zone 1, 2% is in Flood zone 2, 9% is in Flood zone 3a and 77% of the site is in Flood zone 3b.
- 4.24. The site was assessed in the Sequential Test for Flood Risk (FLO/01). Due to the sites location within flood zones 2, 3a and 3b, the Exception Test was applied to the site in compliance with paragraph 102 of the NPPF.
- 4.25. The test concluded that as the site has been previously developed and is in a sustainable location, the site passes this part of the exception test as it will be safe for its lifetime and reduce flood risk overall and is therefore suitable for allocation (FLO/01: Page 20).

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 4.26. HOUS/02 sets out the constraints and key infrastructure needs for the site. The main constraint is flood risk as detailed in Q7 above. In the vicinity is a Grade 1 listed bridge and a Grade II listed building. It is in a conservation area. Archaeological investigations will be needed. There may be contamination. Vehicle and pedestrian access will need to be created.
- 4.27. Identification of the infrastructure provision necessary is currently underway as part of the application.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

4.28. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure

typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.

- 4.29. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Huntingdon will be served by the Huntingdon Wastewater Treatment Works. The Water Cycle Study acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.
- 4.30. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and off-site reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).
- 4.31. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 4.32. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 4.33. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF04, para 3.6). The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).
- 4.34. The Study is not site specific, as this is not a requirement for the local plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 4.35. Policy LP25 (affordable housing provisions) seeks a target of 40%. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is not viable due to specific site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal. The viability work within INF/04 indicates that the typology that this site falls into will generally have limited viability, so subject to viability analysis, a below policy level of affordable housing will be considered.

Question 11: What is the expected timescale and rate of development and is this realistic?

- 4.36. Given the significance of the flood risk any capacity for residential uses is likely to be very limited without suitable mitigation. No capacity has therefore been suggested here, although the Council would support a suitable scheme (MON/01, pages 82-83).
- 4.37. Much of the site has been cleared in anticipation of redevelopment following 16/00906/FUL approval and could be developed in the early part of the plan period.

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

4.38. The boundary of the site is appropriate as it represents the entire disused Marina premises that are bound by the River Great Ouse, A14 trunk road and adjacent properties and as submitted as available for development. No representations were received to the proposed submission Local Plan consultation suggesting that the boundary should be amended.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 4.39. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA and the Huntingdonshire Local Plan Viability Study and Strategic Flood Risk Assessment (FLO/03 page 165-169) and Sequential Test (FLO/01 page 20) see question 1.
- 4.40. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 107 and 451) and Statement of Representations (CORE/04, Page 89-90).
- 4.41. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG⁹. The site is developable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development is available now can be completed within a five year time period.

HU17- RGE Engineering

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 4.42. Currently the land is used as a public car park and an industrial unit although production has already relocated with only office uses remaining.
- 4.43. This piece of land was put forward during the Stage 3 consultation in 2013 and originally assessed for the Local Plan 2036 in the Environmental Capacity Study: Additional Site Assessments document consulted upon in November 2013. The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 111-113 for full assessment).
- 4.44. This site is located in close proximity to a number of services including a primary school, doctor's surgery and open space, there are numerous employment opportunities located nearby particularly within Huntingdon town centre. The site has been previously developed and is located within the urban/ rural fringe of Godmanchester. Therefore, the site is considered suitable for a mixed use development with medium density residential development across a net developable area of 55% of the site resulting in an estimated capacity of 70 dwellings (HOUS/02: page 113).

⁹ Housing and economic land availability assessment
Question 2: What is the scale and type/mix of uses proposed?

- 4.45. The site is allocated for a mixed use development comprising of 90 dwellings and the reprovision of part of the site as a public car park.
- 4.46. The type and mix of residential units will be determined through the application of policy LP 26 Housing Mix.

Question 3: What is the basis for this and is it justified?

- 4.47. The site is situated adjacent to a residential area with good access to services and facilities. It is therefore considered that residential residential-led mixed use development following the relocation of REG Engineering and the partial relocation of the public car park on the site is an appropriate use on this brownfield site.
- 4.48. Initial assessment through the HELAA identified that the site is suitable for 70 dwellings, however further consideration of the site considered the site suitable for approximately 90 dwellings.
- 4.49. Representations submitted by RGE Engineering (ID: 1153087) support the site's residential capacity from 70 dwellings to approximately 90 units on the basis that the actual number of residential units which can be supported on site will be considered and assessed through the planning application process, subject to the detailed design of the development proposal.
- 4.50. Representations from Godmanchester town Council (ID 1150548) raise concerns to the increase to 90 dwellings from 70 as more space is required for car parking.
- 4.51. The revised figure of 90 dwellings is justified on the basis of some of the development being apartments given the adjacent built form and historical built form of the site (pre-RGE) and given its proximity to the town centre and correlation with the more built-up nature of the adjacent area to the west.
- 4.52. Policy LP 26 is justified through the application of Cambridge Sub-Region SHMA (HOUS/07) and Peterborough SHMA (HOUS/08) and local housing need and strategies (including HOUS/06). By referring to up-to-date evidence the policy ensures that the most appropriate strategy is employed in line with local demand and settlement type and location, or proximity to the most appropriate housing market area consistent with paragraph 50 of the NPPF and NPPG Housing and economic development needs assessments.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

4.53. No planning application has yet been submitted.

Question 5: What are the benefits that the proposed development would bring?

- 4.54. Redevelopment of the site will bring many benefits to the surrounding area. A large proportion of the site is currently hardstanding of the public car park, and industrial buildings of RGE Engineering. The existing visual appearance of the industrial buildings does is not positively contribute to the conservation areas of Godmanchester or Huntingdon, nor does it provide a sympathetic interface with the River Ouse meadow to the north. The redevelopment of this site presents the opportunity for positive enhancement to the setting of heritage assets (adjacent listed buildings and Conservation Areas as identified in Paragraph: 004 Reference ID: 18a-004-20140306 of the NPPG through criterion d, which asks for the development proposal to take appropriate account of the site's location adjacent to within the conservation areas and relationship with several listed buildings. This would include high quality design which reflects the site's sensitive location on the urban / rural fringe (para 9.134 of the Local Plan CORE/01). Redevelopment of the must ensure that heritage assets and their settings are preserved and where possible enhanced.
- 4.55. Redevelopment of the site would require a heritage statement to ensure redevelopment contributes to the setting in line with paragraph 128 of the NPPF.
- 4.56. The employment use on the site has historically generated a notable number of HGV in and out of the site through Godmanchester, the redevelopment of the site will, post completion, remove HGV on the site and surrounding local road network.
- 4.57. The presence of the site partially within flood zones 2 and 3 presents the opportunity for flood mitigation by reducing the developable area of the site and implementing mitigation works as appropriate (criterion a and para 9.132, page 180). The site is protected by modern flood defences and has many commonalities with the buildings in the surrounding area. This meets the requirements of paragraph 94 and 99 of the NPPF by adopting a proactive strategy to mitigate and adapt to climate change by taking into account flood risk and considering the longer term implications of climate change. Through the removal of a notable amount of hard surfacing on the site and the introduction of open space and private curtilages to dwellings the site will be more permeable and the run off rate reduced.
- 4.58. The site was assessed as a highly sustainable location suitable for residential development, it is easily accessible to the town centre on foot and is close to accessible natural green space, open space, sports, social facilities, shops, and a doctors' surgery and primary school.
- 4.59. The development will improve publically accessible viewpoints and will sit comfortably within the context of the wider area. There is potential to provide a footbridge crossing over Cook's Stream to the east to connect to Hemingford Abbots, criterion e.
- 4.60. The development will provide for the relocation on the site of part of the existing public car park.
- 4.61. The development will contribute to the Council's five-year land supply and provide residential accommodation that is highly accessible to local services and facilities.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 4.62. The HELAA identifies potential adverse impacts with regards to protected water resources (both quality and quantity) flood risk, its separation of Westside Common by Cook's Stream; its proximity to Portholme (SAC and SSSI) is approximately 250m southwest of the site. Potential for protected species on site due to trees and vegetated waterway margins, the site being close to an air quality management area, potential for noise and light pollution.
- 4.63. The former and existing uses of the site also leads towards potential contamination issues.
- 4.64. Mitigation measures are identified in the HELAA and within HU17 in the Local Plan and include the requirement for a detailed flood risk assessment, ecological survey, air quality assessment, and arboricultural report and contamination (CORE/01,criteria a, b, c, f and g, page 180).
- 4.65. Potential contamination will be addressed by an environmental assessment alongside any appropriate mitigation (CORE/01, para 9.132, page 180).
- 4.66. Due to the site's proximity to the River Great Ouse and adjacent vegetated waterway margins on the site coupled with the presence on site of mature trees along the length of some of the northern and eastern boundaries of the site, there is potential to adversely impact on protected species of any are present on the site. To mitigate this risk an ecological survey will be required to assess avoidance, mitigation or compensation strategies.
- 4.67. Trees on site can be mitigated through an arboricutural report, and ensuring that development is outside root protection zones and sited so not to be dominated or shaded by the trees.
- 4.68. Due to the site's location, adjacent to open countryside, development at this site could cause light pollution. The design of any development proposal and its landscaping scheme should demonstrate how it will mitigate and minimise such impacts.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

- 4.69. 66% of the site is in Flood zone 1, 7% in Flood zone 2, 3% in Flood zone 3a and 24% in Flood zone 3b.
- 4.70. The site was assessed in the Sequential Test for Flood Risk (FLO/01). Development is to be limited to within floodzone 1. A flood risk assessment will be required as part of any planning application submitted on the site as indicated in criterion a of the allocation

(CORE/01, page 180) and as advised through FLO/03: Huntingdonshire Strategic Flood Risk Assessment – Appendix A Level 2 Detailed Site Assessments (Page 5).

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 4.71. HOUS/02 sets out the constraints and essential infrastructure. In particular, flood risk is an issue. Additionally, given its sensitive location, a high quality development will be required with a cycle/foot bridge over Cook's Stream.
- 4.72. Infrastructure costs have not been identified or costed at this time but will be established through the planning application stage.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

- 4.73. In 2016 Arup was commissioned by the Council to undertake an Infrastructure Delivery Plan ('IDP') (INF/01) to support the Local Plan. The IDP considered a wide range of infrastructure typologies, including waste water capacity. The IDP was based on both a desk review and consultation exercise with Anglian Water to determine existing infrastructure capacity. Following this a modelling exercise was undertaken by Arup to understand the likely demand that proposed development over the Plan period would generate. This applied typical industry accepted demand assumptions multiplied by the total number of homes proposed within each spatial planning area. Further consultation with Anglian Water matched this demand to the existing waste water infrastructure to establish where the existing network can support this demand, and where reinforcement would be necessary. In November 2017 a further update to the IDP (INF/03) was undertaken based on a marginally different distribution pattern. Arup noted that the overall change in demand arising between each settlement pattern was minimal. As such it was deemed that overall this would unlikely substantially alter the previous assessment, with the exception of settlements where the quantum of growth had substantially reduced.
- 4.74. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Huntingdon will be served by the Huntingdon Wastewater Treatment Works. The Water Cycle Study acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.
- 4.75. Regarding future investment and network reinforcement, Anglian Water in their consultation response state that they: "work closely with the Environment Agency, Local Planning Authorities and developers to understand the scale, timing and likelihood of growth in catchments to inform future investment. [Anglian Water is] a statutory consultee on Local Plan preparation and will be taking into account the future growth proposed in the Council's

emerging Local Plan to ensure that infrastructure provision aligns with growth". The response goes on to state that "water recycling centre (previously referred to as sewage or wastewater treatment works) upgrades where required to provide for additional growth are wholly funded by Anglian Water through our Asset Management Plan". Site specific and offsite reinforcements will be funded via Anglian Water's zonal charges (as set out in Anglian Water's Developer Services, Summary of Charges 2018/2019).

- 4.76. In March 2018 Anglian Water released its Outline Business Plan 2020-2025 for the Asset Management Period 7 ('AMP 7') for public consultation. The document suggests that Anglian Water will "manage an adaptive programme of delivery using intelligence from key indicators, live modelling tools and relationships with local authorities and developers, to determine the optimal timing of solution delivery". This provides further evidence that Anglian Water is committed to monitoring ongoing capacity across its assets and is committed to making the required investment to ensure new demand can be accommodated within the network.
- 4.77. It is important to note that representations received by Anglian Water at Regulation 19 stage are supportive of the proposed policy approach outlined in Policy LP6.

Question 10: Is the site realistically viable and deliverable?

- 4.78. The Huntingdonshire Local Plan Viability Study (INF/04) assessed the effect of Local Plan policies (INF/04, Section 3.9, page 15), affordable housing, CIL and a range of site types to demonstrate that the Local Plan allocations and policies are viable and deliverable. The Study uses construction cost assumptions based on the BCIS median weighted for Cambridgeshire to reflect current construction costs. Taking a cautious approach, allowances were also made for contingency costs and fees, to plan for changing market circumstances (INF/04, para 3.6). The Study factors in a sum of £20,000 per dwelling for site infrastructure costs such as primary and secondary access roads, utility connections, infrastructure and open space (INF/04, para 3.8.6).
- 4.79. The Study is not site specific, as this is not a requirement for the local plan (NPPG Para: 005 Reference ID: 10-005-20140306). Testing has been undertaken for a range of development size typologies, dwelling densities, value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 4.80. Policy LP25 (affordable housing provisions) seeks a target of 40%. Consideration will be given to reducing the requirement to ensure viability is achievable where it can be demonstrated that the target is not viable due to specific site conditions such as high cost infrastructure elements. This will be assessed through the submission and validation of a viability appraisal. The viability work within INF/04 indicates that the typology that this site falls into will generally have limited viability, so subject to viability analysis, a below policy level of affordable housing will be considered.

Question 11: What is the expected timescale and rate of development and is this realistic?

- 4.81. In response to the Council's Annual Monitoring Report housing trajectory survey 2017, the agent for the site has confirmed the sites availability once the relocation programme currently underway for the existing commercial occupier is completed.
- 4.82. Also, the agent considers that the site could accommodate up to 150 dwellings and be delivered within 5 years, however, capacity has been kept in line with the Local Plan proposed allocation requirement, as no planning application has yet been submitted and the existing business have yet to relocate (MON/01, page 83).
- 4.83. The first 45 homes are expected to be completed in the year 2022/2023, the timescale for delivery is set out below:

No. units	22/23	23/24	Total 17/36	
in years 1-5				
0	45	45	90	

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 4.84. Whilst no representations have been received on the consultation stage regarding the site boundary, the boundary of the site does not allow for significant space for partial relocation of the car park whist safeguarding the sites trees and providing safe pedestrian and vehicular access from the carpark onto the development site / junction with The Avenue.
- 4.85. Discussions are currently underway to agree access to the site with the intention of submitting a modification to the Inspector which includes an increased site area in order to accommodate the car parking area. This increase in site area would allow for the provision of car parking under the bridge adjacent to the site.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

4.86. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA and the Huntingdonshire Local Plan Viability Study and Strategic Flood Risk Assessment. Reasonable alternatives such as the allocation of the site for wholly supported housing were dismissed (see question 1).

- 4.87. The policy requirements are effective and have been based on consultation with statutory consultees such as the Heritage England, Environment Agency and Cambridgeshire County Council. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 314, 391, 451) and Statement of Representations (CORE/04, Page 90).
- 4.88. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG¹⁰. The site is developable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development can be completed within the plan period.

HU18- Wigmore Farm Buildings

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 4.89. The land was mostly grassland, with hardstanding and a dilapidated barn located on the eastern edge of the site. New development and public open space relating to it lies to the south.
- 4.90. This site was put forward during preparation of the Core Strategy 2009 and was originally assessed in Stage 2 of the Local Plan to 2036 in the Environmental Capacity Study: Huntingdon Spatial Planning Area document consulted upon between August 2012 and November 2012 (HOUS/02: Availability, page 120). The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 118-120 for full assessment).
- 4.91. The site is situated on the edge of a residential area in close proximity to services, public transport, employment opportunities and open space. It has few constraints including development into the open countryside. Therefore, it is considered suitable for low density residential development across a net developable area of 55% of the site resulting in an estimated capacity of 13 dwellings (HOUS/02: page 120).

Question 2: What is the scale and type/mix of uses proposed?

- 4.92. The proposed use is for approximately 13 dwellings.
- 4.93. Application 16/01477/FUL, approved in January 2018 confirmed that 40% of the development (5 units) will be allocated to affordable housing.

Question 3: What is the basis for this and is it justified?

4.94. The site comprises approx. 0.5ha of land on the edge of the built-up area of Godmanchester. In order to provide a sympathetic transition from the countryside to the urban environment,

¹⁰ Housing and economic land availability assessment

a low density development of circa 55% of the site (13 dwellings) is considered be appropriate. This approach was derived from the findings in the HELAA 2017 (HOUS/02).

4.95. Representations made by Godmanchester Town Council (ID: 1150548) [source: PREP/01] note that Godmanchester Town Council is, in general terms, supportive of the residential development of the site, but concerns remain regarding the perceived inadequacy of the access along Silver St to the site.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

4.96. A full application for 13 dwellings (planning reference 16/01477/FUL) was approved in August 2017 and commenced on the 8th March 2018.

Question 5: What are the benefits that the proposed development would bring?

4.97. The development will contribute to the Council's five-year land supply and provide residential accommodation with reasonable access to local services, facilities and employment opportunities.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 4.98. The HELAA (HOUS/02) identifies that the majority of the site falls within flood zone 1, although a small parcel of the southwest of the site falls within flood zone 2. The capacity of Huntingdon WWTW was also raised as a potential issue, along with the potential presence of protected species within the mature hedging and trees on the site. Due to the location of the site, a potential increase in unnecessary light and noise emissions into the open countryside was identified.
- 4.99. Representations submitted by the Environment Agency (ID: 1146949) and Cambridgeshire County Council (ID: 1150302) [source: PREP/01] identified a concern that development of the site could impact on flood risk to Stoneyhill Brook and Godmanchester and in order to avoid such a situation, the development should be required to reduce discharge rates.
- 4.100. Mitigation measures identified in the HELAA (HOUS/02) and within HU18 of the Local Plan (page 182) are achievable. These include a flood risk assessment, landscaping scheme, basic transport assessment, archaeological assessment, contamination report and an agreement with the Council (in liaison with the Environment Agency) that the Water Framework Directive is not compromised. In addition, Cambridgeshire County Council as LLFA suggested a condition to ensure an appropriate scheme for surface water drainage be imposed. The Council considers that the criteria identified for site HU 18 adequately addresses these issues as demonstrated by the approval of planning application 16/01477/FUL.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

4.101. With the exception of a small parcel of land (southwest corner – c. 624 sq. m.), the site is in Flood zone 1 (FLO/01, page 10). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 4.102. There are relatively few constraints to consider for this site. The design and landscaping of the scheme will need to reflect the sites location next to open countryside. Some of the site falls into flood zones, requiring mitigation measures. A single access point off Silver Street will be required.
- 4.103. There are no significant infrastructure requirements identified.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

4.104. HOUS/02 sets out the wastewater constraints. This site will be served by the Huntingdon Wastewater Treatment Works. There is current capacity for this development though commencement has yet to take place. A start on site is anticipated in 2018.

Question 10: Is the site realistically viable and deliverable?

4.105. It has been demonstrated that the site is viable with Policy levels of affordable housing. A S106 agreement has been signed.

Question 11: What is the expected timescale and rate of development and is this realistic?

- 4.106. The 13 homes are expected to be completed in the year 2019/2020.
- 4.107. This is realistic as permission has been granted and the development has commenced with the developer's website shows homes as 'coming soon' (MON/01, page 67).

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

4.108. The HELAA (HOUS/02) document identifies that landscape impact is a development constraint. The boundaries of the site comprise close board fencing to the south, with similar fencing and established planting forming the boundary to the northeast. A combination of

mature hedging and timber post and rail fencing defines the boundary to the west, adjacent to the highway.

4.109. This arrangement is appropriate as it represents the land submitted as available for development.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 4.110. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA (HOUS/02) and the Huntingdonshire Local Plan Viability Study (INF/04) and Strategic Flood Risk Assessment (FLO/02).
- 4.111. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 108, 197, 314, 391 and 451) and Statement of Representations (CORE/04, Page 89-90).
- 4.112. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG¹¹. The site is deliverable as defined through paragraph 47 of the NPPF. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development is available now can be completed within a five year time period the developer's website indicates that new homes on the site are 'coming soon'.

HU19- Bearscroft Farm

Question 1: What is the background to the site allocation? How was it identified and which options were considered?

- 4.113. The site is located south of the A14 and to the eastern edge of Godmanchester. The site lies in close proximity to the A14; located north of the site is the Cardinal Business Park. Running along the western edge of the site is the A1198.
- 4.114. This piece of land was originally put forward during the production of the Core Strategy 2009 and assessed for the Local Plan to 2036 in the Environmental Capacity Study: Huntingdon Spatial Planning Area document consulted upon between August 2012 and November 2012. The site has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 160-163 for full assessment).
- 4.115. This site is situated to the east of Godmanchester, immediately south of the A14 with limited access to services and facilities. The A1198 separates the site from the established

¹¹ Housing and economic land availability assessment

settlement but direct access to this has been achieved with introduction of a roundabout and T-junction. This site is considered suitable and is under construction for residential-led mixed use development, it is of sufficient scale to provide a primary school to serve local needs, which is scheduled to move into the new building on site in September 2017.

Question 2: What is the scale and type/mix of uses proposed?

- 4.116. The site is allocated for a mixed use development comprising of approximately 750 homes, 4.4ha of land for employment uses (all class 'B' uses except 'B8') a neighbourhood centre to comprise 950m2 retail floorspace (28) (classes 'A1', 'A2', 'A3'or 'A5'), of which not more than 700m2 to be shops (class 'A1') a primary school on 2.3ha of land an area of at least 2ha of accessible natural green space with comprehensive links to the wider green infrastructure network social and community facilities to meet needs arising from development.
- 4.117. The approval of multiple planning applications has determined the mix of uses on site (see response to question 4).

Question 3: What is the basis for this and is it justified?

- 4.118. The site was originally put forward during the production of the Core Strategy 2009 and assessed for the Local Plan to 2036 in the Environmental Capacity Study: Huntingdon Spatial Planning Area document consulted upon between August 2012 and November 2012.
- 4.119. Planning permission 1200685OUT was granted in March 2014 for a mixed use development of up to 753 dwellings along with 4.4ha of employment land, a primary school, community and retail facilities. Reserved Matters were approved in December 2015 for the first phase of 223 dwellings (15/01158/REM) and development commenced in April 2016. Reserved Matters applications for further parcels of residential development have been approved. A primary school and local centre comprising A1, A2, A3, A5 uses and/or D1 in the alternative (16/00833/REM) have also been constructed on the site and are operational. Completions are coming forward faster than originally anticipated.
- 4.120. The site abuts the eastern edge of Godmanchester and is bound to the north by the A14. Whilst initial assessment through the HELAA identified that access to existing services and facilities was limited, the site is of sufficient scale such that a primary school has been provided to serve local needs. A local centre and employment land also form part of approved planning permission 1200685OUT.
- 4.121. The site is situated within Flood zone 1 (FLO/01, page 9) and is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.
- 4.122. The site is within the built-up area as defined within the Godmanchester Neighbourhood Plan 2017-2036 (page 67).

- 4.123. Representations at Consultation Draft Stage (July to August 2017) by The Fairfield Partnership (ID: 1140352) and during subsequent stages of consultation outline that the 4.4ha of employment land granted outline consent in 2014 (as part of permission 1200685OUT) has been the subject of a marketing exercise since February 2015; as a result of which, very little interest has been expressed for use of the land for B1 use. It is therefore contended that given the marketing evidence gathered, there is no reasonable prospect of the employment land at Bearscroft delivering "B class" uses and therefore, the reference to employment should be omitted from the allocation, given the provisions of paragraph 22 of the Framework. The representation suggests that residential development on this land would be more appropriate and could provide circa 120 dwellings. The LPA considers that the employment requirement should be retained to promote a sustainable balance of uses (CORE/05, page 108). A planning application has been submitted in relation to employment land to the west of the A1198, seeking consent for residential development and/or a care home on the land (in the alternative); reference: 18/00532/OUT. This application is currently pending consideration. In addition, it is noted that planning permission for an access road to serve the employment land to the east of the A1198 has only recently been obtained on 22 December 2017; reference: 17/01951/FUL.
- 4.124. Policy LP 26 is justified through the application of Cambridge Sub-Region (HOUS/07) and Peterborough Strategic Housing Market Assessments (SHMA) (HOUS/08) and local housing need and strategies (including HOUS/06). By referring to up-to-date evidence the policy ensures that the most appropriate strategy is employed in line with local demand and settlement type and location, or proximity to the most appropriate housing market area consistent with paragraph 50 of the NPPF and NPPG Housing and economic development needs assessments.

Question 4: What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

- 4.125. Outline planning permission (planning reference 1200685OUT) for 753 dwellings was approved in March 2014. As of 31st March 2017, 87 dwellings had been completed and 49 were under construction.
- 4.126. 16/00425/CCA for the two form entry (420 place) primary school and nursery building (56 place) was approved in July 2016.
- 4.127. 15/01158/REM for 223 dwellings (73 of which will be affordable) was approved in December 2015 and commenced on the 11th April 2016.
- 4.128. 16/00833/REM for a local centre of an area for 0.3ha for class uses A1,A2,A3 and A5 and/or D1 was approved in August 2016 and commenced on the 22nd May 2017.
- 4.129. 16/02486/REM for 270 dwellings (of which 94 will be affordable) was approved in June 2017, as of March 2018 the development had not commenced.

- 4.130. 16/02570/REM for 167 dwellings (of which 51 will be affordable) was approved in July 2017 and commenced on the 19th October 2017.
- 4.131. 17/01952/REM for 106 dwellings (of which 40 will be affordable) was approved in December 2017 and will commence on the 6th June 2018.
- 4.132. 17/01951/FUL for a section of adoptable standard road and associated drainage to serve the employment land to the east of the A1198 was approved in December 2017.

Question 5: What are the benefits that the proposed development would bring?

- 4.133. Taking the Framework policies into account, and in accordance with its Section 1, the development would have important economic benefits through employment in the construction of the housing (including in the supply chains of materials, fittings and furnishings) and in the local economic contribution from future residents. The mixed-use nature of the consent granted (1200685OUT) provides further opportunities for employment generating uses and for development of the site to make a contribution to the local economy. The provision of a primary school on the site ensures that local education needs are met.
- 4.134. There would be important social benefits from the provision of market and affordable homes for the residents in accordance with Section 6 of the Framework and in the creation of public recreational land on the open space in accordance with Section 8. The provision of on-site open space and landscaping would also have benefits for the environment and biodiversity in accordance with Sections 7 and 11 of the Framework. The provision of a mixed-use development also provides environmental benefits through providing facilities and services within walking distance of most properties; promoting sustainable transport in accordance with Section 4 of the Framework.
- 4.135. The development will contribute to the Council's five-year land supply and provide residential accommodation that is highly accessible to some local services and facilities as these form part of the development.
- 4.136. Access is identified as a constraint at present. A proportionate Transport Assessment will be required to demonstrate that safe, appropriate access can be provided from the road network, and that any adverse offsite transport impacts can be adequately mitigated. In particular, the design of the development should provide a sustainable transport network for vehicles, cyclists, pedestrians and public transport. A travel plan will also be required to ensure that the development encourages the use of sustainable modes of transport by all users, thereby reducing off-site traffic impacts.
- 4.137. Within the HELAA, noise is also identified as a constraint given the proximity to Cardinal Distribution Park. It would be necessary to demonstrate that development would mitigate and minimise impacts arising from noise such to safeguard the amenity of future residents.

Question 6: What are the potential adverse impacts of developing the site? How could they be mitigated?

- 4.138. The HELAA identifies potential adverse impacts with regards to the amount of traffic development of the site would generate, the potential for negative landscape impacts due to the location of the site and scale of development proposed, the potential for noise and light pollution, the potential for protected species on the sites and the demands arising for the provision of services and community facilities. The need for appropriate points for vehicular access and appropriate links for pedestrians and cycles was also identified, such to encourage the use of sustainable modes of transport; thereby reducing off-site impacts.
- 4.139. In addition, as identified within the HELAA, there are known archaeological assets in the vicinity of the site. Therefore, appropriate investigations are necessary, followed by further recoding, conservation and other work as applicable (para. 9.149 of the Local Plan CORE/01). Representations by Ms Debbie Mack (ID: 56252), Historic England raise objection to the current policy wording and outline that the policy should be amended to refer to archaeological potential, as articulated in the reasoned justification of the supporting text.
- 4.140. Representations at Consultation Draft Stage (July to August 2017) by Mrs V Pryce of Godmanchester Town Council (ID: 1150548) and during subsequent stages of consultation, objected to allocation and development of the site; despite noting the granting of planning permission 1200685OUT for a mixed-use development including up to 753. Within the representations received it is argued that the site is not suitable for such a large mixed development and that there are other sites in the district that are more sustainable. Significant concerns are also expressed about the A1198 running through the site; splitting Godmanchester in two and dividing the new community from the existing town. Within the representations, it is identified that a number of issues should be addressed, including: road safety concerns (especially the crossing and speed of the A1198), increased traffic congestion, lack of parking in the centre of Godmanchester, adequate health care, schooling and other infrastructure needs.
- 4.141. Mitigation measures are identified in the HELAA and within HU 19 in the Local Plan and include the requirement for appropriate landscaping to provide noise mitigation, mitigate light pollution and mitigate landscape impacts, the production of a flood risk assessment and drainage strategy, provision of a sustainable transport network and implementation of a travel plan, the undertaking of ecological surveys and identification of appropriate mitigation, as well as careful consideration of the design of the development including production of design codes, to mitigate landscape impacts. Further mitigation measures identified include the provision of services and facilities on site such to meet the needs arising from the development (CORE/01, criteria a –e, page 184 and HOUS/02, page 162). Concerns were raised as part of the planning application in relation to many of these matters. However, mitigation measures are achievable, as demonstrated through the approval of application 1200685OUT and the subsequent reserved matters consents; although conditions were suggested by Statutory Consultees and applied to these consents respectively. It is noted that a condition relating to archaeology was appended to planning

permission 1200685OUT and this is subsequently progressing through the process of being discharged.

4.142. Representations at Consultation Draft Stage (July to August 2017) by The Fairfield Partnership (ID: 1140352) and during subsequent stages of consultation, note that the draft allocation states that 4.4 hectares of employment land is suitable for uses falling with Use Classes B1 and B2; however, the outline permission (1200685OUT) limited the use of the commercial land to uses falling within Use Class B1 only. The restriction to B1 use only resulted following detailed noise modelling which illustrated that other B Class uses would not be appropriate given the potential for noise and disturbance by operations and by HGV vehicle movements. It is therefore contended that the allocation should omit reference to B2 use for the employment land parcels. Whilst this point is noted, this matter could subsequently be addressed through the planning application process.

Question 7: How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

4.143. The site is in Flood zone 1 (FLO/01, page 9). It is therefore at the lowest risk of flooding and the most suitable for development in conformity with the sequential test (NPPG, Para: 019 Reference ID: 7-019-20140306) and paragraph 100 and 101 of the NPPF.

Question 8: What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 4.144. The main infrastructure provision was a Primary school which is now open. Significant landscaping and road alterations have been undertaken to link the development with the existing settlement across the A1198. Further services have been provided- a shop and food outlet have now opened within the site.
- 4.145. The main constraint has been the provision of safe access points onto the site which have been achieved through road improvements.

Question 9: In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

- 4.146. The development is served by existing capacity.
- 4.147. The 2014 Huntingdonshire Detailed Water Cycle Study (FLO/11) acknowledged Huntingdon as being one of four works district-wide that would run out of capacity within the Plan period. There is an identified capacity until 2021/22. It has been established that the upgrades necessary after this date are achievable through applying conventional technology upgrades. The Council will continue to work with Anglian Water Services and the Environment Agency to ensure that waste water flows from the proposal can be met and agreed.

4.148. The Council undertook an updated Water Cycle Study (FLO/11) in 2014 to determine how the water cycle constraints relate to all the potential development sites highlighted in the Local Plan to 2036. It provides a detailed approach to the management and use of water to ensure the sustainability of the water environment is not compromised by growth. Sites in Huntingdon will be served by the Huntingdon Wastewater Treatment Works. The Water Cycle Study acknowledged Huntingdon as reaching capacity with improvements needed by 2021/22 if growth is in line with the Local Plan is to be enabled.

Question 10: Is the site realistically viable and deliverable?

4.149. Development is underway and affordable housing has been secured as detailed in Q4.

Question 11: What is the expected timescale and rate of development and is this realistic?

4.150. In response to the Councils Annual Housing Trajectory Survey, the developer confirmed that the site is progressing well and that development of the site is anticipated to take approximately eight years to complete (MON/01, page 69). The first 87 homes were built in the 2016/2017 monitoring year, the timescale for delivery is set out below:

Units built	No. units in years 1-5			19/20 Yr. 3			22/23	23/24	Total 16/36
87	475	95	95	95	95	95	95	96	753

4.151. Findings from the HELAA identified that the development is proving attractive to the market and completions are coming forward faster than originally anticipated (HOUS/02: Suitability, page 162).

Question 12: Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 4.152. The defined boundary is appropriate as it represents the land submitted as available for development and as approved under application 1200685OUT.
- 4.153. No representations were received in relation to the Local Plan consultation suggesting that the boundary should be amended. Representations received relate to the uses which are outlined within the allocation to be accommodated within the identified boundary.
- 4.154. The defined boundary allows for comprehensive development of the site, with a natural boundary formed by the A14 to the north and the built form of Godmanchester to the west.

Question 13: Are the detailed policy requirements effective, justified and consistent with national policy?

- 4.155. The detailed policy requirements are justified and based on a proportionate evidence base including the HELAA, the Huntingdonshire Local Plan Viability Study and the Strategic Flood Risk Assessment.
- 4.156. The policy requirements are effective and have been based on consultation with statutory consultees such as the Environment Agency, Natural England, Anglian Water, Highways England, Historic England and Cambridgeshire County Council as the LLFA, Local Highway authority, and Archaeology unit. Their responses and the Council's subsequent amendments to the policy can be found in the Statement of Consultation (CORE/05, Pages 194, 195, 196, 313, 314, 391 and 452) and Statement of Representations (CORE/04, Page 53, 77, 90 and 91).
- 4.157. There are also no objections raised on technical grounds on the planning application (12006850UT) from Anglian Water, Cambridgeshire Constabulary, Cambridgeshire Fire and Rescue, Cambridgeshire County Council (CCC) Archaeology, CCC as Local Highways Authority, CCC Education, CCC Ecology, CCC Libraries and Lifelong Learning, CCC Sustainable Water Management, CCC Waste Management, the Wildlife Trust, English Heritage, Environment Agency, Environmental Health, Highways Agency, Natural England, National Grid and the National Health Service. Subsequent applications for reserved matters have been approved.
- 4.158. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG. The site is developable as defined through paragraph 47 of the NPPF, with outline consent for a mixed-use development including 753 dwellings having been approved on 6 March 2014; demonstrating the development is viable and suitable. Recent responses to the Annual Monitoring Report Housing Trajectory identify that development of the site has commenced and is progressing well, with approximately 63% of dwellings approved under permission 1200685OUT anticipated to be completed within a five year time period.

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 site⁷. 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 years⁸ and indeed for UK greenfield and urban land, is still below levels last seen at least 2003⁹. There is thus little to incentivise hoarding land with permission.

The LGA has identified circa 400-500,000 units of 'unimplemented' permissions¹⁰, 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 lapsed¹¹. 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.

Start to Finish

12

⁷ DCLG Presentations to the HBF Planning Conference (September 2015)

⁸ Knight Frank Residential Development Land Index Q1 2016 http://content.knightfrank.com/research/161/documents/en/q1-2016-3844.pdf
⁹ Savills Development Land Index http://www.savills.co.uk/research/uk/residential-research/land-indices/development-land-index.aspx
¹⁰ 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

¹¹ 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 annum¹²; it is now projected to deliver at an annual rate of just 250¹³.

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 (\pounds /ha) by Local Authorities in 2014¹⁴ 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)

Start to Finish

¹² South Cambridgeshire Annual Monitoring Report 2006/07

¹³ South Cambridgeshire Annual Monitoring Report 2014/15

¹⁴ 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

Start to Finish

14 Source: NLP analysis

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 $\pounds 12$ 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 $\pounds 20$ 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 funding¹⁵.

"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.

¹⁵ 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.

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.

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

Start to Finish

viability overall. 16

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.

Start to Finish

Appendix 2: Huntingdon West AAP



Huntingdon West Area Action Plan Adopted 2011







Contents

	Foreword	i
1	Introduction	1
2	Policy Context	2
3	Area Context	3
4	Vision	6
5	Objectives	8
6	Sustainable Travel	10
7	Vibrant Growth	14
8	Healthy and Green	26
9	High Quality Environment	30
10	Infrastructure, Phasing and Implementation	31
11	Monitoring	33
	Appendices	
1	Infrastructure Requirements	36
2	Potential Phasing	39
3	Saved Policies to be Superseded	41
4	Proposals Maps	42
	Glossary	45

Contents

Maps	S	
	Map 1 The Action Plan Area	5
	Map 2 The Vision	7
	Map 4 Pedestrian and Cycle Links	12
	Map 6a George Street / Ermine Street - Existing Land Uses	16
	Map 6b George Street / Ermine Street - Townscape Analysis	17
	Map 6c George Street / Ermine Street - Planning Constraints	18
	Map 6d George Street / Ermine Street - Land Parcels	19
	Map 6e George Street / Ermine Street - Land Uses	20
	Map 7a Hinchingbrooke Community Campus - Existing Land Uses	22
	Map 7b Hinchingbrooke Community Campus - Townscape Analysis	23
	Map 7c Hinchingbrooke Community Campus - Planning Constraints	24
	Map 7d Hinchingbrooke Community Campus - Land Use Proposals	25
	Map 8 Hinchingbrooke Country Park	27

Contents

Foreword

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

Foreword

The area covered in this action plan will face significant change over the next 15 years. This is seen in the approved proposal to create a new West of Town Centre Link Road. The Council has long recognised that a plan is needed to ensure that development takes place in a manner which will benefit the existing town centre and the district as a whole. Although the recession has had an impact, our belief in the importance of this area for sustainable development is undiminished.

This plan sets out a vision for the area which is vibrant, easy to get around, modern yet respectful of the environment. The vision is followed by objectives and policies which will guide development. Monitoring proposals together with infrastructure and phasing details are also included.



Councillor Douglas Dew Executive Councillor for Planning Strategy and Transport

Foreword

Introduction 1

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

1 Introduction

1.1 The area action plan covers approximately 300 hectares of land west of Huntingdon's town centre. Of this, some 20 hectares is land between the town centre and the railway line and includes the Huntingdon Railway Station. The remaining land extends west to encompass the Hinchingbrooke area. The Huntingdon West Area Action Plan is an area where significant change is expected. It will help deliver planned growth, stimulate regeneration, protect areas particularly sensitive to change, and resolve potentially conflicting objectives in this area.

1.2 Supporting information can be found in the Statement of Consultation. This details how the plan was prepared and the community engagement which took place. It also lists documents which provide information supporting the plan and includes assessments on soundness and legal compliance as required by the Planning Inspectorate.

Appraisal and Assessment of the Area Action Plan

1.3 A Habitats Regulation Assessment (HRA) has been carried out by consultants in accordance with Articles 6(3) and 6(4) of the Habitats Directive (European Council Directive 92/43/EEC). This assessment considers the potential effects of the area action plan on the objectives and integrity of specific sites identified for their importance to conservation. The first stage is a scoping assessment that determines whether significant effects are likely. Where this scoping assessment cannot rule out significant effects, then a full Appropriate Assessment is required which suggests mitigation measures to help reduce the potential effects of policies and proposals. The HRA was completed in October 2009 and concluded that a number of minor adverse impacts on European sites are predicted, however if the recommendations for avoidance and mitigation contained in the assessment are conscientiously followed, the Huntingdon West AAP will not have an adverse effect on European sites.

1.4 A sustainability appraisal (SA) has been carried out. This assesses policies in order to judge their potential effects. The SA is an important part of plan development to ensure that the final plan promotes sustainable growth. A strategic environmental assessment (SEA) is also required and for the purposes of the area action plan is incorporated into the SA process. A sustainability appraisal report has been produced for each stage of plan development and has been an integral part of producing the

preferred approach. A final SA has been prepared for this document and is available alongside this document. The final SA notes the changes which have been made since the Preferred Approach stage and concludes that the plan will lead to sustainable development.

1.5 Equalities assessment has been carried out and can be found in the final SA document. The process of preparing the plan has been undertaken in accordance with all the relevant documents. The area action plan addresses some key equality issues in that it seeks development in a manner which promotes inclusive and cohesive communities.

2 Policy Context

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

2 Policy Context

East of England Plan

2.1 The East of England Plan (EEP) is the Regional Spatial Strategy (RSS) for the Eastern Region. It was published in May 2008 and sets the regional framework for preparation of local development documents. This area action plan is a development plan document (DPD) that will form part of the Huntingdonshire local development framework (LDF) and as such must be in conformity with the EEP.

2.2 The EEP sets specific targets and policy requirements. It requires Huntingdonshire to deliver a minimum of 11,200 homes in the period 2001 – 2021, and provide a share of 75,000 new jobs for Cambridgeshire over the same period. The EEP also sets out a number of policies which seek to secure sustainable development.

Sustainable Community Strategy

2.3 The Sustainable Community Strategy (SCS) for Huntingdonshire, developed by the Huntingdonshire Strategic Partnership, uses six strategic themes: growth and infrastructure; health and well-being; inclusive, safe and cohesive communities; economic prosperity; environment; and children and young people. This area action plan will serve to help meet the SCS vision and contribute towards meeting a number of the spatial outcomes it identifies.

Core Strategy

2.4 The Core Strategy sets the strategic spatial planning framework for how Huntingdonshire will develop to 2026. Its vision, objectives and strategic policies are overarching and form the basis for the whole LDF. The Core Strategy was adopted by Huntingdonshire District Council in September 2009. The Core Strategy sets the plan period for the LDF.

2.5 The Huntingdon West area action plan is identified in the Core Strategy as being important in helping to achieve the requirements of the EEP and the Core Strategy. The area is seen as particularly important in achieving housing, employment and retail targets and meeting objectives for redeveloping previously developed land, enhancing strategic green infrastructure and encouraging sustainable travel.

Other Development Plan Policies

2.6 This area action plan forms part of the Development Plan which encompasses all planning policies affecting the district. The policies in this area action plan must be read in conjunction with all other policies of the Development Plan that are relevant. For development proposals within the area covered by this area action plan, relevant Development Plan policies will principally be contained in the Core Strategy and Development Management DPD.

Area Context 3

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

3 Area Context

The Area

3.1 The Huntingdon West area is situated to the west of the town centre and is defined by the A14, Huntingdon's inner ring road, Ermine Street up to the railway, George Street and its continuation along Brampton Road and Thrapston Road. It also includes the station area, the former station cottages and a small part of Mill Common. Huntingdon's principal housing and employment areas lie to the north and the town centre lies to the east. Open countryside and Huntingdon Racecourse lie to the west and the water meadows, river and the main part of the village of Brampton lie to the south.

3.2 The area is diverse in character. It contains: the older industrial area with associated Victorian housing close to the town centre and the railway line; vestiges of the parkland setting around Hinchingbrooke House now containing the secondary school, headquarter buildings and the hospital, new housing and employment areas built on former agricultural land; former gravel workings now part of Hinchingbrooke Country Park; Views Common; and mixed agricultural land fringing the village of Brampton and the A14.

History

3.3 Huntingdon, lying on the north bank of the River Great Ouse, has had settlement since pre-historic times. It was founded by the Anglo Saxons and Danes in medieval times along the approximate line of the Roman road (Ermine Street). Extensive Common land was established around the town in the medieval period and this is still a feature today.

3.4 The origins of Hinchingbrooke House to the west of the town centre are medieval. A priory of Benedictine nuns occupied the site and there are some medieval remnants in the house. The grounds were given to the Cromwell family during the dissolution of the monasteries and subsequently owned by the Montagu family, who became the Earls of Sandwich after the Restoration, before becoming publicly owned. Hinchingbrooke House is Grade I listed and the immediate gardens are also of regional and national importance.

3.5 The railway opened in Huntingdon in 1830 and attracted industry to the area close to the railway station, including carriage works, foundries and other trades. The area around St John's Street and Sayer Street retains houses from the late 19th century which are likely to have originally housed local workers.

3.6 The Hinchingbrooke estate was sold in 1962 to the then Huntingdonshire County Council. In 1970 the County Council established Hinchingbrooke School on part of the land, including Hinchingbrooke House itself, and subsequently created the Hinchingbrooke Country Park. Parts of the land were sold for the hospital, Police Headquarters and Forensic Laboratory. Since the 1990s land has also been sold for housing and employment development. With the exception of the employment area this land is served by a single road access and a variety of pedestrian and cycle linkages.

3.7 The one-way ring road around the town centre cut through the town in the 1960s. The A14 built in the 1970s currently runs through the town on a generally elevated route including a viaduct over the railway. Views Common, to the west of the railway line, is bisected by the A14. The ring road creates both a physical as well as a movement barrier to the rest of the town. Ferrars Road and Handcroft Lane, as the main route to Views Common, have been disrupted by the ring road and past intensification of industrial development.

Constraints and Opportunities

3.8 The historical form of development, the railway and the roads constrain the ability of the town centre to grow and link in with this area to the west. New roads, together with public transport and footpaths offer the opportunity for better links. The Highways Agency prepared draft orders in 2009 for a scheme to re-route the A14 south of its current route, removing the viaduct over the railway and introducing a range of links with the local road network. Although this scheme was withdrawn in October 2010, the Department of Transport will undertake a study to identify cost effective and practical proposals which bring benefits and relieve congestion looking across modes to ensure sustainable proposals. This approach will also provide an opportunity for the private sector to play its part in developing schemes to tackle existing problems in the corridor. Huntingdonshire District Council plans to create a West of Town Centre Link Road which will serve to alleviate traffic flows, open up land for redevelopment opportunities and aid the introduction of measures to reduce the barrier effect of the ring road. An additional long-stay car park in the vicinity of

3 Area Context

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

the new West of Town Centre Link Road would help reduce the need for movements around the existing ring road in search of car parking. Future improvements to Huntingdon Bus Station situated on the ring road outside of the area together with the recently developed bus interchange at the station, will also serve to improve services in the action plan area.

3.9 Rundown industrial land between George Street/Brampton Road and Ermine Street offers potential for regeneration. Large industrial sheds are at or nearing the end of their useful lives and it is understood that potential new landowners have options for purchase and proposals for redevelopment. Huntingdon's town centre is currently losing trade to centres outside the district and, in order to allow Huntingdon to fulfil its potential as the main shopping destination for the area, high quality retail development is required. The town centre is constrained and has limited opportunities to expand to cater for its future needs. The action plan area being situated close to the town centre could enable complementary retail and other business development to locate here with improved linkages to the existing town centre.

3.10 The George St/ Ermine St residential areas have experienced some redevelopment recently and there are opportunities for further residential development. This will help provide much needed housing, including affordable housing, in a location close to the town centre.

3.11 The pattern of development in the Hinchingbrooke area is now largely set, with only a few opportunities left for further development. The single access road (Hinchingbrooke Park Road) causes congestion problems that need to be addressed. The nature of the area, encompassing a number of institutions, provides both a constraint in that further development should respect the existing character, and an opportunity in that the environment can be enhanced to become a 'community campus'.

3.12 There are opportunities to enhance and expand the Hinchingbrooke Country Park onto neighbouring agricultural land and to improve Views Common, particularly if the A14 viaduct is to be removed. There are also likely to be other opportunities to create additional green spaces.

3.13 Parts of the action plan area are covered by the Huntingdon and Brampton Air Quality Management Areas (AQMAs), in particular the George Street/ Brampton Road/ Ermine Street area and north west of Hinchingbrooke. The AQMAs have been designated in order to tackle the high levels of nitrogen dioxide emissions associated

with the A14 and Huntingdon Ring Road. There are opportunities to help reduce nitrogen dioxide emissions in the AQMAs through any future changes to the A14 and construction of the West of Town Centre Link Road.

Issues

3.14 The issues that this area action plan seeks to address are:

- 1. Achieving the most sustainable development possible
- 2. Re-using previously developed land
- 3. Providing a mix of housing for a wide range of people
- 4. Providing employment opportunities
- 5. Providing future shopping opportunities
- 6. Reconfiguring roads to deal with current problems of accessibility and congestion
- 7. Improving connections with the town centre and other surrounding areas
- 8. Providing additional long stay car parking avoiding travel on the ring road
- 9. Providing needed additional infrastructure
- 10. Contributing additional open space to link with existing green infrastructure
- 11. Ensuring the various elements of the plan link together
- 12. Ensuring a high quality environment
- 13. Delivering the changes envisioned in the area action plan

Area Context 3





4 Vision

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

4 Vision

4.1 The vision is intended to identify the character of Huntingdon West at the end of the plan period in 2026. It must address the challenges the area faces and identify the results of changes.

4.2 The vision will only be achieved by working closely with the community, landowners, public bodies and service providers. The vision is the starting point from which objectives and policies that will guide development in accordance with the vision are derived.

The Huntingdon West Vision

It is intended that by 2026 Huntingdon West will be a vibrant part of the town enjoyed by residents, workers and visitors. Huntingdon West will have a distinctive identity with a series of innovative exemplar developments that interconnect providing a transformed community with opportunities for living, working and leisure.

New and improved transport routes will enable better, easier and more sustainable travel patterns enabling new land uses that will reflect the improved accessibility of the location. The new routes will help to break down the barrier caused by the main roads and enhance the connections and inter-relationships between this area and the rest of the town centre.

The George St/ Ermine St area will be transformed with modern residential, retail and office development, which will positively complement the town centre and enhance the vitality and viability of Huntingdon as a whole. Development in the Hinchingbrooke area and west of the railway involving land no longer needed for other uses will complement the existing community focused land uses. The Hinchingbrooke area will be a 'community campus' created by the variety of employment activities and agglomeration of institutional and public uses.

The wealth of heritage in Huntingdon West, including Hinchingbrooke House and other listed buildings, will be respected by new development. Development will be of a scale that recognises the Conservation Area designation, topography, and context. New buildings will be designed to showcase emerging technologies in renewable energy production, designed to use much less energy, and will promote the use of modern sustainable methods of construction. Buildings will be designed to be adaptable in terms of their design and lifecycle to help respond and adapt to the effects of climate change and the changing requirements of their users.

Hinchingbrooke Country Park will be enhanced and enlarged to provide a major community, recreational and biodiversity resource. This, together with other green space, including Views Common, will link Huntingdon West to strategic open space around the town and strengthen the habitat network for wildlife.

4.3 The vision takes account of the visions set out in the East of England Plan 2008, the Sustainable Community Strategy and the Core Strategy. It recognises the need for change in the Huntingdon West area and seeks to enhance the area to create a thriving and vibrant area of Huntingdon which will help to boost the town's vitality and viability. It identifies areas where the most change is expected to occur and sets out ways in which improvements to the environment can be made. Fundamental to this are the changes to transport routes which will make the area more accessible.

4.4 The quality of development is identified as being of particular importance. The vision sets out how Huntingdon West should lead the way in sustainable development and use innovative technologies.


5 Objectives

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

5 Objectives

5.1 The objectives set the framework beneath the vision upon which the policies are based.

Objectives

Objective 1 - Sustainable Travel

To improve accessibility both within Huntingdon West and in the way it integrates with surrounding areas and encourage walking and the use of buses, trains, and bicycles.

Objective 2 - Vibrant Growth

To provide an appropriate level of new and enhanced retail, employment, housing and other opportunities to meet local need in a manner which integrates with existing development and is complementary to, and expressly beneficial to the town centre.

Objective 3 - Healthy and Green

To facilitate healthy and active lifestyles by contributing to a network of improved and new high quality green spaces which link to strategic green spaces and routes around the area including an improved Hinchingbrooke Country Park and Views Common.

Objective 4 - A High Quality Environment

To ensure that new development is complementary to the existing natural and historic environment and is of a high quality and a sustainable design.

Objective 5 - Infrastructure, Phasing and Implementation

To provide necessary infrastructure, using contributions from developers where appropriate and to phase development to occur in conjunction with major road infrastructure provision.

5.2 The objectives are consistent with the overarching objectives set out in the Core Strategy. Promoting sustainable travel is important for Huntingdon and there are a number of opportunities in the action plan area. The Highways Agency were previously promoting significant changes for the A14 and surrounding local road network, and while that scheme was withdrawn in October 2010, a study will be undertaken to identify cost effective and practical proposals which may include changes affecting this area. There is also the opportunity for further accessibility improvements with a West of Town Centre Link Road and potentially other roads, pedestrian and cycle routes and improved public transport.

5.3 Huntingdon West offers considerable opportunities to contribute towards meeting the District's requirements for retail, employment and residential development. To meet the requirements of the Core Strategy, a mixture of complementary uses is envisaged within the area. This will include opportunities for a range of housing to meet housing needs, additional office employment and potentially new shops provided they link in and support the town centre shopping offer. This mixture of uses is intended to create a much more vibrant area of the town.

5.4 Improving the environment of Hinchingbrooke Country Park and Views Common are central to the area action plan. The network of green space in and around Huntingdon West will be added to, with additional public open space. Improving open space has the twin benefits of increasing people's access to leisure and increasing opportunities to improve biodiversity.

5.5 A high quality environment is important for everyone who will live or work in the area or visit it. As the area is a prominent gateway area for Huntingdon and provides links between several areas of the town, there is a great opportunity to create a place that is innovative and distinctive, has a sense of identity and responds to its context. It is imperative that new development within Huntingdon West takes account of the character and setting of the surrounding area – this includes the buildings and equally importantly the spaces between them, in order to contribute positively to this part of the District. All the differing areas of Huntingdon West have existing character assets and attributes that need to be respected by new development. This is particularly important in the Hinchingbrooke area which is characterised by its parkland setting and the Grade I listed Hinchingbrooke House.

Objectives 5

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

5.6 To achieve the vision it is necessary to set out what infrastructure and land is needed, how it will be provided, and when development can occur. Phasing will be required as some developments will be dependent on the creation of particular pieces of infrastructure whilst other developments can be brought forward earlier. These infrastructure and phasing requirements are set out at the end of the AAP.

6 Sustainable Travel

Objective 1

To improve accessibility both within Huntingdon West and in the way it integrates with surrounding areas and encourage walking and the use of buses, trains, and bicycles.

New and Enhanced Local Road Networks

6.1 A new West of Town Centre Link Road has been approved and further changes to the road network in this area are likely in future. Such changes may occur as a result of the Department of Transport's study into improving the A14 as well as in respect of individual development proposals.

Policy HW 1

Changes should be made to the road network in order to promote better accessibility and enable redevelopment including:

- a. the West of Town Centre Link Road the design and specification of which will be determined by Huntingdonshire District Council in consultation with its partners.
- b. the A14, the future of which will be determined through a study undertaken by the Department of Transport.

6.2 The District Council previously endorsed the principle of the changes proposed by the Highways Agency in 2008 which resulted in Draft Orders in 2009. In the AAP area, the changes involved the removal of the viaduct over the railway line. The new local road network envisaged involved a new access into Huntingdon over Mill Common (known as Pathfinder Link), a new alignment of the existing road with access points into the Railway Station, utilisation of an upgraded Brampton Road, and a new road

through Cambridgeshire Constabulary land and Views Common (known as Views Common Link). This scheme was withdrawn by the government following its Spending Review of October 2010, although it recognises that this corridor faces severe congestion, and that mobility along the route is critical for economic success and growth and will therefore undertake a further study to identify sustainable proposals.

6.3 The West of Town Centre Link Road was first proposed as part of the Huntingdon & Godmanchester Market Town Transport Strategy, approved by both the County and District Councils in June 2003. The aim is to ease capacity issues on the ring road to allow further development in Huntingdon town centre and to serve redevelopment in the George Street/ Ermine Street area. The Council has prepared a detailed scheme for the Link Road and planning permission was granted in 2009. The Council and its partners have secured Housing Growth Funding to help with the early delivery of the Link Road.

6.4 Changes to roads in this area can help to improve air quality in the Huntingdon and Brampton air quality management areas, which cover parts of the action plan area. The removal of the viaduct, subject to the outcome of the proposed study, would help to visually improve Brampton Road as it enters Huntingdon, providing the opportunity to enhance this gateway to the town.

6.5 Other changes to the road network are possible within the plan period. A further road link in Hinchingbrooke could enhance the accessibility of this area and help to address congestion issues on Hinchingbrooke Park Rd. There is currently access through the Hinchingbrooke Business Park available for emergency vehicles through to the A14, and there could be potential to open up this access to other traffic, or create a new road over Views Common. Investigation of this potential change will need to await the Department of Transport's study into the future of the A14 and would be dependent on funding coming forward.

6.6 New roads also provide the opportunity for a better bus service network and bus priority measures, and improved provision for pedestrians and cyclists (through new footpaths and cycleways).

Sustainable Travel 6

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

Pedestrian and Cycle Links

6.7 Cycling and walking are heavily promoted through the Cambridgeshire Local Transport Plan and the Huntingdon & Godmanchester Market Town Transport Strategy. The Strategy and its supporting action plan include measures to improve linkages between the town centre and Hinchingbrooke, onward links to Brampton, the Racecourse and other areas of Huntingdon and Godmanchester. These existing proposals, together with additional proposals in this area action plan, will encourage walking and cycling.

Policy HW 2

Pedestrian and cycle links which will improve accessibility between Huntingdon West, the town centre and surrounding areas as shown on Map 4 'Pedestrian and Cycle Links' will be safeguarded and provided within the plan period.

6.8 Proposed pedestrian and cycle routes affecting this area in the Huntingdon & Godmanchester Market Town Transport Strategy include better links between the town centre and Hinchingbrooke, and Stukeley Meadows and the railway station. In addition an improved linkage between Hinchingbrooke Business Park and the town centre across Views Common is desirable, as are further routes through Hinchingbrooke Country Park. To break the barrier effect of the ring road, measures that give much greater priority to pedestrians are needed.

6.9 Improved access for pedestrians and cyclists will be associated with the new road proposals associated with the West of Town Centre Link Road. In some cases it may be necessary to stop up, divert or provide an alternative for existing rights of way subject to the appropriate procedures being carried out. Signalised crossings to provide for the safe movement of pedestrians and cyclists across the roads may be required.

6.10 An additional cycleway/footpath may be required along Brampton Road in the vicinity of the railway station immediately to the north of the current bridge should there be significantly more traffic along Brampton Road in future. Such provision could help to encourage cycling and walking in the area by providing a high quality link across the railway.

6 Sustainable Travel

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011



Map 4 Pedestrian and Cycle Links

The Railway Station

6.11 Huntingdon railway station is a key transport facility in Huntingdon and to the wider area. It plays a very important part in enabling commuters to travel long distances without the use of a private car. Services operate south to intermediate stations and London Kings Cross and north to Peterborough with interlinking services beyond. The railway station is served by a number of different bus services linking Huntingdon to nearby towns and villages as well as Cambridge.

Policy HW 3

The Council will work with Network Rail, the Train Operating Company, the Local Transport Authority and bus companies to develop and enhance the Huntingdon Railway Station land, in order to provide more integration between modes of travel and improve links with the town centre and other parts of the town.

6.12 The Council will continue to work with partners to secure improvements as part of proposals for improving public transport accessibility in Huntingdon West. This will include better linkages between the railway station and buses including the Cambridge to St Ives Guided Bus.

6.13 Improved pedestrian and cycle paths are proposed to the railway station. Additional cycle parking will also be encouraged.

6.14 Access to the railway station was previously proposed to be changed following the removal of the viaduct as part of the A14 scheme. Under that scheme access to the eastern side would be in two new positions and some of the existing car parking removed as a result of the road changes. Whether such changes are in future proposed again or not, improved access is desirable, particularly for the west car park and improvements will be sought in conjunction with any proposal for additional car parking in this area.

6.15 No commercial development is provided for on the railway station land as it is envisaged that all the existing land owned by Network Rail will continue to be needed for operational purposes and car parking.

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

7 Vibrant Growth

Objective 2

To provide an appropriate level of new and enhanced retail, employment, housing and other opportunities to meet local need in a manner which integrates with existing development and is complementary to, and expressly beneficial to, the town centre.

The George Street/ Ermine Street Area

7.1 The George St/ Ermine St area lies immediately west of the town centre. It includes areas of poor quality industrial development which are largely redundant with opportunities for reuse. However, apart from these poor quality areas, there are several fine buildings and attractive areas which are part of the Huntingdon Conservation Area.

7.2 Locating new development in this area positively contributes towards sustainability as it is well served by facilities, given its proximity to the established town centre. Redevelopment offers the opportunity of improving the overall character of the area and improving its links to the town centre.

Policy HW 4

Development sites in the George St/ Ermine St area of approx 6ha will be redeveloped according to a masterplan using the concepts set out in Map 6e 'George Street / Ermine Street - Land Uses' including provision for the following mixed uses:

- a. Retail of approximately 5,350m^{2(a)} that is complementary to the continuing vitality and viability of the town centre and does not jeopardise the delivery of further redevelopment at Chequers Court;
- b. Approximately 170 to 230 homes (including affordable housing);
- c. Open space;
- d. Employment of approximately 0.57ha^(b) such as office (B1a), or alternative town centre uses such as live/work units, restaurants, a hotel and leisure facilities;
- e. An additional public car park to serve the need for long stays in the town centre; and
- f. Related servicing, pedestrian and cycle links, cycle and car parking.

7.3 The redevelopment of vacant and under-used industrial land in this sustainable location will facilitate the sustainable and organic growth of the town centre.

7.4 National, Regional and Core Strategy policies have been taken into account in determining the amount, type and location of additional retail provision that can be supported in Huntingdon. The Core Strategy is committed to development in the town centre first and seeks to provide at least an additional 9,000m² of net comparison shopping space in Huntingdon and at least 4,000m² of convenience floorspace across the District. The Council's updated Retail Study in 2010 identifies that the need in

a This figure is an approximate net internal floor area and has been arrived at from a robust residual assessment based upon the submissions made by the Council and principal landowners in the Chequers Court area and evidence of need from the Huntingdonshire Retail Development Advice (Roger Tym and Partners on behalf of HDC, 2010). Any retail development beyond this figure would need to satisfy the policy tests in CS 8 of the Core Strategy, HW4 of the AAP and demonstrate its acceptability in transport terms.

b Any employment development beyond this figure would need to satisfy the policy tests in CS 7 of the Core Strategy, HW4 of the AAP and demonstrate its acceptability in transport terms.

Huntingdon is for a total of approximately 19,450m² net retail floorspace, the majority of which (17,400m²) is for comparison sales. The provision of some of this space as part of a second phase of redevelopment at Chequers Court is planned but there is a need to facilitate further land for retail use. The George St/ Ermine St area offers the opportunity for complementary retail development which can demonstrate that the proposed site is or will be well connected to the town centre. Retail proposals will have to demonstrate that the sites chosen are appropriate, propose an acceptable traffic and urban design solution (for the redevelopment of the site and as part of the redevelopment of the area as a whole) and have regard to issues of retail mix. They will also have to demonstrate that they enhance the vitality of Huntingdon town centre by complementing existing retail provision and choice and act as a positive factor in terms of the overall regeneration and enhancement of the town centre. The area closest to George Street is the most appropriate for any retail as it will have access from the proposed West of Town Centre Link Road, is close to existing retailing in the town centre and will help to facilitate improved linkages between the town centre. the railway station and the Hinchingbrooke area through the site.

7.5 Close to George Street there are also opportunities for some housing or alternative complementary activities such as offices, a hotel or leisure uses. In a housing proposal, a range of approximately 20 and 40 homes is anticipated on approximately 0.5ha.

7.6 At the northern end of the George St/ Ermine St area around Ferrars Road, redevelopment encompassing housing on the existing industrial and servicing sites is envisaged. Approximately 150 to 190 homes could be achieved either side of the new link road on approximately 2ha. This northern end is significantly less suitable for retailing as it is further from shops in the main part of the existing town centre and the railway station than the George St end. The existing residential development in this area also lends support to increased housing in a manner which fits well with the surrounding townscape given the conservation area status of part of the land.

7.7 The Cambridgeshire Constabulary buildings and the recent site of the temporary library could become available. Town centre uses, principally office (B1a) use would be acceptable here.

7.8 Live/work units providing accommodation for both residential and suitable business use is an alternative activity envisaged throughout the George St/ Ermine St area.

7.9 Long stay public car parks in Huntingdon located at Riverside and Bridge Place serve the east and south of the town. In order to avoid unnecessary travel on the ring road, a further long stay car park serving the north and west is proposed. The suggested location is land opened up by the West of Town Centre Link Road adjacent to the railway. This would be subject to charges in the same way as other Council car parks.

7.10 Concepts for development of the land are set out on Map 6e 'George Street / Ermine Street - Land Uses' and this will be used to help develop a masterplan for the area. In addition to development, the masterplan will address open space (further discussed under Policy HW8) and a strategic approach to managing surface water using Sustainable Drainage systems (further discussed under Policy HW9).

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011













Existing land uses

Map 6a George Street / Ermine Street - Existing Land Uses





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Map 6b George Street / Ermine Street - Townscape Analysis



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Map 6d George Street / Ermine Street - Land Parcels

The potential land parcels are defined by both the routes of the proposed link road and the potential for improved and additional cycle and pedestrian routes.

This then allows for the creation of defined 'perimeter blocks' within which built form and open space can be designed.





Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011



Map 6e George Street / Ermine Street - Land Uses





Hinchingbrooke Community Campus

7.11 West of the railway line there are opportunities to enhance the 'community campus' character that has developed with the institutional uses on the former Hinchingbrooke Estate and make the best use of land that is available for redevelopment in that location.

Policy HW 5

Sites west of the railway and in the Hinchingbrooke area will be developed in accordance with a masterplan using the concepts in Map 7d 'Hinchingbrooke Community Campus - Land Use Proposals' for the following uses:

- a. 1.1ha of land between the site of the proposed Huntingdonshire Regional College and Views Common will be redeveloped for office uses (B1a).
- b. 1.9ha of land west of the Railway will be redeveloped for office uses (B1a). Noise mitigation measures will be incorporated recognising the location adjacent to the railway line.
- c. Land that currently has permission for the relocation of Huntingdonshire Regional College and the permission for the Water Tower conversion will be considered for employment uses (B1a and/or B1b) or non-residential institutional uses (D1) should alternative uses be sought instead of implementing these permissions.

Proposals must be set in landscaped grounds that reflect the context provided by Views Common, the historic parkland setting of Hinchingbrooke House and the aims of enhancing the 'community campus' identity.

7.12 New activities in this location must fit in with the character of the surrounding open space and existing institutional uses, and reinforce the strong 'community campus' identity for the area.

7.13 Land owned by the Cambridgeshire Constabulary north east of the approved Regional College is allocated for employment uses. This Police Headquarters land would need to be redeveloped having regard to the protected trees on it. Innovative, knowledge-based businesses or an innovation centre with a flexible range of units

available offering space for businesses to grow may be suitable uses. All this Constabulary land will require an appropriate road access, having regard to the previously proposed plans associated with the A14 improvements, the Government's proposed study on the A14, and any further proposals in respect of enhanced access around Huntingdon.

7.14 The Water Tower west of the railway near Brampton Road has planning permission for redevelopment for office use. Should alternative development be sought, office or institutional use may be possible. Particular regard will need to be given to the retention of significant trees on the site. The 1.9ha site in the same ownership west of the railway is considered suitable for office use in the longer term. This site will present an interesting design challenge with development needing to respond to the constraints upon the area including road access, noise from the railway, and the relationship with the open environment of Views Common adjoining the site. A single point of access as currently exists for both the Water Tower and this 1.9ha site is envisaged.

7.15 The Huntingdonshire Regional College has planning permission for development of a new further educational facility on part of the Police Headquarters land. Relocation of the college from its current Huntingdon location is dependent on funding. Should this relocation not go ahead, the policy identifies suitable alternative development for employment or institutional uses.

7.16 The Hinchingbrooke Health Care NHS Trust has advised that there is a possibility that some of the hospital land will become available for alternative uses if there is a reduction in activity at the hospital or there is related redevelopment, such as concentrating car parking in a decked car park structure. As there are no precise proposals or timeframes, no land is allocated in this plan. Office use or other institutional uses such as a general practitioner's surgery or a community facility may be suitable should land be identified and a planning application made.

7.17 A masterplan is proposed to be prepared to direct development and safeguard the important features of the area.

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Map 7a Hinchingbrooke Community Campus - Existing Land Uses

The area is dominated by the existing large institutional uses of Hinchingbrooke Hospital, Hinchingbrooke School the Cambridgeshire Police Headquarters and the Fire Service

Residential

Open space

Woodland

Railway station

Institutional uses



22

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Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011



Map 7c Hinchingbrooke Community Campus - Planning Constraints

As this area is mostly sited within the grounds of the former Hinchingbrooke House, there are a substantial number of tree protection orders in the vicinity. The conservation area has also been extended.



Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011



8 Healthy and Green

Objective 3

To facilitate healthy and active lifestyles by contributing to a network of improved and new high quality green spaces which link to strategic green spaces and routes around the area including an improved Hinchingbrooke Country Park and Views Common.

Hinchingbrooke Country Park

8.1 There is considerable potential to improve and extend the Hinchingbrooke Country Park to provide a better experience for increasing numbers of visitors and to encourage wildlife.

Policy HW 6

The Council will work with adjoining landowners to pursue extension of Hinchingbrooke Country Park to include some or all of the land identified on Map 8 'Hinchingbrooke Country Park' in order to enhance the facilities of the park and to provide for biodiversity and visitors.

8.2 Hinchingbrooke Country Park consists of 70 hectares (170 acres) of woodland, meadows and lakes together with a number of facilities. The Council will seek to add land to the Country Park to provide for additional recreational activities and support improved biodiversity. Such land could be leased or purchased. The existing route around the eastern lake provides a loop that would ideally be replicated by paths around the western part. This could be achieved in stages with initial paths leading to bird hides enabling people to view the wildlife. Country Park management of the island within the western lake would enable the lake to become a better habitat. The allocated land is currently farmed and is largely within the floodplain. Adding land to the Country Park which is currently within floodplain will ensure that the land is not

used for an incompatible use. The Country Park will need to have flood management practices in place. Low-key recreational use is expected given the potential for flooding.

8.3 There is a significant demand for car parking during events at the Country Park. Leasing or purchasing adjoining land near Huntingdon Rd could provide for an additional car park. A permanent car park located along Huntingdon Road will be pursued in order to cater for increased visitor numbers and avoid the need for all visitors arriving by car to use Hinchingbrooke Park Road.

8.4 It is anticipated that there will be no major development along the Thrapston Rd / Huntingdon Rd border which will help to maintain the rural outlook of the Country Park.

Healthy and Green 8

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011



Map 8 Hinchingbrooke Country Park

8 Healthy and Green

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

Views Common

8.5 Views Common will be significantly changed if the A14 viaduct is removed and a new local road is constructed across it, as was proposed in the 2009 Draft Orders. Removal of the viaduct and its associated embankment, subject to the outcome of the proposed study, would enable the partial restoration of the historic form of the Common. There is also potential to improve this open space with additional public access.

Policy HW 7

Views Common will remain as a significant open space and, subject to the outcome of the proposed study, if the A14 viaduct and embankment is to be removed, it will be added to by reinstatement of that land. The Council will work with the owners to enhance public access across the Common.

8.6 Views Common is an important area of historic open space which is home to a variety of flora. It forms part of a green corridor from the River Great Ouse through to Hinchingbrooke Country Park and beyond. Archaeological remains and habitats supporting wildlife will need to be safeguarded in any development works.

8.7 The Department of Transport's study into the A14 will need to consider whether the viaduct over the railway will be removed and consequently the embankment removed and part of the historic Views Common reinstated. Given the potential for this, the area of the embankment is allocated for open space and it is envisaged that the embankment would be levelled to provide useful open space. Should the viaduct be removed, additional road access may be required for re-routed traffic. Once the outcome of the study is known, the Council will be in a position to identify the potential for additional links and enhancements having regard to the intrinsic landscape and biodiversity values of the Common.

Other Open Space and Play Areas

8.8 Open space and play areas are valuable community resources which can promote healthy lifestyles and help foster community pride.

8.9 There are some small public open spaces and play areas in the Hinchingbrooke area, together with other open spaces such as the Hinchingbrooke School playing fields. The George St/ Ermine St area currently has no public open space and with large scale redevelopment there are opportunities to create new open and play space and complete a missing part in an otherwise continuous green corridor through the town. Green spaces such as these will be delivered in accordance with the Development Management DPD.

Policy HW 8

Existing open spaces will be maintained and enhanced and further open space, where possible linking to the strategic open space network around Huntingdon will be provided with future development.

8.10 There are opportunities to create a continuous green corridor from the waterfront at Riverside Park, through Mill Common, Views Common, and Hinchingbrooke Country Park with links to the countryside and strategic green spaces defined in the 2006 Green Infrastructure Strategy and the emerging review of this strategy due to be completed during 2011.

8.11 Two large mixed use developments in the George St/ Ermine St area will create a need for additional open space, for example play areas for children occupying new housing. There is the opportunity in these areas to link open space to the surrounding area by creating the missing links.

8.12 The re-opening of Handcroft lane as a green corridor will re-create not only an important historic feature but also an important desire line between the town centre and Views Common with access under the railway. Other potential links should feed into this corridor.

8.13 One particular opportunity for greening the area is associated with Barracks Brook. Barracks Brook currently flows through the Ferrars Road area mostly in an underground culvert. This area is subject to a flood probability of 1 in 1000 years known as Flood Zone 2. Any new buildings should be set back from the watercourse and the opportunity could be taken to open up the stream and create a natural feature in this area. Developers will be expected to liaise with the Alconbury and Ellington

Healthy and Green 8

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

Internal Drainage Board and the Environment Agency to assess the feasibility of whether the stream should be opened up as part of a new green linkage. Opening up the culvert within Huntingdon West in conjunction with development could contribute to the natural environment and create a new green linkage as well as create a natural and distinctive focus to this part of the town.

8.14 Portholme lies beyond Mill Common and is a gateway to the Ouse valley. It is an alluvial flood meadow recognised as a Special Area for Conservation (SAC) and is subject to the Habitats Directive in European legislation. Assessment of the area action plan on this area, and other European sites further afield has been undertaken in accordance with the Habitat Regulations. The assessment predicted effects on Portholme relating to recreational disturbance, water abstraction and water pollution. Recommendations for the avoidance and mitigation of effects have been incorporated into this plan.

9 High Quality Environment

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

9 High Quality Environment

Objective 4

To ensure that new development is complementary to the existing natural and historic environment and is of a high quality and a sustainable design.

Design

9.1 Good design, arising from a thorough understanding of place and context, is important in creating environments that contribute to people's well-being. Good design leads to sustainable, high quality, and attractive places.

Policy HW 9

In areas allocated for development, proposals must demonstrate a high standard of design and show how an attractive environment has been created. Proposals must also provide evidence as to how the principles contained within the relevant design guidance documents and plans contained in this document have been adhered to, and in particular how any proposal has:

- 1. Protected the area's heritage by having regard to Conservation Area status and the setting of any listed buildings
- 2. Created a sense of coherence and distinctiveness to the area
- 3. Respected the topography and scale of neighbouring developments
- 4. Used appropriate materials
- 5. Retained existing mature trees and promoted biodiversity
- 6. Utilised Sustainable Drainage techniques
- 7. Enabled ease of movement through the area, particularly by walking and cycling

9.2 Development should be distinctive, respecting the existing context and environment in which Huntingdon West sits. There are areas of mature trees and landscaping throughout Huntingdon West which will have a significant effect on the design and setting of development. The Huntingdon Conservation Area which includes much of the George St/ Ermine St area, the Railway Station, Views Common and some of the Hinchingbrooke area including the 'historic core' of Hinchingbrooke House and gatehouse is particularly important.

9.3 In those areas outside of the Conservation Area, development will still need to be of a high standard of design and contribute positively to the environment without harming the setting of the Conservation Area, but there may be more flexibility to incorporate design of a different scale and form. Additional residential development in the George St/ Ermine St area must relate to the existing residential neighbourhoods in terms of scale and massing.

9.4 Barracks Brook, which runs through the northern part of the George St/ Ermine St area is currently mostly culverted. Prior to entering Huntingdon West there are already flood retention measures in place in Stukeley Meadows. The Brook flows from Huntingdon West around the ring road to the River Great Ouse at Riverside. A Sustainable Drainage system to manage surface water would help maintain surface water quality, reduce flood risk and create high amenity public open space that supports biodiversity.

9.5 Developments should have regard to neighbouring developments, existing rights of way, and lines of desirable movement, in order to ensure that it becomes easier to move around and through the area.

10 Infrastructure, Phasing and Implementation

Objective 5

To provide necessary infrastructure, using contributions from developers where appropriate, and to phase development to occur in conjunction with major road infrastructure provision.

Infrastructure

10.1 The District Council, together with the County Council and the government are already engaged in providing necessary infrastructure to support development in Huntingdon West. Developers will also be expected to contribute to necessary infrastructure. The District Council has obtained funding to part support the delivery of the West of Town Centre Link Road. The previously proposed changes to the A14, which were to cost £1.4 billion, were withdrawn in the government's spending review in October 2010, but the Department for Transport has committed to a study and has indicated that the private sector may be involved in developing schemes to tackle problems in the A14 corridor.

Policy HW 10

Contributions from development towards infrastructure in the Huntingdon West area will be expected in particular to assist appropriately in the delivery of:

- a. Planned roads
- b. Public transport
- c. Public car parking
- d. Public access improvements, particularly pedestrian and cycle routes
- e. Improvements to Hinchingbrooke Country Park and other open space
- f. Utilities infrastructure and renewable energy

- g. Education
- h. Any other requirement as set out in Policy CS10 of the Core Strategy

More detail on the contributions is set out in Appendix 1 'Infrastructure Requirements'.

10.2 Development proposals will be expected to provide or contribute towards the cost of providing appropriate infrastructure, and of meeting social and environmental requirements, where these are necessary to make the development acceptable in planning terms. Contributions may also be required to meet the management and maintenance of services and facilities provided through any obligation. Specific requirements are set out in this area action plan in addition to other requirements dealt with by other development plan documents.

10.3 The government has published proposals for the establishment of a Community Infrastructure Levy (CIL) which could be applied in future.

Phasing and Implementation

10.4 Producing an area action plan for Huntingdon West is urgently needed to manage and coordinate piecemeal change that has been occurring and the further change that will occur.

Policy HW 11

The timing of the development in the George St/ Ermine St area will be determined by the completion of the link road, the demolition of redundant buildings and treatment of contamination.

Elsewhere where it is considered that there is potential for a proposal to affect the A14 a transport assessment will be required to demonstrate that there will be 'nil detriment' to traffic flows on the A14 in accordance with the current Highways Agency policy position.

10 Infrastructure, Phasing and Implementation

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Retail development in the George St/ Ermine St area will be dependent on the proposals being complementary to plans for the town centre in terms of the mix of retail activity and that the selected sites are appropriate in urban design terms and can demonstrate that they are well connected to the town centre.

Further detail on phasing is set out in Appendix 2 'Potential Phasing'.

10.5 The effects of the recession are likely to result in slower rates of development in Huntingdon West than anticipated when the area action plan was being drawn up. However, key road infrastructure works are publicly funded and these are progressing albeit with revised timeframes. Some office development may not be viable in the short term and is likely to need more favourable market conditions.

10.6 Permission for the proposed Link Road through the George Street/ Ermine Street Area has been granted and the road is planned for completion in 2013. The development of this area needs to take place in a comprehensive fashion and be accessed from the link road. Although it may be possible for some development to commence prior to the opening of the whole link road, any schemes advanced before completion of the road cannot undermine the delivery of the road or associated infrastructure.

10.7 Developers in the George St/ Ermine St area are expected to investigate land for contamination and ensure that any required remediation takes place. Given the large areas of hardstanding, and the need for decontamination, there is also the need to ensure that waste is appropriately dealt with.

10.8 The timing of retail development has to have regard to plans for Huntingdon town centre, in particular the Chequers Court redevelopment. Retail development proposals must demonstrate that they are complementary to proposals for the existing town centre thus ensuring its continued vitality and viability. In urban design terms, the selected sites must be presented as part of a coherent strategy in relation to the redevelopment of the area as a whole. Buildings will need to be well designed and integrated, with car parking and service areas effectively incorporated into the townscape. Attractive new areas of public realm that generate activity and create positive streetscapes are essential. In addition, routes and accesses should be established or enhanced to link shops in the area with the rest of the town centre and further afield.

Monitoring 11

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

11 Monitoring

11.1 The Council produces an Annual Monitoring Report (AMR) in accordance with the Planning and Compulsory Purchase Act 2004. The AMR assesses performance against indicators, which are linked with spatial objectives from the Core Strategy as

well as sustainability appraisal objectives and other adopted policies. If, as a result of monitoring, areas are identified where a policy is not working, or key policy targets are not being met, this may give rise to a review of the area action plan.

11.2 The following table shows how policies in the area action plan will be monitored by indicators and the targets that are sought in relation to those indicators.

Policy	Indicators	Indicator Type	Targets	Responsible Agencies
HW1, HW10	Completion of WOTC Link Road	Local output (S106 and MTTS report)	CPO for WOTC Link Road complete by Dec 2011 Construction of WOTC Link Road by Dec 2013	Huntingdonshire District Council, Private Sector, Cambridgeshire County Council
HW1	Completion of new A14 and associated works	Local output	Study to identify cost effective and practical proposals for the A14 completed in accordance with government timeframes	Highways Agency
HW2	Additional pedestrian and cycle paths included in the Market Town Transport Strategy	Local output (MTTS report)	Market Town Transport Strategy reviewed within 12 months of outcome of A14 study	Huntingdonshire District Council, Cambridgeshire County Council
HW2, HW4, HW10	Additional pedestrian and cycle paths created within the AAP area	Local output (S106 report)	Link from Ferrars Road through Handscroft Lane created with development by Dec 2020	Private Sector
HW2, HW4, HW10	Additional pedestrian and cycle paths created within the AAP area	Local output (MTTS report)	Additional crossing points on ring road created after WOTC Link Road and additional development by Dec 2020	Huntingdonshire District Council, Private sector
HW2, HW6, HW7, HW10	Additional pedestrian and cycle paths created within the AAP area	Local output (Management Plan reports)	Additional public access around Hinchingbrooke Country Park and Views Common created as funding becomes available by Dec 2026	Private Sector, Huntingdonshire District Council, Cambridgeshire County Council
HW2, HW3, HW4, HW10	Additional pedestrian and cycle paths created within the AAP area	Local output (S106 and MTTS report)	Additional and diverted links north and south of George Street created with development by Dec 2020	Private Sector, Huntingdonshire District Council, Cambridgeshire County Council
HW2, HW3, HW4,	Additional pedestrian and cycle paths created within the AAP area	Local output (S106 and MTTS report)	Cycle and pedestrian bridge across railway if needed created with development by Dec 2026	Private Sector, Huntingdonshire District Council, Cambridgeshire County Council

11 Monitoring

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

Policy	Indicators	Indicator Type	Targets	Responsible Agencies
HW10				
HW3	High satisfaction with Huntingdon railway station	Local Output – specific to AAP (MTTS report and 5 yr survey)	More than 75% satisfied and more than 50% highly satisfied in survey	Network Rail, First Capital Connect, Cambridgeshire County Council, Huntingdonshire District Council
HW4, HW9	Completion of a masterplan for George St/ Ermine St area	Local Output – specific to AAP	Adoption of masterplan by Dec 2013	Huntingdonshire District Council, Private Sector, Cambridgeshire County Council, Internal Drainage Board
HW4	Completed retail, and leisure development (gross and net internal floorspace in m ² A1, A2, D2)	Core Output	4,000m ² gross retail by Dec 2020	Private Sector
HW4	Completed employment development (gross and net floorspace in m ² B1a, B1b, B2, B8)	Core Output	2,000m ² gross employment by Dec 2026	Private Sector
HW4	Completed floorspace for other use class (net internal floorspace in m ² A3, A4, C1, C2, D1, sui generis)	Core Output	No specific target	Private Sector
HW4	New dwellings on previously developed land	Core Output	170 dwellings by Dec 2020	Private Sector
HW4	Affordable housing completions	Core Output	40% on proposals of 15 or more homes or 0.5ha or more	Private Sector, Registered Social Landlords
HW4, HW8, HW10	Additional public open space (m ²)	Local Output	Open space near George St and near Handscroft Lane with development by Dec 2020	Private Sector
HW4, HW10	Additional public car parking	Local Output (MTTS report)	Public car park to west of Huntingdon by Dec 2020	Huntingdonshire District Council, Private Sector
HW5, HW9	Completion of a masterplan for Hinchingbrooke area	Local Output – specific to AAP	Adoption of masterplan by Council by Dec 2016	Huntingdonshire District Council, Private Sector, Cambridgeshire County Council

Monitoring 11

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

Policy	Indicators	Indicator Type	Targets	Responsible Agencies
HW5	Completed employment development (gross and net floorspace in m ² B1a, B1b, B2, B8)	Core Output	3000m ² gross by Dec 2020 5000m ² gross by Dec 2026	Private Sector
HW6, HW10	Extension to Hinchingbrooke Country Park	Local Output – specific to AAP	Lease or purchase of all additional land identified by Dec 2026	Huntingdonshire District Council, Private Sector, Cambridgeshire County Council
HW6, HW10	Enhanced facilities in Country Park	Local Output	Additional car parking for 250 cars provided by Dec 2020	Huntingdonshire District Council, Private Sector
HW6	High satisfaction with Country Park	Local Output (Management Info + 5 yr Survey)	More than 75% satisfied and more than 50% highly satisfied in survey	Huntingdonshire District Council
HW7	Reinstatement of land to Views Common	Local Output	Land added after removal of viaduct	Highways Agency
HW8, HW10	Additional public open space (m ²)	Local Output (S106 report)	Open space created as required by development	Private Sector
HW9	Number and percentage of housing sites (10+ dwellings) with a Building for Life assessment of less than 10, 10-13, 14-15 and 16+	Core Output (Survey)	Sites to achieve a minimum score of 10	Private Sector, Registered Social Landlords
HW9	High quality developments	Local Output (5 yr Survey)	More than 75% rate quality good and more than 50% rate quality high in survey	Private Sector, Registered Social Landlords
HW10	Amount of contributions towards infrastructure	Local Output (S106 report)	Infrastructure set out in Appendix 1 to AAP provided	Private Sector, Huntingdonshire District Council
HW11	Plan implemented within timeframes	Local Output	Timeframes set out in Appendix 2 to AAP met	Huntingdonshire District Council, Private Sector, Cambridgeshire County Council, Highways Agency

Appendix 1 Infrastructure Requirements

Proposals Associated with A14

1.1 The Government announced in October 2010 that it will undertake a study to identify cost effective and practical proposals to improve the A14. Funding is expected from Government but the approach from Government will also provide an opportunity for the private sector to play its part in developing schemes to tackle existing problems in the corridor.

1.2 It is envisaged that some development will go ahead in advance of the completion of the study and the road network changes it may bring, and provided this is not significant in scale, the impact on the A14 is likely to be negligible. A transport assessment will be required to demonstrate that there will be 'nil detriment' to traffic flows on the A14 in accordance with the current Highways Agency policy position.

West of Town Centre Link Road

1.3 Huntingdonshire District Council has obtained housing growth funding to part fund the creation of the new Link Road between George Street/Brampton Road and Ermine Street which has obtained planning permission.

1.4 Normally developers would be expected to pay for the complete road provision, but as it will be part-funded separately, some level of contributions from developers could be allocated to other infrastructure requirements.

Additional Hinchingbrooke Link Road

1.5 A further road link in Hinchingbrooke either through the Hinchingbrooke Business Park or across Views Common will be investigated if appropriate following the Department of Transport's study into the future of the A14. Delivery of the link would be dependent on funding coming forward.

Buses

1.6 The Cambridgeshire Guided Busway is expected to be completed prior to the implementation of this area action plan. The Busway will run from Cambridge to St Ives with on-street sections and bus priority measures through to Huntingdon. This

will include linkage to Huntingdon Town Centre including the bus station and the railway station. George Street and Brampton Road are key elements of that on-street route to provide integration with Huntingdon West. In accordance with the approved Market Town Transport Strategy (MTTS) and any subsequent review of the strategy relating to public transport measures, this strategy will be used to secure contributions from developments within Huntingdon West towards the measures contained in that strategy.

1.7 Within the timeframe of the area action plan, the MTTS will be reviewed and it is likely that a review of the MTTS will investigate a revised set of public transport initiatives themselves linked to the development scenarios contained within the Core Strategy and the Are Action Plan. On the basis of the measures contained in the MTTS, it will be that strategy that will be used to secure developer contributions.

Railway Station

1.8 Continued work will take place to secure more bus services and improved accessibility at the dedicated interchange with the rail station. Additionally, improved information, including Real Time provision, will be sought.

1.9 Additional car parking to serve the railway station may be proposed privately or through Network Rail and First Capital Connect.

Public Car Parking

1.10 Additional public car parking is envisaged on land adjoining the West of Town Centre Link Road as shown on Map 6e 'George Street / Ermine Street - Land Uses'. The land will need to be secured by the Council and contributions from developers are expected to contribute to the costs of providing this additional public car parking. The cost will include land acquisition plus design and construction costs. Ongoing costs are expected to be met through the application of car parking charges in line with elsewhere in the town.

Pedestrians and Cyclists

1.11 Additional pedestrian and cycle linkages are proposed, as shown on Map 4 'Pedestrian and Cycle Links'. Developers are expected to contribute to the costs of establishing these routes. A number of these routes are already detailed in the

Huntingdon & Godmanchester Market Town Transport Strategy (MTTS) and creating additional paths will help to complete these routes. In addition an improved linkage between Hinchingbrooke Business Park across Views Common is envisaged and a separate pedestrian/cycle bridge across the railway is to be investigated. Further pedestrian routes within an expanded Hinchingbrooke Country Park would also be expected.

Hinchingbrooke Country Park

1.12 Appropriate contributions from developers in the wider Huntingdon area are expected to improve Hinchingbrooke Country Park as follows:

- 1. Lease or purchase of additional land for the Country Park
- 2. Lease or purchase of land for an overflow car park near Huntingdon Road
- 3. Improvements to the existing car park
- 4. Improvement to the countryside centre including renewable energy (such as a wind turbine), insulation and maintenance
- 5. CCTV and Lighting
- 6. Interpretation boards, waymarking signs and leaflets
- 7. Play and recreation facilities
- 8. Café improvements
- 9. New toilet block
- 10. Footpath / Cyclepath / Bridleway improvements (including those which form part of the existing Rights of Way Network) and cycle facilities
- 11. Ranger staff time

1.13 There is a need for additional land for recreation and for an overflow car park. Additional and/or improved car parking in the existing car park could help to increase capacity beyond the current 80 spaces. Improvements to the access road could also aid access and egress from the car park but careful design would be needed to ensure the retention of trees.

1.14 The countryside education centre is used as a community facility for the area but its opening hours are currently very limited. Improvements to insulation and the heating system, perhaps provided by a sustainable energy source such as a wind turbine, will enable the centre to have greater usage over the winter months. With the increase in visitor numbers and the extended hours of usage, additional lighting and

CCTV coverage may also be needed. The visitors centre could also be further improved following the recent café extensions. An additional toilet block will also be needed to meet additional demand.

1.15 Improvements to the unsurfaced footpath network will increase the overall carrying capacity of the Park and enhance facilities for those with disabilities. A bridge over the Alconbury Brook for pedestrians and cyclists will allow a further circular path network to be expanded, together within improving access to the wider countryside. Facilities for play and recreation such as young children's play equipment and older children's outdoor gym equipment, together with additional seating and barbeque areas will cater for a wide age range of users. Interpretation boards, waymarking signs, bird hides and Ranger staff could also be used to inform visitors about the features of the Park and encourage appropriate recreational activity.

Other Open Space and Contributions towards Leisure and Sports Facilities

1.16 Additional areas of open space are proposed in the George St/ Ermine St area as shown on Map 6e 'George Street / Ermine Street - Land Uses'. These areas are expected to be provided by developers as part of the mixed use developments envisaged in those locations. The Council may adopt these spaces subject to appropriate management funds being provided by the developer. Other contributions may also be required in accordance with adopted local standards and pooled for the creation or improvement of sports facilities to serve Huntingdon and for the development of the Great Fen Project.

Utilities

1.17 Utilities such as water, electricity and gas may need to be upgraded as a result of new development. Developers will be expected to create high quality developments in accordance with the standards such as the Code for Sustainable Homes in order to limit the pressure on existing resources. Contributions may be required to facilitate renewable energy, including off-site renewables created through partnerships using pooled funds.

Education

1.18 Existing education provision will be affected by new housing. Based on current Cambridgeshire County Council calculations a range of possible requirements is identified as follows:

Table 1 Requirements for New School Places

Policies	New Homes	New Primary places required	New Secondary places required
George St/ Ermine St			
Lower estimate	170	51	34
Higher estimate	230	69	46

1.19 Of the two existing secondary schools, Hinchingbrooke is operating at capacity and is usually oversubscribed in each admissions round. There is some spare capacity currently at St Peters and the scope to expand the school by an additional form of entry (150 pupils). While Huntingdon continues to be served by two secondary schools the County Council's approach will be to provide for growth by utilising the existing spare capacity at St Peter's School and through the potential to expand it by one form of entry. A review of the secondary school catchment areas in Huntingdon may be required to support this approach. A third secondary school is another option the County will consider.

1.20 The size of developments proposed is unlikely to warrant any new primary schools. However, with spare capacity in the existing primary schools diminishing, some expansion of primary school provision will be required. The two closest primary schools (Stukeley Meadows and Cromwell Park) have limited spare capacity and the sites do not lend themselves easily to expansion. The County Council will have to assess the potential for expansion of other school sites in Huntingdon and the contribution that new school sites in the larger housing allocation areas can contribute to increasing capacity in the primary sector.

1.21 Developers are also expected to contribute towards the establishment of child care facilities for 0-4 years old.

Other Contributions

1.22 Policy CS10 of the Core Strategy sets out the contributions to infrastructure that may be required. In addition to the items above, contributions could be required for other items. The Council will be developing further guidance dealing with developer contributions.

1.23 Affordable housing will be sought as set out in Core Strategy policy CS4. The Council currently has a SPD dealing with developer contributions for affordable housing. That SPD will be updated as required.

Appendix 2 Potential Phasing

2.1 In the light of the withdrawal, in October 2010, of the A14 scheme which had been due to be heard at a Public Inquiry in June 2010 it has been necessary to make some changes to this AAP.

2.2 The Government has announced that it will undertake a study to identify cost effective and practical proposals which bring benefits and relieve congestion, looking across modes to ensure they develop sustainable proposals.

2.3 In the event of the study resulting in changes which do not involve removal of the A14 viaduct across the railway and consequent local road changes in this area, the AAP can still largely be implemented and its proposals delivered, save for the employment development proposed on land directly west of the railway identified as Site B on Map 7d which may only be capable of being delivered in a form that responds to the physical constraints arising from the retention of the viaduct.

2.4 If the Link Road was not to proceed there may be the possibility of some small scale development coming forward in parts of the George St/ Ermine St area (though such development would require careful justification to show how it would serve to alleviate traffic flows, open up land for redevelopment opportunities and aid the introduction of measures to reduce the barrier effect of the ring road). The Link Road would be a safeguarded route pending a review of the AAP, which would be likely triggered in this event.

2.5 Pedestrian and cycle links within and adjacent to parcels will be provided as part of development and in tandem with proposals contained within the Huntingdon & Godmanchester MTTS, including any review of that strategy once the outcome of the A14 study is known.

Map 8 'Hinchingbrooke Country Park'

2.6 Hinchingbrooke Country Park can be improved and extended as funds become available throughout the life of the area action plan between 2010 and 2026. Low cost and urgent improvements are expected in the short term. It is anticipated that within a year of the AAP being finalised, some additional land will become accessible to Country Park users through lease arrangements with adjoining landowners delivered

through the Higher Level Stewardship (HLS) or other agri-environment schemes. Land near Huntingdon Rd may be used for car parking for events on a limited number of occasions in the summer months. It is anticipated that within a year of the AAP being finalised, some additional land will become accessible to Country Park users through lease arrangements with adjoining landowners delivered through the Higher Level Stewardship (HLS) or other agri-environment schemes. Land near Huntingdon Rd may be used for car parking for events on a limited number of occasions in the summer months. In the longer term additional land may be leased or purchased as funds become available.

Map 6e 'George Street / Ermine Street - Land Uses' – Parcel I (Public car park proposal)

2.7 It is anticipated that this land would be secured by Huntingdonshire District Council at the same time as land for the West of Town Centre Link Road and so is dependent on funding. Subject to planning approval, it could be formed as a public car park at the same time as the Link Road, possibly as early as 2012, however funding may delay this.

Map 6e 'George Street / Ermine Street - Land Uses' – Parcels A, B, D (Residential land proposals)

2.8 Proposals to redevelop this land could be made pending construction of the West of Town Centre Link Road, anticipated in 2013. The proposals will need to be accompanied by a schedule detailing demolition and decontamination works. Appropriate measures will need to be in place, having consulted with the Environment Agency and the Alconbury and Ellington Drainage Board, regarding Barracks Brook in order to ensure that the risk of flooding is mitigated. Additional open space is anticipated in this area. The anticipated timeframe for development is between 2012 and 2020.

Map 6e 'George Street / Ermine Street - Land Uses' – Parcels G and H (Mixed retail and residential proposal)

2.9 As with the sites above, proposals for this land are dependent on the West of Town Centre Link Road being built, existing buildings demolished and land being decontaminated. Additional open space is also anticipated in this area facing George Street in order to link with Mill Common. An existing pedestrian right of way may need

Appendix 2 Potential Phasing

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

to be moved and a gas main diverted. The timing of development of the Chequers Court area within the town centre, and the effect of retailing in this location on the town centre, will be relevant to applications for retail development on this land as delivery of the Chequers Court redevelopment should not be jeopardised and the town centre must remain vital and viable. The anticipated timeframe for development is between 2012 and 2020.

Map 7d 'Hinchingbrooke Community Campus - Land Use Proposals' – (Site A and site with permission for College)

2.10 Development of these sites requires an appropriate road access, having regard to the previously proposed plans associated with the A14 improvements. The permission for the Huntingdonshire Regional College was granted with conditions allowing for a road to be built by developers to Highways Agency standards anticipating its eventual incorporation as part of the then proposed A14 scheme. Developers would be expected to show how both sites would be served by a new road and liaise with the Highways Agency in respect of further studying options for the upgrading of the A14.

Map 6e 'George Street / Ermine Street - Land Uses' – Parcels C, E and F (Employment and mixed town centre use proposals)

2.11 Development of this land may not be entirely dependent on the West of Town Centre Link Road, but nevertheless is unlikely to come forward in the short term as new buildings are likely to follow the major investment on nearby sites. Parcels C and E are currently in use as the Huntingdon Police Station and there is currently no proposal to bring forward redevelopment. Parcel F was the temporary library and the building could be re-used for employment purposes. In the longer term, anticipated towards the end of the plan period between 2016 and 2026 the sites could be redeveloped with new buildings and activities.

Map 7d 'Hinchingbrooke Community Campus - Land Use Proposals' – (Site B and Water Tower Site with permission for development)

2.12 Part of this land has been operating as a temporary car park since 2009. Employment development would be facilitated by the removal of the viaduct which was part of the now withdrawn scheme for the A14, but it is not necessary for the viaduct to be removed for some development to occur. Such development will need

to respond to the physical constraint of the viaduct and the outcomes of the A14 study, if the viaduct is removed. Joint use of the existing access to Brampton Road is anticipated.

Views Common

2.13 The removal of the embankment on Views Common will be dependent on the delivery of the A14 scheme and the associated removal of the viaduct. The Highways Agency will commence work to remove the existing viaduct and associated infrastructure, including the embankment when the new A14 is complete and open. The removal of materials from the embankment and reinstatement of land will be funded by the A14 project.

Saved Policies to be Superseded Appendix 3

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

Appendix 3 Saved Policies to be Superseded

3.1 This DPD is required to identify those policies from the Huntingdonshire Local Plan 1995 and the Huntindonshire Local Plan Alteration 2002 which are currently saved^(c) that will be superseded by policies contained in this DPD (in line with Regulation 13(5)).

3.2 Due to the district wide coverage of the remaining saved policies and the limited geographic area covered by this DPD none of the saved policies will be superseded by policies contained in this document.

c Those policies the Secretary of State for Communities and Local Government in the exercise of the power conferred by paragraph 1(3) of Schedule 8 to the Planning and Compulsory Act 2004 has directed, for the purposes of the policies specified paragraph 1(2)(a) of Schedule 8 to the Planning and Compulsory Purchase Act 2004 does not apply.

Appendix 4 Proposals Maps

4.1 Huntingdonshire District Council is required to maintain an adopted Proposals Map as part of the Local Development Framework. The Proposals Map shows geographically the adopted policies and proposals of Development Plan Documents. The adopted Proposals Map will be revised each time a new DPD is adopted.

4.2 The current Proposals Map is based on the Proposals Map originally published with the Huntingdonshire Local Plan 1995. It was considered clearer to illustrate designations that are no longer in effect by modifying the Local Plan Proposals Map. The Development Plan also includes saved Minerals and Waste Policies which are illustrated geographically on the Minerals and Waste Saved Policies Proposals Map Insets. These maps are available on the <u>Council's Website</u>.

4.3 The following maps identify the allocations made by the action plan. Please be aware that these maps will only be to scale if printed at 100%.


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Glossary

Adoption

The point at which the final agreed version of a document comes fully into use.

Affordable Housing

Housing available at a significant discount below market levels so as to be affordable to householders who cannot either rent or purchase property that meets their needs on the open market. It can include social-rented housing and intermediate housing. It is defined in Planning Policy Statement 3: 'Housing'.

Amenity

A positive element or elements contributing to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquility.

Annual Monitoring Report (AMR)

Document produced each year to report on progress in producing the *Local Development Framework* and implementing its policies.

Areas of Strategic Green Space Enhancement

Areas which have been identified as having opportunities to expand and create strategic green space.

Biodiversity

The whole variety of life on earth. It includes all species of plants and animals, their genetic variation and the ecosystems of which they are a part.

Brownfield

Previously developed land (PDL). In the sequential approach this is preferable to greenfield land. Previously developed land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings), and associated fixed surface infrastructure. The definition includes the curtilage of the development. Previously developed land may occur in both built-up and rural settings. A precise definition is included in Planning Policy Statement 3 'Housing'.

Community Infrastructure

Facilities available for use by the community that provide for the health, welfare, social, educational, leisure, recreational and cultural needs of the community. Examples include village halls, doctors' surgeries, pubs, churches and children's play areas. It may also include areas of informal open space and sports facilities.

Comparison Floorspace

Shops retailing items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.

Compulsory Purchase Order (CPO)

The power given to the Local Authority to acquire land for redevelopment which may include development by private developers.

Conservation Area

A designated area of special architectural and/or historical interest, the character or appearance of which it is desirable to preserve or enhance. It is a recognition of the value of a group of buildings and their surroundings and the need to protect not just individual buildings but the character of the area as a whole.

Convenience Floorspace

Shops retailing everyday essential items, including food, drinks, newspapers/magazines and confectionery.

Core Strategy

The main document in the *Local Development Framework*. It is a *Development Plan Document* containing the overall vision, objectives, strategy and key policies for managing development in Huntingdonshire.

Development Plan

The documents which together provide the main point of reference when considering planning proposals as defined in legislation.

Development Plan Documents

A document containing local planning policies or proposals which form part of the *Development Plan,* which has been subject to independent examination.

European Sites

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

Consist of Special Protection Areas (SPAs), Special Areas of Conservation (SACs), RAMSAR sites and sites on draft lists for protection as outlined in Regulation 10 of the Habitats Regulations 1994.

Examination

Independent inquiry into the soundness of a draft *Development Plan Document* chaired by an Inspector appointed by the Secretary of State, whose recommendations are binding.

Greenfield

Land which has not been developed before. Applies to most sites outside built-up areas.

Green Infrastructure

The network of protected sites, nature reserves, green spaces (including local parks, sports grounds, cemeteries, school grounds, allotments, commons and historic parks and gardens) woodlands (including Ancient Woodlands) and green-way links. It offers opportunities to provide for a number of functions, including recreation and wildlife as well as landscape enhancement.

Green corridors

Linear wildlife and public access corridors that link areas of green infrastructure and green spaces with each other and to settlements, and which also link into the wider countryside.

Green spaces

Publicly accessible spaces, including local parks, sports grounds, cemeteries, school grounds, allotments, commons and historic parks and gardens.

Habitat

The natural home or environment of a plant or animal.

Infrastructure

A collective term for services such as roads, electricity, sewerage, water, education and health facilities.

Local Development Document

The collective term for policy documents that are part of the *LDF*, including *Development Plan Documents, Supplementary Planning Documents* and the *Statement of Community Involvement*.

Local Development Framework (LDF)

The collective term for the group of documents including *Local Development Documents*, the Local Development Scheme and Annual Monitoring Reports.

Local Development Scheme

Sets out the Council's programme for preparing and reviewing *Local Development Documents*.

Mitigation measures

These are measures requested/ carried out in order to limit the damage by a particular development/ activity.

Open Space and Recreational Land

Open space within settlements includes parks, village greens, play areas, sports pitches, undeveloped plots, semi-natural areas and substantial private gardens. Outside built-up areas this includes parks, sports pitches and allotments.

Planning Policy Guidance Notes (PPG)/ Planning Policy Statements (PPS)

Central Government produce Planning Policy Guidance Notes, to be replaced by Planning Policy Statements which direct planning in the country.

Previously Developed Land (PDL)

(See definition for Brownfield)

Regional Spatial Strategies (RSS)

Plan covering the East of England as a whole, and setting out strategic policies and proposals for managing land-use change.

Registered Social Landlords

These are independent housing organisations registered with the Housing Corporation under the Housing Act 1996. Most are housing associations, but there are also trusts, co-operatives and companies.

Huntingdonshire LDF | Huntingdon West Area Action Plan: Adopted 2011

Sequential Approach

A planning principle that seeks to identify, allocate or develop certain types or locations of land before others. For example, brownfield sites before greenfield sites, or town centre retail sites before out-of-centre sites. In terms of employment a sequential approach would favour an employment use over mixed use and mixed use over non-employment uses.

Social rented

Social Rented Housing is housing available to rent at below market levels. Lower rents are possible because the Government subsidises local authorities and registered social landlords in order to meet local affordable housing needs.

Spatial Planning

Spatial planning goes beyond traditional land use planning. It brings together and integrates policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. This will include policies which can impact on land use, for example, by influencing the demands on or needs for development, but which are not capable of being delivered solely or mainly through the granting of planning permission and may be delivered through other means.

Stakeholders

Groups, individuals or organisations which may be affected by or have a key interest in a development proposal or planning policy. They may often be experts in their field or represent the views of many people.

Statement of Community Involvement

Document setting out the Council's approach to involving the community in preparing planning documents and making significant development control decisions.

Statement of Compliance

A report or statement issued by the local planning authority explaining how they have complied with the Town and Country Planning Regulations 2004 and their Statement of Community Involvement during consultation on Local Development Documents.

Statutory Development Plan

The Development Plan for an area which has been taken to statutory adoption. In other words, it has been through all the formal stages and has been approved by the relevant Government office and adopted by the Council.

Statutory Organisations

Organisations the Local Authority has to consult with at consultation stages of the Local Development Framework.

Strategic Green Space

These are areas of green space that serve a wider population than just the District, for example Paxton Pits and The Great Fen.

Submission

Point at which a draft *Development Plan Document* (or the draft *Statement of Community Involvement*) is submitted to the Secretary of State for examination.

Supplementary Planning Documents

Provides additional guidance on the interpretation or application of policies and proposals in a *Development Plan Document*.

Sustainable Development

In broad terms this means development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The Government has set out five guiding principles for sustainable development in its strategy "Securing the future - UK Government strategy for sustainable development". The five guiding principles, to be achieved simultaneously, are: Living within environmental limits; Ensuring a strong healthy and just society; Achieving a sustainable economy; Promoting good governance; and Using sound science responsibly.

Sustainable Drainage System

Previously known as Sustainable Urban Drainage Systems, these cover a range of approaches to surface water drainage management including source control measures such as rainwater recycling and drainage, infiltration devices to allow water to soak into the ground, vegetated features that hold and drain water downhill mimicking natural drainage patterns, filter drains and porous pavements to allow rainwater and

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run-off to infiltrate into permeable material below ground and provide storage if needed and basins and ponds to hold excess water after rain and allow controlled discharge that avoids flooding.

Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA)

The Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development. Sustainability appraisal is a systematic appraisal process. The purpose of sustainability appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document from the outset of the preparation process. This will ensure that decisions are made that accord with sustainable principles.

Tenure

Refers to the way in which a property is held e.g. freehold, leasehold, shared equity or rented.

Use Class Orders

Planning regulations outlining a schedule of uses to which a given premises or building can be put. Some changes of use require planning permission.

Vitality and Viability

In terms of retailing, vitality is the capacity of a centre to grow or to develop its level of commercial activity. Viability is the capacity of a centre to achieve the commercial success necessary to sustain the existence of the centre.

Zero carbon building

A building with net carbon emissions of zero over a typical year. This can be measured in different ways relating to cost, energy or carbon emissions. Reference should be made to the national Code for Sustainable Homes.

Appendix 3: RAF Brampton Urban Design Framework









RAF BRAMPTON DRAFT URBAN DESIGN FRAMEWORK

DECEMBER 2011



Contents

1.	Introduction
1.1	Purpose of the Urban Design Framework
1.2	The Site
1.3	Brampton
1.4	The Core Strategy and Growth
1.5	What will the Development Provide?
1.6	What are the Development Timescales?
1.7	What will the Impacts be on Brampton?
1.8	Process

- 2. The Site
- 2.1 Site Context
- 2.2 Land Ownership
- 2.3 Historic Context
- 2.4 The Site Character Areas
- 2.5 Planning Constraints and Opportunities
- 2.6 Planning History
- 3. Urban Design Objectives and Principles
- 3.1 Urban Design Objectives
- 3.2 Place Making Principles

4.	Development of Urban Design Objectives and Design Guidance
4.1	Part 1. Broad Concept
4.2	Part 2. Detailed Development Guidance
4.3	Land Uses
4.4	Form of Development
4.5	Integration and Movement
16	Sustainability

- 4.6 Sustainability
- 4.7 Section 106 and Community Infrastructure Levy
- 4.8 Implementation
- 5. Useful Information

List of Maps

- Map 1 Proximity to Huntingdon and Cambridge
- Map 2 Local Facilities
- Map 3 Core Strategy Key Diagram
- Map 4 Site Context
- Map 5 Land Ownership
- Map 6 1880 Map
- Map 7 1970 Map
- Map 8 Aerial photograph showing existing tree coverage
- Map 9 Strategic Flood Risk Assessment Flood Map
- Map 10 Brampton Conservation Area
- Map 11 Location of Listed Buildings and Historic Walls
- Map 12 Bus Services between Huntingdon and St Neots
- Map 13 Street Names and Speed Limits
- Map 14 Preferred Option
- Map 15 Land Uses
- Map 16 Urban Structure and Urban Grain
- Map 17 Employment, Shops and Community Facilities
- Map 18 Open Space
- Map 18A 1924 Map of Walled Garden to Brampton Park House
- Map 18B Strategic Green Infrastructure Close to the Site
- Map 19 Capacity Study
- Map 19A Alternative Capacity Study

Map 19B Alternative capacity Study Map 19C Alternative Capacity Study Potential Locations for Infill on Annington Homes Estate Map 20 Map 21 Density **Building Heights** Map 22 Map 23 Character Areas Landmark and Key Buildings and Key Views Map 24 Key Areas of Public Realm Map 25 Principal Road Junctions and Preferred Bus Route Map 26 Cycle and Pedestrian Routes Map 27 Map 28 Street Hierarchy

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1. INTRODUCTION

1.1 Purpose of the Urban Design Framework | 1.2 The Site | 1.3 Brampton | 1.4 The Core Strategy and Growth

1.5 What will the Development Provide? | 1.6 What are the Development Timescales? | 1.7 What will the Impacts be on Brampton?

1.8 Process

1.1 Purpose of the Urban Design Framework

1.1.1 The Royal Air Force has decided to vacate the RAF Brampton base and relocate at RAF Wyton. The purpose of the Urban Design Framework (UDF) is to describe the main planning and design factors and requirements that developers must address in delivering a sustainable mixed-use development within the vacated RAF Brampton site. It reflects wider visual and landscape considerations as well as site specific opportunities and constraints. The framework will be a material consideration when determining any future planning applications on the site.

1.2 The Site

- **1.2.1** RAF Brampton is located on the southern edge of Brampton. Brampton has good service provision including a primary school, a number of shops and two community centres. The village has a close physical and functional relationship with Huntingdon.
- **1.2.2** There are good main road transport links to St Neots, Bedford and Peterborough via the A1 and Cambridge via the A14. Brampton falls within the sphere of Cambridge's economic influence; Cambridge is approximately 15 miles to the east and is easily accessible via road.

1.2.3 The site is approximately 1 mile south west of Huntingdon train station which is on the East Coast Mainline (ECML). The ECML provides easy access to London which is only an hour away, and also provides easy access to Peterborough and the north.



Map 1. Proximity to Huntingdon and Cambridge



1.3 Brampton

- 1.3.1 Brampton is centrally located within Huntingdonshire District, close to the town of Huntingdon. The current population is approximately 5,000. Brampton has a long history and is mentioned in the Domesday Book. Since the 1950s the village has grown significantly outside the historic core. Development to the south has largely been in association with the RAF base. The boundaries of the village are clearly defined by existing roads to the north, and drains and ditches along the majority of other boundaries.
- 1.3.2 Brampton is a thriving village with a busy High Street and has numerous clubs and societies. The village has one school, Brampton Village Primary School, formerly separate infants and junior schools which merged in 2007. Secondary provision is close by at Hinchingbrooke School in Huntingdon, with over 1800 pupils. The location of these schools together with other facilities is illustrated on Map 2.

Map 2: Local Facilities



1.4 The Core Strategy and Growth

- 1.4.1 The Huntingdonshire Core Strategy forms the primary context for the redevelopment of RAF Brampton. Adopted in 2009, it sets the strategic framework for development in Huntingdonshire up to 2026. The Core Strategy was prepared in the context of national and regional planning policy prevailing at the time.
- 1.4.2 A vision and objectives are set out in the Core Strategy which forms the basis of how Huntingdonshire will be shaped and how the District will respond to the economic, social and environmental challenges, Promotion of sustainable development, responding to climate change and protecting the character of Huntingdonshire are fundamental to the Core Strategy's vision. One element of the vision is particularly relevant to this site:
- 1.4.3 'Redundant military bases in Huntingdonshire will need careful consideration to ensure that any potential re-use or redevelopment maximises the economic benefit to the District.' (Core Strategy, 2009, p 12).
- 1.4.4 The Core Strategy aims to:
 - Facilitate growth in sustainable locations
 - Support the local economy and provide for local employment needs
 - Conserve and enhance habitats and natural resources

- Promote high quality, distinctive new development
- 1.4.5 A spatial strategy has been developed to guide growth up to 2026 within the context set by the vision and objectives. This identifies how different parts of Huntingdonshire will develop. The Huntingdon Spatial Planning Area (SPA)is defined as one of the two key focal points for growth in the district. It comprises Huntingdon, Brampton and Godmanchester as these three settlements have close physical and functional relationships. The Huntingdon SPA is noted in the Core Strategy as a key driver of the local economy.
- **1.4.6** The Core Strategy was written in the context of PPS12: Local Development Frameworks (2004) which encouraged identification of broad directions of future growth rather than specific sites. Hence, policies CS2 (Strategic Housing Development) and CS7 (Employment Land) both refer to total housing and employment land requirements without pinpointing specific sites. Policy CS2 seeks 1800 additional homes in the Huntingdon SPA by 2026 and policy CS7 seeks an additional 51 ha of employment land in the Huntingdon SPA. These are complemented by a key diagram on which mixed-use development within the built-up area is clearly annotated on the southern part of Brampton.
- 1.4.7 To support the Core Strategy, a draft Development Management Development Plan Document (DPD) has been in use for Development Management purposes since

mid 2010. Together these provide detailed policy guidance for development proposals and any scheme should have regard to them. The Core Strategy principles are being rolled forward into a new Local Plan in the context of the National Planning Policy Framework issued in March 2012.

- 1.4.8 Sustainable development underpins the Core Strategy, as highlighted in policy CS1 (Sustainable Development in Huntingdonshire). The draft Development Management DPD builds on this ethos through more detailed policies, many of which are pertinent to the redevelopment of RAF Brampton. Policies are grouped to provide guidance on different aspects of development and include:
 - Policies that deal with climate change, ensuring development proposals are designed to withstand the predicted impacts of climate change and to minimise future contributions to global warming
 - Policies that address protecting and enhancing the environment; they seek to concentrate development in existing builtup areas, to protect heritage and natural assets and to promote sustainable modes of travel
 - Policies that focus on delivering housing that contributes to sustainable, inclusive communities and meet the needs of all members of society whilst responding to its local context



- Policies that concentrate on supporting prosperous communities; which aim to contribute towards the delivery of 13,000 new jobs in Huntingdonshire by 2026; to diversify local job opportunities and reduce the level of out-commuting
- Policies that tackle contributing to successful development; and promote the delivery of infrastructure alongside growth which is essential to building sustainable communities with adequate physical, recreational and social services to promote a high quality of life
- 1.4.9 The new Huntingdonshire Local Plan to 2036 is now under preparartion. This will allocate specific pieces of land for development for particular uses. This will be informed by a range of evidence including the Strategic Housing Land Availability Assessment (2010) (SHLAA), and the Employment Land Availability Assessment (2011) (ELAA).
- 1.4.10 The SHLAA recognises RAF Brampton as one of Huntingdonshire's few genuine large scale opportunities for redevelopment of previously developed land. Both the SHLAA and the ELAA visualize its redevelopment with a mixture of housing and employment with associated community facilities and services.



Map 3: Core Strategy Key Diagram

1.5 What will the Development Provide?

- **1.5.1** The development of RAF Brampton will provide a sustainable mixed-use development with areas of open space within the site. The development will have approximately 400 homes including up to 40% affordable homes and approximately 3.2 hectares of (gross) employment land, including office and light industrial, to be developed up to the year 2026.
- **1.5.2** As well as these new homes and employment opportunities, there is also the opportunity to create large areas of public open space to be used for recreation purposes.
- **1.5.3** There may also be the opportunity for other uses in this location, such as a small shop and other community facilities and leisure uses.

1.6 What are the Development Timescales?

1.6.1 The Defence Infrastructure Organisation is in the early process of transferring the Ministry of Defence (MoD) operations at RAF Brampton to RAF Wyton. It is understood that this will be a phased transfer with the site becoming vacant sometime in 2013. The development on the site is likely to be delivered up until the year 2026, which is the timeframe for the Council's Core Strategy.

1.6.2 The existing married quarters are owned by Annington Homes and leased back to the MoD. It is understood that these 215 houses will still be occupied by RAF and other military personnel after 2013.

1.7 What will the Impacts be on Brampton?

- 1.7.1 One of the key aspirations for the District Council is that the redeveloped RAF Brampton is successfully integrated with Brampton village. It should also retain its own high quality distinctive character, reflecting the previous uses of the site, and retaining as much open space and historical features as possible.
- 1.7.2 To reflect the site's historic character development will need to be sympathetic to its many positive features, such as the Listed Buildings and associated walls, pre military and military history, historical routes and trees. The development will create an attractive entrance to Brampton from the south. The removal of the perimeter fencing will open up views of the site and make the site more accessible.
- **1.7.3** Any development will contribute financially to the upgrading of the existing education provision in the village.
- **1.7.4** A key factor in promoting the area's sustainability will be to facilitate use of modes of transport other than the car to access

facilities within the site, and the wider area. This will lessen the impact of the development on traffic generation.

1.8 Process

- **1.8.1** This Urban Design Framework has been shaped and informed by a working group of County, District and Parish Councillors.
- **1.8.2** This Urban Design Framework document was the subject of wide public consultation and was approved by the Council's Cabinet on 8th December 2011. The document is now a material consideration when determining planning applications for development within the study area.
- **1.8.3** The Council will use the Urban Design Framework, along with the statutory Development Plan, to work with the landowners and future developers in the preparation of outline and detailed planning applications for the development area.



2. THE SITE

2.1 Site Context | 2.2 Land Ownership | 2.3 Historic Context | 2.4 The Site Character Areas 2.5 Planning Constraints and Opportunities | 2.6 Planning History

2.1 Site Context

- 2.1.1 This part of Brampton is characterised by a series of existing physical features that form a strong context for urban design solutions for the site. These include:
- A. Buckden Road: the eastern edge of the site is delineated by Buckden Road. This is the main road which links Brampton to the southbound A1 and it forms a strong physical boundary to the site. The road provides a key gateway approach to Brampton from the south and is characterised by a well defined tree belt within the RAF site to the west and the Golf Course to the east. The site is visible from this southern approach through a tree and hedged boundary where the existing dwellings on the base can be seen.
- B. The roundabout on Buckden Road serving development along St George's Close and the entrance to the site provides a spacious approach to the site. The roundabout does however dominate this part of Buckden Road. The dwellings on St George's Close and along Buckden Road are large and detached.
- C. Open setting: the site is surrounded to the north, south and west by an attractive open landscape of largely arable fields, which contain public footpaths. A public footpath connects the site with the village to the north. These footpaths allow open views towards the site.
- D. Brampton: to the north of the arable field is the suburban development of Brampton

Village and Brampton Village Primary School. This part of the village is bounded by Ellington Brook.

E. Park Farm is adjacent to the western boundary of the site, containing a farmhouse and various barns. There are some isolated cottages along Park Road to the west of the site.





Buckden Road - looking south



Views towards the site from the south



Brampton Village Primary School

Map 4. Site Context





Memorial Playing Fields & Skate Park



Buckden Road roundabout



Brampton Park Golf Course

2.2 Land Ownership

- 2.2.1 The land within RAF Brampton is managed by two separate organisations, the Ministry of Defence (MoD) and Annington Homes. The MoD is represented by the Defence Infrastructure Organisation (DIO), the body that succeeded Defence Estates in April 2011. Annington Homes is a private company that has an interest (a 999 year lease) but only owns the freehold when the MoD vacates and has no further demand for military housing in the area. It is doubtful that such an eventuality would occur in the foreseeable future. Annington Homes lease military housing back to the MoD.
- 2.2.2 The area of land belonging to the MoD totals some 49ha (Area A shown in purple on Map 5). This land contains office and workshop buildings, barracks, Brampton Park House, other ancillary buildings and extensive areas of open space and woodland.
- 2.2.3 The areas of land within Annington Homes interest equates to some 17ha (Area B shown in orange on Map 5). This land comprises principally 2 storey, semi detached and detached married quarters residential accommodation with associated areas of incidental open space and children's play areas.
- **2.2.4** The total area of land under consideration within the Urban Design Framework is 66ha.







2.3 Historic Context

The RAF Brampton site used to be known as 2.3.1 Brampton Park. Its history can be traced back to the 12th Century. Brampton Park House is believed to sit on the site of two post-medieval houses and possibly their predecessors. In the early 19th Century it was decided by the owner, Lady Olivia, to build an impressive house, and hence a new form of Brampton Park was born. The 1880 O.S. map illustrates that the house was laid out with a symmetrical parkland with a number of landscape features positioned to enable the house to be experienced in a specific manner. The fire of 1907 robbed the house of some of its grandeur but the landscape has been retained. The Park was used as a prisoner of war camp during the First World War, and during the Second World War it was a nursery and later a United States Air Force headquarters. From 1955, it has been used by the RAF for a number of headquarter functions, and notably as the Joint Air Reconnaissance Intelligence Centre.



Brampton Park house before the fire

Map 6: 1880 Map



Map 7: 1970 Map



- 2.3.2 The uses relating to the site's history have left their mark on the site and as such any development proposals for the site should consider and reflect on the significance of the heritage assets, both pre-military and military, and also the associated landscape in which they are located. Specific attention should be drawn to preserving the vistas, walls and avenues that were created to complement the various buildings. Any scheme should be informed by appropriate site survey work which should include a survey of 20th Century military heritage. The Defence Infrastructure Organisation already has a desk based archaeological assessment which may serve to identify any further archaeological investigation. In addition to the designated heritage assets in the area, and the non designated assets relating to the RAF occupation of the site, it will be important to consider the potential impact of development on undesignated, sub-surface archaeological remains. In addition to features which may be associated with Brampton Park, there is crop mark evidence for enclosures and linear features of probable late prehistoric or Roman date which encroach on the southern part of the design framework area.
- 2.3.3 Brampton Conservation Area covers the historic streets of the main village, namely High Street, Church Road and part of Buckden Road. RAF Brampton is located outside the Conservation Area but development of the site could potentially affect its setting and due regard will need to be given to this in any development proposals.

2.4 The Site Character Areas

- 2.4.1 This part of Brampton was historically the landscaped grounds of Brampton Park, a country home. The site has existing physical feature reference points that relate both to the former use as a stately home with extensive landscaped gardens, overlaid by its later use as a military base and the base's more ordered development layout. It is separated from the main centre of the village by a field to the north.
- 2.4.2 The site is characterised by a number of existing physical features and areas that form a strong context for urban design solutions to the site. These are:
- A. The northern area this contains a wide variety of uses, including the gatehouse, single and two storey office and workshop buildings, the remains of Brampton Park House (now used as the Officers' Mess), outbuildings associated with Brampton Park House, large areas of car parking, barracks buildings and a few detached married quarters houses. Most of the MoD buildings are from the mid 20th century. There is also a substantial tree belt of varying width along the northern edge as well as other smaller groups of trees in this area.
- B. The eastern and south eastern part of the site is delineated by the edge to Buckden Road. This is one of the main roads linking the A1 with Brampton and Huntingdon. This road has a semi rural character alongside the site. A large garden centre (Frost's), Brampton golf

course and a second hand car sales and repair garage are located on the eastern side of Brampton Road. Within the site there is a strong tree belt of semi mature and mature trees. This acts as a landscape buffer to the site and allows glimpsed views into and out of the site. There are two vehicular accesses and one other pedestrian access along this edge although only the main entrance is currently open for security reasons. The north eastern corner of the site abuts the Brampton Conservation Area.

- C. The western part of the site is characterised by a small number of 2 storey, low density semi detached and detached married quarters, set within a landscape of specimen trees and open space. A ditch, Park Farm and arable fields lie beyond. A public footpath runs along the boundary outside the site.
- D. The southern area of the site contains 2 storey low and medium density residential development. Within this residential area are pockets of open space and a significant number of trees, both within rear gardens and along the highway verges. Along the western part of the site within the southern area is located a large scale office complex. There are long views along many of the straight residential roads and especially along the historic route of Park Lane. An arable field lies to the south beyond the southern boundary.
- E. The centre of the site is characterised by a large area of open space laid out as playing fields. This open space has a notable number of trees within and along its edges. There is

also a gym building. A prominent 3 storey office building is located to the north of the open space providing a hard edge in this location.

2.4.3 The site is largely flat. Dispersed throughout the site are historic street lights, road signage names, and pillbox features. These features should be fully assessed and, where possible, incorporated into development proposals.





A. Tree lined road



A. Park Lane vehicular access



D. Existing employment buildings



D. Semi-detached dwellings



B. Feature trees



B. Detached dwellings



E. Central open space



E. Dominant office building



C. Feature trees



C. Buckden Road



Road sign



Pillbox

2.5 Planning Constraints and Opportunities

Landscape and nature conservation designations

- 2.5.1 The Huntingdonshire Landscape and Townscape Assessment (2007) identifies the site as being located within the Ouse Valley Landscape Character Area. It highlights some of the general characteristics associated with this Landscape Character Area, however it is noted that the site has its own distinctive landscape created through its former and existing uses.
- 2.5.2 There are no designated County Wildlife Sites (CWS) or Sites of Special Scientific Interest (SSSI) on or adjacent to the site.

Mineral Safeguarding Area

2.5.3 An extensive area of land around Brampton including the site falls within a Minerals Safeguarding Area for sand and gravel as identified within the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011). The aim is to avoid the County's finite mineral resource being unknowingly or unnecessarily sterilised. Given the designation, the landowner and future developer must liaise with the County Council regarding potential mineral extraction aspects prior to the development of site proposals on the site.

Tree Preservation Orders

- 2.5.4 RAF Brampton is set within a mature parkland landscape containing approximately 1100 trees. A Tree Preservation Order (TPO) number L/TPO/325 covers part of the area owned by the MoD. This TPO has been amended to remove dead, dying or dangerous trees or those trees which do not have a significant amenity value or long life expectancy. A TPO is a legally enforceable order to protect trees in the interests of public amenity. These trees individually and collectively make a significant visual contribution to the site and the wider area. Examples of these trees are seen on the accompanying photographs.
- 2.5.5 It is important that trees are retained to maintain the rich landscape character of the site and to provide an attractive backdrop to any development. Trees naturally change in their health and amenity. A full arboricultural survey will be required as part of any development proposals to identify those trees for retention and potentially trees that could be lost. Any loss of a tree will need to be vigorously justified. The survey will also help inform constraints posed by trees identified for protection and will ultimately help shape the developable area of the site. Additional tree planting in any new areas of development will be encouraged, thereby enriching the landscape and helping any new development to integrate into the wider area of the site.

2.5.6 The assumption will be that the large groups of trees will be retained to provide context both within the site and help to retain the softened edge to the site. Individual specimen estate trees will also be retained within the site to help create local landmarks within the development.









Map 8. Aerial photograph showing existing tree coverage



Topography

2.5.7 The site is predominantly flat, however there is a very gradual slope down to the northern edge of the site.

Hydrology and Flood Risk

- 2.5.8 There are no waterways on the site. There is a drain just outside the northern boundary which runs along the majority of the northern boundary of the site. Just outside the southern half of the western boundary there is also a ditch. There is also a ditch along the length of Buckden Road between the roundabout and the gate.
- The northern edge of the site is located within 2.5.9 the River Great Ouse floodplain. The District Council has carried out a Strategic Flood Risk Assessment (SFRA) which identified flood risk across Huntingdonshire. This has been endorsed by the Environment Agency (EA). Map 9 shows three categories of flood risk across the northern part of the site. The northern part of the site is in the 1 in 100 year (1% annual probability) floodplain (light blue area) and south of Central Avenue is within the 1 in 100 year plus climate change flood risk area (green area). The National Planning Policy Framework (NPPF) sets out government guidance on development in flood risk areas.
- 2.5.10 Design issues relating to flood risk and its mitigation must be considered within proposals for the sites redevelopment. Without appropriate mitigation, large parts of

the site will lie within the 1 in 100 year floodplain (incorporating an allowance for climate change – 1%). Consideration should be given to the design of Central Avenue to be held at a level above the 1% (plus climate change) level and not have any sewer or conduit crossings. Finished floor levels will require consideration for all development even on the southern part of the site so not to be at risk from flooding even in the future. It is recommended that future developers / landowners seek advice from the Environment Agency. A "drainage and flood risk strategy" will need to be agreed which must include any phased development proposals and future maintenance responsibilities.

2.5.11 The proposed employment areas to the north of Central Avenue will need careful consideration with only footprint redevelopment allowed without suitable mitigation / compensation. This is because they are situated within the 'High Probability' 1 in 100 year floodplain.







Heritage Assets

- 2.5.12 The site lies outside Brampton Conservation Area, however it is contiguous with the northeastern corner of the site. The setting to this designated heritage asset should be preserved and enhanced through any redevelopment of the site.
- 2.5.13 There are 3 Listed Buildings with associated curtilage listed walls within the grounds of the site. These designated heritage assets are very important, giving character and interest to the site and should be sensitively reused and incorporated into any development proposals. It is important that key views and the setting of the buildings and walls are retained. The quality and significance of these remaining features should be fully assessed within any development proposal.
- 2.5.14 The long history and use of this site means that it has a mix of heritage interests. Due regard will need to be given to identifying the undesignated heritage assets such as the sites military heritage and archaeological potential and these may also shape the scheme.
- 2.5.15 Following public consultation it has been suggested that the Gate House might possibly be converted back into a one bed dwelling, and a community orchard in the walled garden would complement the allotments.

Map 10. Brampton Conservation Area





Officers Mess - Grade II listing (A)

2.5.16 This is the former Brampton Park House. It was built in 1821-2 and much altered in 1825. In 1907 there was a devastating fire where the eastern half of the building was destroyed. No attempt was made to rebuild the original house and little more than one-third of the building as it stood before the fire is now in existence. After the fire the building was refurbished / rebuilt in a new style using a reddish colour brick.



Front northern elevation



Rear southern elevation

Map 11. Location of Listed Buildings and Historic Walls



The Gatehouse - Grade II listing (B)

2.5.17 This is the former Lodge at the original entrance from Buckden Road, built in around 1825.



Former coach house and stables (C)

2.5.18 The former coach house and stables were built in the early 19th century. The stables and coach house form a courtyard against the western side of the Officers Mess.



(D). Dwarf wall with integral seating



(E). Wall of former kitchen/courtyard garden



(F). Wall with steps. Former integral seat along wall edge is missing



(F). Wall of former formal gardens. This wall acts as a retaining wall to land to the north on the other side





Existing road and public transport networks

Buckden Road

2.5.19 Buckden Road (B1514) is a main road, connecting the A1, to the south, with the village of Brampton and Huntingdon beyond (and carries high levels of traffic). The road is currently divided into two speed limit zones, changing to 30 mph as it approaches the village. The road runs past the east of the site before entering the village. The road is intermittently paved on either side together with highway verges. The principal entrance to the site is located towards the northern end of the site via the roundabout on Buckden Road, and connects with Central Avenue. There is also a secondary access that is occasionally used. This is located towards the southern end of the site and connects with Park Lane.

Park Road

2.5.20 There is a redundant vehicular access from Sandwich Road in the far north western corner of the site, which used to be connected with Park Road and to the western end of the village. Whilst this access is closed to vehicles because of the MoD use of the site, there is currently a controlled pedestrian link, allowing access to the public Right of Way to the north of the site.

Bus services

2.5.21 There are 2 bus services that go through Brampton connecting Huntingdon and St Neots and intermediate villages. These routes run approximately every hour throughout the week. The bus route and stops are shown on Map 12.

Access

2.5.22 The majority of the site will be accessed from the exiting roundabout on Buckden Road. The access from Park Lane onto Buckden Road will be reopened, and a pedestrian / cycle link with Sandwich Road and the Public Right of Way to the north west is being considered.

Existing Footpaths and Connections

2.5.23 A public Right of Way runs along the southern boundary and close to the western boundaries of the site connecting to the village. There is also a public Right of Way opposite the northern part of the site along River Lane leading to the Ouse Valley.



Existing Public Right of Way to the village

Map 12. Bus Services between Huntingdon and St Neots



Map 13. Street Names and Speed Limits





2.6 Planning History

- 2.6.1 The site was covered by Crown Immunity until 7 June 2006. Crown Immunity enabled development to occur without the requirement for planning permission. Part 7, Chapter 1 of the Planning and Compulsory Purchase Act 2004 ended the Crown's immunity from the planning system by applying the Planning Acts to the Crown. Development on site now requires planning permission from the Local Planning Authority.
- 2.6.2 The site does not contain any recent planning permissions for residential or mixed use development. A Tree Preservation Order was placed on the site at the end of December 2010 to protect and safeguard the significant trees on site prior to development proposals being considered.



3. URBAN DESIGN OBJECTIVES AND PRINCIPLES

3.1 Urban Design Objectives | 3.2 Place Making Principles

3.1 Urban Design Objectives

- 3.1.1 The Council's vision is to create a sustainable mixed-use development for Brampton that will provide new housing and employment for the Brampton area, as well as providing a significant area of new open space that will become available for recreation and leisure uses.
- **3.1.2** The development of the site will be founded upon best urban design principles. Of particular importance are the following points:
- A. To create a genuine mixed-use site that will help to meet the future housing, employment and community needs of Brampton, Huntingdon and the surrounding area.
- B. To provide a range of social and community facilities including a local shop(s), sport and recreation provision, and upgrading of the existing village primary school to meet the needs of the enlarged residential community.
- C. To create a network of open spaces across the site, linking with the surrounding countryside and green infrastructure network via sustainable urban drainage, wildlife corridors and other biodiversity opportunities.
- D. To create a sustainable, well planned, interesting and distinctive place that has its own identity yet becomes an integral part of the village and its community.

- E. To develop the site with careful consideration of the existing landscape and historical features, and to use land efficiently and creatively, making the most of and reflecting the attractive existing landscape features on the site.
- F. To ensure sensitive uses such as residential development will be located away from areas of higher flood risk.
- G. To reduce the need for residents to travel long distances by providing good links from residential areas to local employment areas, community facilities and services, the village centre, and to the public transport network for journeys to employment and other services beyond the village.
- H. To ensure that the development is clearly connected and permeable, to be based on a network of well designed attractive and interconnected streets and walkways that will encourage links to the existing village.
- I. To ensure, through good design, that the residential environment is not dominated by the car.
- J. To improve pedestrian footpath access from the site into the open countryside to the north and west of the site, connecting with the existing public footpath routes.
- K. To ensure an attractive and wide landscaped entrance to the village along Buckden Road, softening the impact of the development on the entrance to the village from the south.

- L. To enhance native biodiversity (the number and variety of plant and animal species) within the area and address the impact of development on the biodiversity and environmental quality of the surrounding countryside.
- M. To promote an energy efficient new development that has minimal impact on the causes of climate change, and which takes advantage of appropriate renewable technologies.



3.2 Place Making Principles

3.2.1 It is important that RAF Brampton is designed to be a distinctive and attractive place in its own right, also one that integrates and benefits the whole village. The Districts within Cambridgeshire have produced the Cambridgeshire Quality Charter to provide an overarching set of 4 place making principles. These will also be important principles when designing any new developments. Huntingdonshire District Council has adopted the charter and will use it as a material consideration when determining planning applications for the site.

These 4 principles are:

- Community
- Connectivity
- Climate
- Character

Community

- **3.2.2** Individuals and families that live in and use places create and shape their communities. The following community focused, placemaking principles provide a basis for ensuring that RAF Brampton will be a well designed and successful place whose community has the best chance to thrive:
 - Involve communities from the start of the design and planning process

- A range of housing tenures should be available, and homes should be built in a way that allows adaptation to different stages of life
- Individuals should feel able to get involved in managing their communities
- Social infrastructure, including health, education and leisure opportunities, is just as important as physical infrastructure
- There should be a mix of formal and informal greenspace and links between them
- Community activities should be encouraged by the provision of places to meet informally and formally
- Public space should promote social interaction and healthier lifestyles
- Community facilities and buildings should be flexible and able to make use of the latest technology
- Space should be made available for a local shop(s) and services to develop and thrive.

Connectivity

3.2.3 Whilst private cars will remain important they should not dominate the design process or the completed development. The following connectivity focused place-making principles, provide a basis for ensuring that RAF Brampton will be well connected internally

and beyond by a range of transport choices and opportunities to walk and cycle:

- New development areas should be easily accessible by high quality and frequent public transport services
- Public transport should integrate with existing transport systems with frequent services and stops
- New developments should enhance the feasibility of walking and cycling
- Development should facilitate the ability of people to work close to home for part of their working time
- Streets, footpaths and other links should provide for ease of mobility for all sectors of the community
- Bus stops should be well designed and should provide information on services and local facilities
- Unnecessary car usage should be discouraged by parking control and the establishment of initiatives such as car clubs
- Road designs should include permeable surfaces. To avoid roads being continually dug up by services (water, waste etc.) these should go in green space corridors or in distribution ducts.
Climate

- **3.2.4** All new development and infrastructure at RAF Brampton will be built to meet the latest environmental standards, using the following climate change focussed place making principles:
 - Generally, the pattern of development should allow people to adopt sustainable lifestyles easily
 - Parts of the development area should aim to achieve the highest environmental standards and act as examples of good practice as the development proceeds
 - New residential development should not be located in areas liable to environmental risks, such as flooding
 - Sustainable waste management systems should be built into new developments to make recycling easy and unobtrusive and encourage people to waste less
 - Utility service providers should work together in designing infrastructure that promotes energy and water conservation and the use of locally produced renewable energy
 - All buildings should be designed to anticipate the potential impacts of climate change and have a capability to be easily adapted

- Biodiversity and wildlife should be encouraged through a network of green spaces and sustainable urban drainage systems. Biodiversity should also be encouraged within the built environment, for example nest/roost provision within buildings – see RIBA's publication "Biodiversity for Low and Zero Carbon Buildings: A Technical Guide for New Build" (Williams, 2010)
- Sustainable energy partnerships or trusts should be encouraged as part of new developments and within local communities
- Trees and planting should be used to provide shade and cooling in summer and to soak up rain, as well as providing an attractive landscape.

Character

- **3.2.5** The following design character focused placemaking principles provide a basis for ensuring that RAF Brampton will be a well designed and attractive place:
 - Existing landscape features should be identified and used to create a locally distinctive place
 - The Urban Design Framework should provide a sound basis for master-planning RAF Brampton

- Design quality should be promoted in the development in accordance with the principles established in the Urban Design Framework
- Densities and massing should vary with higher densities around local shops, services and transport nodes
- Creative but simple designs, well built with durable materials and attention to detailing are often the most successful approaches
- Open space should be designed to be integrated with buildings and good landscapes are as important as good buildings
- All buildings should be designed to be flexible and adaptable
- Car and cycle parking, storage and waste recycling should be integrated into the design process of all buildings.



Building for Life

- **3.2.6** Building for Life is the national industry standard for well-designed homes and neighbourhoods. Good quality housing design can improve social wellbeing and quality of life by reducing crime, improving public health, easing transport problems and increasing property values. Building for Life promotes design excellence and celebrates best practice in the house building industry.
- **3.2.7** The 20 Building for Life criteria embody the Council's vision of functional, attractive and sustainable housing. New housing development at RAF Brampton will be scored against the Building for Life criteria to assess the quality of their design during the planning process.
- **3.2.8** The Building for Life criteria are a series of 20 questions which are used to evaluate the quality of new housing developments. Developments are given an overall score out of 20 and graded as "very good", "good", "average" or "poor".
- **3.2.9** Building For Life can be viewed online via the following link:

http://webarchive.nationalarchives.gov.uk/20 110107165544/http://www.buildingforlife.o rg/criteria

- **3.2.10** The 20 questions are based on the following four criteria to assess the quality of any given development:
 - 1. Environment and Community
 - 2. Character
 - 3. Streets, Parking and Pedestrianisation
 - 4. Design and Construction



4. DEVELOPMENT OF URBAN DESIGN OBJECTIVES AND DESIGN GUIDANCE.

4.1 PART 1. Broad Concept | 4.2 PART 2. Detailed Development Guidance | 4.3 Land Uses | 4.4 Form of Development | 4.5 Integration and Movement | 4.6 Sustainability | 4.7 Section 106 and Community Infrastructure Levy | 4.8 Implementation

4.1 Part I. Broad Concept

- Using the detailed understanding of the site 4.1.1 gained from carrying out an analysis of the site's historical context, constraints and opportunities, a preferred option has been developed. This highlights the broad issues that must be addressed by development proposals. The preferred option places significant emphasis on providing enhanced public open space, ensuring integration with Brampton village and reflecting the historic form, in particular through protecting and enhancing the setting of Brampton Park House and referencing the existing structure of the site. The concept recognises the need for redevelopment of the site to be economically viable.
- **4.1.2** The preferred option focuses on six key principles that development must address:
 - Establishment of the extent of development
 - Establishment of sustainable connections with Brampton village
 - Retention of historic buildings and reflection of the historic form
 - Protection of the existing natural landscaping features and open space
 - Integration with the adjoining Annington Homes estate
 - Retention of amenity structures and other viable buildings

4.1.3 The influences of each of these on the preferred option are set out after the preferred option plan. The preferred option is illustrated in map 14.



Map 14. Preferred Option





Establishment of the extent of development

4.1.4 The site is well contained and development should only take place within its existing boundaries. It consists of five distinct existing character areas as highlighted in section 2.4.



- 4.1.5 In the northern area (number 1 on the plan), development should be concentrated towards the eastern end near to the vehicular access into the site and only on previously developed land. To protect the boundary tree belt, development must not extend northward beyond North Road. Development in this area must have due regard to the setting of the Conservation Area.
- **4.1.6** The extent of development in the eastern area (number 2 on the plan) naturally flows right up to the existing eastern tree belt. Networks of landscape infrastructure should be retained and reinforced.

- **4.1.7** A significant opportunity for redevelopment can take place on the site of the large office complex in the south western area (number 3 on the plan). The extent of development will be influenced by the need for effective integration with the adjacent Annington Homes area.
- 4.1.8 Any development close to the western boundary of the site should have regard to the rear building line of the existing houses and provide a landscape buffer between the dwellings and the boundary to avoid the creation of a hard edge (no's 3 and 4 on the plan). Development must not be located at the western end of Park Lane and Central Avenue so that open views out to the countryside are maintained. Some development will be acceptable on part of the existing cricket pitch on the western part of the site.
- **4.1.9** The central part of the site (numbers 5 on the plan) comprises a large area of green space which will be retained and enhanced within the development proposals. This will protect and enhance the setting of Brampton Park House and protect long distance views towards it from the south. This area of public open space will also provide valuable playing fields and other recreational facilities.

Establishment of sustainable connections with Brampton village

4.1.10 Improved connections with the existing public footpath network will be an essential feature within any future development in order to improve integration with Brampton village.

The existing access points and paths should be upgraded (with agreement from the adjacent landowner) to enhance pedestrian and cycle access and new ones created where appropriate (as shown on the plan below). This will create direct routes within the site and across to Brampton village and its facilities, as well as to the wider amenity areas such as Brampton Wood and the Ouse Valley. Following recent ministerial guidance, upgrading of footpaths for cycle access should be achieved where possible by formal public bridleway status.



4.1.11 As the site is currently used as a military base, it is enclosed by a boundary fence. The removal of this fence will allow pedestrian and cycle links to be created and link the site eastwards onto Buckden Road thereby improving integration to this part of the village, improving access to the nearby secondary school, and to Buckden and Huntingdon. Any future development will be required to remove this fence.



Retention of historic buildings and historic form

- 4.1.12 Brampton Park House, the Stables, and the Gatehouse are all Grade II Listed Buildings and must be retained and maintained to English Heritage standards in any development proposal. These buildings form a strong integral part of the site's character and reflect the site's historic context. Future development must protect and enhance their integrity and setting. The former garden walls, which are protected due to their relationship with the listed main house, are also a positive asset to the site which must be retained with new development located sensitively to these features.
- 4.1.13 Within the development the opportunity exists to retain elements of the site's military heritage and archaeology. A summary of the sites military heritage will need to be undertaken to establish the interests of this heritage, identifying what is to be kept and justifying what is to be removed.



4.1.14 The site is formally laid out, based around a network of routes established by the RAF, overlaid on top of the landscaped setting that was in place when Brampton Park was a landed estate. Both the formality of these routes and the setting of the house and its grounds must form the basis of any new development on this site. New routes should enhance the formal grid system of roads, paths and spaces and reinforce the distinctiveness of the site.

Protection of the existing landscape features and open space

- **4.1.15** The individual trees and groups of trees are the most important existing natural landscape features on the site because they contribute significantly to the overall landscaped appearance of the site. It will be important to protect and enhance the mature tree belts along the northern, eastern and south eastern boundaries of the site, to maintain the established historic planting scheme that strongly characterises the site and minimise the impact of new development on the wider landscape.
- **4.1.16** Within the site the trees lining internal roads currently make a strong contribution to the spacious character of the site's layout. These should be retained and reinforced by the addition of new avenues of trees along key east and west routes.



4.1.17 There are several pockets of trees which form a network of green spaces. This network should be reinforced to improve green space linkage across the site and better connect the site to the peripheral edges and countryside beyond. Single and small groups of mature trees within the existing open space should be retained and used to guide the locations of future public open space which will benefit from a mature landscaped backdrop.

Integration with the Annington Homes estate

4.1.18 Military personnel will still be living on the Annington Homes part of the site following redevelopment, and their living quarters and the roads within the Annington Homes area will need to be fully integrated into development proposals to further integrate the site within the village. Development on the site must avoid the creation of two separate enclaves.



Retention of amenity structures and other viable buildings

4.1.19 The site benefits from good existing amenity provision. Some good quality tennis courts exist within the site which should be retained as a useful facility for future residents. The existing playing field which is currently used as a rugby pitch will need to be retained as playing fields for use by the local community. Retention of this playing field will help to preserve the green backdrop to the south of Brampton Park House, and once the existing 3 storey office building is demolished, will help to enhance the setting of this listed building. It is more sustainable to retain existing facilities, such as playing fields and tennis courts, than create new ones elsewhere. A car park is located close to these facilities and part of this car park must be retained to serve the recreational and community facilities.



4.1.20 There are some buildings which may be worthy of retention in the short term for employment uses along the northern edge of the site and their suitability should be fully assessed. The Airmen's Mess building currently used as a mess and used by The Brampton Little Theatre Company and a choral society could be retained and incorporated into the site for community uses. Options for its partial retention are illustrated on map 19A-19C later in the document.



4.2 Part II. Detailed Development Guidance

- **4.2.1** The following detailed development guidance builds on the constraints, opportunities and design principles identified in previous chapters. It sets out how the Council envisages the site will be developed.
- **4.2.2** The six principles identified in Part I have been further developed to create detailed development guidance.
- 4.2.3 This site presents the opportunity to create an attractive and sustainable mixed-use community consistent with national and local policy. It will provide homes of mixed type and tenure together with employment opportunities, publicly accessible open space, shops and community facilities and improved footpath and cycle ways to integrate it with the existing village. The development will create a unique sense of place defined by a bold and innovative landscape framework whilst creating an attractive well connected setting for new homes.
- 4.2.4 To ensure high quality redevelopment and implementation of the preferred option, the following section sets out detailed guidance on the scale, form and quantity of development considered appropriate. This is illustrated by a variety of maps and photographs to aid interpretation. Guidance is set out under the following headings:

- Land uses
- Form of Development
- Integration and Movement
- Sustainability
- Section 106 and Community Infrastructure Levy
- Implementation

4.3 Land Uses

- 4.3.1 Redevelopment of the site will comprise a mix of uses including residential and employment development, community infrastructure and open space. The land uses have been located to create a comprehensive design which not only responds to the physical, historical, socio-economic and ecological context of the site, but will also enable the provision of jobs, homes, shops and infrastructure in this wellconnected location.
- **4.3.2** The following land uses will be incorporated into development proposals:
 - Approximately 400 homes
 - Approximately 3.2 ha employment land
 - Shop(s)
 - Community facilities
 - Accessible open space
- 4.3.3 It is envisaged at this stage that the scale of development will not generate the need for an additional primary school. Brampton Village Primary School will be upgraded / extended as required and agreed with the County Council to cater for additional school places. Having one enlarged primary school in the village will help to facilitate integration of the existing village community and the new community at RAF Brampton and will provide an enlarged role as a community hub for the village.







4.4 Form of Development

4.4.1 The form of development on the site will respond to the existing positive site features and will embrace and learn from other highly regarded development both locally and around the country.

Urban Structure and Urban Grain

- **4.4.2** 'Urban structure' is the elements which make up a place - blocks, streets, buildings, open space and landscape - and how they fit together. The preferred option creates an accessible, large, central open space within the site, with the buildings comprising a clear framework of routes and spaces that connect both within the site and beyond. The existing east-west routes form the main structural element within the site, with tree belts of varying widths along the periphery.
- 4.4.3 The preferred option will create a tight urban grain within a grid, with varying sized building blocks, creating a built form that draws from and responds to the existing layout of the site and traditional historical patterns of towns. This layout will help to add variety and interest to the development. The urban structure and urban grain of the development are illustrated on map 16.
- 4.4.4 The urban structure and grain of the development facilitate a safe and sustainable environment for residents, employees and visitors, taking into account 'Secured by Design' principles.

Map 16. Urban Structure and Urban Grain



Employment Development

- Employment uses will be located towards the 4.4.5 north eastern part of the site along Central Avenue where there is good vehicular access from Bucken Road, the B1514. Buildings with elevations and / or frontage to Central Avenue should be of a very high standard of design incorporating natural surveillance, as Central Avenue is the principal access road into the site. 3.2 ha of land (gross) is set aside for the employment areas which should be class B1 uses. This encompasses a) offices, b) research and development or products or processes, or c) for any light industrial process. These should include start-up, incubator units and grow-on space for smaller businesses, and provide high value jobs in sectors that complement and help promote growth in the local economy. Specific employment uses which match the requirements of the local and regional market should be explored.
- 4.4.6 A key element of the site will be the main entrance area from Buckden Road. This is where the employment area and shops will be located. Development must have regard to the spatial characteristics of this part of the site, especially the mature trees, listed buildings and curtilage listed walls. Pedestrian and cycle access must be provided at the north western corner of the site, connecting with the existing Public Right of Way, and thereby connecting the development site with the school and the rest of the village.
- 4.4.7 Brampton Park House could be an attractive location for a country house hotel, conference

centre or institution. At this stage however, the Council is not specifying a particular use for this group of buildings with proposals being considered depending on the viability and appropriate protection of the listed building.

4.4.8 Some limited development may be considered within the former kitchen gardens to support the viability of a future use for Brampton Park House.

Heritage Assets

- 4.4.9 The listed buildings within the site are afforded statutory protection under the Planning (Listed Building & Conservation Area) Act 1990. They must be retained within the scheme. Any change of use and associated refurbishment must be sympathetic to the architectural and historic interests of the individual listed buildings. Any proposal should be based on an understanding of the significance of each building and should be supported by appropriately presented research.
- **4.4.10** The National Planning Policy Framework is the statutory guidance on 'Planning for the Historic Environment', and a material consideration in planning decisions. It is very specific in ensuring heritage assets which are not designated, in this case the archaeology and military heritage of RAF Brampton and adjoining Conservation Area, are given due consideration in planning decisions. Any scheme will need to take this into account.

Shops and Community Facilities

- 4.4.11 A small convenience store and possibly one or two other small shops / facilities will be provided as part of the development. The shops should be located close to the entrance to the site to allow for greatest accessibility by all of the new community, the employment areas, and existing residents as well as to benefit from passing trade. The convenience store should be of a similar size to the Co-op in Godmanchester. It will be a two storey building with housing above the shop, as has been constructed at Hinchingbrooke.
- 4.4.12 A multi use community building will be required close to the centre of the site, close to existing outdoor recreational facilities. This will provide appropriately sized multi - use community and activity rooms, potential indoor sport, and additional changing facilities to Football Foundation and Sport England standards for the playing fields, tennis courts and other sports on site. The Parish Council envisages the provision of three rooms, one smaller room and two larger rooms of different size. The multi use community building could accommodate demand for additional preschool places generated by the development. The specification is dependent on the decision to be made regarding potential theatre use within the building. Changing facilities should be provided on a scale to match the proposed sports provision. An integral tool store should also be provided as part of the building. The Parish Council wishes it to be large enough to accommodate a small tractor and other grounds maintenance equipment.



- **4.4.13** Part of the existing car park on the southern side of Central Avenue opposite Brampton Park House will be retained as parking to the serve the community building and recreational facilities.
- 4.4.14 An option is provided, illustrated on maps 19A-19C, for the partial retention of the Airman's Mess for community uses, however it is envisaged that a separate building would be required for changing facilities to serve the central recreational facilities. It is envisaged that such a building would be located next to the car park and central recreational facilities to the south of Central Avenue.

Map 17: Employment, Shops and Community Facilities



Open Space

4.4.15 RAF Brampton presents a significant opportunity for new development to be set within a well designed framework of public open space. This should take advantage of the landscape characteristics of the site and include formal and informal play areas. Public open space within the site must be high quality to allow residents to meet many of their recreational needs in their development. The major area of open space proposed is situated in the centre of the site and is currently used as playing fields which are well drained and maintained. This will form a focal area for the site and give an attractive backdrop to Brampton Park House. The size and arrangement of formal sports pitches on the central area of open space must have due regard to the protected trees within this area, and will need future consideration and discussion with the Parish Council and potential user groups. This area of open space must be capable of being used for community events as well as sports pitches. Within the centre of the site there are also some good quality tennis courts. The Parish Council wishes to seek the retention of at least 3 of these tennis courts. The remaining tennis courts could be converted into a Multi Use Games Area (MUGA) for older children. Other large areas must be incorporated including the existing tree belts on the northern and eastern edges.

Map 18. Open Space





- 4.4.16 There will need to be at least two equipped play areas on the site. These new play areas will be bespoke to the site, designed with the input of the Parish Council and local young people including the village Youth Forum. A woodland trim trail will also be required within the northern tree belt providing an exercise circuit for all levels of physical ability, not only for children but for the whole community. All areas of equipped play, tennis courts and sports pitches must have easily accessible cycle parking close by to encourage usage and promote sustainable travel modes.
- **4.4.17** Open landscape areas should be provided adjacent to the countryside edges particularly along the western edge, providing a transition area between the countryside and the development. Other landscaped areas should be located to the east of Brampton Park House, further enhancing its setting. The location of various forms of open space is illustrated on map 18.
- **4.4.18** Development adjoining open space and landscaped areas must front onto it, both to provide a high quality back drop and natural surveillance to facilitate a safe environment.
- 4.4.19 Allotments will be provided in part of the former walled kitchen garden to the west of Brampton Park House. Map 18A illustrates the layout of Brampton Park by a surveyor, dating from 1824. This plan should be used to help influence landscaping and public realm around the house and the division of the walled garden within any proposal.



43

- 4.4.20 Open space within the site will be owned and managed by a variety of public bodies. The District Council and Brampton Parish Council may both be interested in maintaining different parts of the green space on site, and commuted sums will be required to maintain these spaces. The long-term management will be essential in ensuring these areas provide maximum long-term benefits for people and wildlife.
- **4.4.21** Open space provision is essential to create improved areas for wildlife and biodiversity. Development proposals must incorporate appropriate areas for habitation creation through a network of green spaces, sustainable urban drainage systems (SUDs) and for trees and planting to provide shading and cooling in summer. These areas will link into other green infrastructure corridors and contribute to the provision of green infrastructure within the District.
- 4.4.22 In addition to the creation of large areas of open space, well designed, multi – functional green corridors within the site, must be included to create linkages between these areas and to areas off site. To maximise benefits green corridors must include more than just a row of trees – these should be as wide as possible and incorporate structural and habitat diversity, for example by including shrubs, species rich grassland and drainage features.
- **4.4.23** Any proposals must include allotments and green roofs within the development as these will again provide multi functional benefits. Inclusion of green walls, bat and bird boxes will

also provide biodiversity enhancement. The development of the site will require a detailed ecological assessment and mitigation and enhancement strategy. It is likely that a number of protected and / or biodiversity species will be present within and around the site.

Map 18B. Strategic Green Infrastructure Close to the Site

4.4.24 Development of the site must have regard to the Cambridgeshire Green Infrastructure Strategy in linking areas of open space with the surrounding countryside and green infrastructure network. Local areas of green infrastructure are illustrated on map 18B.





Residential Development

4.4.25 Approximately 400 new homes are proposed which will include a mix of detached, semi detached and terraced houses, as well as apartments and bungalows to create an allage inclusive development. These homes should be provided at a range of densities, sizes and styles to create a variety of character areas across the site. The following capacity map illustrates how the character areas and densities may be arranged on the site having due regard to the opportunities and constraints on the site.

Map 19. Capacity Study



Alternative Residential Layout

- **4.4.26** During the public consultation on the draft UDF, a number of requests were made to include a plan illustrating the partial retention of the Airman's Briefing Building to be used for a number of purposes.
- 4.4.27 The following plans illustrate an alternative capacity layout with the retention of part of the Airman's Briefing Building. A Charitable Trust is currently being set up by The Brampton Little Theatre Save the Theatre Action Group who have expressed significant interest in owning or leasing the building. The Trust proposes to convert the building into an Arts Centre for Brampton. This will incorporate a theatre, cinema, coffee bar, meeting rooms and a small garden. The Arts Centre would have two large rooms which could be used in many ways (rehearsal space, meeting rooms, crèche, fitness classes etc). There would also be a food preparation area. However, there will not be any sports changing facilities in the building.
- 4.4.27 The Trust proposes to manage the centre on a day-to-day basis and be responsible for its upkeep. The Trust has produced a five year business plan which they believe shows the centre profitable from the first year. Further information can be found on the Trust's website: www.bramptonlittletheatre.co.uk





4.4.28 Plan 19A illustrates the partial retention of the building which could be used as a theatre / choral venue. The building would allow for the retention of the existing auditorium, toilets, bar area and storage space. The building to be retained is illustrated in blue and there is capacity for some parking to the front of the building. Residential development would be located adjacent to the building. It is envisaged that a purpose built multi-use community building would also be required under this option. Map 19A. Alternative Capacity Study



4.4.29 Plan 19B and 19C illustrates the larger partial retention of the building which could be used as a theatre / choral venue with flexible space to provide for multi-use community facilities. A small amount of space is provided to allow for outside use in association with the building. It is unlikely that this option would cater for sports changing facilities in association with the sports facilities to be provided within the central area of open space opposite Brampton Park House, a purpose built venue would be required. A small number of parking spaces could be provided to the front of the building. Residential development would be located to the south of the building, and plan 19B and 19C illustrate two slightly different options of how residential development could be located within the residential area to the east of the central area of open space.

Map 19B. Alternative Capacity Study







Map 19C. Alternative Capacity Study

4.4.30 It is possible that within the Annington Homes estate, some infill development may be acceptable. This will be subject to site constraints and needs to be carefully integrated into the existing development.

Map 20. Potential Locations for Infill on Annington Homes Estate





Density and Mix

- 4.4.31 To ensure legibility and add interest a wide range of residential densities will be required across the site ranging from low density areas, with detached houses located within spacious plots, to medium density areas of semi detached houses with driveways and garages to the side and high density areas of continuous terraces of houses and apartments.
- 4.4.32 The general theme is for the higher density areas to be located predominantly on the eastern part of the site around the entrance, with lower density in the western and southern parts of the site. A broad illustration of where the lower and higher density areas should be located is illustrated on map 21. Approximately 170 homes can be developed on previously developed land at the eastern side at a high density, and approximately 80 homes on the western part of the site at a medium and low density. Approximately 150 homes can be built on part of the current playing fields and to the south of the former kitchen gardens at a variety of density ranges appropriate to the location.
- **4.4.33** To create sustainable and mixed communities there needs to be a mix of housing tenure including appropriate provision of affordable housing. Appropriate provision of affordable housing will be required as indicated within the Huntingdonshire Core Strategy (2009). Affordable housing must be well integrated with the market housing in a way which

Map 21. Density



results in different types and tenures of housing being in close proximity to each other. To ensure the creation of a mixed community, large groupings of single tenure dwellings must be avoided. Any Section 106 Agreement will require affordable housing units to be provided in clusters of no more than 10-15 units dispersed throughout the development. Designs will be required that show indistinguishable differences between housing tenures.

4.4.34 To provide adequate choice amongst market housing and ensure needs are met across the full range of potential demand a range of property sizes will be required. The mix of properties should have regard to the outcomes of the Cambridgeshire Strategic Housing Market Assessment. The Cambridge Housing Sub-Region Property Size Guide August 2010 provides guidance on appropriate housing mix. For the sake of clarity, 2 bed homes do not include a study on the 1st floor, as this could be easily classed as a bedroom. It is important that there is a reasonable supply of homes designed for those with disabilities and smaller properties to meet the increasing need from single person households.

Scale and Massing

4.4.35 Building heights add architectural interest and can have an impact on the sense of enclosure within the public realm. A range of building heights should be provided throughout the development and should reflect the site's urban / rural location. In order to reflect the existing character of buildings on site most of the houses within the development site should be a maximum of 2 storeys in height. A limited number of 2 $\frac{1}{2}$ and 3 storey houses will be acceptable in the higher density part of the site along Central Avenue and at key locations. Map 22 illustrates the range of building heights across the site.

Map 22. Building Heights





4.4.36 A wide range of housing typologies will also be required, as this is desirable not only to provide a broad range of house types for future residents, but also to establish a varying grain and character to the entire development. A greater use of modelled house types will also be required. A modelled house is one that is not a simple box shape. These more innovative house types add interest and distinctiveness to any development.







- 4.4.37 Detailed guidance on individual house designs include the following types:
- **4.4.38** Narrow Frontage Terrace: These serve to create a strong continuous edge with a tighter grain, giving a different character to the public realm. Their frontage width ranges from 4-6 metres.







4.4.39 Wide Frontage Terrace: These serve to create a strong continuous edge to the public realm. Their frontage width ranges from 8-14 metres. In the case of dwellings with on-plot parking a car port must be incorporated into the mass of the main house. They can often be cranked or splayed to help create interesting spaces and places.





4.4.40 Semi-Detached Houses: These can be 2, 3 and 4 bedroom houses. In the case of dwellings with on-plot parking the garage should be in the side or rear garden area and the minimum space between adjacent buildings is 5.5m where shared drives are used. These houses should generally have a front garden of approximately 5 metres in depth in the lower density area which helps to provide an attractive sense of place.







4.4.41 Detached Houses: These are located on larger plots with front gardens generally 5-7m deep, and with garages in the rear or side gardens. The houses are spaced with generous gaps between buildings.









Character and Distinctiveness

- 4.4.42 The site already contains an underlying framework of routes and spaces with the existing east / west routes and their north / south connections forming the main structural element to the site. To create a distinctive, legible urban form, a series of new character areas should be established which flow from the existing features of the site. These will be fundamental to the delivery of legible townscape and should be achieved by taking advantage of the various landscape settings and routes within the site. It will be expected that over this development site a series of interesting character areas will be created as illustrated on map 23 and noted below:
 - The Entrance
 - Central Avenue
 - The Central Open Space
 - The Eastern Tree Belt
 - The Western Edge
 - Brampton Park House





- **4.4.43** Landmark and key buildings should be provided in certain locations and built to exceptional design standards. The locations for these key buildings are illustrated on map 24. These key buildings will be important to articulate the urban structure, emphasise open spaces and strengthen the main connections.
- 4.4.44 Certain view corridors have been established within the layout of the site. These generally link the development areas with the surrounding landscape, towards key trees, along straight roads and towards Brampton Park House. Views of existing landscape features such as trees and long views should be optimised. Long views are also illustrated on map 24. The creation of long views will help to create a quality development and positive environment.

Map 24. Landmark and Key Buildings and Key Views





- 4.4.45 The Council would like to see a wide variety of house builders involved in the provision of houses in this location. As well as national house builders and social housing providers, there is an opportunity for smaller local builders and self builders and their architects to be involved in providing a variety of homes in this very attractive location. This approach will help to add interest to the development. The creation of new business uses of varying size and the refurbishment of Brampton Park House and its outbuildings will reinforce this.
- 4.4.46 The design of new housing should be innovative, well-proportioned and attractive, taking its lead from good quality architecture and design that has been achieved elsewhere in Cambridgeshire and wider afield. The following examples provide some interesting and innovative ideas:

2007 Project winner – Housing Design Awards – Broadclose, Bude



4.4.47 The Broadclose scheme showed a generosity of spirit with open space, using level changes to create an attractive public realm. The architecture is pleasing, with interest and variety using simple house type form. The scheme shows how much quality a little thinking can bring.

2008 – Prize winner – RIBA Stirling Prize – Accordia, Cambridge



4.4.48 Accordia challenges the traditional concept of a new home with a diverse range of architecturally dynamic new apartments and townhouses that were designed to bring the outside in. It was themed around the concept of 'living in a garden'. There is real innovation in use of internal space and internal layouts.

The homes have been built with natural, traditional materials but these were used in a highly contemporary way. Stock bricks, copper and timber give texture and warmth to the homes, while large expanses of glazing flood the homes with natural light. Internal layouts are highly innovative in terms of the spaces created, with terraces, balconies and courtyard gardens being provided at varying levels throughout the homes, blurring the conventional boundaries between outside and inside. There are split levels, open plan layouts and even central atriums.

4.4.49 Accordia, the site of former Government Offices in Cambridge has more than 700 existing mature trees and these provided the framework for the masterplan. From productive gardens with fruit trees, herbs and berries, to formal lawns, reedbeds and meadows, the existing mature landscape has been enhanced with new and diverse green spaces between the mews courts, greens and squares. It is a very high quality environment which already feels mature. RAF Brampton's existing trees have a similar effect on providing a framework for development.

2010 – Project winner – Housing Design Awards – the Triangle, Swindon



4.4.49 This development from 'Grand Designs' host Kevin McLoud, consists of Code Level 4 homes, with familiar floor plans and comfortable wide frontages. External walls built in hempcrete and a passive stack ventilation system drives hot and stale air via the stairwell to vent through a chimney. Elegant ventilation cowls, or ecohats, create a distinctive design solution.

Public Realm

4.4.50 Key locations within and adjacent to the built development will become very attractive areas of public realm. These will be located where there are key views, around listed buildings and historic walls, at the interface between open spaces and the built up areas, areas where there are existing groups of trees, junctions of cycle paths and footpaths, and other incidental spaces within the built form.

- **4.4.51** These key locations are illustrated on map 25 and will include:
- A. The entrances to the site
- B. Central Avenue and area at western end of Central Avenue
- C. Front (north elevation) and Rear (southern elevation) of Brampton Park House
- D. Garden steps and walls of Brampton Park House and historic link to southern elevation of Brampton Park House
- E. The edge of built form on the central area of open space
- F. Entrances into the site from public footpath connections
- G. The new avenue of trees along Park Lane
- H. New row of trees and interface with the countryside along the western edge of the site
- I. Side (south western elevation) and Rear (north western elevation) of the Gatehouse
- J. Other incidental spaces within the development
- **4.4.52** It is anticipated that these spaces will be where the majority of public activity takes place and will facilitate the interaction between people and the opportunity to sit

and relax. They may be spaces where public art is on show. Public art should not just be used for commissioning autonomous art artefacts but should also be used for the creation of "special features" such as public landscapes, light installations, street furniture, street junctions, feature fences or gates. It is understood that Brampton Parish Council wishes to be consulted before the frequency and positioning of street furniture and other items are finalised.

4.4.53 The principal entrances / gateways into the site must contain high quality public realm and bespoke buildings and landscaping to create a high quality entrance into the site, such design details can be assessed in detail at a Reserved Matters stage.







Map 25. Key Areas of Public Realm



4.5 Integration and Movement

- 4.5.1 A number of key elements will have to be incorporated to ensure that the redevelopment promotes sustainable travel and provides alternative options to local car usage. The development of a transport and movement strategy for the site relies on several key components working together, and it is important that these place sustainability at the heart of the strategy. These key components are:
 - Principal road junctions
 - Road access through the site
 - Public transport
 - Cyclists and pedestrians
 - Countryside access
 - Street design
 - Car parking
- 4.5.2 Any planning applications for the site will have to include a Transport Assessment which shows the precise traffic impact of the development. This Transport Assessment will have to be produced by the developer. It will need to be acceptable to Huntingdonshire District Council (as local planning authority), Cambridgeshire County Council (as highway authority) and the Highway Agency (as authority for the Strategic Road Network) before planning permission can be granted.

4.5.3 To ensure that any development produces as little car traffic as possible, developers will also be required to produce a set of measures to promote bus use, cycling and walking and to make more efficient use of cars (e.g. car sharing). These measures will need to be included in a 'travel plan' which is acceptable to both the planning and highway authorities before planning permission can be granted.

Principal Road Junctions

- 4.5.4 The Department of Transport (DfT) has recently produced a document called 'Manual for Streets 2'. The aim of this document is to explain how to design better quality streets and junctions. The District Council will be working co-operatively with the County Council to ensure that highway junction designs will be well designed and that the aspirations of Manual for Streets and Manual for Streets 2 (DfT, 2007, 2010) and other guidance which the County Council use are met.
- **4.5.5** The site will be accessed from the north via the existing roundabout junction on Buckden Road into the site onto Central Avenue. The opportunity exists to revisit the design of the junction of Central Avenue onto the roundabout, to be remodelled to be less highway dominant and create a high quality entrance into the site. This junction will serve the development in the northern half of the site.

- **4.5.6** The existing vehicular access from the south east will be improved and upgraded by the reopening of Park Lane as a T-junction onto Buckden Road. This junction will serve the development in the southern half of the site. Current speed limits may need extending depending on the traffic movements and the junction designs necessary to accommodate the traffic. A detailed Transport Assessment will need to be submitted for this to be determined.
- 4.5.7 The existing junction between Buckden Road and High Street may need to be improved. The current junction could be replaced by a mini roundabout to ease access from High Street. Further information regarding the design and the associated traffic flows related to the potential min roundabout at the High Street junction will be required to assess its feasibility. A Transport Assessment to determine the appropriate junction arrangements will have to be agreed, junctions must comply with TD 42/95. This may also highlight other junctions close to the site that may need to be redesigned / remodelled.

These junctions are illustrated on map 26.



Public Transport

- **4.5.8** Development of public transport strategies must be led by the County Council, in partnership with the local authorities, bus companies and developers. The District Council has prepared an initial strategy which seeks to act as a basis for further discussion, negotiation and detailed route planning. The site is adjacent to existing bus routes along Buckden Road, and the Preferred Option seeks the diversion of this route into the site, this route is illustrated on map 26.
- Further consideration should be given to the 4.5.9 location of bus stops, bus shelters at bus stops, and the frequency of the bus service to encourage patronage. The use of a local shuttle bus could be explored to encourage future occupants to use public transport. As a means of encouraging use of buses, the District Council and Parish Council would like to see each person moving onto the site be given a one-year free bus pass by the developers. This would encourage usage and reduce car journeys in the early years of the development whilst travel habits are being created. It is also important that there is ready access from the outset to buses for occupants (both residents and employees) on the site.

Map 26. Principal Road Junctions and Preferred Bus Route



- **4.5.10** Pedestrian and cycling activity is the lifeblood of a neighbourhood as it facilitates opportunities for interaction between people, enabling free and easy pedestrian movement throughout the site and is therefore a very high priority. Design of pedestrian routes should consider the following five criteria:
 - Connected serve all desire lines and provide easy, direct routes to public transport and green spaces
 - Convenient direct with minimum diversion
 - Comfortable wide, overlooked and feel safe
 - Convivial free from excessive noise and designed for aesthetic enjoyment
 - Conspicuous routes should be easy to read and clearly signposted
- **4.5.11** The layout has been designed to allow easy pedestrian and cycle access across and through the site. As part of the upgrading of Central Avenue there will be a dedicated cycle path along the length of this road, on the southern side. Pedestrian and cycle routes through the development need to have public highway status.
- **4.5.12** The development is an important opportunity to contribute towards and improve access to the wider landscape through the local network of public Rights of Way and routes

for non vehicular traffic. Where cycle routes are proposed this should be achieved by the provision of bridleways. This will enable better access to the countryside, encouraging more healthy lifestyles. In addition, the enhancement of Rights of Way and routes will be necessary in order to achieve access improvements for the wider community.

- **4.5.13** The existing public Right of Way from RAF Brampton to Layton Crescent (close to the school) will be slightly re-routed (away from the adjacent working farm and private dwelling) and upgraded; this will be a direct route for new residents on this development and forms a key structural element of the overall development. The re-routing of the public Right of Way will result in a short stretch of the existing path being stopped up. This is illustrated on map 27.
- 4.5.14 The detailed design of the upgraded and diverted route should have regard to the existing trees adjacent to the path, and the provision of suitable landscaping / lighting as necessary. The upgrading of this route to incorporate a cycle path including its priority was agreed as part of a joint Cambridgeshire County Council / Huntingdonshire District Council reprioritisation of rural cycleways project in Summer 2008. Its priority 4 has been given because of its linkage to redevelopment opportunities at RAF Brampton.
- 4.5.15 Pedestrian links, and some cycle links to the wider landscape will be improved and incorporated and will assist in access to green

infrastructure areas. In particular a direct footpath link could be laid from the western end of Park Lane within the site, out to connect to other leisure routes west of the site towards Brampton Wood which is a Special Site of Scientific Interest (SSSI) and other Rights of Way beyond. This route could be more informal and rural in design. As with all off site access improvements, detailed discussions with landowners, the District, County and Parish Councils will be necessary, but other existing footpath routes in the locality could be stopped up and or diverted especially as the fence around the site will be taken down as part of the development.

- 4.5.16 Routes within the site will need to have highway status if they are to substitute for routes currently outside the development area and be located within a green perimeter corridor. Links on the eastern side of the site will enable connections to existing long distance cycle and pedestrian routes such as the Ouse Valley Way. These suggested routes are illustrated on map 27. The redevelopment of the site may also provide opportunities to up-grade cycle / pathways to Hinchingbrook School to encourage secondary school pupils to walk and cycle to school.
- 4.5.17 It will be necessary for Defence Infrastructure Organisation and developers in conjunction with adjoining landowners alongside the District and Parish Council to maintain access across the field to the village and school as soon as DIO vacate the site to allow existing children on the base within Annington Homes



to continue to safely access the school by non car modes. The initial diversion of the existing route may therefore be required to be implemented prior to the vacation of DIO. It will also be necessary for developers to provide a strategy that delivers the strategic routes early on in the development of the area. Roads or paths which substitute Rights of Way must be adopted as public highways.

Map 27. Cycle and Pedestrian Routes


Street Design

- **4.5.18** Networks of streets and routes have been designed to allow maximum ease of movement through the site. A variety of streets are proposed to cater for anticipated usage; vehicular, pedestrian and cyclists. The layout of the site is formed from a hierarchy of streets which includes tree lined avenues, streets with footpaths, shared surface streets and mews. Map 28 illustrates the potential location of different categories of street. The layout has included anticipated desire lines and routes people will take when travelling through the site by foot or cycle.
- **4.5.19** Within the site the principle road improvement will be the upgrading of Central Avenue as a wide tree lined street, with a dedicated cycle path. As it is fundamental to the overall design of the development that the Annington Homes estate is fully integrated with the rest of the site, then it may be appropriate for some of the roads within the Annington Homes estate to be upgraded and offered for adoption to the County Council. These are highlighted on map 28.







- **4.5.20** It is important that all highway design proposals are design audited to ensure that 'Manual for Streets', 'Manual for Streets 2' and 'Cambridgeshire Design Guide for Streets and Public Realm' principles are adhered to, with the aim of providing pedestrian friendly streets. All streets should be built to adoptable standards.
- **4.5.21** When considering street design the following design principles must be adhered to:
 - Connectivity all streets shall lead to other streets so as to create a connected and permeable street network in all areas
 - Cul-de-sacs these will not be permitted
 - Street Dimensions there will be wide range of street widths, from wide avenues with street trees in verges and up to 7m wide avenues, down to 4m wide shared surface streets and homezones, with 3m pinch points
 - Street Junctions as stated in the Manual for Streets "the arrangement of buildings and footways has a major influence on defining the space at a junction. It is better to design the junction on this basis rather than purely on vehicle movement". All junctions should be designed to facilitate easy pedestrian and cycle movement, while providing opportunities to give distinctive character to each part of the site. They must not think about geometry and engineered vehicle junction above all other design considerations



- Ease of movement building block lengths will vary from area to area, and in order to achieve a successful overall design, it is essential that all streets and public spaces are fronted by buildings which positively address the public realm, providing an active and secure streetscape
- Street trees space for street trees, and their provision, must be designed in at the outset. A tree lined avenue has been suggested within the layout along Central Avenue and part of Park Lane. Tree planting will add value to the development, will soften the impact of the buildings in the street, create interest and character and responds to the former character of the site prior to its usage by the RAF.
- **4.5.22** The District Council will work with the County Council to ensure that design considerations are given due weight in highway design decisions.





Car Parking

- **4.5.23** Development proposals must be designed so that car parking does not dominate.
- 4.5.24 The principles put forward in English Partnerships' document 'Car Parking, What Works Where' (CPWWW) must be applied to this development area. Although no longer available on-line, this document provides a useful evidence base to show how people park cars in new housing developments, and that this is often at odds with how developers may have intended drivers to act. This has lead to criticism that new developments do not have enough or the right kind of car parking. The document is available to view at the District Council Offices in Huntingdon on request. CPWWW lists nine golden rules for all locations. These are:
 - 1. Go for the quality of the street above all else. So where you put the parking is more significant than how much
 - 2. There isn't a single best solution. A combination of on plot, off plot and onstreet is the solution, according to location, topography and the market
 - 3. Rediscover the street as a beautiful car park – people understand how it works, it's efficient and it increases the activity and safety of the street
 - 4. Maximise the activity between the street and the house for safer, friendlier streets. New residential areas usually have too few people moving around

- 5. Do not park at the back of the block until on-street and frontage parking permutations have been exhausted. Use of mews or rear court parking should support on street provision, not replace it
- 6. Avoid allocating more than half of the parking spaces. Research by Noble and Jenks shows that the more spaces you allocate, the more you have to provide
- 7. There are now three types of on-street parking: uncontrolled; controlled parking zones (CPZ) where spaces can be defined by user and / or by times; and restricted parking zones (RPZ) where positive parking controls do not rely on yellow lines
- 8. Provide cycle parking to all parking solutions that is safe and secure
- 9. Don't forget Secured by Design principles
- 4.5.25 For this site there needs to be widespread use of unallocated car parking, including onstreet car parking, designed in such a way that cars do not park half on the footpath, impeding pedestrian movement. For the higher density areas, car parking could take place in small car parking areas to the front. Rear car parking courts will not be permitted as the evidence demonstrates that they are not preferred by users and are often perceived to be unsafe. However, mews parking will be permitted in high density areas as this incorporates elements of residential development as well as car parking. This provides opportunities for natural surveillance and enhanced safety. CPWWW provides

evidence that on-street car parking is a much more efficient way of providing car parking than allocating a majority of off-street allocated car parking places and should be given due weight in highway design decisions.

4.5.26 Where garages are provided, single garages must be at least 3m wide internally, so that they can be used to accommodate and park cars more easily, and at least 6m deep so that they can be used for storage of bicycles and other items as well. For too long garages have been constructed that have not been wide enough to be able to park cars easily, and have often been used for storage purposes only. This has further contributed to car parking problems on recent new developments. The widespread provision of car ports should also be provided as these are also more often used for the parking of cars rather than storage.





4.6 Sustainability

- 4.6.1 Renewable and low carbon energy technology is a rapidly changing field. It would be inappropriate at this stage to require one particular approach to development here, although the landowner will be required to promote a robust strategy to use renewable energy and sustainable methods of construction in this location. The design of buildings should embrace open and eco-friendly designs, creating a unique development on this site.
- **4.6.2** The site offers the opportunity to maximise use of on site renewable energy and low carbon technology to ensure that these play a major part in demonstrating that this site will be truly sustainable. Consideration must be given to the reuse and recycling of waste from demolished buildings on site and its re-use as hardcore aggregate / aggregate for concrete within the development.
- **4.6.3** Planning policy is still evolving with energy and technological innovation also moving fast so the Council will be pragmatic about what can be achieved in this regard. However, there are a number of ways in which renewable and low carbon technologies could be incorporated including:
 - Meet the Code for Sustainable Homes
 - Allowable solutions the site could create a fund to improve the energy efficiency of existing housing stock

- Combined Heat and Power there is the potential for a local combined heat and power network
- 4.6.4 In 2006 the Government announced a rating system for homes (known as the Code for Sustainable Homes) in which level 1 was marginally more energy efficient than building regulations at the time, and level 6 was 'carbon neutral.' The aim was to increase building regulations gradually so that, by 2016, all new homes would be at least level 6 and totally 'carbon neutral.' However, in the budget of March 2011, the new Government downgraded their definition of 'carbon neutral' so that by 2016 new homes will only have to attain level 5 on the scale www.communities.gov.uk/planningandbui lding/sustainability/codesustainablehomes/
- **4.6.5** The difference between level 5 and level 6 is primarily to do with the elements included in the assessment. To attain a level 5, a home must only be 'zero carbon' in its emissions from fixed heating and lighting. For level 6, the home must also be carbon neutral in its emissions from home appliances as well.
- 4.6.6 It is important that locally distinctive solutions are utilised in addressing sustainable development measures. As East Anglia is the driest part of the country, measures to deal with domestic water usage should be highest on the agenda, and rain harvesting and other similar systems must be explored. All dwellings with gardens must contain a waterbutt for rainwater harvesting for garden irrigation where other internal rainwater

harvesting schemes are not used.

- **4.6.7** With regards to other ways of addressing onsite renewable energy, the best way of dealing with this is to use less energy in the first instance, such as by providing thicker walls and more insulation.
- **4.6.8** There are many examples being developed around the country where sustainable design is being tested in various ways. One of the more interesting examples is at Nottingham University, where exemplar houses are being constructed by Tarmac.
- **4.6.9** The design is based around a typical threebedroomed home. The red brick house is designed and built to code level four, while the rendered house is aiming higher, for level six. The obvious difference from the outside is the external finish, which is the main clue to the different envelope constructions being trialled.
- **4.6.10** The level four home uses cavity wall construction with an inner-leaf blockwork, a 150mm cavity and an outer leaf of facing bricks, giving it an overall wall thickness of 353mm, compared with the more traditional 302mm.
- **4.6.11** The level six home, on the other hand, has solid-wall, thin-joint construction using Durox, an aircrete block from Tarmac, which is finished with 150mm of phenolic insulation and then rendered. The solid walls have a thickness of just over 370mm.



4.6.12 The other key difference in the two homes is the energy supply. The level-six home needs to be totally self-sufficient. The electrical load for the house was calculated at 3.5kWh and on the south-facing roof 22m2 of photovoltaic (PV) tiles with a peak generating capacity of 3.7kW were installed. This is what drove the asymmetric roof design as it is the only way they could get the area of PVs needed. The integrated tiles were seen as the neatest solution.



4.6.13 Both homes also have 3m2 of solar thermal panels to provide up to 70% of the hot water needs during the summer months, while a 10kW biomass boiler - which could supply up to six homes of this size - provides hot water and space heating via radiators. This has a very positive effect on the code four house.

Drainage

- 4.6.14 Sustainable Drainage Systems (SUDS) are systems designed to reduce the potential impact of new and existing developments on surface water drainage. SUDS try to replicate natural drainage systems that can drain away dirty and surface water run-off through collection, storage, and cleaning before allowing it to be released slowly back into the environment, often via watercourses. Changes to legislation in 2010 (the Flood Management Act 2010) has enabled SUDS to be more widely accepted than before. The Environment Agency has recently produced guidance to help.
- **4.6.15** The District Council will expect developers to submit proposals that incorporate the SUDS approach and there is an increasing body of case study research to show what works in which situation. Public surface water systems should only be considered when all other methods have been discounted. Appropriate surface water management methods need to be incorporated in the detailed master planning design by the landowners / developers at an early stage as this can impact on the final layout.





- **4.6.16** For a development of this size, a Surface Water Drainage and Flood Risk Strategy will be required to clarify how this will be achieved.
- **4.6.17** The Council will also expect to see green roofs playing a part in the design of new buildings, helping to deal with storm water attenuation.



Re-use of Materials and Waste Management

- **4.6.18** The Cambridgeshire and Peterborough Minerals and Waste Core Strategy (Policy CS28 Waste Minimisation, Re-use, and Resource Recovery) requires strategic development areas such as this site to include a temporary waste recycling facility to maximise the re-use, recycling and recovery from inert waste streams from construction and demolition operations which will take place. These must be in place throughout the construction phase of the development.
- **4.6.19** Waste Audit and Strategy this policy also requires a waste management audit strategy to be in place for all developments over the value of £300,000. As a minimum, the audit strategy should provide information on:
 - anticipated nature and volumes of waste arising
 - steps that will be taken to minimise the amount of waste arising
 - steps that will be taken to ensure segregation of waste at source; and its sorting, storage, recovery and recycling
 - steps taken to ensure the re-use of waste arising in the development e.g. soils and recycled aggregate
 - • any other steps taken to manage the waste which cannot be incorporated within the development or that arises once the development is complete

- **4.6.20** Advice from the Waste Planning Authority (WPA) can be sought when compiling or assessing a waste audit and support strategy for a strategic development or complex site.
- **4.6.21** Site Waste Management Plan there is also a requirement for a Site Waste Management Plan, under the Site Waste Management Regulations 2008. This is in addition to the information required by Policy CS28. These plans will be assessed by the Local Planning Authorities in Cambridgeshire and the unitary Peterborough Authority. Together a Site Waste Management Plan and waste audit and strategy should provide robust information about the waste arising and how it will be managed.
- 4.6.22 Household Recycling Centre (HRC) The Minerals and Waste Core Strategy (Policy CS16) states that new development will contribute to the provision of HRCs. This may be via a legal agreement or through the Community Infrastructure Levy. Contributions should be consistent with the guidance in the Cambridgeshire and Peterborough Waste Partnership (RECAP) Waste Management Design Guide.
- 4.6.23 Bring Sites, Waste Storage, and Collection new development is also expected to contribute to bring sites consistent with the RECAP Waste Management Guide. This Guide sets out practical information on waste storage, collection, recycling and bring sites. The Guide includes a Toolkit, which must be complete and submitted within any planning application.

4.7 Section 106 and Community Infrastructure Levy

- 4.7.1 The Community Infrastructure Levy (CIL) is a new mechanism to allow local planning authorities to seek to raise funds, in the form of a levy. It is required from development in order to pay for the infrastructure that is, or will be, needed as a result of that new development. The CIL came into force in Huntingdonshire on 1st May 2012. Huntingdonshire District Council, as the Local Planning Authority, is the Charging Authority and will also be the Collecting Authority. A chargeable development is one for which planning permission is granted and which is liable to pay CIL in accordance with the CIL Regulations 2010 (as amended).
- 4.7.2 The charge will be levied on most new building developments that people would normally use. It is chargeable in pounds per square metre on the net additional floorspace if that floorspace is more than 100m2. However, if the development involves the creation of a new dwelling, even if it is less than 100m2, it is still liable to pay CIL. In certain circumstances CIL may also be charged where planning permission is granted to change the use of existing floorspace.
- 4.7.3 As identified in the Huntingdonshire Community Infrastructure Levy Charging Schedule, RAF Brampton is a large scale major development and as such will require development specific infrastructure. Development specific infrastructure will be

dealt with through a Section 106 agreement in addition to the CIL Charge.

- 4.7.4 Section 106 Agreements and planning conditions will also continue to be used for local infrastructure requirements on development sites, such as site specific local provision of affordable housing, open space, habitat protection, access roads and archaeology. For large scale major developments (200 units or above) further obligations could be required. The principle is that all eligible developments must pay towards CIL as well as any site specific requirement to be secured through Section 106 Agreements. The Developer Contributions Supplementary Planning Document was adopted in December 2011 and can be viewed on the Supplementary Planning Documents webpage of the Huntingdonshire District Council website.
- 4.7.5 Together CIL and / or Section 106 Developer Contributions (including commuted sums) from development on the site along with other funding streams could contribute amongst other things:
 - Affordable housing
 - Community facilities
 - Extension / expansion to primary school provision
 - Creation of a cycle link from the site to Layton Crescent

- Highway and transport improvements including public transport
- Footpath and other cycleway connections as well as the wider public Right of Way network around the development
- Connections with and improvements to the green infrastructure network
- Public open space including sport and play provision
- Public realm enhancement and public art
- Health
- Residential wheeled bins.
- Heritage interpretation
- Archaeological investigation and recording



4.8 Implementation

- It is understood that Defence Infrastructure 4.8.1 Organisation (DIO) seeks to submit an outline planning application for the redevelopment of the site in the summer of 2012 with the benefit of the responses on the draft Urban Design Framework. DIO should be aware that they will need to ensure that any outline planning permission permits development in phases in order for each phase to be considered as a separate chargeable area with regards to the CIL. DIO hopes to sell the site with the benefit of outline planning permission, and the end developer will then devise a detailed scheme for the site. The Regiment Building along Buckden Road will be retained for use by the Air Cadets.
- 4.8.2 It is the intention of DIO to vacate the site, and leave all the buildings and other structures in situ. Parts of the site will be fenced off by the owner with security in place to guard the site from vandalism. The extent of this fenced off area will need to be agreed with the District Council after discussion with the Parish Council.
- **4.8.3** It will be the responsibility of DIO to maintain the listed buildings and associated structures on the site in the same condition as they left them and subsequently this obligation will transfer to successes in title.
- **4.8.4** Access from the retained Annington Homes buildings to Buckden Road will still be needed around the fenced off parts of the site.

- 4.8.5 Existing facilities such as the playing fields and tennis courts will need to be retained and accessible to the public immediately after the base is closed, while the rest of the site is fenced off. Without such maintenance they will rapidly deteriorate and become a financial burden to reinstate. Legal agreements will be necessary to ensure the effective maintenance of these facilities by the landowner until such time that they are transferred to any other public body. It may be that future owners would welcome an early transfer of responsibility to the Parish or District Council (accompanied by a suitable commuted sum). These much needed facilities will generate from the outset a sense of interdependency of Brampton Park with the remainder of the village.
- The existing pedestrian access from the north 4.8.6 western corner of the site to the adjacent public Right of Way (RoW) is via a controlled manned gate which is opened at either end of the school day to allow children to walk to school. It is important that access to the public RoW is available immediately after the base is closed to allow children living in the Annington Homes dwellings to walk to school. The existing access from the base to the public RoW is over private third party land. Arrangements need to be made prior to the closure of the base to ensure that suitable access arrangements are in place. It may be that the early provision of the new access from the north western corner of the site to the RoW is implemented prior to the closure of the base. Early discussions between DIO, the adjacent landowner and the Parish and District Council are necessary in this regard.
- **4.8.7** It is anticipated that the responsibility for demolishing existing structures on the site will lie with any future developer and subject to appropriate site survey work and assessment which will consider their significance. A phased plan for the demolition of these structures, the retention of open space, the reuse of existing buildings, the bus route, and the general redevelopment of the site, must be agreed between the District Council, the current owners of the site and the eventual developer. This plan will include measures to control noise and inconvenience generated by the redevelopment of the site during this time.
- **4.8.8** A contamination survey will be required to be submitted prior to any development on the site. Any contaminated land found will be required to be remediated to the appropriate standard prior to any construction on site.
- **4.8.9** There is preference within the Parish Council for the development to be called Brampton Park. The Parish Council also has a strong wish to be involved in the naming of new streets.



5. USEFUL INFORMATION

5. Useful Information.

Government has set out urban design principles in documents such as:

Better Places to Live, a companion guide to PPG3, CABE 2001

http://www.communities.gov.uk/publicationspla nningandbuilding/betterplaces

By Design - Urban design in the planning system, DETR, 2000

www.cabe.org.uk/publications/by-design

Car Parking - What Works Where - English Partnerships

www.englishpartnerships.co.uk/qualityandinnov tionpublications.htm

Creating Successful Masterplans, CABE, 2008

www.cabe.org.uk/publications/creatingsuccesful -masterplans

Safer Places – The Planning System and Crime Prevention, ODPM, 2004

http://www.communities.gov.uk/publications/pla nningandbuilding/saferplaces Start with the Park, creating sustainable urban green spaces, CABE 2005

www.cabe.org.uk/publications/startwiththepark

The Value of Housing Design and Layout

www.cabe.org.uk/publications/the-value-ofhousing-design-and-layout

Urban Design Compendium – English Partnerships

www.urbandesigncompendium.co.uk

Other useful documents that have been published by various agencies and organisations include:

Cambridge Housing Sub-Region Property Size Guide, Draft Consultation, August 2010

http://www.cambridgeshirehorizons.co.uk/docu ments/shma/2010_editions/consultations/size_g uide_complete.pdf

Guidance for Sustainable Urban Drainage Systems, Environment Agency

www.environmentagency.gov.uk/business/sectors/36998.aspx Joseph Rowntree Foundation, Creating and Sustaining Mixed Income Communities

www.jrf.org.uk/sites/files/jrf/9781905018314.pdf

Manual for Streets, Department for Transport, 2007

www.dft.gov.uk/pgr/sustainable/manforstreets

Manual for Streets 2, Department for Transport, 2010

http://www2.dft.gov.uk/pgr/sustainable/manfors treets/

Secured by Design – New Homes Guide 2010

www.securedbydesign.com/pdfs/SBD_New_Hom es_2010.pdf

Sport England, Active Design 2007

www.sportengland.org/facilities.../active_design. aspx



Corporate documents published by or affecting Huntingdonshire District Council and will inform the development of the RAF Brampton include:

Cambridgeshire and Peterborough Minerals and Waste Development Plan

Cambridgeshire Historic Environment Record

Cambridgeshire Quality Charter

Growing Awareness: A Plan for Our Environment 2008

Growing Our Communities: Huntingdonshire Sustainable Community Strategy 2008 – 2028

Growing Success 2010-2011

Housing Strategy 2006-2011

Huntingdonshire Community Infrastructure Levy – Charging Schedule 2012

Huntingdonshire Design Guide (2007)

Huntingdonshire Landscape and Townscape Assessment (2007)

Local Economy Strategy 2008 -2015

Local Investment Framework 2009

Joint Strategic Needs Assessment for New Communities in Cambridgeshire [Department of Health, (2007) Commissioning framework for health and well-being]

RECAP Waste Management Design

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