Huntingdonshire District Council
Local Plan
Matter 7 Statement

Examination in Public

July 2018
DAVID LOCK ASSOCIATES
ON BEHALF OF URBAN&CIVIC
Huntingdonshire District Local Plan
Examination in Public

Hearing Statement on behalf of Urban&Civic plc.
(Consultee 992844)

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Matter 7: Proposed site allocations – St Neots Spatial Planning Area

SEL2 St Neots East

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

1. U&C are development partners in Wintringham Park alongside the Nuffield Trusts (The Partnership). This site is one component of the St Neots Eastern Expansion along with Loves Farm East.

2. As illustrated below, the principle of development at St Neots East has been long established:

<table>
<thead>
<tr>
<th>Year</th>
<th>Document</th>
<th>Detail</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>Huntingdonshire Core Strategy</td>
<td>Identifies St Neots as a strategic location for 2650 homes</td>
</tr>
<tr>
<td>2010</td>
<td>St Neots Eastern Expansion Urban Design Framework</td>
<td>Framework for urban growth within the area</td>
</tr>
<tr>
<td>2012</td>
<td>Huntingdonshire Local Plan: Scoping and Initial Issues and Options</td>
<td>St Neots East features in each of the three growth scenarios as one of the key strategic development sites</td>
</tr>
<tr>
<td>2012</td>
<td>Huntingdonshire Local Plan: Strategy and Policy Consultation</td>
<td>Identifies the St Neots East Urban Extension within the St Neots Spatial Planning Area</td>
</tr>
<tr>
<td>2013</td>
<td>Huntingdonshire Local Plan</td>
<td>Identifies the St Neots East Expansion as a Strategic Expansion Location, and potential for 3700 homes and 25ha of employment land</td>
</tr>
<tr>
<td>2015</td>
<td>Huntingdonshire Local Plan Targeted Consultation</td>
<td>Identifies the St Neots East Expansion as a Strategic Expansion Location with potential for 3820 homes and 22ha of employment land</td>
</tr>
<tr>
<td>2017</td>
<td>Consultation Draft</td>
<td></td>
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<tr>
<td>2018</td>
<td>Submission Draft</td>
<td></td>
</tr>
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Statement on behalf of Urban & Civic July 2018
Question 2

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

3. A hybrid application for outline planning permission and access arrangements on the Wintringham part of St Neots East was submitted in October 2017. The description of development is as follows:

Hybrid planning application comprising:

1) Application for outline planning permission for development of a mixed use urban extension to include; residential development of up to 2,800 dwellings (C3), up to 63,500 sqm of employment development (B1-B8), District Centre including shops, services, community and health uses (A1-A5, D1 & D2), Local Centre (A1-A5), Temporary Primary School, Two Permanent Primary Schools, open space, play areas, recreation facilities and landscaping, strategic access improvements including new access points from Cambridge Road & A428, associated ground works and infrastructure. All matters reserved with the exception of means of access; and

2) Application for full planning permission for the construction of new roads, hard & soft landscaping, creation of SUDS and all associated infrastructure and engineering works including creation of haul routes.

4. The Partnership took the decision to submit as a hybrid application to enable early delivery of on-site infrastructure to facilitate new homes. A positive process of local engagement has been established which has results in minimal levels of objection to the development.

Question 3

What is the basis for this and is it justified?

5. The St Neots East SEL strongly accords with the NPPF key principle of sustainable development, through the coordinated provision of homes, jobs and supporting infrastructure within an accessible location. This equally supports the draft Local Plan’s Strategy Approach of concentrating development in locations which provide or have the potential to provide the greatest access to services and facilities.

6. The scale and type of uses proposed is based upon:
   a. identification of St Neots as a strategic location for growth in the 2009 Core Strategy;
   b. masterplanning and design work undertaken in the preparation and adoption of the St Neots Eastern Expansion Urban Design Framework in 2010;
c. inclusion in the Growth Scenarios under the Issues and Options stage of the Huntingdonshire Local Plan

d. a consideration of supporting infrastructure (e.g. transport linkages)

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

7. HDC’s Development Management Panel resolved to grant the Wintringham hybrid planning application for 2,800 dwellings in March 2018 subject to finalisation of the S106 Agreement. A separate full planning application for the construction of two vehicular access points and associated works was granted planning permission in April 2018.

8. The S106 agreement is currently being finalised and is expected to be signed by all parties with Planning Permission being granted in July 2018.

9. A school operator has been selected for the first primary school and a procurement process commenced. Discussions have also begun with housebuilders for delivery of the first residential parcels.

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

10. The development will deliver up to 2,800 new homes, a proportion of which will be affordable. Huntingdonshire District Council will allocate the affordable housing mix on the site. Building in sustainability will be an integral part of the development. The Partnership will promote good design through layout and orientation, meeting internal space standards and this is reflected in the submitted Key Phase 1 Design Code.

11. Wintringham Park will build upon the economic strengths of the area through the provision for a range of employment opportunities for residents of St Neots and surrounding areas. This includes a mixed-use district centre and a local centre to include a range of local retail and other commercial uses, together with scope for non-residential institutions, assembly and leisure, and health facilities. Up to 7,100 sqm of retail development will be provided in Use Classes A1, A2, A3, A4 and A5. Additionally, up to 63,500 sqm of employment development is to be provided in Use Classes B1, B2 and B8. The Partnership will be investing considerably in bringing commercial and employment development forward. This is aligned with The Partnership’s aspirations to support local jobs and skills work on the broader promotion of St Neots and
Huntingdonshire, linked to the existing EDGE partnership which is a jobs brokerage funded and led by Urban&Civic with the District Council, DWP, local colleges and Careers Service.

12. Two new primary schools are to be delivered as part of the development, both through the provision for serviced land and funding. The school sites will also provide scope for additional forms of entry, building in additional flexibility to the provision. Provision for secondary education services is to be secured through payments under the Community Infrastructure Levy which the development of the site will attract. The application provides for nursery/créche uses to be brought forward within the District and Local Centres and for early years provision within the two on-site primary schools.

13. Wintringham Park will secure a number of transport improvements supporting local and wider travel. This includes upgrades and enhancements to existing road junctions within St Neots and along the A14, including as Caxton Gibbet, should these be required pending the delivery of Highways England’s planned A14 Road Improvement Scheme. These will support the functioning of the existing road network, the expansion of St Neots and larger planned Eastern Expansion Area, as well and the proposed growth strategy for Huntingdonshire. A package of upgrades and environmental enhancements to Cambridge Road will be jointly delivered in connection with Wintringham and Loves Farm Phase 2 (Loves Farm East). This will provide new infrastructure for pedestrian and cycle access and for bus stops or laybys where required to cater to existing and extended bus services. The development will provide for bus provision including both on and off-site bus stops and services.

14. A range of civic uses will be co-located within and associated with the planned District and Local Centres. These include leisure centres, multipurpose community centres, library, faith spaces, cultural attractions or nursery/créche uses together with two new primary schools. In recognition that the community building should be a fully developed centre to serve the planned expansion area, this will encompass a broad range of services and is to include community centre facilities comprising flexible rooms and larger spaces capable of accommodating youth, sports and library uses. Supporting facilities, as would be required to enable the functioning of the building for a variety of purposes, will potentially include ICT facilities, storage and offices spaces, kitchen facilities, WCs, meeting rooms, car and cycle parking.

15. The development will deliver a varied, connected network of open space of more than 60 hectares supporting sport and activity across all ages. This will include play facilities including LAPs, LEAPs, NEAPs; a skate park; mini soccer; full sized soccer; tennis courts; and a bowling green. Indoor sports uses will be accommodated as part of a multi-use community hub to be provided within the District Centre. The development will include an extensive network of recreational routes, circular walks and perimeter greenways to connect with the established...
rights of way network to the east and west of the site. A package of community development initiatives is to be delivered, supported by the appointment of a Community Development Worker to be funded by the Partnership. The initiatives will present a tangible opportunity to put healthy lifestyles and physical activity at the heart of the new community from the outset.

16. A number of biodiversity benefits will also arise from the provision of 48.45 hectares of informal open space at Wintringham. The development will safeguard and enhance existing high value Green Infrastructure assets including recreational routes and the Hen Brook and Wintringham Brook and support the delivery of a connected multifunctional habitat mosaic linking into the existing hedgerows and tree lined watercourses. Approximately 3.2 hectares of productive landscape will be provided promoting local food production with provision for community allotments and orchards. The development will establish a new gateway to existing Green Infrastructure destinations within the immediate context of the site, such as the Great Ouse River Valley Corridor, Paxton Pits, Riverside Park and Barford Road Pocket Park. This will provide a high-quality landscape setting to support sustainable economic growth and attracting inward investment of jobs and people.

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

17. All potential impacts have been fully assessed through the Environmental Impact Assessment (EIA) undertaken in support of the hybrid planning application and will be mitigated in full in accordance with the outcomes of EIA.

**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?

18. Wintringham Park is bisected by the Hen Brook, the Wintringham Brook and a tributary of the Wintringham Brook, which generally flow to the west to the River Great Ouse. Environment Agency Flood Zone maps indicate that the majority of the site is located within Flood Zone 1 – Low Probability of flooding.

19. The Wintringham Park Environmental Statement included an assessment of flood risk carried out by Peter Brett Associates LLP (PBA). This was supported by a report titled *Wintringham Park, St Neots - Flood Risk Assessment, October 2017.*
20. As a result of the assessment, proposals have been agreed including a surface water management strategy, prepared in accordance with the principles of the Cambridgeshire Flood and Water Supplementary Planning Document (Adopted by Huntingdonshire District Council in April 2017), to regulate flows to the watercourse network and demonstrate that flood risk downstream is not increased as a result of the development proposals.

21. The FRA shows that development will be located in areas at the lowest probability of flooding and that flood risk impacts will be mitigated such that occupants are safe and flood risk elsewhere is not increased. On this basis, the assessment concludes that the development proposals comply with planning policy in respect of development and flood risk.

22. The Parameter Plan for Wintringham Park has been developed in accordance with the ‘sequential approach’, such that all More Vulnerable and Less Vulnerable uses will be located within Flood Zone 1.

**Question 8**

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

23. All infrastructure requirements and costs have been fully assessed as part of the planning process, through the completion of an Environmental Assessment, Transport Assessment, Green Infrastructure Statement, and Sustainability Statement, submitted and approved within the Outline Planning Application.

24. The S106 Agreement (2018), ensures the phased delivery of infrastructure and facilities, including early provision of education facilities, open space, and access routes.

25. As part of the Hybrid Application approach details have been submitted for green and grey infrastructure to serve early development within the first phase of development and will be the subject of first implementation on site in 2018.

**Question 9**

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

26. The Wintringham Environmental Assessment fully considers the impacts of the scheme on utilities including potable and foul water.
Significant infrastructure already exists, and capacity has been confirmed by Anglian Water. Future reinforcement requirements will consist of upgrading pumps and the installation of up to a 280mm OD HPPE from the existing 355mm HPPE main at Priory Hill Reservoir.

Discussions are ongoing with Anglian Water to agree a phased approach using the existing Pumping Station and Rising Main located at Loves Farm and what residual capacity remains in St Neots WRC. A pumping regime will be proposed to convey flows to the WRC 2.2km to the north west of the site including standby pumps and telemetric systems as mitigation.

**Question 10**
Is the site realistically viable and deliverable?

The development proposals have been subject to a full viability assessment with review mechanism built in. The hybrid planning application is designed to allow early delivery of infrastructure and Cambridgeshire County Council, are currently developing a planning application for the first primary school on site to enable timely delivery in September 2020.

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

The St Neots East Strategic Expansion Location consists of two sites (Wintringham Park and Loves Farm Phase 2) that will be delivered within the plan period and will be built out separately with a number of distinct phases within each site.

The Partnership is committed to early delivery of development at Wintringham Park and the timely submission and approval of a hybrid planning application is key to enable this. The hybrid planning application was submitted in Q3 2017 as set out in the response to the AMR and includes details seeking full planning permission for infrastructure serving the first phase of the development.

The Partnership remain of the view that the construction of new homes will be underway on site in 2018/19. However, due to the fact that the determination of the hybrid planning application has been delayed, it is now unlikely that the 25 homes predicted in this period of the AMR will be possible.

With a positive set of outcomes from the planning process in terms of finalisation the S106 agreement, issuing of the Hybrid Planning Permission and the swift turnaround of Residential Reserved Matters applications, the Partnership believe that it would be possible to deliver in
the region of 65 homes in 2019/20. This still reflects the full build out of the scheme within the Local Plan period but recognises the realities of a delayed start on site.

Should the positive planning outcomes sought not be achieved. the Partnership would revert to the view of the Inspector at the recent appeal at Thrapston Road, Brampton (APP/H0520/W/17/3172571) where he concluded:

“I consider that the trajectory should be pushed back at least one year which would result in a reduction of 250 dwellings being completed within the next 5 years”.

Source: Inspector’s Report, 11th December 2017 (Para 27)

In the light of this, delivery is projected over a 14-year period at an average annual rate of 200. This represents an achievable rate of delivery, taking into account the following key considerations:

- there is already a momentum of delivery in the area building on the current Loves Farm Scheme;
- this is a greenfield site, with limited constraints and existing infrastructure opportunities;
- the site is in a fantastic location relative to the market with easy access to St Neots town centre, the Rail Station with connections to London and to the employment centre of Cambridge in the East;
- the hybrid planning application, including the detailed Design Code and full proposals for initial infrastructure, provides a platform for reserved matters to be brought forward quickly and infrastructure to be delivered at an early stage; and
- housebuilders for the first parcels have already been identified and a reserved matters application for the first parcel is currently being developed.

A number of these factors are corroborated by the Nathaniel Lichfield & Partners research paper ‘start to finish’ (November 2016) which highlights the key influencing factors of local market strength, number of sales outlets and tenure mix.

Whilst it is accepted that all development sites have unique circumstances regarding delivery, the figure below provides a comparison to other large sites that have delivered (or are still delivering) a large volume of residential units. The selected sites have all achieved a higher peak number of dwellings within a single year than is currently projected for the Wintringham Park site. All three of the selected sites have also achieved an average number of dwellings per annum that is greater than currently projected for the Wintringham Park site.
As evidenced by analysis set out within the *Letwin Independent Review of Build Out Rates* (June 2018), large sites are a fundamental part of housing supply with rapid house building a consequence of variety within those sites. Significantly, research contained within the Letwin Review highlights that the median percentage of the site built each year averages at 6.5%. This equates to 182 dwellings per year at Wintringham Park, however, given the conditions set out above and the comparators identified, the Partnership are confident that the identified levels of delivery can be achieved.

**Question 12**

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

39. The site boundary for the SEL is appropriate – it reflects the area bounded by the Outline Planning Application for Wintringham Park and the area bounded by the Outline Planning Application for the Loves Farm Phase 2.

**Question 13**

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

40. The detailed policy requirements align with the submitted hybrid planning application and are reflective of a long-established evolution of policy including the St Neots East Urban Design Framework. They are considered to be effective, justified and consistent with national policy.