



Local Plan Examination Hearing Statement

In respect of:

**Huntingdonshire District Council Local Plan 2011-
2036**

**Matter 8 – Proposed Site Allocations (St Ives
Spatial Planning Area)**

HLP2036-PS:442

Author:

Andy Brand BSc (Hons) MA MRTPI
Planning Director
The Abbey Group Cambridgeshire Limited

My Ref: TAG/HDC02

1.0 Introduction

- 1.1 The Abbey Group Cambridgeshire Limited (“Abbey”) is a property developer and land promoter based in Cambridgeshire who have submitted various schemes in Huntingdonshire ranging from renewable energy projects to residential and commercial schemes.
- 1.2 The Abbey Group is made up of a number of companies including Abbey Properties Cambridgeshire Limited. RPS are appointed to act for Abbey Properties Cambridgeshire Limited in relation to this examination in public and they will give evidence on Abbey’s behalf in relation to a range of matters.
- 1.3 I am the Planning Director of Abbey and have been in post for over 4 years. Prior to joining Abbey I was employed as a Development Management Team Leader at Huntingdonshire District Council between 2012 and 2014. I am a Chartered Town Planner with over 15 years of experience.
- 1.4 My statement refers only to two sites within St Ives (Vindis and St Ives North) in relation to the issue as to whether the proposed site allocations for the St Ives Spatial Planning Area are justified, effective and consistent with national policy.
- 1.5 My statement seems to identify two new locations for housing within the St Ives Spatial Planning Area. In so doing I do not per se object to any of the proposed housing allocations within St Ives (given that they rely upon already approved schemes and brownfield land for residential land allocations) but I do agree with the St Ives Town Council (HLP2036-PS:745) that additional housing is needed within the town in order to reflect the status of the town within the settlement hierarchy of the District. I would also note that St Ives is a settlement which would be able to viably deliver new housing growth.
- 1.6 I therefore do not directly respond to the Inspector’s Questions (as those relate to individual sites) but I do address appropriate considerations below. Section 2 refers to the Vindis Car Showroom site and Section 3 refers to St Ives North. Location plans off each of the proposed allocations have been previously provided but are included at **Appendix One** and **Appendix Two** respectively.

2.0 Vindis Car Showroom Site, St Ives

- 2.1 This site was originally allocated within PREP/05 for 70 dwellings. The allocation was removed, we understand, on the basis of an objection from the Environment Agency.
- 2.2 We have been working with the Environment Agency since December 2016 and believe that we have agreed a position whereby, subject to mitigation which relates principally to the ground floor design and use of the development, the sites redevelopment can be supported in principle. We have recently received confirmation of an appropriate method on which to consider flood risk and to calculate levels. This is attached at **Appendix Three**. We are also due to hold initial pre-application discussions with the Local Planning Authority ahead of the Local Plan examination and a copy of the Design & Access Statement which informs those is attached at **Appendix Four**.
- 2.3 Having regard to the Council's assessment of the site within HOUS/02 (pages 328- 330) I comment as follows:

SA Objective	Comments
1.	Noting that Appendix 2 of HOUS/02 establishes that high density development is 85 dwellings per hectare of built form we would not object to this comment per se. A scheme of between Medium and Low density would be appropriate though here in order to provide a high quality design of an appropriate scale to the gateway location which the site enjoys. It is not therefore appropriate for the Council to give this a negative score – it should be positive.
4.	We consider that the site could link in to a green network given its access to the marina and other water fronting areas which benefit from public access. The negative score should therefore be replaced with a positive score.
10.	Noise and light pollution should be identified as a positive impact given the ability to remove the existing use from the site and to replace this with domestic effects in this regard.
15.	It is not clear why the Council's assessment considers that insignificant affordable housing would be available on site. The score should be positive or at least neutral.
20.	The score should be positive given the first sentence in the Council's assessment.

- 2.4 The assessment that the Council has undertaken is therefore incorrect in relation to five objective points. The site is considered to be sufficiently suitable and is certainly available for development and achievable.
- 2.5 The Council's assessment therefore wrongly concludes that the site is not appropriate on the basis of flooding and availability.
- 2.6 I therefore conclude that allocating the site for new housing development would be appropriate in that the future redevelopment of this site would be consistent with the aims of national planning policy.

3.0 St Ives North

3.1 Having regard to the Council's assessment of the site within HOUS/02 (pages 334-337) I comment as follows:

SA Objective	Comments
1.	The third impact box should be positive as higher densities could easily be accommodated within the development.
3.	The small part of the site that is within the climate change allowance zone need not produce an overall negative impact.
4.	The negative impact should be positive.
6.	The Council's assessment does not identify any significant adverse impacts – clearly development would have some impact but a neutral score would be more appropriate given the sites containment.
10.	Light pollution could be minimised and in any event the roads to the south of the site are all lit. A neutral impact would be appropriate.
21.	Our position is that the site could be successfully accommodated without any severe residual impacts arising upon the safety and free flow of traffic in the local area. The development could assist in tackling particular areas of concern by widening junctions within highway land. We do not believe there to be a capacity concern as alleged. A neutral impact would result rather than a negative one.

3.2 An indicative site masterplan has been developed and this has been provided to the Council in response to previous iterations of the Housing and Employment Land Availability Assessments. This is included at **Appendix Five**.

3.3 The masterplan demonstrates how a high quality scheme of up to 1,500 dwellings together with employment, education and commercial uses could be developed at this site. It would provide a logical expansion of St Ives in an area that is significantly less constrained than other greenfield locations on the edge of the town. For example land to the south of St Ives is constrained by flood risk and land to the east and west raises concerns over coalescence with neighbouring parishes.

3.4 The Council's assessment concludes that the development is only not acceptable based upon transport grounds. There is though no evidence to identify this and as such the site could be allocated for housing and mitigation could be proposed through a Transport Assessment. The development can only address its own impacts but it is clear that it could provide a joined up approach in order to seek to deliver an appropriate scheme.

3.5 Further representations have been made in relation to part of this overall site by others. There is a clear message that there is a willingness to see the overall site developed and so this should not be perceived as a barrier to development coming forward.

3.6 I therefore conclude that allocating the site for new housing development would be appropriate in that the future development of this site would be consistent with the aims of national planning policy.

Appendix One – Vindis Site Location Plan

H.M. LAND REGISTRY

TITLE NUMBER

CB104173

ORDNANCE SURVEY
PLAN REFERENCE

TL3070 TL3170

Scale
1/2500

COUNTY CAMBRIDGESHIRE

DISTRICT HUNTINGDONSHIRE

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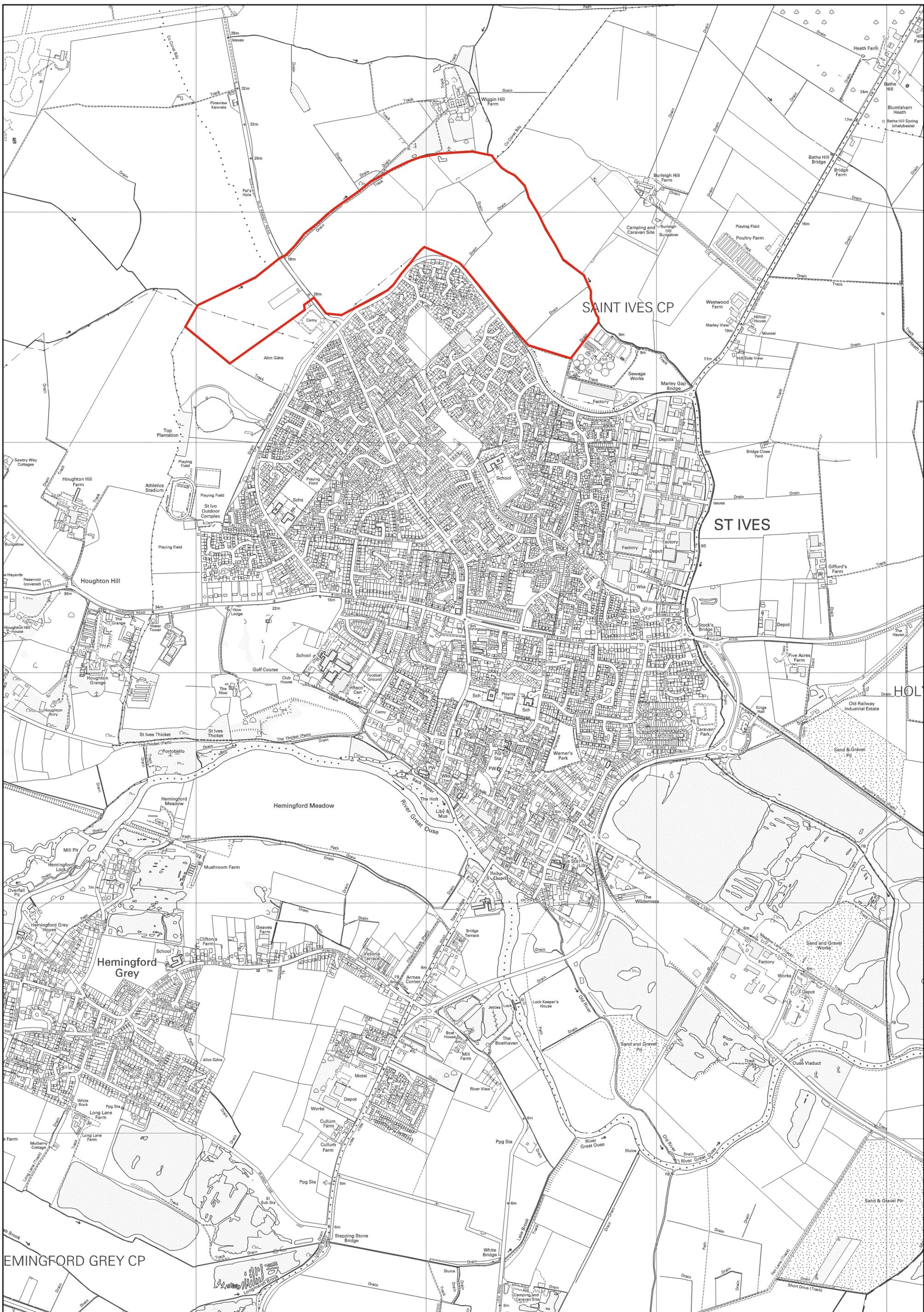


TL3070
TL3170



CB104173

Appendix Two – St Ives North Site Location Plan



**Appendix Three – Environment Agency correspondence relating to the Vindis
Site**

Ms Leigh Parratt
Amazi
13 Tovells Road
Ipswich
Suffolk
IP4 4DY

Our ref: AC/2017/126015/02-L01
Your ref: AMA588
Date: 03 July 2018

Dear Ms Parratt

COST RECOVERED ADVICE, ENVPAC/1/EAN/00036: REVIEW OF FLOOD RISK INFORMATION (CLIMATE CHANGE ENHANCED FLOOD LEVEL) VINDIS SITE, LOW ROAD, ST IVES

Thank you for your e-mail regarding the above mentioned site, which was received on 19 June 2018.

We have reviewed the calculations submitted and have the following comments to make:

Method 1a

- This method uses the Excel forecast function to estimate the level based on an extrapolated 1% x 1.35 flow at node Gt011800D, then adds this to the closest 2D water level. The result is 6.62mAOD.
- We would caution against using this method as the Excel relationship is only based on two data points.
- We would also caution against combining the 1D and 2D data for simplicity – these are estimates only in the light of no better information, therefore adding additional complexity to the calculation in combining the 1D node levels with the 2D water levels brings an unnecessary level of complexity to the calculation.

Method 1b

- This method uses the 'difference method' to estimate the 1+35% level at node Gt011800D, adding this to the closest 2D water level. The result is 6.598mAOD
- The difference method breaks down the difference between the 1% and the 1+20% level into 20 increments, then multiplies this up to give a +35% extrapolation. This is then added to the 1% level to give a 1+35% extrapolation.

- We would also caution against combining the 1D and 2D data for simplicity – these are estimates only in the light of no better information, therefore adding additional complexity to the calculation in combining the 1D node levels with the 2D water levels brings an unnecessary level of complexity to the calculation.

Method 2

- This method uses the 'difference method' as described above but applies it to the 2D water level data only, immediately adjacent to the site. The result is 6.627mAOD
- This has the advantage of giving a water level estimation immediately adjacent to the defence and the site, without using any in channel levels which are more remote from the site.

Using the information provided, the results have been re-created and confirmed, however the most appropriate technique is considered to be Method 2 as this method gives both an estimate immediately adjacent to the site & defence and does not attempt to combine the 1D and 2D results. Using the data from the 2D domain also eliminates any bias which may arise from selecting an in channel node point.

The results from each method however give similar results (within 3cm of each other), which suggests a certain level of robustness in the results of the extrapolation. A precautionary approach is encouraged when selecting which method to use in the next phase of the flood risk assessment.

We hope this is of assistance to you. If you have any further queries please do not hesitate to contact us.

Yours sincerely



Mrs Dawn Porter
Sustainable Places Planning Advisor

Direct dial 020302 51819

Direct e-mail planning.brampton@environment-agency.gov.uk

Appendix Four – Vindis Site Design Statement

DESIGN AND ACCESS STATEMENT

Vindis Site, Fenstanton, near St.Ives



NATIONAL PLANNING POLICY

The importance of good design in new development is set out in the National Planning Policy Framework. Paragraph 58 states:

“Planning policies and decisions should aim to ensure that developments:

1. will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
2. establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
3. optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
4. respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
5. create safe and accessible environments where crime and disorder, and the fear of crime and disorder, do not undermine quality of life or community cohesion and;
6. are visually attractive as a result of good architecture and appropriate landscaping.”

PiP and the client look to comply with this requirement within all of our developments.

OTHER DESIGN GUIDANCE

Urban Design Compendium 1 and 2, 2007, English Partnerships & Housing Corporation

By Design - urban design in the planning system: towards better practice, 2000, DETR & CABE

Building for Life, 2008, CABE

Huntingdonshire District Council, Urban Design Guide SPD, 2017

WHO ARE PiP?

PiP is an experienced, award-winning architectural practice located in central Cambridge. As a practice registered with CIAT, our reputation is built on delivering high quality and dependable designs from conception through to planning and construction. We are fortunate to have a large returning client base, including private individuals, colleges and developers.

Our entire team believes strongly in the role that good architecture has to play in enhancing the quality of our environment. We constantly keep abreast of the latest developments in architecture and construction technology so that we can provide elegant, effective and efficient solutions. In addition, we maintain strong relationships with planning authorities to ensure that we help our clients deliver buildings that support the needs of the local community.

From restorations of heritage buildings, to renovations, extensions and new builds, we are proud to have participated in projects that have delivered beautiful and sometimes award-winning residential and commercial buildings throughout Cambridge, Cambridgeshire and the wider East Anglia region.



INTRODUCTION

This Design and Access Statement has been prepared in support of pre-application discussions involving the proposed redevelopment of the Vindis site in Fenstanton within the Spatial Planning Area of St. Ives. It is intended to assist Huntingdonshire District Council in its consideration of this enquiry.

The Site

The enquiry site (which measures approximately 2.763 Hectares) is located on the A1096 London Road which forms an approach road to St Ives.

The site is presently owned by the Vindis Group and as a result of future relocation of their commercial vehicle business to an alternative site, the site will become available for redevelopment. The site has operated as a commercial showroom and service centre following the granting of planning permission in 1988.

In our view the site presents an important gateway into and out of St Ives. The majority of the site is open with the existing showroom and service buildings located on the western portion of the site. Along the southern boundary of the site is an existing attenuation pond which is to be retained within any future scheme.



ARIEL PHOTO

Flood defences have also been incorporated on the eastern area of the site in the form of bunding. To the north of the site is St. Ives Marina with more recent residential development to the west on the other side of the A1096 London Road.

The site was identified in the Huntingdonshire District Council emerging Local Plan (Targeted Consultation: 2015) as a suitable site for residential development for approximately 70 dwellings.

However this draft allocation was subsequently withdrawn due to flood risk issues. Since 2016 the applicants has been in detailed discussions with the Environment Agency (EA). We believe that an acceptable position has been agreed and a note of understanding has been agreed with the EA (see Appendix 1). This establishes some immediate design constraints – principally in relation to levels and the need for elevated escape routes. We recognise that the site still requires assessment through the exception test (as required by paragraph 102 of the NPPF) but in this regard we note the Council’s position within its ‘Sequential test for flood risk’ report (2017) which concludes that, at present, the site is not in need of regeneration and as such it would not presently pass the exception test. It follows that should the site become vacant then it would be in such need.

Redevelopment of this important and prominent site offers a real opportunity for the provision of much needed new housing within the District, enhancements to the built environment, the re-use of brownfield land within a sustainable location and an opportunity to create a new gateway development into the town.

The following pages provide further information and analysis of the site and begin to set out some design principles for the future development of the site



LOCAL FACILITIES & AMENITIES



- BUS STATION
- SCHOOL
- PUBLIC HOUSE
- CHURCH
- POST OFFICE
- GARAGE
- VILLAGE HALL
- RECREATION GROUND
- ALLOTMENTS
- BUS STOP

LOCATION PLAN



CONSTRAINTS & OPPORTUNITIES: PLAN



VISUAL CONTEXT



Looking across half of the site from the entrance on Low Road towards the roundabout and the A1096 London Road.



Looking into the site from the A1096 London Road. The existing showroom building is set-back from the road. Forming the western and part of the northern boundary of the site is an existing SUDS drainage ditch.



A large man-made pond runs along the southern boundary of the site. The pond was created by excavating earth which was then used to build up the ground level for the car showroom on the site.



Looking north east across the parcel of open semi-improved grassland which forms the eastern section of the site. Flood defences run along the eastern and northern boundary of this section of the site.

DESIGN PROPOSAL

The current proposal seeks to develop the application site (approximately 2.763 Hectares) which is located on the A1096 London Road.

The proposal would provide for a total of 84No. new homes. The affordable housing element of the scheme will evolve through discussions with the Council. We believe though that the site will engage the concept of vacant building credits in due course.

Layout and Access

The proposed Layout Plan shows units divided in two different type of houses of 3-4 beds terraced and flats blocks of 1-2 beds units.

The rear gardens of the terraced houses are organized in two different levels. The first level on the ground and adjacent to the private parking spaces and the second level on the first floor connected to the footbridges located within the residences with the function of connecting the dwellings to the pedestrian entrances of the site which would be used in case of a flood. All the back gardens comply with the Design Guide requirements and in most cases exceed them, providing better spaces for homes. All 1 and 2

bedroom flats have a single parking space, all 3 and 4 bedroom units have two spaces within the curtilage.

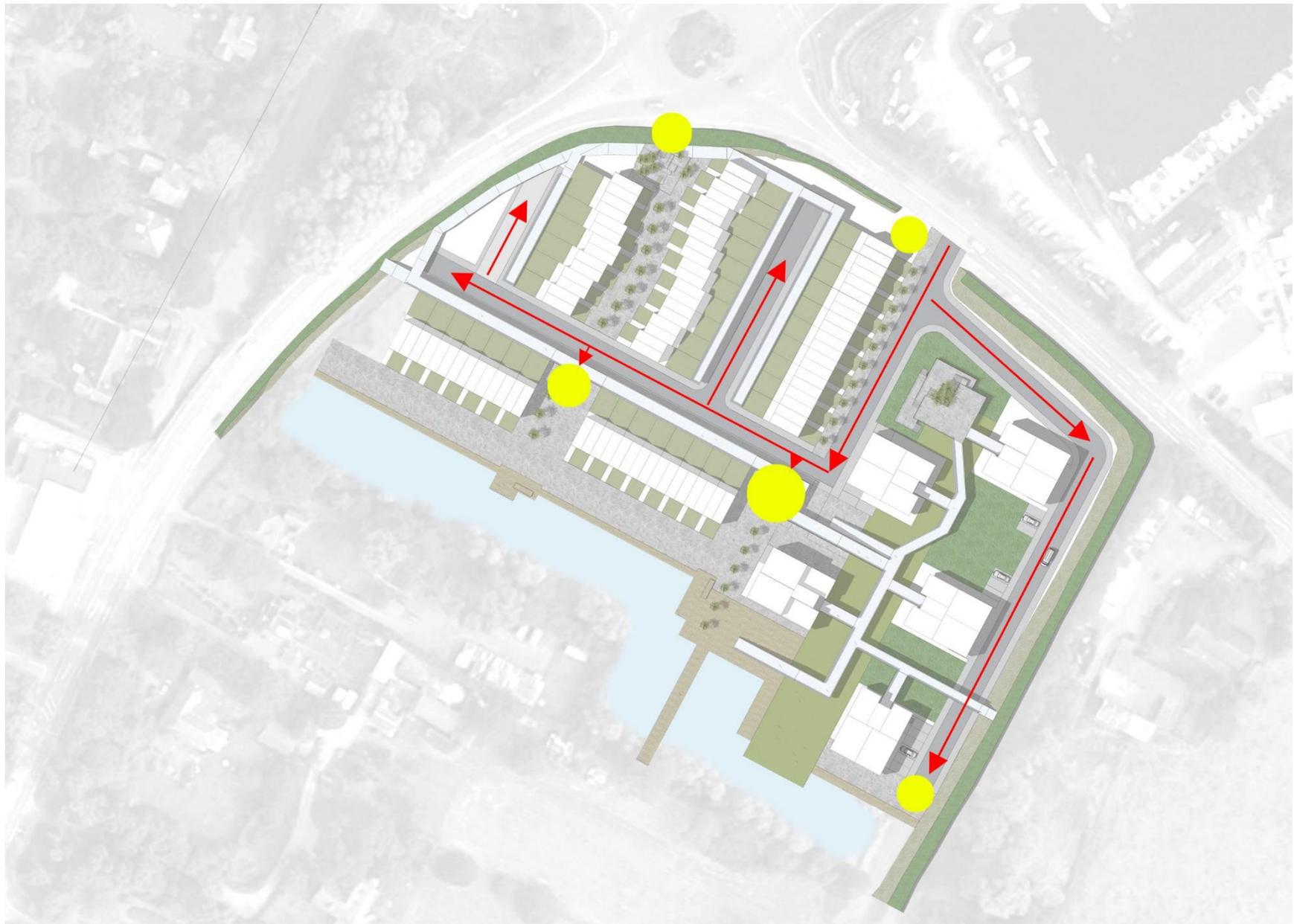
We propose a pedestrian green axis near the western boundary connecting the site entrance to the promenade along the pond. This may require refinement in the event of ecological constraints associated with the pond. A second axis has been designed to connect the vehicle entrance to the footbridge crossing the pond. The communal garden located within the flats blocks would provide a third axis which would integrate the flats blocks and their amenities to the rest of the site and specifically to the areas of main interest.

Through our explorations of different approaches to the arrangement of the site we have identified that is the best area within the site for the communal gardens and the promenade along the pond as they will remain accessible to new residents and wider community.

DESIGN PROPOSAL

Key:

-  Drop-off area
-  Vehicle circulation



DESIGN PROPOSAL

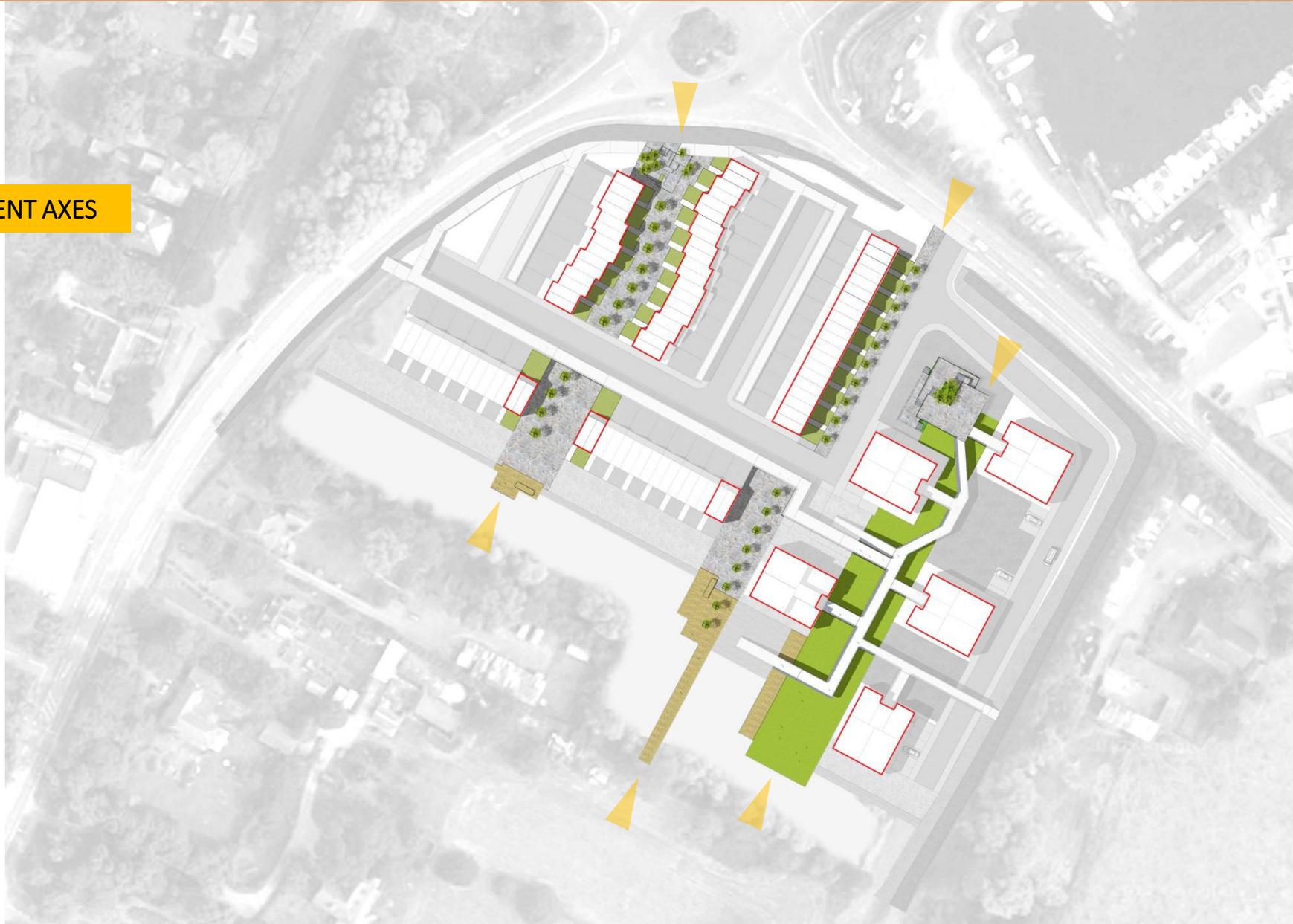
Key:

-  Pedestrians walk above 7.00m
-  Pedestrians Walk at ground level



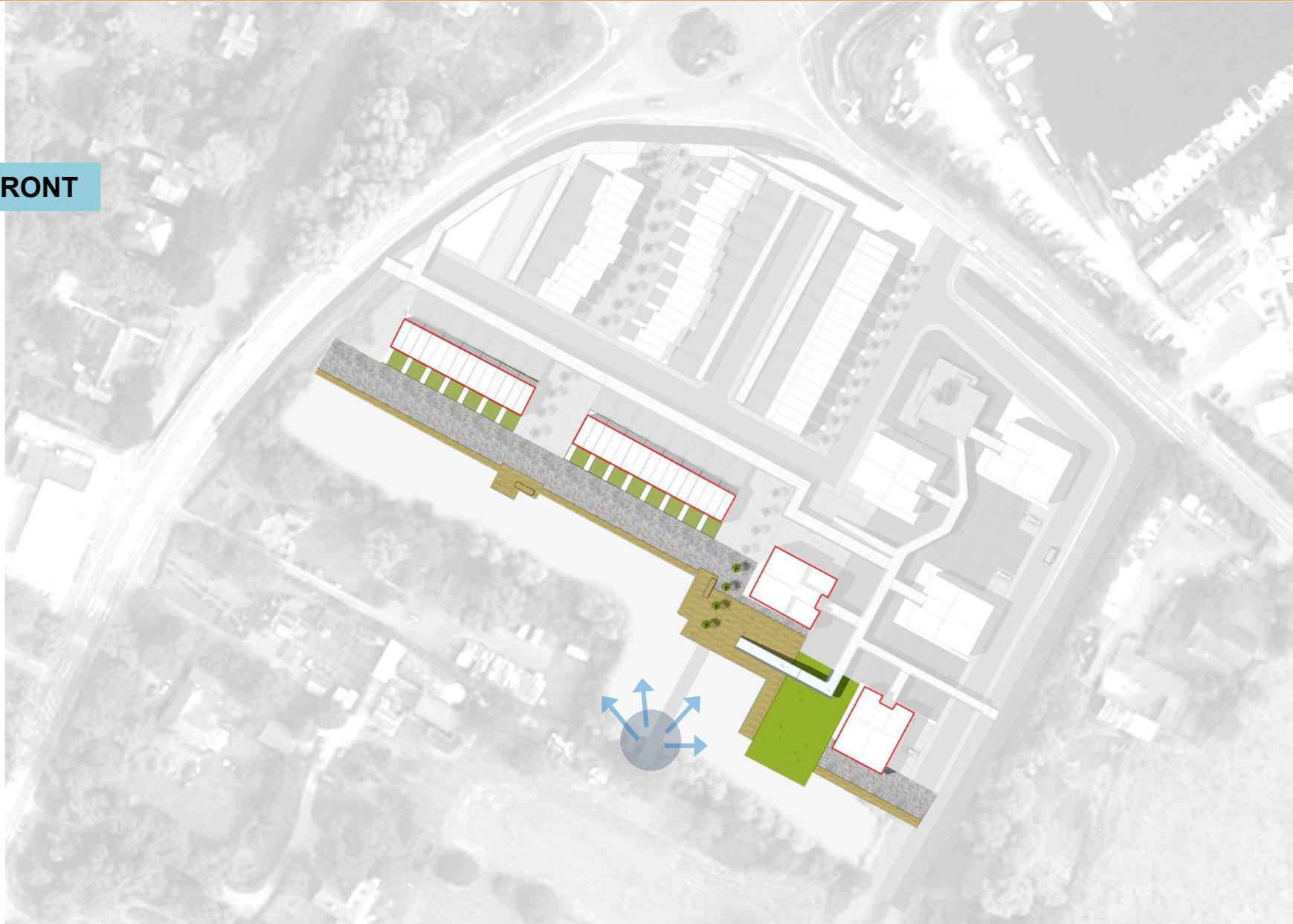
DESIGN PROPOSAL

MAIN DEVELOPMENT AXES



DESIGN PROPOSAL

WATERFRONT



DESIGN PROPOSAL



DESIGN PROPOSAL

PROPOSED LAYOUT PLAN



ACCESS

Vehicular Parking and Access

The main access to the site would be achieved through the northern boundary on Low Road.

The proposed access incorporates a 5.5 metre wide carriageway width and kerb radii's designed to facilitate the movement of refuse vehicles without encroaching the opposite side of the carriageway.

Waste Storage & Recycling

The layout accommodates the waste storage within integral garage or porch areas. This will be large enough to accommodate coloured 240 litre wheeled containers (allocated for green waste, dry recyclables, and residual waste) which conforms to adopted guidance. Gate widths are to be a minimum of 1m. Internally, kitchens are to be provided with integral separate waste containers to encourage recycling.

Sufficient turning space has been provided towards the end of the site to allow for an

11.65m length refuse vehicle to manoeuvre. All travel distances for collections are in accordance with RECAP Waste Management Design Guide.

Disability Design and Access

Disabled access has been provided which is compliant with current Approved Document Part M of the Building Regulations. External surfaces and parking areas will be paved in a smooth hard material suitable for use by wheelchairs.

All doors are to have level thresholds which will be of a sufficient width to facilitate wheelchair access.

Consideration is to be given to the interior colour scheme to provide a contrast between elements such as skirtings, and any signage is to be of an appropriate size to aid the visually impaired. The gardens are to be fully accessible.

COUNCIL INPUT

Following our agreement with the EA we are now looking to engage with the Council in order to progress the layout and design of the scheme ahead of submitting a full planning application.

The images which follow this page provide our initial design concepts at this stage.

As stated above there are some initial design parameters relating to flood risk (i.e. the introduction of raised walkways within the site and no ground floor habitable rooms) which cannot be diverted away from.

In our view the redevelopment of the site can use this as a positive step in seeking to deliver a vibrant and unique development which uses the parameters positively.

We would welcome engagement with the Council in relation to the following matters within the initial pre-application enquiry meeting:

- i) The principle of redeveloping this brownfield site
- ii) Confirmation of the engagement of vacant building credits
- iii) Recognition of the design parameters
- iv) Initial discussions and thoughts with regard to design, density and landscaping
- v) Initial discussion in relation to traffic, access and open space

Should the meeting provide a positive outcome then we would look to engage with the Council via a Planning Performance Agreement in order to develop the design and review all other planning matters.

INDICATIVE ILLUSTRATIONS



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INDICATIVE ILLUSTRATIONS



APPENDIX ONE

Environment Agency Note of Understanding

APPENDIX ONE

The table opposite summarises measures requested by the Environment Agency established from discussions Dec 2016 – Sept 2017.

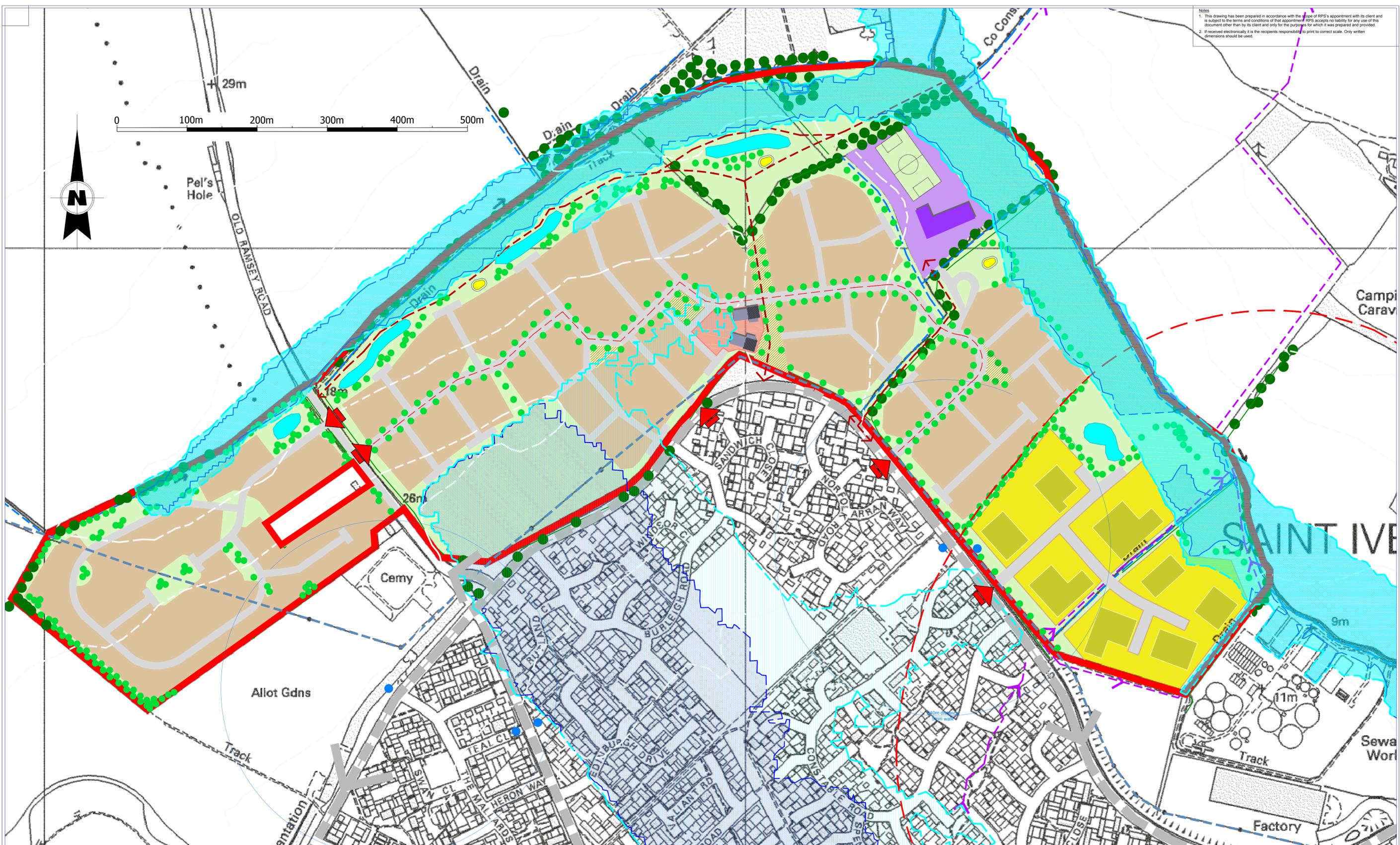
NB: Non-climate change flood data received from EA end Dec 2016 (password to access does not work – need to re-request). Climate change enhanced flood data received from EA end March start May 2017 (not password protected).

LSP, 18 September 2017

Topic	Measure	Reason	Record
Flood Storage	The sum of any proposed footprints on site should not be greater than the existing building footprint of 1,720 m ² . Given recent experience of other EA offices, this is likely to include all columns, garages and all structures, raised footways, roads etc.	To ensure no loss of flood storage on site in the 1:100 + 35% climate change (CC) flood event, i.e. up to a level of 6.603 mAOD.	Amazi email 11 July 2017 EA email 01 August 2017
Floor Levels	Finished floor levels must be a minimum of 400 mm above the peak 1:100 + 35% CC flood level, i.e. 6.603 + 0.4 = 7.00 mAOD.	To provide freeboard above design flood level.	Amazi email 11 July 2017 EA email 01 August 2017
Defence Failure	Any structures below 7 mAOD will need to be structurally capable to withstand the dynamic forces resulting from a sudden failure of flood defences. The EA has confirmed that it does not require a hydraulic model of breaching because access and floor levels to be above peak design flood levels, - use of look up tables only in an FRA.	To ensure the structures remain standing in the event of defence failure.	Amazi emails 11 July 2017 & 18 August 2017 EA email 15 Sept 2017
Safe Access	The EA has stated: <i>'The responsibility for assessing the suitability of access/egress during a flood event lies with the Local planning Authority'</i> . It can (just about) be demonstrated that 'safe' access is possible to the south as long as the site has an access to London Road at the north west corner of the site.	To provide safe access during the 1:100 + 35% climate change (CC) flood event.	Amazi email 11 July 2017
Flood Resilience	Building designs will need to be flood resilient in accordance with national guidance.	If flooding occurs the site will remain operational, or quickly return to normal use.	EA email 01 August 2017

Appendix Five – St Ives North Masterplan

Notes
 1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
 2. If received electronically it is the recipient's responsibility to print to correct scale. Only written dimensions should be used.



Key

- | | | | | | |
|---------------------------------|-------------------------------|----------------------------------|---|--------------------------------------|--|
| Application Site Boundary | Employment | Residential Roads | Bus stops with 240m/5min distance/walking circles | W7AM exclusion zone | Existing Contours |
| Residential Area | Vehicular Access Points | Local Squares | Overhead Power Line | Proposed Trees | Indicative Flood Zone 2 Ecological enhancement areas |
| Primary School Site and Grounds | Primary Road / Bus Route | Existing Public Right of Way | Informal Open Space | Proposed Hedges | Indicative Flood Zone 3 Ecological enhancement areas |
| Local Centre | Residential Tree lined Avenue | Footpath Network and Connections | Existing Vegetation | Ditches | Children's Play Area |
| | | | | Indicative Attenuation Pond / Swales | LEAP - LOCAL EQUIPPED AREA OF PLAY
NEAP - NEIGHBOURHOOD EQUIPPED AREA OF PLAY |

RPS
 Registered Office: 1 Poppy, Colton Business Park, Buntingford, CB9 9JF
 T: 01223 220000 F: 01223 220002 E: rps@rpsgroup.com W: www.rpsgroup.com

Job/drg. No: **AAHS376**
 Date: 20/01/17
 Drawn: DJ

Rev: **C**
 Scale: **NTS**

Client: **Abbey Properties Cambridgeshire Ltd. & Jane Norman and Richard Edward Anderson.**
 Project: **St. Ives North**
 Title: **Masterplan**

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Rev C: Bus route amended to Old Ramsey Road. 09/03/17
 Rev B: Application area amended and residential area increased. 06/03/17
 Rev A: Amendments made following Clients comments. 27/01/17
 Rev:
 For guidance only. Do not scale off this drawing