

Huntingdonshire Local Plan to 2036 Examination

Hearing Statement Matter 11:

Proposed site allocations – Local Service Centres

Huntingdonshire District Council

July 2018

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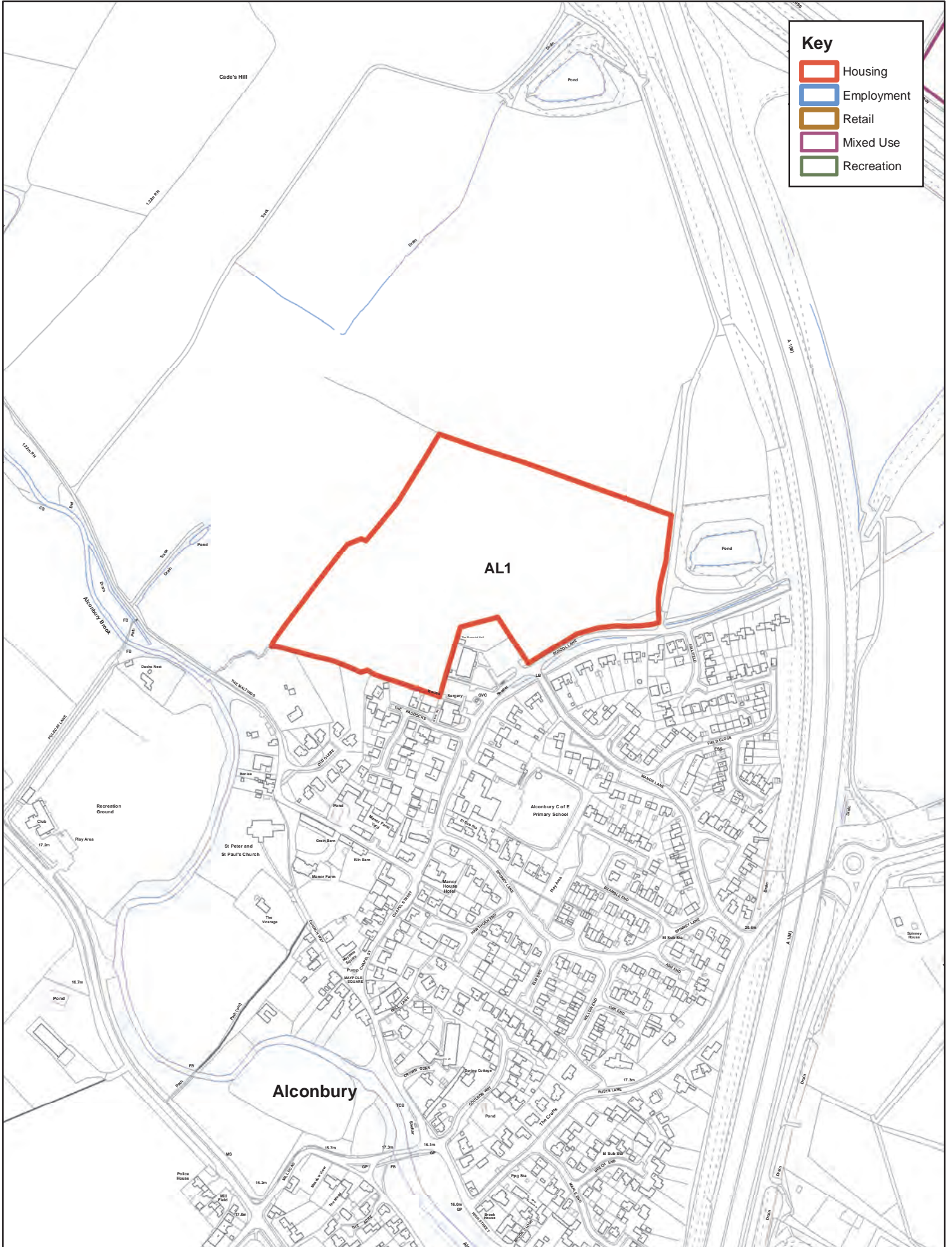
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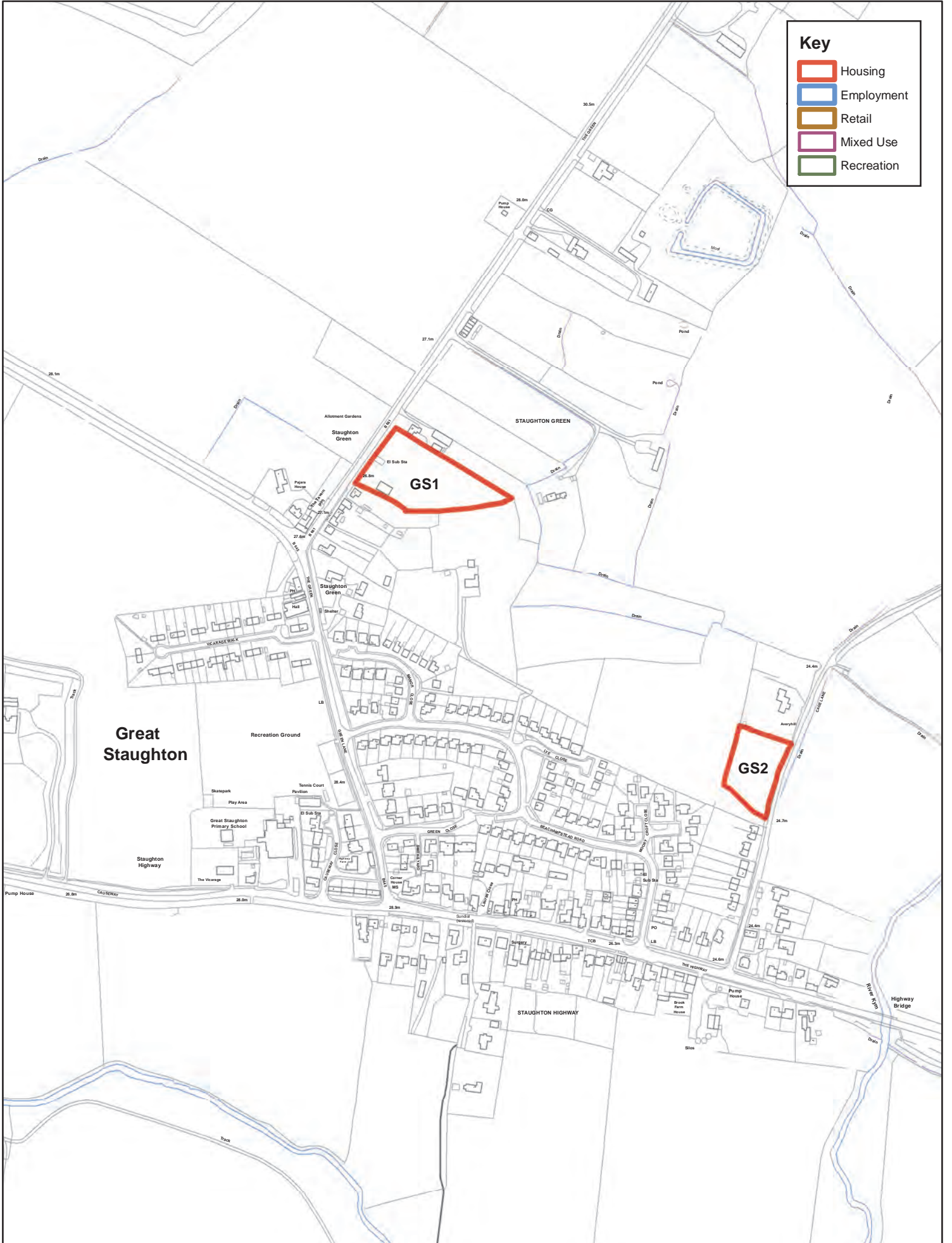
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Key

-  Housing
-  Employment
-  Retail
-  Mixed Use
-  Recreation



Issue

Whether the proposed site allocations for the Local Service Centres are justified, effective and consistent with national policy.

1. Alconbury

AL1- North of School Lane

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

- 1.1. The site is greenfield land with agricultural land extending to the north of the site.
- 1.2. It was submitted in response to the Call for Sites in August 2017 (HOUS/02: Availability, page 762) and has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 759-762 for full assessment).
- 1.3. This site wraps around the northern edge of the village in close proximity to the village hall, GP surgery and primary school giving it excellent access to local services and facilities. Although open the land slopes down towards the village containing it within the landscape. It has few constraints on site but would need to ensure substantial landscaping to the northern boundary. Therefore, it is considered suitable for low density residential development across 50% of the site resulting in an estimated capacity of 95 dwellings (HOUS/02: Suitability, page 761).

Question 2: What is the scale of housing development proposed?

- 1.4. The proposed use is for approximately 95 dwellings.

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

- 1.5. The Council's assessment of the site determined that a capacity for approximately 95 dwellings (HOUS/02 – page 761) is suitable recognising that the land slopes down towards the village, containing it within the landscape, that substantial landscaping would be required to the northern boundary and that it has excellent access to the services and facilities of Alconbury.
- 1.6. Initial assessment through the HELAA identifies that the site is considered suitable for low density residential development across a net developable area of 50% of the site. This results in an estimated capacity of 95 dwellings (HOUS/02 – pages 759-762).

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

1.7. No planning application has been submitted.

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

1.8. 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.

1.9. 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.

1.10. 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.

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

1.11. The HELAA identifies potential adverse impacts with regards to landscape impact due to countryside extending to the west and north of the site, the potential for noise and light pollution, air quality issues, transport impacts, impact upon ecology and pressure upon the water supply network.

1.12. Mitigation measures are identified in the HELAA and within allocation AL 1 (criteria a to g) in the Local Plan and include the requirement for a noise assessment and appropriate mitigation, retention and protection of trees and hedgerow along the boundaries, substantial landscaping along the northern and western boundaries, a design that incorporates any important views towards the Church of Saints Peter and Paul, provision of a surface water drainage strategy, provision of an ecological assessment and enhancement scheme and a suitable means of access to be provided alongside a sustainable transport network for pedestrians, cyclists and vehicles.

1.13. Representations submitted by WYG on behalf of the site promoters (ID: 998125) advise that a series of studies have been undertaken and these demonstrate that no potentially significant ground contamination has been identified which would significantly impact on the development of the site; noise impacts can be mitigated; there are no 'in principle' ecological constraints which would preclude residential development; the site can be satisfactorily

drained; and a Transport Feasibility Assessment identifies how the site access can be provided via a junction onto School Lane.

- 1.14. Representations have been received raising objections to the site. Main issues of concern include: the principle for residential development; lack of capacity on the local road network including the historic bridge in the village centre; increased parking congestion; the impact on the character of the village and lack of need for additional housing given the scale of development at nearby Alconbury Weald; impact on biodiversity and in principle protection of greenfield land; loss of land used for informal recreation; loss of views and privacy due to the sloping nature of the site; the lack of capacity within local services to accommodate the needs of additional residents; increased flood risk; and noise impacts due to proximity to the A1(M) (as detailed within CORE/04, Pages 128 to 132). These matters would be addressed through the mitigation measures identified in the HELAA, within criteria a to g of AL 1 in the Local Plan, and as part of the planning process for any subsequent application for planning permission. When all policies within the Local Plan are considered, the issues raised within the representations received would be assessed as part of the planning application process.
- 1.15. The representations received include comments from Statutory Consultees the Environment Agency (ID: 1146949), and Cambridgeshire County Council (ID: 1150302), object as the site is upstream of a surface water flow route that links to the Alconbury Brook, associated with flood risk in Alconbury, and advises that development on this site should reduce discharge rates. This matter would be addressed through the mitigation measures identified in the HELAA and within criterion f of AL 1 in the Local Plan and as part of the planning process for any subsequent application for planning permission; particularly given the provisions of policy LP 5 (Flood Risk) and LP 6 (Waste Water Management) of the Plan being examined.
- 1.16. Historic England (ID: 56252), outlines that whilst reference to the views of the Grade I Listed Church in the policy is welcomed, Historic England consider that the policy should reference 'Mon Abri' the Grade II Listed Building to the south west of the site (Mon Abri) as well as the Conservation Area. It is however noted that 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 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?

- 1.17. The site is in Flood zone 1 (FLO/01, page 11). 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 NPP.

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

- 1.18. HOUS/02 sets out the constraints in detail. The site borders with open countryside so a landscaping scheme will be required to show how it mitigates landscape impact and light/noise pollution. There will be a need for noise and pollution attenuation, given the proximity to the A1. A transport assessment will need to demonstrate safe access and resolution of how traffic impact will be mitigated. An ecological survey is required to mitigate impact on any protected species.
- 1.19. Constraints are relatively few, though the northern boundary may need landscaping and overall, a low density development is considered appropriate.
- 1.20. There are no significant infrastructure issues to consider. The appropriate requirements will be assessed through a planning application.
- 1.21. Representations submitted by WYG on behalf of the site promoters (ID: 998125) advise that a series of studies have been undertaken and these demonstrate that no potentially significant ground contamination has been identified which would significantly impact on the development of the site; noise impacts can be mitigated; there are no 'in principle' ecological constraints which would preclude residential development; the site can be satisfactorily drained; and a Transport Feasibility Assessment identifies how the site access can be provided via a junction onto School Lane.

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

- 1.22. 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.
- 1.23. 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.

- 1.24. 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).
- 1.25. 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.
- 1.26. 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?

- 1.27. 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).
- 1.28. 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 and value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).

- 1.29. 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.
- 1.30. The viability work within INF/04 indicates that the typology that this site falls into will generally show strong viability.

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

- 1.31. The site is deliverable, in response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the agent for the site considers that the site could accommodate 110-130 dwellings; however, capacity has been kept at 95 to reflect the draft Local Plan allocation (MON/01, page 92). The first 15 homes are expected to be completed in the year 2020/2021 with all units expected to be completed within years 1-5, the timescale for delivery is set out below:

No. units in years 1-5	20/21 Yr. 4	21/22 Yr. 5	22/23	Total 17/36
55	15	40	40	95

- 1.32. A response to the Local Plan Proposed Submission consultation from WYG confirms the site owners intention to develop the site, through the undertaking of a series of site studies into ground contamination, noise, ecology and transport feasibility.

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

- 1.33. The site is currently bordered by trees and hedges which provides a natural boundary. It is not considered that there is justification for amending the boundary and no representations have been submitted to suggest so.
- 1.34. The defined boundary allows for comprehensive development of the site whilst responding to the constraints of the site.
- 1.35. No representations were received in relation to the Local Plan consultation suggesting that the boundary should be amended.

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

- 1.36. 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.
- 1.37. 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 120, 128, 474, 489, and 521) and Statement of Representations (CORE/04, Pages 8, 126, 128 to 132).
- 1.38. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG.

2. Bluntisham

BL1- West of Longacres

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

- 2.1. This is a greenfield site and situated to the west of Colne Road, Bluntisham.
- 2.2. It was submitted in response to the Call for Sites in August 2017 (HOUS/02: Availability, page 771) and has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 768-771).
- 2.3. This site is situated on the northern edge of the village immediately across the road from St Helen's Primary School with good access to sports, recreation and community social facilities and therefore, considered suitable for low density residential development a net developable area of 55% of the site. This results in an estimated capacity of 150 dwellings (HOUS/02: Suitability, page 771).

Question 2: What is the scale of housing development proposed?

- 2.4. The proposed use is for approximately 150 homes.

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

- 2.5. Objections are raised with regard to the definition of Local Services Centres; the basis for Local Service Centres and the scale and type of development allocated within them. These objections are dealt with in Matter 3 – Development Strategy. This Matter deals only with the detailed issues concerning the individual proposed site allocation.
- 2.6. Objections are raised with regard to the suitability of the site. However, the Council's assessment of the site in the HELAA (HOUS/02 - pages 770-771) determined that a capacity for approximately 150 dwellings across a net developable area of 55%. The site is situated on the northern edge of the village and across the road from the Primary School with good access to sports, recreation and community social facilities. It is at low flood risk and is close to open space, sports and social facilities, a GP facility and primary school, is close to a bus stop, has no known transport infrastructure constraints and is outside areas of search for waste and there are no air quality management areas nearby. Furthermore it was considered that any adverse impact upon the landscape/townscape is likely to be limited if developed (HOUS/02 – pages 770-771).

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

- 2.7. An Outline planning application (planning reference 17/00906/OUT) for 135 dwellings is under consideration.

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

- 2.8. 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.
- 2.9. 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.
- 2.10. The development would contribute to the Council's housing land supply and provide residential accommodation in an area which is accessible to local services and facilities, which could be accessed by sustainable modes of transport; in accordance with Section 4 of the Framework.

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

- 2.11. The HELAA (HOUS/02 – pages 768-771) identifies potential adverse impacts with regards to landscape/townscape (qualified as likely to be limited), transport impacts and accessibility, potential impacts on protected species and an assumption that capacity may not exist in the foul sewage network.
- 2.12. Mitigation measures are identified in the HELAA and within criteria a to c of BL 1 in the Local Plan and include the requirement for a suitable means of access and provision of a sustainable transport network for pedestrians, cyclists and vehicles based on a proportionate transport assessment, retention and protection of existing trees and hedgerow, landscaping scheme, a surface water drainage strategy, and (as supported by Natural England, ID: 34468) an assessment of potential impacts on the Ouse Washes SAC/SPA/Ramsar site and the Berry Fen SSSI arising from increased recreational pressure generated by residents of this site.
- 2.13. Representations have been received raising objections to the site. Main issues of concern include: the principle for residential development and the justification for the designation of the village as a Local Service Centre; lack of capacity on the local road network increased parking congestion; the impact on the character of the village and lack of need for additional housing; impact on biodiversity; the lack of capacity within local services to accommodate the needs of additional residents; the limited opening hours of the GP facility and lack of capacity

in other nearby GP surgeries; noise impacts; light pollution; loss of grade 2 (BMV) agricultural land; distance of the site from facilities; flood risk; uncertain funding of necessary infrastructure; loss of greenfield land is contrary to Government brownfield first policy; uncertain future of the last trading public house in the village.

- 2.14. Historic England (ID: 56252) also note that there is a cluster of grade II listed buildings to the south west of the site. Development of the site has the potential to impact on the setting of these listed buildings. It is recommended that there should be requirements for sufficient planting along the south western boundary of the site should be included in the policy and supporting text.
- 2.15. These matters are in the process of being fully assessed through the planning application 17/00906/OUT and to date there are no outstanding objections to the planning application from statutory consultees. Consultation responses to the planning application are as follows: Natural England has no objection to the application; The Environment Agency makes advisory comments; Anglian Water advises that the Somersham Water Recycling Centre will have available capacity for these flows and the sewage system has available capacity for the flows from the development; The County Council Highways/Transport and Lead Local Flood Authority teams raise no objection; The Wildlife Trust has no objection. The management of Bluntisham Primary School advise that preliminary forecasts surrounding the number of additional children in catchment arising from the development could not be accommodated within the current structure and accommodation at the School. The County Council education team raises no objection. The NHS raises no objection but advises that the GP surgery does not have sufficient capacity to accommodate growth and therefore it will seek, via the Community Infrastructure Levy, funds for an increase in GP capacity to mitigate.
- 2.16. The mitigation measures are identified in the HELAA and within criteria a to c of allocation BL 1 in the Local Plan, and the consideration of the planning application have demonstrated that the adverse impacts of the developing the site for 135 homes, which is fewer than the allocation policy proposing 150 dwellings, can be satisfactorily mitigated.

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?

- 2.17. The site is in Flood zone 1 (FLO/01, page 11). 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?

- 2.18. There are no specific concerns with the constraints detailed in HOUS/02. Given its proximity to the school, safe highway access will be addressed after carrying out a transport assessment

- 2.19. The site has good access to most village amenities.
- 2.20. No specific infrastructure is required and appropriate provision will be agreed through the planning application stages and secured by a S106 agreement.

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

- 2.21. 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.
- 2.22. 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).
- 2.23. The 2014 URS Detailed Water Cycle Study FLO/11 for Huntingdonshire acknowledged that there might be capacity issues for wastewater treatment at Huntingdon, Oldhurst, Ramsey, Somersham and St. Neots, if engineering solutions to increase capacity are not undertaken, future development proposals connecting to the sewer network will only be supported based on certain criteria and highlighting the fact that process upgrades and increased discharge consents are likely to be required at these five WWTWs".
- 2.24. It is understood that this site is served by Somersham Treatment Works. In the case of Somersham, it is acknowledged that capacity is limited. As future developments come forward, there will be an increasing need for agreement with Anglian Water and the

Environment Agency if further capacity can be provided or if interim solutions can be implemented while longer term solutions are designed and implemented.

- 2.25. 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.
- 2.26. 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?

- 2.27. 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).
- 2.28. 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).
- 2.29. 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.
- 2.30. The viability work within INF/04 indicates that the typology that this site falls into will generally show strong viability.

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

- 2.31. In the Annual Monitoring Report 2017 (MON/01, page 92), the agent for the site has confirmed that the site can be achieved within the 5 years. The first 35 homes are expected to be completed in the year 2019/2020 and all homes expected to be completed in years 1-5, the timescale for delivery is set out below:

No. units in years 1-5	19/20 Yr. 3	20/21 Yr. 4	21/22 Yr. 5	Total 17/36
135	35	50	50	135

2.32. This is considered reasonable given the submission of a planning application on the site.

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

2.33. The defined boundary allows for comprehensive development of the site whilst responding to the constraints of the site and is justified by the planning application that is in the process of being determined.

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

2.34. 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, and the knowledge gained through consideration and consultation on the planning application.

2.35. 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 475, 552-523) and Statement of Representations (CORE/04, Pages 135 - 136).

2.36. Responses to the questions above demonstrate that site is suitable, available and achievable as defined in the NPPG.

BL2- North of 10 Station Road

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

- 2.37. The site is greenfield, with approximately half of the site being covered by notable trees (subject to a TPO).
- 2.38. It was submitted in response to the Call for Sites in August 2017 (HOUS/02: Availability, page 783) and has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 780-783 for full assessment).
- 2.39. This site is situated on the western edge of the village immediately across the road from local retail services with reasonable access to other sports, recreation and community social facilities and therefore, considered suitable for low density residential development across 75% of the site resulting in an estimated capacity of 29 dwellings (HOUS/02: Suitability, page 783).

Question 2: What is the scale of housing development proposed?

- 2.40. The proposed use is for approximately 30 dwellings.

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

- 2.41. The Council's assessment of the site determined that a capacity for approximately 29 dwellings (HOUS/02 – page 780-783) is suitable recognising that the site is situated on the western edge of the village immediately across the road from local retail services with reasonable access to other sports, recreation and community social facilities and is relatively enclosed on two sides by existing development or hedging.
- 2.42. Initial assessment through the HELAA identifies that the site is considered suitable for low density residential development across a net developable area of 75% of the site. This results in an estimated capacity of 29 dwellings (HOUS/02 – pages 780-783). The final allocation was rounded up to approximately 30 dwellings.

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

- 2.43. An Outline planning application (planning reference 17/01015/OUT) for 30 dwellings and 4 replacement commercial units is under consideration.

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

- 2.44. 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.

- 2.45. 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.
- 2.46. 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.

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

- 2.47. The HELAA identifies potential adverse impacts with regards to transport impacts, potential noise issues, landscape impact due to the site's location on the edge of Bluntisham, potential impact upon the setting of heritage assets, impact upon ecology and additional pressure on foul sewage network capacity and the waste water supply network.
- 2.48. Mitigation measures are identified in the HELAA and within criteria a to d of allocation BL 2 in the Local Plan and include the requirement for provision of a suitable means of access for vehicles, pedestrian and cycles and satisfactory resolution of additional traffic impacts on local roads having regard to a Transport Assessment, an arboricultural survey that seeks to retain and protect boundary trees and hedgerows, provision of a belt of soft planting between the homes and the northern boundary of the site and an ecological survey.
- 2.49. No objections have been received from Statutory Consultees on the planning application with regards to the site's location. The Lead Local Flood Authority has raised no objection to the application and a condition can secure a detailed surface water drainage scheme. Anglian Water has outlined that Somersham Water Recycling Centre has available capacity for flows from the development; however, submission of a drainage strategy should be secured by condition to prevent an unacceptable risk of flooding downstream. The current planning application is supported by an Ecology Report and Arboricultural Impact Assessment and Tree Survey and the recommendations within these for mitigation and enhancement measures that could be secured by condition. County Archaeology has advised that the site lies in an area of high archaeological potential and therefore the site should be subject to a programme of archaeological investigation to be secured by condition.
- 2.50. Representations at proposed submission consultation stage from Historic England (ID: 56252), raise objection, noting that development of the site has the potential to impact on the setting of the adjacent listed buildings and the conservation area. Historic England therefore outlines that the policy and supporting text should reference the requirement for development to

preserve the listed buildings and their settings and preserve or where opportunities arise enhance the Conservation Area and its setting. It is however, noted that 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 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?

2.51. The site is in Flood zone 1 (FLO/01, page 11). 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?

2.52. The HELAA (HOUS/02) identifies potential adverse impacts with regards to transport impacts, potential noise issues, landscape impact due to the site's location on the edge of Bluntisham, potential impact upon the setting of heritage assets, impact upon ecology and additional pressure on foul sewage network capacity and the waste water supply network.

2.53. Mitigation measures are identified in the HELAA and within criteria a to d of allocation BL 2 in the Local Plan and include the requirement for provision of a suitable means of access for vehicles, pedestrian and cycles and satisfactory resolution of additional traffic impacts on local roads having regard to a Transport Assessment, an arboricultural survey that seeks to retain and protect boundary trees and hedgerows, provision of a belt of soft planting between the homes and the northern boundary of the site and an ecological survey.

2.54. Infrastructure needs have not been identified or costed in relation to the site. Provision will be determined as part of the planning application. The IDP (INF/01) will be a reference point as it assesses the suitability of existing infrastructure provision and identifies the infrastructure investment required to support growth in the settlements.

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

2.55. 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.

- 2.56. 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).
- 2.57. The 2014 URS Detailed Water Cycle Study FLO/11 for Huntingdonshire acknowledged that there might be capacity issues for wastewater treatment at Huntingdon, Oldhurst, Ramsey, Somersham and St. Neots, if engineering solutions to increase capacity are not undertaken future development proposals connecting to the sewer network will only be supported based on certain criteria and highlighting the fact that process upgrades and increased discharge consents are likely to be required at these five WWTWs”.
- 2.58. It is understood that this site is served by Somersham Treatment Works. In the case of Somersham, it is acknowledged that capacity is limited. As future developments come forward, there will be an increasing need for agreement with Anglian Water and the Environment Agency if further capacity can be provided or if interim solutions can be implemented while longer term solutions are designed and implemented.

Question 10: Is the site realistically viable and deliverable?

- 2.59. 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).

- 2.60. 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 and value areas on greenfield and previously developed land (NPPF Para 174 and PPG Paragraph: 007 Reference ID: 10-007-20140306).
- 2.61. 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.
- 2.62. The viability work within INF/04 indicates that the typology that this site falls into will generally show strong viability.

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

- 2.63. In response to the Annual Monitoring Report 2017 (MON/01, page 92), the agent has confirmed that the site can be made immediately available and could be developed within 2 years.
- 2.64. The first 10 homes are expected to be completed in the year 2020/2021 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	20/21 Yr. 4	21/22 Yr. 5	Total 17/36
30	10	20	30

- 2.65. This is considered realistic as an Outline planning application (planning reference 17/01015/OUT) for 30 dwellings and 4 replacement commercial units is under consideration.

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

- 2.66. The land owner has submitted representations supporting identification of the land for allocation but suggesting that the boundary of the site be amended to include land to the north; such to make optimum use of the land available (Stephen Highland (ID: 897723). The land to the north of the site is subject to a Tree Preservation Order, with the protected trees being retained on the site. The boundary within the Local Plan (CORE/01, page 281) is therefore appropriate, such to respond to this constraint.
- 2.67. The defined boundary allows for comprehensive development of the site whilst responding to the constraints of the site.

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

- 2.68. 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.
- 2.69. 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 120, 475, 490 and 524) and Statement of Representations (CORE/04, Pages 8, 75, 126, and 133 to 137).
- 2.70. 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 can be completed within a five year time period.

3. Great Staughton

GS1- South of 29 The Green

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

- 3.1. The site is primarily greenfield however a storage building is situated along the southern boundary.
- 3.2. This site was submitted in response to the Call for Sites in August 2017 (HOUS/02: Availability, page 795) has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 793-795 for full assessment).
- 3.3. This site is situated on the edge of the village surrounded primarily by open countryside. It is relatively well screened by existing landscaping which limits the potential impact of development on the landscape. It has good access to the services and facilities of Great Staughton. Taking this into consideration, the site is considered suitable for low density residential development across a net developable area of 85% of the site resulting in an estimated capacity of 20 dwellings (HOUS/02: Suitability, page 795).

Question 2: What is the scale of housing development proposed?

- 3.4. The proposed use is for approximately 20 dwellings.

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

- 3.5. The Council's assessment of the site within the HELAA (P794) identified The site is considered suitable for low density residential development resulting in an estimated capacity of 20 dwellings. This site has few constraints on site but would need to take account of the existing boundary hedging and the setting of nearby listed buildings.

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

- 3.6. No planning application has yet been received.

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

- 3.7. 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.

- 3.8. 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.
- 3.9. 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.

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

- 3.10. The HELAA (HOUS/02, page 795) identifies no major adverse impacts for the site. Any development scheme would need to be designed to preserve the rural character of the area. There is a substantial wooded area to the east and extensive mature trees and hedgerows on all boundaries with the potential for ecology.
- 3.11. The Environment Agency (ID: 1146949) are concerned that even though the site is identified as being at significant surface water flood risk, that the policy does not specify that a Flood Risk Assessment is required and what outcomes the LPA wish to achieve through the site i.e. a reduction in offsite flood risk. In response, the site is in Flood zone 1 and when a planning application comes forward it will be considered against all relevant and supplementary planning documents, and conditions can be used where appropriate.

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?

- 3.12. The site is in Flood zone 1 (FLO/01, page 11). 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?

- 3.13. The site borders open countryside and a landscape assessment will be needed to demonstrate the impact on the landscape is mitigated. Safe access must be designed through a transport assessment. There is boundary hedging to consider and the setting of nearby listed buildings.
- 3.14. A low density development is appropriate given its location next to the existing settlement.

- 3.15. Infrastructure needs have not been identified or costed in relation to the site. Provision will be determined as part of the planning application. The IDP (INF/01) will be a reference point as it assesses the suitability of existing infrastructure provision and identifies the infrastructure investment required to support growth in the settlements.

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

- 3.16. 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.
- 3.17. 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. It is understood this site will be served by the Kimbolton Wastewater Treatment Works. FLO/11 acknowledged Kimbolton as having capacity.
- 3.18. 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).
- 3.19. 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.

- 3.20. 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?

- 3.21. 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).
- 3.22. 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).
- 3.23. 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.
- 3.24. The viability work within INF/04 indicates that the typology that this site falls into will generally show strong viability.

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

- 3.25. The site is deliverable, the first 10 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 years 1-5	19/20 Yr. 3	20/21 Yr. 4	21/22 Yr. 5	Total 17/36
20	10	10	0	20

3.26. The agent for the site again has confirmed that there are no constraints on delivery, so the timescale for delivery is deemed to be realistic.

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

3.27. The site is currently bordered by trees and hedges which provides a natural boundary. It is not considered that there is justification for amending the boundary and no representations have been submitted to suggest so.

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

3.26 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.

3.27 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 445, 475, 490, and 525) and Statement of Representations (CORE/04, Page137).

3.28 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.

GS2- Between 20 Cage Lane and Averyhill

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

- 3.28. The site is greenfield with substantial hedging along the boundaries.
- 3.29. It was submitted in response to the Call for Sites in August 2017 (HOUS/02: Availability, page 801) and has since been assessed in the Housing & Economic Land Availability Assessment 2017 (HELAA) (HOUS/02: Pages 799-801).
- 3.30. This site is situated on the north eastern edge of the village with open countryside to the west but a single house beyond. It has reasonable access to the services and facilities of Great Staughton. It is unlikely to be suitable for higher density development and is likely to have adverse impacts on the landscape/ townscape, but is unlikely to have adverse impacts on heritage assets if developed at a low density across a net developable area of 100% of the site resulting in an estimated capacity of 14 dwellings (HOUS/02: Suitability, page 801).

Question 2: What is the scale of housing development proposed?

- 3.31. The proposed use is for approximately 14 dwellings.

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

- 3.32. The Council's assessment of the site within the HELAA (HOU/02, page799) identified that the site is considered suitable for low density residential development resulting in an estimated capacity of 14 dwellings. This site has few constraints on site but would need to take account of the existing boundary hedging, potential for protected species and surrounding landscape and townscape setting.

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

- 3.33. No planning application has been submitted.

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

- 3.34. 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.
- 3.35. 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.

- 3.36. 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.

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

- 3.37. The HELAA (HOUS/02, page 801) identifies no major adverse impacts for the site. Any development scheme would need to be designed to preserve the rural character of the area. There is a potential for ecological improvements to the site.
- 3.38. Allocation GS2 sets out clear requirements for submitting any future planning application including the provision of a suitable means of access, the protection of trees and an ecological survey. With that in mind it is considered that any adverse impacts arising from this scheme could be mitigated through sympathetic design and the use of planning conditions.

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?

- 3.39. The site is in Flood zone 1 (FLO/01, page 11). 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?

- 3.40. HOUS/02 sets out the constraints. In summary, the site has reasonable access to local services but is constrained by an electricity line crossing the site. The edge of village location will require a landscape scheme to mitigate impact on the surrounding landscape.
- 3.41. Infrastructure needs have not been identified or costed in relation to the site. Provision will be determined as part of the planning application. The IDP (INF/01) will be a reference point as it assesses the suitability of existing infrastructure provision and identifies the infrastructure investment required to support growth in the settlements. Infrastructure requirements will be addressed as part of the planning application process and pre application discussions.

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

- 3.42. 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.
- 3.43. 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. It is understood this site will be served by the Kimbolton Wastewater Treatment Works. FLO/11 acknowledged Kimbolton as having capacity.
- 3.44. 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).
- 3.45. 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.

3.46. 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?

3.47. 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).

3.48. 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).

3.49. 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.

3.50. The viability work within INF/04 indicates that the typology that this site falls into will generally show reasonable levels of viability e.g. in the range 25-30% affordable housing provision is viable.

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

3.51. The site is deliverable. In response to the Council’s Annual Monitoring Report housing trajectory survey 2017, the owner of the site has confirmed that the site is immediately available, and could be developed within 5 years (MON/01, page 93).

3.52. The first 7 homes are expected to be completed in the year 2020/2021, 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	20/21 Yr. 4	21/22 Yr. 5	Total 17/36
14	7	7	14

3.53. The delivery timescale set out for this site is considered reasonable, as no major constraints have been identified on the site.

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

3.54. The site is currently bordered by trees and hedges which provides a natural boundary. It is not considered that there is justification for amending the boundary and no representations have been submitted to suggest so.

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

3.55. 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.

3.56. 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 122, 475, 526) and Statement of Representations (CORE/04, Page138).

3.57. 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.