

A meeting of the **CABINET** will be held in **COUNCIL CHAMBER, PATHFINDER HOUSE, ST MARY'S STREET, HUNTINGDON PE29 3TN** on **THURSDAY, 12 JUNE 2008** at **11:30 AM** and you are requested to attend for the transaction of the following business:-

## **APOLOGIES**

  
**Contact**  
**(01480)**

**1. MINUTES** (Pages 1 - 6)

To approve as a correct record the Minutes of the meeting of the Cabinet held on 15<sup>th</sup> May 2008.

**Mrs H Taylor**  
**388008**

**2. MEMBERS' INTERESTS**

To receive from Members declarations as to personal and/or prejudicial interests and the nature of those interests in relation to any agenda item. Please see Notes 1 and 2 below.

**3. TREASURY MANAGEMENT ANNUAL REPORT 2007/08**  
(Pages 7 - 16)

To consider a report by the Head of Financial Services reviewing the performance of Investment Fund Managers.

**S Couper**  
**388103**

**4. BUDGET AND MTP PROCESS 2009-2014** (Pages 17 - 22)

To receive a report by the Head of Financial Services

**S Couper**  
**388103**

**5. THE EAST OF ENGLAND PLAN - REVISION OF THE REGIONAL SPATIAL STRATEGY FOR THE EAST OF ENGLAND** (Pages 23 - 26)

To consider a report by the Head of Planning Services regarding the East of England Plan – Revision of the Regional Spatial Strategy for the East of England issued by the Secretary of State.

**S Ingram**  
**388400**

**6. LOCAL DEVELOPMENT FRAMEWORK - THE CORE STRATEGY FOR SUBMISSION TO THE SECRETARY OF STATE** (Pages 27 - 406)

To consider a report by the Planning Policy Manager

**R Probyn**  
**388430**

**7. PROSPEROUS PLACES: TAKING FORWARD THE SUB NATIONAL REVIEW OF ECONOMIC DEVELOPMENT AND REGENERATION CONSULTATION DOCUMENT** (Pages 407 - 416)

With the assistance of a report by the Head of Policy and Strategic Services, to consider a response to the consultation document "Prosperous Places: Taking Forward the Sub National Review of Economic Development and Regeneration" produced by the Department for Business Enterprise and Regulatory Reform.

**Ms C Garbett**  
**388459**

**8. ECO-TOWNS: LIVING A GREENER FUTURE - RESPONSE TO THE DEPARTMENT OF COMMUNITIES & LOCAL GOVERNMENT CONSULTATION (Pages 417 - 420)**

With the assistance of a report by the Head of Planning Services – to consider a response to the Government's proposal to develop an eco-town site at Hanley Grange in South Cambridgeshire as part of their Eco-Towns Initiative.

**S Ingram**  
**388400**

**9. EARITH CONSERVATION AREA: BOUNDARY REVIEW AND CHARACTER ASSESSMENT STATEMENT (Pages 421 - 426)**

To consider a report by the Planning Policy Manager on consultation responses received in respect of the draft Conservation Area Boundary Review and Character Assessment Statement for Earith.

**R Probyn**  
**388430**

**10. THE HEMINGFORDS CONSERVATION AREA: BOUNDARY REVIEW AND CHARACTER ASSESSMENT STATEMENT (Pages 427 - 434)**

By way of a report by the Planning Policy Manager to consider the consultation responses received in respect of the draft Conservation Area Boundary Review and Character Assessment Statement for the Hemingfords.

**R Probyn**  
**388430**

**11. GROWING SUCCESS - PERFORMANCE MONITORING (Pages 435 - 458)**

To consider a report by the Head of Policy and Strategic Services on the Council's performance against its priority objectives over the ensuing year.

**H Thackray**  
**388035**

**12. CORPORATE EQUALITY POLICY: ACTION PLAN PROGRESS (Pages 459 - 496)**

To consider a report by the Head of Policy and Strategic Services on progress made to date in respect of the Corporate Equality Policy Action Plan.

**Mrs L Sboui**  
**388032**

**13. BENEFIT FRAUD PROSECUTION POLICY AND PROCEDURES (Pages 497 - 508)**

To consider a report by the Head of Customer Services on the outcome of a review of the existing procedure for the sanction and prosecution of those persons found to be committing benefit fraud.

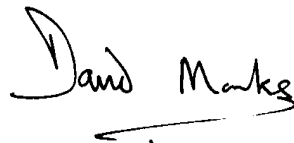
**Mrs J Barber  
388105**

**14. REPRESENTATIVES ON ORGANISATIONS 2008/09** (Pages 509 - 516)

To consider a report by the Head of Administration in relation to the appointment/nomination of representatives to serve on a variety of organisations.

**Mrs H Taylor  
388008**

Dated this 5 day of June 2008



Chief Executive

**Notes**

1. *A personal interest exists where a decision on a matter would affect to a greater extent than other people in the District –*
  - (a) *the well-being, financial position, employment or business of the Councillor, their family or any person with whom they had a close association;*
  - (b) *a body employing those persons, any firm in which they are a partner and any company of which they are directors;*
  - (c) *any corporate body in which those persons have a beneficial interest in a class of securities exceeding the nominal value of £25,000; or*
  - (d) *the Councillor's registerable financial and other interests.*
2. *A personal interest becomes a prejudicial interest where a member of the public (who has knowledge of the circumstances) would reasonably regard the Member's personal interest as being so significant that it is likely to prejudice the Councillor's judgement of the public interest.*

**Please contact Mrs H Taylor, Senior Democratic Services Officer, Tel No. 01480 388008/e-mail Helen.Taylor@huntsdc.gov.uk /e-mail: if you have a general query on any Agenda Item, wish to tender your apologies for absence from the meeting, or would like information on any decision taken by the Cabinet.**

**Specific enquiries with regard to items on the Agenda should be directed towards the Contact Officer.**

**Members of the public are welcome to attend this meeting as observers**

except during consideration of confidential or exempt items of business.

Agenda and enclosures can be viewed on the District Council's website – [www.huntingdonshire.gov.uk](http://www.huntingdonshire.gov.uk) (under *Councils and Democracy*).

If you would like a translation of Agenda/Minutes/Reports or would like a large text version or an audio version please contact the Democratic Services Manager and we will try to accommodate your needs.

***Emergency Procedure***

*In the event of the fire alarm being sounded and on the instruction of the Meeting Administrator, all attendees are requested to vacate the building via the closest emergency exit and to make their way to the car park adjacent to the Methodist Church on the High Street (opposite Prima's Italian Restaurant).*

# Agenda Item 1

## HUNTINGDONSHIRE DISTRICT COUNCIL

MINUTES of the meeting of the CABINET held in the Council Chamber, Pathfinder House, St Mary's Street, Huntingdon PE29 3TN on Thursday, 15 May 2008.

PRESENT: Councillor I C Bates – Chairman.

Councillors P L E Bucknell, K J Churchill, D B Dew, A Hansard, C R Hyams, Mrs D C Reynolds, T V Rogers and L M Simpson

### 1. COUNCILLOR K J CHURCHILL

The Chairman welcomed Councillor Churchill to his first meeting of the Cabinet.

### 2. MINUTES

The Minutes of the meeting of the Cabinet held on 24<sup>th</sup> April 2008 were approved as a correct record and signed by the Chairman.

### 3. MEMBERS' INTERESTS

No declarations were received.

### 4. APPOINTMENT OF EXECUTIVE COUNCILLORS

RESOLVED

- (a) that executive responsibilities for the Municipal Year 2008/09 be allocated as follows –

Finance and Environment	- Councillor T V Rogers
Planning Strategy and Transport	- Councillor P L E Bucknell
Leisure	- Councillor D B Dew
Resources and Policy	- Councillor A Hansard
Housing and Public Health	- Councillor D C Reynolds
Customer Services and Information Technology	- Councillor L M Simpson
Operational and Countryside Services	- Councillor C R Hyams
Special Advisor to Cabinet	- Councillor K Churchill

- (b) that the Leader of the Council be appointed to serve as an ex-officio Member of the Employment Panel; and

- (c) that Executive Councillors be appointed to serve as ex-officio Members of Panels as follows –

<b>Executive Councillors for -</b>	<b>Ex-Officio for –</b>
Resources and Policy	Licensing and Protection Panel/Licensing Committee
Planning Strategy and Transport	Development Control Panel

## **5. LEISURE CENTRE MANAGEMENT COMMITTEES**

RESOLVED

that for the Municipal Year 2008/09, Members be appointed to serve on the Leisure Centre Management Committees as follows –

- **Huntingdon Leisure Centre Management Committee**  
Councillors K Baker, J J Dutton, Miss S Kemp, D J Priestman, T D Sanderson and L M Simpson
- **St Neots Leisure Centre Management Committee**  
Councillors R W Eaton, B Farrer, A Hansard, Mrs M J Thomas and R J West
- **St Ivo Leisure Centre Management Committee**  
Councillors J D Ablewhite, J T Bell, S J Criswell, J W Davies, D B Dew, and C J Stephens
- **Ramsey Leisure Centre Management Committee**  
Councillors E R Butler, D B Dew, I R Muir, R Powell and P A Swales
- **Sawtry Leisure Centre Management Committee**  
Councillors Mrs M Banerjee, D B Dew, J E Garner, P G Mitchell and J S Watt

## **6. HINCHINGBROOKE COUNTRY PARK JOINT LIAISON GROUP**

RESOLVED

that Councillors M Baker, Mrs M Banerjee, C R Hyams and Mrs M J Thomas be appointed to serve on the Hinchingsbrooke Country Park Joint Group for the ensuing Municipal Year.

## **7. HUNTINGDONSHIRE TRAFFIC MANAGEMENT AREA JOINT COMMITTEE**

RESOLVED

that Councillors M Baker, P L E Bucknell, D B Dew, R S Farrer, M F Newman and T D Sanderson be appointed to serve on the Huntingdonshire Traffic Management Area Joint Committee for the ensuing Municipal Year.

**8. CUSTOMER FIRST AND ACCOMMODATION ADVISORY GROUP**

RESOLVED

that Councillors P L E Bucknell, S J Criswell, P J Downes, T V Rogers, L M Simpson, G S E Thorpe and Mrs M J Thomas be appointed to serve on the Customer First and Accommodation Advisory Group for the ensuing Municipal Year.

**9. MEMBERS' ADVISORY GROUP FOR PUBLIC CONVENIENCES**

RESOLVED

that membership of the Members' Advisory Group for Public Conveniences remain in abeyance until further notice.

**10. DEVELOPMENT PLAN POLICY ADVISORY GROUP**

RESOLVED

that Councillors I C Bates, P L E Bucknell, P J Downes, P G Mitchell, J M Sadler, P A Swales and G S E Thorpe be appointed to serve on Development Plan Policy Advisory Group for the ensuing Municipal Year.

**11. SAFETY ADVISORY GROUP**

RESOLVED

that Councillors Mrs B E Boddington, J W Davies, A Hansard, Mrs P A Jordan and L M Simpson be appointed to serve on the Safety Advisory Group for the ensuing Municipal Year.

**12. ENVIRONMENT STRATEGY WORKING GROUP**

RESOLVED

that Councillors M G Baker, I C Bates, P L E Bucknell, D B Dew, J A Gray, T V Rogers and R G Tuplin be appointed to serve on the Environment Strategy Working Group for the ensuing Municipal Year.

**13. MEMBERS' CAR PARKING WORKING GROUP**

RESOLVED

that Councillors P L E Bucknell, K J Churchill, Mrs J Dew, J E Garner, C R Hyams, D J Priestman, J M Sadler be appointed to serve on the Members' Car Parking Working Group for the ensuing Municipal Year.

**14. NATIONAL AIR TRAFFIC SERVICE (NATS) CONSULTATION: PROPOSED CHANGES TO TERMINAL CONTROL NORTH AIRSPACE OVER CAMBRIDGESHIRE**

Consideration was given to a report by the Heads of Environmental & Community Health Services, of Planning Services and of Environmental Management (a copy of which is appended in the Minute Book) which described the key elements of a proposal by the National Air Traffic Service (NATS) to change the use of terminal control north, an area of airspace extending from London to Huntingdon.

By way of background, Members were advised that Luton and Stansted airports currently shared two holds in the vicinity of Royston and Sudbury. With the continued growth in air traffic, NATs had proposed that the current holds be relocated to new airspace and a new third hold created, which would result in two holds dedicated to Stansted and one for Luton. It was explained that the proposed new hold for Luton would lead to a number of aircraft stacking over the south of the district.

In reviewing the issues involved, Executive Councillors questioned the need to change existing holds and expressed the view that their retention, together with the creation of an additional new hold would better address the issues identified. Whilst discussing NATs proposals, Members expressed general concern about the impact of noise from aircraft stacking, the threat to tranquillity from noise and visual intrusion and the general detriment to the environment and well-being of the populations in rural areas.

Having raised concerns over NATs failure to take into account the population growth factor predicted for Cambridgeshire and the potential effects from the growth of air traffic, the Cabinet

RESOLVED

that the Director of Environmental and Community Services, after consultation with the Executive Councillor for Finance and Environment, be authorised to respond to the consultation along the lines described in paragraphs 4.1 - 4.3 of the report now submitted.

**15. LOCAL AREA AGREEMENT**

By way of a report by the Head of Policy and Strategic Services (a copy of which is appended in the Minute Book) Members were acquainted with the content a new Local Area Agreement for Cambridgeshire. The Agreement reflected the Government's intention to streamline funding, encourage partnership working and direct investment towards local priorities.



Having discussed the Agreement together with a schedule of 34 performance indicators and 5 local targets, the Cabinet

RESOLVED

that the contents of the proposed new Local Area Agreement for Cambridgeshire be supported.

**16. THE COUNCIL'S CONSTITUTION: SCHEME OF DELEGATION AND MONITORING OFFICER:INTERIM ARRANGEMENTS**

With the assistance of a report by the Head of Administration (a copy of which is appended in the Minute Book) the Cabinet considered interim arrangements in relation to the Council's scheme of delegation following the impending retirement of the Director of Central Services.

Whereupon, it was

RESOLVED

that with effect from 27<sup>th</sup> June 2008 and pending a decision on and the recruitment of a new Director, the Chief Executive be authorised to undertake the executive and other powers delegated to the Director of Central Services by virtue of the Scheme of Delegation and otherwise.

**17. EXCLUSION OF PRESS AND PUBLIC**

RESOLVED

that the press and public be excluded from the meeting because the business to be transacted contains exempt information relating to the financial affairs of particular persons.

**18. DOCUMENT CENTRE - PURCHASE OF INSERTER**

By means of a report by the Head of Administration (a copy of which is appended in the Minute Book) the Cabinet considered the circumstances in which the acceptance of a tender other than the lowest received had been recommended for the purchase of inserting equipment.

Having considered the information contained in the report, the Cabinet

RESOLVED

that the second lowest tender as referred to in the report now submitted, for the supply of inserting equipment be accepted in accordance with paragraph 11.4 of the Council's Code of Procurement.

**19. FLEXIBLE WORKING: REMOTE ACCESS PROJECT: AUTHENTICATION SYSTEM**

By means of a report by the Head of Information Management (a copy of which is appended in the Minute Book), the Cabinet were apprised of the outcome of the tendering process for a two factor authentication system as part of the remote access project.

Having been advised of the circumstances surrounding the acceptance of a quotation other than the lowest received, the Cabinet

RESOLVED

that the contents of the report now submitted be noted.

Chairman

CABINET

12<sup>th</sup> JUNE 2008

## TREASURY MANAGEMENT ANNUAL REPORT 2007/08 (Report by the Head of Financial Services)

### 1. INTRODUCTION

- 1.1. During 2007/08 the Council continued to have significant investments but during the year the funds were withdrawn from Investec and managed as medium term investments in the in-house portfolio

Manager	April 2007 £m	March 2008 £m
Investec Asset Management	21.5	Nil
City Deposit Cash Managers (CDCM)	31.5	26.5
In-house medium term	Nil	12.0
In-house for cash flow	Nil	1.8

- 1.2 This report reviews the performance during 2007/08, considers if the strategy that the Council has adopted has been effective, and addresses any issues of risk and compliance with statutory and regulatory requirements. It also explains the reasons for reducing the number of fund managers from two to one and the preparations taken to borrow in advance should the right market conditions prevail.

### 2. PERFORMANCE OF FUNDS

- 2.1. Investec continued its run of poor performances into 2007/08 by not achieving its benchmark and the actual performance being significantly below that of CDCM.

PERFORMANCE FOR THE QUARTER APRIL 2007 – JUNE 2007					
	Performance %	Benchmark %	Variation from benchmark	Industry average %	Variation from average %
<b>Investec</b>	<b>0.92</b>	0.93 *	<b>-0.01</b>	1.16	<b>-0.24</b>
<b>CDCM</b>	<b>1.28</b>	1.42 **	<b>-0.14</b>	1.16	<b>+0.12</b>

- 2.2. The Capital Receipts Advisory Group met on 30<sup>th</sup> July 2007 with Chris Anthony from Butlers, our Treasury Management advisers. With market rates being above 6% and bearing in mind that the financial plan shows that the Authority will need funds in 1 to 2 years, it was considered to be the right time to bring funds managed by Investec back in-house. Investec accordingly returned £21.5m on 3 September 2007 and these funds were invested for periods between March 2008 and February 2009 at rates between 6.24% and 6.3%.

- 2.3. The performance of the funds with CDCM and managed in-house, for the whole year, are shown below:

<b>PERFORMANCE FOR THE YEAR APRIL 2007 – MARCH 2008</b>			
	<b>Performance %</b>	<b>Benchmark %</b>	<b>Variation from benchmark</b>
<b>CDCM</b>	<b>5.40</b>	5.85	<b>-0.45</b>
<b>In-house</b>	<b>6.23</b>	5.74	<b>+0.49</b>

- 2.4. The excellent performance of the in-house funds reflects the good rates available in September 2007 when the funds were returned from Investec and invested in time deposits.
- 2.5. CDCM did less well due to the rise in interest rates. Thus, whilst investments taken out in previous years have been providing good returns they have now fallen below market rates. Investments therefore need to be considered over their whole life to judge their true return. Over a longer time frame, CDCM has had a very satisfactory track record.

### **3. IN-HOUSE INVESTMENT OF FUNDS**

- 3.1. In September 2007 the in-house portfolio included £20m invested until March 2008 and beyond. In March 2008 £8m matured and was used to finance the expenditure of the Authority.
- 3.2. In addition there are short term 'in-house' funds that fluctuate on a daily basis due to the volatility of the cash flow to and from the Authority. The cash position varied from total investments of £7.1m (excluding the £20m medium-term investments) to net borrowings of £1.9m.

### **4. STRATEGY**

- 4.1. The Council agreed new broader mandates with the three Fund Managers in July 2000. The size of its reserves meant that the Authority could take the view that the Fund Managers should maximise the returns in the medium term, three years, rather than on an annual basis. To the end of March 2007 it can be seen that this strategy has been effective.

<b>CUMULATIVE PERFORMANCE SINCE START OF MANDATES JULY 2000* – MARCH 2007</b>					
	<b>Performance %</b>	<b>Benchmark %</b>	<b>Variation from benchmark %</b>	<b>Industry Average %</b>	<b>Variation from Average %</b>
<b>Investec</b>	37.0	36.6	<b>+0.4</b>	35.3	<b>+1.7</b>
<b>Alliance</b>	37.7	36.0	<b>+1.7</b>	34.6	<b>+3.1</b>
<b>CDCM</b>	39.2	35.3	<b>+3.9</b>	35.3	<b>+3.9</b>

\* The mandate with Alliance Capital started in August 2000  
Returns are not compounded.

- 4.2. The above table of cumulative returns shows that the performance of Alliance Bernstein and Investec was quite close after nearly 7 years.
- 4.3. In March 2007 Alliance Bernstein wished to withdraw from the Local Government market and those funds not immediately needed were placed with CDCM.
- 4.4. The performance of Investec in 2007/08 resulted in their funds being withdrawn and managed in-house. However the reduction of fund managers from three to two to one was in-line with the strategy as it was recognised that investments would reduce as the reserves are need to fund capital expenditure.
- 4.5. The Annual Treasury Management Strategy includes the mandates for Fund Managers and in-house investments; copies of the mandates, in place as at March 2008, are attached at Annex A. No changes were made during the year to the mandates.

## **5. BORROWING IN ADVANCE**

- 5.1 The 2006/07 MTP showed that from 2008/09 the Council would need to borrow to finance capital expenditure. Following discussion with external auditors, it was agreed, and included within the Treasury Management Strategy, that the Council would borrow in advance a maximum of the forecast borrowing during the MTP period as long as it was considered that the rates were attractively low, compared with future expectations of long term rates.
- 5.2 Advice was taken as to a target low level for this borrowing. However during both 2006/07 and 2007/08 rates had not fallen to that level but the rates continue to be monitored daily.

## **6. RISK IMPLICATIONS**

- 6.1 The Treasury Management Policy approved by the Cabinet on 27<sup>th</sup> February 2002, emphasises the importance of controlling risk i.e. returns should be maximised but only at an acceptable level of risk.
- 6.2 There are three main elements of risk:
  - that the borrower will be unable to return the loan when it is due
  - that the Fund Managers will take the wrong view on interest rate movements leading to poor returns
  - that the investments are not sufficiently liquid to be able to be sold to meet the cash flow needs of the Authority.

These were important considerations when the mandates were first agreed in 2000.

6.3 The Authority has minimised these risks in the following ways:

**Risk of the borrower being unable to repay the investment**

A rigid system of credit rating ensures that only the very safest organisations (those with high credit ratings) are dealt with, together with limits on the value placed with one issuer. CDCM is highly attuned to any market intelligence that might suggest a borrower is likely to have their credit rating reduced in the future and the Treasury Management Advisers provide regular updates on changes to credit rating. That said, the credit rating agencies did not predict the problems faced by Northern Rock in the summer of 2008. The Council already had £5m of investments with Northern Rock which matures between February and November 2009, however as they are now backed by the Government they actually have the highest credit rating of all counterparties. None of the treasury management transactions during the year have compromised the rules that have been set.

**Risk of the wrong view on interest rates being taken**

All CDCM investment recommendations are referred to the Council before the deal is made so the authority can question the proposal if they have any concerns. Advice from the Council's advisers ensures that reasonable views are taken.

All investments are, since September, in time deposits rather than gilts and CDs which had higher volatility and hence higher risk.

The mandates limit the duration of the investments which reduces the impact on the value if the interest rate view turns out to be incorrect.

**Risk of the funds not being available to be returned to the Council**

The mandate for CDCM allows it to invest a maximum of 25% of the fund, (currently £5m) for longer than 3 years and requires 50% to be repayable within 12 months. The 2008/09 Treasury Management Strategy introduces a change whereby the amount that needs to be available each year is clearly stated to reflect the fact that most of the funds will need to be returned in a staged manner over the coming years.

**Seeking Professional Advice**

Butlers were employed as our Treasury Management Consultants until December 2007 and their advice was sought before it was decided to withdraw Investec's funds. Sterling Consultancy Services were appointed from 1 January 2008.

**Active monitoring**

As well as reports to Cabinet, your officers monitor returns each month.

## **7. COMPLIANCE WITH REGULATIONS AND CODES**

- 7.1 All the treasury management transactions have been carried out in accordance with the legislation and regulations concerning treasury management.
- 7.2 The Council met the requirements of the CIPFA Code of Practice on Treasury Management by adopting a Policy Statement in February 2002 and Treasury Management Practices in 2003/04. These assist both Members and Officers in the effective management and control of treasury management activities.
- 7.3 In 2003/4 CIPFA introduced the Prudential Code for Capital Finance and the DCLG brought out new guidance on Local Government investments. Both of these became effective from 1 April 2004. These require the Council to approve Prudential Indicators and an annual Treasury Management Strategy. Those for 2007/08 were approved at the Council meeting on 21<sup>st</sup> February 2007. Annex B shows the relevant indicators and the actual results.
- 7.4 One prudential indicator monitors the limit on investments that cannot be redeemed within 364 days; this is to manage the risk of funds not being returned when required. The limit was £14m based on funds invested by CDCM some of which were not repayable within a year. When Investec returned its funds, the dates on which funds would be required were re-assessed and accordingly some monies were invested for more than 1 year to maximise returns. This meant that £21.5m matured in excess of 1 year in September 2007 and thus the limit was exceeded. However there was no increase in risk to the Authority as funds were invested to ensure they were available when needed. As at 31 March 2008 £10m will mature after 364 days.

## **8. CONCLUSION**

- 8.1 Investec's performance was disappointing and their funds were withdrawn and added to the in-house portfolio in September 2007. CDCM's performance was below the benchmark but their investment decisions may prove to be sound over the life of the investments.
- 8.2 Due to the nature of the Authority's strategy, performance cannot be judged on the basis of a single year. The results from the start of the new broader mandates show that the Authority has adopted a sound strategy and selected Fund Managers that have exceeded their benchmarks and the industry average over the seven years.
- 8.3 The Authority has carried out its treasury management activities with due regard to minimising risk, and in accordance with legislation. It has adopted the CIPFA Code on Treasury Management, the Prudential Code for Capital Finance and the DCLG's guidance on Local Government investments.

**9. RECOMMENDATION**

9.1 It is recommended that the content of this report be noted

**BACKGROUND INFORMATION**

2006/07 cash management files and working papers

Quarterly reports to the Cabinet

**CONTACT OFFICER**

Mrs Eleanor Smith      Accountancy Manager      Tel. 01480 388157



**EXTERNAL FUND MANAGER MANDATE****CDCM**

Duration of investments	50% must be repayable within 12 months Up to and including 5 years maximum maturity No more than 25% may be invested for longer than 3 years
Types of investments	Fixed Deposits Deposits at call, two or seven day notice
Credit Ratings	F1+ by FITCH IBCA or equivalent
Maximum limits	£5m per institution and group for English and Scottish Clearing Banks and their subsidiaries, and Overseas Banks on list of authorised counterparties. Building Societies With assets more than £2,000m      £5m With assets more than £1,000m      £3m Other building societies in the top 25   £2m
Benchmark	3 month LIBID

**IN-HOUSE FUND MANAGEMENT**

<b>Duration of investments</b>	Fixed deposits up to and including 1 year
<b>Types of investments</b>	Fixed Deposits Deposits at call, two or seven day notice Money Market Funds
<b>Credit Ratings and Maximum limits</b>	See below The credit rating is the short-term rating issued by FITCH unless otherwise indicated
<b>Benchmark</b>	LGC 7 day rate

**COUNTER-PARTY LIST**

<b>LIMIT £2.5M BANKS (Rated F1 or better)</b>	<b>SHORT TERM RATINGS</b>
Abbey National plc	F1+
Alliance and Leicester	F1+
Barclays	F1+
Bradford and Bingley	F1
Co-Operative	F1
HBOS	F1+
HSBC	F1+
Kleinwort Benson	P1*
Lloyds TSB Group	F1+
Northern Rock	F1
Royal Bank of Scotland	F1+

<b>LIMIT £2.5M</b>	<b>SHORT TERM RATINGS</b>
<b>BUILDING SOCIETIES (Assets over £5 billion – Rated F1 or better)</b>	
Britannia	F1
Chelsea	F1
Coventry	F1
Leeds	P1*
Nationwide	F1+
Portman	F1
Skipton	F1
West Bromwich	F1
Yorkshire	F1
<b>ALL LOCAL AUTHORITIES, POLICE AND FIRE AUTHORITIES</b>	N/A

\* Moody's equivalent credit rating

<b>LIMIT £1.5M</b>	<b>SHORT TERM RATINGS</b>
<b>BANK SUBSIDIARIES</b> Wholly owned by F1 Rated banks	
RBS Trust Bank Ltd	F1+
Ulster Bank Limited	A1**
Ulster Bank Ireland	A1**
<b>OTHER BANKS</b>	
Allied Irish Bank	F1+
Anglo-Irish	F1
Bank of Ireland	F1+
Bank of Scotland (Ireland)	F1+
Bristol and West	F1
Close Brothers	F1
DePfa Bank	F1+
Dexia Banque Internationale a Luxembourg	A1+**
HFC Bank	F1
Irish Intercontinental Bank	F1
KBC Bank NV	F1+
Singer and Friedlander	F1
<b>OTHER INSTITUTIONS</b>	
3i Group Limited	A1**
Irish Life and Permanent plc	F1
<b>BUILDING SOCIETIES (Assets over £2 billion)</b>	
Cheshire	
Dunfermline	
Newcastle	
Norwich and Peterborough	
Nottingham	
Principality	
Stroud and Swindon	

<b>LIMIT £1M</b>	<b>SHORT TERM RATINGS</b>
<b>BUILDING SOCIETIES (Assets over £1 billion)</b>	
Scarborough	

\*\* Standard and Poor's credit rating

## Prudential Indicators for 2007/08 relating to Treasury Management Comparison of actual results with limits

### The authorised limit for external debt.

This is the maximum limit for borrowing and is based on a worst-case scenario.

2007/8 Limit £000	2007/8 Actual £000
41,700	3,400

### The operational boundary for external debt.

This reflects a less extreme position. Although the figure can be exceeded without further approval it represents an early warning monitoring device to ensure that the authorised limit (above) is not exceeded.

2007/8 Limit £000	2007/8 Actual £000
36,700	3,400

Both of these items reflect the fact that long term rates were not considered low enough to borrow long-term in advance.

### Adoption of the CIPFA Code

The Prudential Code requires the Authority to have adopted the CIPFA Code of Practice for Treasury Management in the Public Services.

**This has been adopted.**

### Exposure to investments with fixed interest and variable interest.

These limits are given as a percentage of total investments.

	2007/8 Limit
Upper limit on fixed rate exposure	100%
Upper limit on variable rate exposure	84%

**The limit is based on the mandates for the Fund Managers. As they did not breach the mandates, this prudential indicator has been within the limits**

### **Borrowing Repayment Profile**

The proportion of 2007/8 borrowing that will mature in successive periods.

	Upper limit	Actual	Lower limit	Actual
Under 12 months	100%	<b>100%</b>	100%	<b>100%</b>
12 months and within 24 months	0%	<b>0%</b>	0%	<b>0%</b>
24 months and within 5 years	0%	<b>0%</b>	0%	<b>0%</b>
5 years and within 10 years	0%	<b>0%</b>	0%	<b>0%</b>
10 years and above	0%	<b>0%</b>	0%	<b>0%</b>

**In 2007/8 all the borrowing was temporary for cash flow purposes**

### **Investment Repayment Profile**

Limit on the value of investments that cannot be redeemed within 364 days.

2007/8 Limit £000	2007/8 Actual- maximum £000	2007/8 Actual – 31/3/08 £000
14,000	<b>21,500</b>	<b>10,000</b>

**This reflects time deposits invested by CDCM and 'in-house'. The limit was exceeded in September 2007 when some of the funds returned from Investec were invested for longer than 364 days to match the projected need for funds in future years.**

CABINET

12 JUNE 2008

## BUDGET AND MTP PROCESS 2009-2014

(Report by the Head of Financial Services)

### 1 PURPOSE

- 1.1 The purpose of this report is to propose the approach, stages and timing for the review and approval of the financial strategy, the 2009/10 budget and the 2010/14 Medium Term Plan.

### 2 BACKGROUND

- 2.1 The Medium Term Plan approved in February 2008 provides a detailed budget for 2008/9 and detailed variations for the following 4 years. The financial strategy, also approved in February, forecasts the financial position through to 2018/9. This data forms the starting point for the creation of a new budget each year.
- 2.2 Whilst the budget for 2008/9 is balanced (in the sense that Council Tax and Government Grant is sufficient to cover the Council's net expenditure after an approved £1.6m is used from reserves) with no need to identify further spending adjustments, this is not true of the following years. In the last two years there has been a target to propose a balanced budget with necessary spending adjustments already identified and this has been achieved. In order to produce the same balanced budget position for 2009/10 there is a need to identify £0.5m of additional income or reduced spending. The situation for subsequent years is more onerous in that **further** additional income or reduced spending of £0.5m, £1m and then £1.6m will be required although there is a longer time period for this to be achieved.
- 2.3 The process of finalising our financial result for 2007/8 is currently underway, however recent forecasts suggest that our performance has been considerably better than originally budgeted in February 2007. Whilst the budget was based on using £1.5m from reserves it is now expected that a small surplus will be achieved. This improvement has been reported to Cabinet quarterly along with the causes of the continuing improvement.
- 2.4 Members will be aware of the Council's track record of beating the budget. A detailed analysis of the variances on this year's budget will be presented to Cabinet with the final results in July. We can, however, already anticipate that some of the improvements can be built into next year's budget although others, such as the significant LABGI receipt will not be repeated on the same scale and additional grants of £250k are already assumed. Thus some improvement in next year's budget can be anticipated without having to introduce changes to service plans. Whilst it is likely that this improvement could make a useful contribution towards identifying the £0.5m 'gap' for 2009/10, it is unlikely to contribute to the increasing gap in subsequent years.

2.5 The shortfall for the MTP period is shown below:

<b>Forecast Total</b>				
	2009/10	2010/11	2011/12	2012/13
	£M	£M	£M	£M
Net Expenditure	22.7	25.3	26.9	28.7
Funding from Government Grants and Council Tax	19.6	20.4	21.2	22.2
<b>Shortfall</b>	<b>3.1</b>	<b>4.9</b>	<b>5.7</b>	<b>6.5</b>
To be met from:				
Spending Adjustments not yet identified	0.5	1.0	2.0	3.6
Reserves	2.6	3.9	3.7	2.9

2.6 The latest forecast of revenue reserves at the end of 2008/09 is about £18.5m and so by the end of 2012/13 they will already have fallen to £5.4m. £3m is considered to be a minimum level for a Council of our size and hence planning further significant drawings is not advised.

2.7 The table below summarises the key reasons as to why the funding gap is increasing from the position in this year's budget. Further detail is provided in Annex A

<b>Forecast variations from 2008/09</b>				
	2009/10	2010/11	2011/12	2012/13
	£M	£M	£M	£M
<b>COSTS RISING</b>				
Pay inflation	1.5	3.1	4.4	5.8
Other expenditure inflation	0.4	0.8	1.2	1.7
Planned MTP variations	-0.6	-0.7	-0.8	-1.1
Falling interest and growing borrowing	1.3	2.3	3.0	3.6
	<b>2.6</b>	<b>5.5</b>	<b>7.8</b>	<b>10.0</b>
<b>INCOME RISING MORE SLOWLY</b>				
RSG and Council Tax	-0.8	-1.6	-2.5	-3.4
Income inflation	-0.3	-0.7	-1.3	-1.6
	<b>-1.1</b>	<b>-2.3</b>	<b>-3.8</b>	<b>-5.0</b>
<b>SHORTFALL RISING</b>	<b>1.5</b>	<b>3.3</b>	<b>4.1</b>	<b>5.0</b>
<b>FUNDED FROM</b>				
Additional use of Reserves	-1.0	-2.3	-2.1	-1.3
<b>Savings Target</b>	<b>-0.5</b>	<b>-1.0</b>	<b>-2.0</b>	<b>-3.6</b>

### 3 PROCESS AND TIMETABLE

3.1 As in previous years, the **first stage** of the process is to review the Council's longer term financial strategy. This will adjust the figures approved by the Council in February for inflation, interest rates, the 2007/08 outturn and any other unavoidable significant issues. It will thus enable the Council to confirm or revise the existing spending adjustment

targets and set any criteria for the review of existing MTP schemes and the inclusion of additional ones.

- 3.2 It is anticipated that this stage will address some of the £0.5m gap in the 2009/10 forecast but that some further work will be necessary to balance this budget and substantially more for later years.
- 3.3 The resulting Financial Forecast report will be considered on the following dates

Scrutiny	Cabinet	Council
<b>2 September</b>	<b>4 September</b>	<b>24 September</b>

- 3.4 The **second stage** will be to review the service budgets implied by the financial forecast whilst also incorporating proposed changes to service plans. The report will set out the changes (including efficiencies) to be introduced to service budgets and any proposals for enhancements to the level of provision which will require additional funding.
- 3.5 Cabinet Members will be involved in the production of the proposed service budgets and financial plans relating to their portfolios over the August to October period in order that they are able to comment to Cabinet upon their proposed service budgets.
- 3.6 The resulting Draft budget, MTP and Financial Strategy report will be considered on the following dates:

Scrutiny	Cabinet	Council
<b>11 November</b>	<b>20 November</b>	<b>3 December</b>

- 3.7 The **final stage** will take account of any, presumably minor, adjustments to the grant settlement figures together with any other necessary final adjustments required. It will show the final budget by service and will allow the Council to formally adopt the budget and set the level of Council Tax for 2009/10.
- 3.8 This report will be considered on the following dates

Scrutiny	Cabinet	Council
<b>27 January</b>	<b>29 January</b>	<b>18 February</b>

#### 4. CONCLUSIONS

- 4.1 The budget/MTP process will need to be increasingly challenging due to the significant value of spending adjustments (additional income or reduced spending) that must be identified over the coming years.

## **5. RECOMMENDATION**

**The Cabinet is recommended to:**

- **approve the timetable and stages for considering amendments to service plans, the financial strategy, budget and MTP**
- **confirm the importance of identifying efficiency savings**

### **ACCESS TO INFORMATION ACT 1985**

2008/09 Revenue Budget and the 2009/013 MTP

#### **Contact Officer:**

Steve Couper, Head of Financial Services ☎ 01480 388103



	Forecast Variations from 2008/09 Approved Budget											
	2009/ 2010	2010 2011	2011 2012	2012 2013	2013 2014	2014 2015	2015 2016	2016 2017	2017 2018	2018 2019		
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000		
Refuse and Recycling	-35	-43	-51	-51	-51	-51	-51	-51	-51	-51	-51	Mainly additional recycling credits
Public Conveniences	-32	-32	-32	-32	-32	-32	-32	-32	-32	-32	-32	Removal of APCs
Planning Policy and Conservation	-195	-356	-358	-381	-381	-381	-381	-381	-381	-381	-381	Mainly removal of one-off spending that had been funded by grants received in earlier years
Economic Development	-50	-50	-51	-51	-51	-51	-51	-51	-51	-51	-51	Mainly net rent income on Units
Joint Leisure Centres	-9	-174	-211	-267	-283	-283	-283	-283	-283	-283	-283	Mainly net additional income from developments
Parks and Open Spaces	-11	-29	4	-51	-51	-51	-51	-51	-51	-51	-51	Mainly net additional income from Hinchingsbroke Park café development
Housing Benefits	23	68	114	160	160	160	160	160	160	160	160	Mainly reduction in Benefits admin grant
Car Parks	-71	-71	-68	-72	-72	-72	-72	-72	-72	-72	-71	Mainly extra net car park income
Environmental Improvements	-2	-1	-51	-52	-52	-52	-52	-52	-52	-52	-52	Drop out of Environment Strategy Funding after 3 years
Offices	-38	157	242	242	242	242	242	242	242	242	242	Additional running costs of new buildings - mainly NNDR
IT related	70	38	50	50	50	50	50	50	50	50	50	
Other	-49	11	-40	-98	-154	-87	-87	-88	-88	-87	-87	
ND Spending adjustments identified	-494	-594	-708	-708	-708	-567	-708	-708	-708	-708	-567	Spending adjustments already planned
Technical	275	336	387	388	388	388	388	388	388	388	388	Mainly schemes b/f, reduction in staff recharges to capital and phasing out of commutations
	<b>-618</b>	<b>-740</b>	<b>-774</b>	<b>-923</b>	<b>-994</b>	<b>-787</b>	<b>-928</b>	<b>-928</b>	<b>-928</b>	<b>-928</b>	<b>-787</b>	
<b>Major items</b>												
Cost of borrowing	418	1,099	1,608	2,003	2,295	2,594	2,895	3,199	3,509	3,821	3,821	
Interest	902	1,216	1,392	1,557	1,671	1,714	1,708	1,702	1,694	1,685	1,685	Loss of interest due to use of revenue and capital reserves
Inflation (details on next page)	1,593	3,259	4,345	5,688	7,056	8,235	9,697	11,205	12,492	14,135	14,135	
<b>TOTAL INCREASE</b>	<b>2,295</b>	<b>4,834</b>	<b>6,571</b>	<b>8,326</b>	<b>10,028</b>	<b>11,756</b>	<b>13,372</b>	<b>15,178</b>	<b>16,766</b>	<b>18,855</b>	<b>18,855</b>	
<b>TO BE FUNDED FROM</b>												
RSG	-415	-782	-1,235	-1,704	-2,189	-2,691	-3,211	-3,749	-4,305	-4,882	-4,882	
Council Tax	-375	-771	-1,189	-1,630	-2,096	-2,589	-3,109	-3,659	-4,239	-4,852	-4,852	
Collection Fund Deficit	-28	-28	-28	-28	-28	-28	-28	-28	-28	-28	-28	
Use of Revenue Reserves	-977	-2,252	-2,119	-1,322	264	1,622	1,622	1,622	1,622	1,622	1,622	
<b>Spending Adjustments still to be identified</b>	<b>-500</b>	<b>-1,000</b>	<b>-2,000</b>	<b>-3,642</b>	<b>-5,979</b>	<b>-8,070</b>	<b>-8,646</b>	<b>-9,365</b>	<b>-9,816</b>	<b>-10,715</b>	<b>-10,715</b>	
<b>TOTAL FUNDING</b>	<b>-2,295</b>	<b>-4,833</b>	<b>-6,571</b>	<b>-8,326</b>	<b>-10,028</b>	<b>-11,756</b>	<b>-13,372</b>	<b>-15,178</b>	<b>-16,766</b>	<b>-18,855</b>	<b>-18,855</b>	

INFLATION	Forecast Variations from 2008/09 Approved Budget									
	2009/ 2010	2010 2011	2011 2012	2012 2013	2013 2014	2014 2015	2015 2016	2016 2017	2017 2018	2018 2019
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Pay and Pensions	1,514	3,135	4,435	5,798	7,227	8,725	10,295	11,942	13,668	15,478
Electricity and Gas	41	85	130	178	228	281	336	394	455	519
Vehicle fuel and mileage allowances	39	79	122	165	211	259	309	361	415	471
All other expenditure items	320	648	984	1,329	1,682	2,045	2,416	2,796	3,186	3,586
Car Park Income			-118	-118	-118	-248	-248	-248	-391	-391
Planning Income			-115	-115	-115	-241	-241	-241	-380	-380
Rents	-46	-93	-142	-192	-244	-298	-353	-409	-468	-528
All other income	-289	-586	-890	-1,203	-1,524	-1,853	-2,190	-2,537	-2,893	-3,258
<b>sub total</b>	<b>1,579</b>	<b>3,268</b>	<b>4,405</b>	<b>5,842</b>	<b>7,348</b>	<b>8,669</b>	<b>10,323</b>	<b>12,057</b>	<b>13,592</b>	<b>15,497</b>
Add inflation on Revenue MTP schemes	14	24	40	46	42	68	81	94	108	123
Less inflation on spending adjustments		-33	-101	-201	-334	-503	-708	-946	-1,209	-1,485
<b>TOTAL</b>	<b>1,593</b>	<b>3,258</b>	<b>4,345</b>	<b>5,687</b>	<b>7,055</b>	<b>8,234</b>	<b>9,697</b>	<b>11,204</b>	<b>12,491</b>	<b>14,134</b>

**CABINET  
DEVELOPMENT CONTROL PANEL**

**12<sup>TH</sup> JUNE 2008  
19<sup>TH</sup> JUNE 2008**

## **THE EAST OF ENGLAND PLAN – THE REVISION TO THE REGIONAL SPATIAL STRATEGY FOR THE EAST OF ENGLAND**

**(Report by Head of Planning Services )**

### **1. INTRODUCTION**

- 1.1 The Secretary of State has now issued the East of England Plan - The Revision to the Regional Spatial Strategy for the East of England and that document now forms part of the statutory Development Plan for Huntingdonshire.

### **2. THE REVISION TO THE REGIONAL SPATIAL STRATEGY**

- 2.1 The Government considers that this review of the Regional Spatial Strategy embeds, within the statutory planning system, a sustainable long term vision for delivering new development in a region faced with dealing with particularly strong growth pressures. It outlines a 20 year vision in terms of how the Government intends to tackle climate change, address housing shortages, strengthen the region's economy, improve the quality of life for the people of the region and improve and conserve the region's environment. The RSS covers the period to 2021 but sets out a vision, objectives and a core strategy for the longer term.

#### **THE SPATIAL STRATEGY**

- 2.2 The regional spatial strategy strongly reflects the Governments desire to put into place a strategy which promotes, rather than constrains, medium and longer term growth. The spatial strategy directs most of the strategically significant growth to the region's major urban areas where public transport accessibility is at its best and there is the potential to use the proposed growth as a means of enhancing physical and social infrastructure. It is proposed that 60% of the proposed new development would be on previously developed land. Cambridge and Peterborough are defined as being Key Centres for Development and Change whilst the strategy also considers that other growth should be directed towards the market towns in order to increase their economic and social sustainability.

#### **ECONOMIC DEVELOPMENT**

- 2.3 The economic development strategy aims to ensure the continued growth of the regions economy and to deliver a better alignment between the location of homes and jobs. The plan states that Local Development Documents should also take into account the outcomes of the on-going review of the Regional Economic Strategy; which is to be published in the summer. Therefore significant growth in jobs is proposed, with an indicative 452,000 for the whole region up to 2021,

with 75,000 new jobs being proposed for Cambridgeshire and 20,000 in Peterborough. The strategic employment policies designate the Cambridge Sub-Region as a centre for world-class research and development whilst Peterborough, to achieve regeneration, is advocated as a centre for the growth of environmental services. The cluster development policy goes on to outline support for a life-science regional super-cluster with concentrations at locations including in the Cambridge sub-region, an environmental technologies cluster stretching from Essex to Cambridgeshire with a particular focus on Peterborough and a strong ICT cluster in the Cambridge area.

## **HOUSING**

- 2.4 The housing strategy proposes a further increase in the planned overall housing numbers for the region so that local planning authorities should facilitate the delivery of at least 508,000 net additional dwellings over the period to 2021. District allocations should be regarded as being minimum targets to be achieved, rather than ceilings which should not be exceeded. Within Cambridgeshire the proposed overall minimum dwelling provision is set at some 98,300 new dwellings with the spread of provision being 11,200 for Huntingdonshire, 19,000 for Cambridge City, 8,600 for East Cambs, 11,000 for Fenland, 23,500 for South Cambs and 25,000 for Peterborough.
- 2.5 The Plan states that all the local planning authorities should plan for the delivery of housing for at least 15 years from the date of adoption of relevant development plan documents. When bringing forward land for housing, planning authorities should take account of the regional spatial strategy, the need for the co-ordination and consistency of approach between neighbouring authorities and the need to co-ordinate development with necessary transport and other infrastructure provision.
- 2.6 With regard to affordable housing provision the Secretary of State has clarified the policy position by setting a regional target for 35% affordable housing provision.

## **THE REGIONAL TRANSPORT STRATEGY**

- 2.7 The regional transport strategy encourages a significant change in travel behaviour, encourages a reduction in distances travelled and a shift towards more sustainable modes of travel. The strategy states that demand management measures should be used to tackle congestion. The strategic and regional road network should be improved, managed and maintained and priority should be given to the efficient and sustainable movement of freight.

## **ENVIRONMENT**

- 2.8 The Plan includes policies to protect the countryside and to promote diversity and the Great Fen Project is defined as being a regionally strategically significant green infrastructure project. Other policies seek to conserve the regions natural and historic environments and encourage high quality built environments.

## **CARBON DIOXIDE EMISSIONS AND RENEWABLE ENERGY**

- 2.9 The Plan strongly outlines that the regional strategy should seek to locate and design new developments in order to optimise its carbon performance and that local authorities should encourage the supply of energy from decentralised, renewable and low carbon energy sources. Proposals for the generation of renewable power should be supported in order to ensure that by 2020 17% of the region's energy comes from renewable sources. Water efficiency and integrated water management are also advocated.

## **SUB-AREAS AND KEY CENTRES FOR DEVELOPMENT AND CHANGE**

### **The Cambridge Sub-Region**

- 2.10 The strategy for the Cambridge sub-region, as previously defined by the Structure Plan, is carried forward largely unchanged into this RSS. The Plan advocates that a comprehensive approach to growth should be adopted to secure the necessary infrastructure and the previously adopted sequential approach to accommodating growth (within Cambridge, on the periphery of Cambridge, at Northstowe and then within, or on the peripheries of, the sub-region's market towns) has been reiterated.

### **Peterborough**

- 2.11 Peterborough is also defined as a Key Centre for Development and Change, at the centre of a sub-region which includes parts of Huntingdonshire, with the aim of the policy being to strengthen Peterborough's role as a major regional centre and focus for the northern part of the London-Stansted-Cambridge-Peterborough Growth Area.

## **3. CONCLUSIONS**

- 3.1 The East of England Plan will set the strategic planning framework for this region for the period up to 2021. It will be the fundamental aspect of regional and local policy, it will guide and influence all strategic development and planning decisions, and therefore the application of its policies will have a pronounced material impact on the future character of Huntingdonshire.
- 3.2 The East of England Plan now forms part of the statutory Development Plan for Huntingdonshire. Accordingly this Council, when acting in respect of its role as the local planning authority, will have to pay due regard to the Plan and its policies in respect of its decision making.

## **4. RECOMMENDATION**

- 4.1 That the Cabinet notes that the Secretary of State has now issued the East of England Plan and that this revision to the RSS will form part of the statutory Development Plan for Huntingdonshire.

## **BACKGROUND INFORMATION**

The East of England Plan – The Revision to the Regional Spatial Strategy for the East of England – May 2008

Contact Officer: Steve Ingram, Head of Planning Services  
Tel: 01480 388400

COMT  
OVERVIEW & SCRUTINY  
CABINET

27<sup>TH</sup> MAY 2008  
10<sup>TH</sup> JUNE 2008  
12<sup>TH</sup> JUNE 2008

**LOCAL DEVELOPMENT FRAMEWORK  
THE CORE STRATEGY -  
SUBMISSION DOCUMENT  
(Report by Head of Planning Services)**

**1. INTRODUCTION**

- 1.1 The purpose of the report is for the Cabinet to endorse the submission document for the Core Strategy before it is approved by Council for formal submission to the Secretary of State.

**2. BACKGROUND INFORMATION**

- 2.1 The Core Strategy is the primary, over-arching document that guides and enables the strategy for the future growth and development of Huntingdonshire. Once submitted to the Secretary of State it will be subject to examination by an independent Inspector to assess whether it meets the tests of soundness.
- 2.2 The Council consulted on Issues and Options (the Regulation 25 stage) for the Core Strategy during May, June and July 2007 and on the Preferred Option ( the Regulation 26 ) stage in December 2007 and January 2008. In addition to engaging with stakeholders (such as Parish Councils, the County Council, Primary Care Trust, Highways Agency, Environment Agency etc), the general public were also invited to comment. The Documents were made widely available at Pathfinder House and in libraries and local access points across the District and through an interactive on-line version on the Council's website. The representations made on the Issues and Options, the document 'Towards a Spatial Strategy' which discussed a number of strategic options and the Preferred Option Document have been taken into account in formulating this Submission Document.
- 2.3 The Core Strategy specifically takes account of the existing adopted Community Strategy and its emerging replacement, the Sustainable Community Strategy. The Core Strategy also has been prepared taking into account the emerging policies in the East of England Plan (which has now been published) and current and emerging Government Guidance.
- 2.4 The Core Strategy has been set out in two volumes (see appendix). **Volume 1** takes the form of a draft strategy document outlining the key policies and their reasoned justification. **Volume 2** records how each policy was assessed and evaluated and thus forms the necessary audit

trail outlining the development of the policies. It also includes, in an appendix, a schedule of responses to the preferred option and changes made to reflect the concerns raised.

2.5 When the Core Strategy is submitted a number of supporting documents will accompany it. These are available on the Members page of the intranet for Members to inspect and note their contents. The supporting documents are:

- Statement of Pre-Submission Consultation
- Final Sustainability Appraisal of the Core Strategy (including Equalities Impact Assessment)
- Habitats Regulations Assessment of the Huntingdonshire LDF Core Strategy
- Amendments to the Proposals Map
- Core Strategy DPD Soundness Self-Assessment

### **3. EVIDENCE BASE**

3.1 The Core Strategy has been informed by a wide range of technical documents (the Evidence Base). A full list is set out in the Core Strategy Volume 1, Appendix 2. The most influential of these include:

- Huntingdonshire Community Strategy
- Sustainable Community Strategy (emerging)
- Cambridgeshire Strategic Housing Market Assessment
- Huntingdonshire Strategic Housing Land Availability Assessment
- Employment Land Review
- Huntingdonshire Retail Assessment 2005 and Update 2007
- Green Infrastructure Strategy

### **4. THE CORE STRATEGY**

4.1 It is proposed that the Core Strategy will deliver at least 5,450 new dwellings, 85ha of employment land and up to 24,000sq m of retail development during the period 2006 - 2026. These figures are over and above what is already proposed in existing plans and in commitments and are considered as a minimum target to reach the challenging new levels of provision which are being advocated in the East of England Plan.

4.2 Until the time that the Core Strategy is adopted significant weight must be given to the policies in the approved East of England Plan together with the Huntingdonshire Interim Planning Policies and the saved policies from the Huntingdonshire Local Plan and Structure Plan.

### **5. CHANGES ARISING FROM DPAG**

5.1 The Development Plans Advisory Group met on 2 June to discuss the draft Volume 1 of the Core Strategy. The following changes to the copies circulated with this report resulted from that meeting.

Reference	Change made
Foreword	Re-written in simpler language
Para 2.9	Last sentence appended to para 2.6, rest deleted as repetition



Para 2.10	Relationship between Sustainable Community Strategy and Local Development Framework clarified
Para 2.12	Paragraph split after 3 <sup>rd</sup> sentence
Para 3.32	Penultimate sentence re-worded for clarity
Para 4.9	Paragraph split after 5 <sup>th</sup> sentence
Para 5.2	Clarification added that the key Diagram does not show current allocations or existing planning permissions that have not been built
Para 5.29	Last sentence amended to refer to rural exceptions sites
Para 5.31	Requirements for affordable housing re-worded for clarity
Para 5.49	Workforce internalization re-phrased to 'proportion of residents working within the town'
Para 5.56	'Qualitative' in last sentence replaced with 1) 'increasing choice' and 2) 'increasing the diversity of choice'
Para 5.73	Sentence added referring to the future expansion of Paxton Pits nature reserve
Para 6.45	Paragraph split after 4 <sup>th</sup> sentence
Throughout	Document titles displayed in italics
Throughout	Minor grammatical corrections

## 6. RECOMMENDATION(S)

- 6.1 Cabinet is recommended to agree that, subject to a legal audit of the document, the Core Strategy as set out in the Appendix (as Volume 1 and Volume 2) and the documents listed in paragraph 2.5 above be submitted to Council for approval and to agree that any minor additional editing and updating which may be needed prior to publication be delegated to the Head of Planning Services after consultation with the Executive Councillor for Planning Strategy and Transport.

## BACKGROUND INFORMATION

As stated in paragraph 3 of the text.

**Contact Officer: Steve Ingram, Head of Planning Services**  
 **01480 388400**

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# Core Strategy - Submission Version - Volume One

Huntingdonshire District Council | Core Strategy - Submission Version - Volume One

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## Foreword

The District Council knows that Huntingdonshire is a place where people can thrive, at work and at play, at home and in the community, in a safe and healthy environment, actively taking part in decisions, and continuing to learn and develop throughout their lives. The Core Strategy, as the primary element in the Local Development Framework (LDF), can help ensure that this is true well into the future. It sets the spatial framework for Huntingdonshire's future to 2026, providing essential housing development, stable economic growth and environmental improvements.

Huntingdonshire is an attractive place and year on year many people come to live and work here. Much of the economy has historically been based around agriculture and associated food production, there is a strong specialist manufacturing industry and more recently the economy has changed with more jobs in retail, leisure and particularly the office based sector. Despite this economic prosperity, many households are in housing need and this has been identified as a critical issue to address through the Core Strategy. There are obvious development pressures and so it will be essential to safeguard the unique character of Huntingdonshire, its landscape, wildlife and the built environment of our market towns and villages.

As well as these local issues, the Core Strategy will need to address matters of wider concern including climate change and the need to reduce our carbon footprint.

The Core Strategy will affect every community in Huntingdonshire, whether it is a major housing development or conversion of redundant farm buildings. This paper sets out the District Council's submission version for the Core Strategy. This is the final stage of consultation for the Core Strategy and is your last chance to get involved and have your say about this important strategy.



Councillor Peter Bucknell  
Executive Councillor for Planning Strategy  
and Transport

# Foreword

Huntingdonshire District Council | Core Strategy - Submission Version - Volume One

## 1 Introduction

**1.1** The Core Strategy sets the strategic spatial planning framework for how Huntingdonshire will develop up to 2026. It contains strategic policies to manage growth and guide new development in Huntingdonshire. The Core Strategy provides the local context for considering the long term social, economic, environmental and resource impacts of development.

**1.2** The key role of the Core Strategy will be to guide the spatial aspirations of the Council and other service providers and stakeholders to ensure that the needs of our residents, businesses and visitors are met.

**1.3** The Core Strategy includes:

- a vision of how Huntingdonshire will develop as a place in order to meet the needs of our residents and business communities, both now and in the future
- strategic objectives for the area to achieve the vision - to help guide and manage development and mitigate any adverse effects
- a spatial strategy which will help direct growth to locations where it can be sustainably accommodated and identifies areas of significant change
- core policies to establish overall spatial principles and to provide a framework for more detailed policies for the Development Control DPD, Planning Proposals DPD and the Huntingdon West Area Action Plan
- recognition of the need to work in partnership to achieve the necessary infrastructure for successful delivery of growth
- details of how the Local Development Framework will be monitored and how the implementation of the Core Strategy will be assessed

**1.4** It will not include detailed development control policies or identify specific development sites. These will be dealt with separately by the Development Control DPD, the Planning Proposals DPD and the Huntingdon West Area Action Plan.

**1.5** The District Council will be preparing a series of companion planning documents, collectively known as the Local Development Framework, to guide and manage growth and change in the District up to 2026. The Development Plan Documents (DPDs), which are subject to independent examination, are:

- Core Strategy Development Plan Document
- Development Control Policies Development Plan Document
- Huntingdon West Area Action Plan
- Planning Proposals Development Plan Document
- Gypsy and Traveller Sites Development Plan Document
- Proposals Map (accompanies this document)

**1.6** These will be complemented by Supplementary Planning Documents (SPD) on specific issues, such as developer contributions to affordable housing and planning obligations. Further details of the stages involved in the preparation of DPDs and SPDs, including the timetables for production, can be found in the Huntingdonshire Local Development Scheme.

**1.7** The Core Strategy is accompanied by Volume 2 which records how each component of the strategy was selected and drawn up. It forms the audit trail for the development of the policies, setting out a précis of the alternatives that were also considered.

## Evolution of the Core Strategy

**1.8** The first stage of preparation was the Issues and Options Stage (Regulation 25). Consultation was undertaken throughout May and June 2007 with identified stakeholders. Limited public publicity was also made at this time to give those interested the opportunity to be involved at this preparatory stage. The representations received were considered and used to inform a further round of consultation with selected key stakeholders through the publication of the consultation document 'Towards a Spatial Strategy for Huntingdonshire' to aid further the preparation of the Preferred Options.

**1.9** The Preferred Options Report (Regulation 26) was published for consultation in November 2007. It was presented in two volumes, the same way as this Submission Version. Volume 1 identified the Preferred Options for policies and their reasoned justification, while Volume 2, provided the evidence base for the development of the Preferred Options. Representations received during this period were considered in detail and have influenced the content of this Submission Core Strategy.

## Sustainability Appraisal and Appropriate Assessment

**1.10** European Directive 2001/42/EC requires an 'environmental assessment' of plans and programmes prepared by public authorities that are likely to have a significant effect upon the environment. This process is known as 'Strategic Environmental Assessment' (SEA). This requirement applies to the documents that make up the Local Development Framework.

**1.11** At the same time, the Planning and Compulsory Purchase Act 2004, requires a Sustainability Appraisal (SA) of all local development documents <sup>(1)</sup>. The processes of SEA and SA are closely related and government guidance on SA in the LDF process incorporates the requirements of the SEA Directive and so only one appraisal process needs to be carried out.

**1.12** The Scoping Report is the first stage of the SA process and provides baseline information and indicators as well as setting out the framework by which documents can be appraised. This was produced by the Council in 2007.

**1.13** Alongside the preparation of the Core Strategy Issues and Options paper an Initial Sustainability Appraisal was undertaken by the Council the outcomes of which informed the development of the Preferred Options. The Preferred Options were then subject to SA, the results of which were published for consultation in the draft Final Sustainability Appraisal Report which accompanied the Preferred Options. A Final SA Report has been completed to accompany this submission version of the Core Strategy to demonstrate the sustainability implications of this plan.

**1.14** Habitat Regulations Assessment (HRA) is complementary to SA/SEA and is designed to protect sites of European importance (European sites). HRA refers to the assessment of the effects of a plan, or plans in combination, on a European site to enable a judgement to be made on whether there will be an adverse effect on the site's integrity. HRA is required under amendments to Article 6(3) and (4) of the Habitat Directive 92/43/EEC which were transposed into UK law by the Conservation (Natural Habitats, &c.) (Amendment) (England and Wales) Regulations 2007. As the Core Strategy will have a significant impact upon the potential scale, location and type of development taking place in the District, the impact on European sites within and beyond the District needs to be assessed. The first stage in the process is to prepare a Screening Assessment. If the screening assessment shows that adverse impacts on European sites cannot be ruled out a full assessment of the likely impacts is required. The full assessment identifies ways in which the plan needs to be changed to ensure no adverse impact and proposes mitigation measures. The HRA process has been carried out by specialist external consultants

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1 section 19 para (5)(a)



Scott Wilson Ltd and is published alongside this Submission Core Strategy. A summary of the main findings of the assessment is presented in Volume Two with additional information where relevant in the sections of the Core Strategy.

## The Development Plan

**1.15** The LDF is part of the statutory Development Plan, which also includes the Regional Spatial Strategy, which for this area is the East of England Plan (2008). This was prepared by East of England Regional Assembly with more recent stages handled by the Government Office for the East of England (GO East). The Minerals and Waste Framework prepared for the county by Cambridgeshire County Council is also part of the Development Plan which was under preparation as at June 2008. The Development Plan is the primary source of policy for the determination of planning applications in line with section 38(6) of the Planning and Compulsory Purchase Act 2004.

# Links with Other Documents

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## 2 Links with Other Documents

**2.1** The Core Strategy is informed by the regional and local context set in other policy documents. The other key document is the Sustainable Community Strategy for Huntingdonshire.

**2.2** The East of England Plan sets specific targets and policy requirements which need to be incorporated into the Core Strategy, and this includes housing at District level. It requires Huntingdonshire to deliver 11,200 homes in the period 2001 to 2021, and in addition to provide a share of 75,000 net new jobs for Cambridgeshire over the same plan period.

**2.3** The East of England Plan also sets out a number of policies which seek to secure sustainable development through different measures. These policies include an expectation for authorities to set appropriate targets for affordable housing so that a minimum of 35% of all housing across the Region will come forward as affordable.

**2.4** As the East of England Plan and the Core Strategy are key parts of the Development Plan they are required to be in conformity, and this is a key test of soundness. Volume 2 considers this and the other tests of soundness.

**2.5** The Huntingdonshire Community Strategy was produced by the Huntingdonshire Strategic Partnership, in which the District Council works with its partners including the County Council, the Area Partnerships, Health Services, the Police, Town and Parish Councils and other key agencies. The original Community Strategy was adopted by the Council in 2004. The Community Strategy has been reviewed and updated during the preparation of the Core Strategy leading to the Sustainable Community Strategy (SCS) for Huntingdonshire.

**2.6** The SCS sets out the long-term vision for the development of communities in Huntingdonshire. The main underlying principle is that it will deal with the issues that the local community feel are important to their economic, social and environmental well-being.

**2.7** The Core Strategy has to have regard to the SCS. The Community Strategy (2004) informed the Issues and Options stage of preparation of the Core Strategy while the SCS has been used to inform the Core Strategy during Preferred Options and this Submission stage. The dynamic relationship between the Core Strategy and the Sustainable Community Strategy, enabled by the simultaneous production, has meant that as each has developed this has affected the other. Strong links between the LDF and the SCS has helped to ensure that the LDF is based on a greater understanding of the community's needs as well as establishing an integrated approach towards future development.

**2.8** The SCS identifies 8 key components of a sustainable community as:

- active, inclusive and safe
- well-run
- environmentally sensitive
- well-designed and built
- well-connected
- thriving
- well-served
- fair for everyone

**2.9** The Huntingdonshire Strategic Partnership sets out the long-term vision for the development and the well-being of communities in Huntingdonshire. The main underlying principle is that it should deal with the issues that the local community feel are important to their economic, social and environmental well-being. The vision will

# Links with Other Documents

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be delivered by public, private and voluntary organisations. 6 strategic themes are also identified in the SCS which have a series of desired outcomes and objectives which will be achieved through implementation of 5 year delivery plans.

**2.10** The Local Development Framework is the means of achieving the spatial elements of the SCS and therefore they have been developed together and have more than just regard to each other. Strong links between the LDF and the Community Strategy will help to ensure that the LDF is based on a greater understanding of the community's needs as well as establishing an integrated approach towards future development.

**2.11** Local Authorities in Cambridgeshire have prepared the Local Area Agreement (LAA), called Cambridgeshire Together, as the delivery contract with central Government for providing high quality cost effective public services. It is based on the priorities of the SCS supported by local planning policy to deliver the outcomes agreed.

## Other Plans and Strategies

**2.12** The Core Strategy's vision, objectives and policies seek to address the spatial implications of a wide range of environmental, social and economic concerns, so that it provides an overall framework for managing the pattern of change in Huntingdonshire. This 'spatial planning' approach requires a wide range of other plans and programmes to be taken into account. The most significant include: the Cambridgeshire Local Transport Plan, the Housing Strategy for Huntingdonshire, the Local Economic Strategy for Huntingdonshire which has recently been revised, the Huntingdonshire Environment Strategy and the Huntingdonshire Cultural Strategy. In addition a series of visions, action plans and urban design frameworks for Huntingdonshire's market towns which contain proposals for the redevelopment and enhancement of selected areas have been taken into account. These have been produced by the Council in consultation with local communities (or, in Ramsey, by the coalition of local organisations). At the most local level Parish Plans can provide a wide variety of information and are representative of how local people see their area and how they would like to see it develop. Wherever possible Parish Plans will be used to inform the District's planning policy.

## Supporting Documents

**2.13** The Core Strategy has been informed by a range of studies produced or commissioned by the Council showing it is backed by a strong evidence base. The documents of most relevance to the Core Strategy are listed below, with a full list set out in the Appendix 2 'Evidence Base':

- Strategic Housing Land Availability Assessment (2008)
- Employment Land Review (2007)
- Housing Needs Survey (2003) and Update (2006)
- Landscape & Townscape Assessment (2007)
- Huntingdonshire Design Guide (2007)
- Strategic Flood Risk Assessment (2004)
- Huntingdonshire Retail Assessment Study (2005) and Update (2007)
- Cambridgeshire Green Infrastructure Strategy (2006)
- Cambridge Housing Sub Region Strategic Housing Market Assessment (2008)
- Settlement Hierarchy Background Paper Update (2007)
- Annual Monitoring Report
- Final Sustainability Appraisal (July 2008)
- Habitats Regulation Assessment (July 2008)
- Huntingdonshire Environment Strategy (June 2008)
- Cambridgeshire Local Transport Plan (2006-2011)
- Huntingdonshire Local Investment Framework (2008)
- Huntingdonshire Spatial Strategy Options Assessment (prepared by Atkins for the Council) (2008)

## 3 The Spatial Vision

### A Spatial Portrait of Huntingdonshire

**3.1** Huntingdonshire is still predominantly rural in character with an area of approximately 350 square miles. The population is currently around 160,000 people (2006)<sup>(1)</sup>, with approximately half living in the four market towns of Huntingdon, St Neots, St Ives and Ramsey and most of the remainder in almost 100 villages. The District's towns, villages and countryside offer diverse and attractive environments in which to live and work, and each has its own distinctive character and role.

**3.2** The District lies within the designated London/ Stansted/ Cambridge/ Peterborough Growth Area and in the East of England Region. The southern part of the District, including the towns of Huntingdon, St Neots and St Ives, fall within the Cambridge Sub-Region and look to Cambridge for many of the higher order services, while the northern part of the District is influenced by the relationship with Peterborough, which has experienced significant growth over recent years and continues to do so. The St Neots area also looks towards Bedford as a higher order centre.

**3.3** The District has experienced considerable pressures for growth, originating with Town Development Schemes for Huntingdon and St Neots in the 1960s and continuing in the 1980's and 1990's. Opportunities are arising to regenerate the Town Development Scheme estates and the town centres of Huntingdon and St Neots. The District has a high net out-commuting pattern to London, Cambridge and Peterborough but also has a buoyant local economy which now contains the largest cluster of high-technology firms in Cambridgeshire outside the immediate area of Cambridge.

#### Huntingdon

**3.4** Huntingdon is the administrative centre and is located toward the centre of the District on the northern valley slopes of the River Great Ouse. It is accessible from the A14, which passes around the southern perimeter of the town. The eastern edge of the town has a strong historic association with the river. Parts of the town centre are undergoing redevelopment and regeneration. Much of the historic core based on the Market Hill and High Street remains largely intact. Huntingdon is a major housing and employment centre with a high jobs to employment ratio. It is well connected with the strategic road network and the east coast mainline railway. It has a relatively strong retail sector and functions as the primary shopping centre for the District. Brampton and Godmanchester to the south west and south east respectively have a close relationship with the services in Huntingdon. The town benefits from a larger supporting population than just the town itself and the residents of Brampton and Godmanchester benefit from the wide range of services and facilities available in Huntingdon.

#### St Neots

**3.5** St Neots is, in population terms, the largest settlement in the District. It is a market town which established on the eastern banks of the River Great Ouse. This settlement has expanded significantly over recent years and the smaller and previously independent settlements of Eaton Socon, Eaton Ford and Eynesbury to the south and west have been largely assimilated into the urban fabric of St Neots, although their historic and separate character is still recognisable within the town. Significant housing development is now taking place to the east of the railway and north of Cambridge Road. St Neots has its own railway station, on the east coast mainline, located in the north eastern quarter of the town, and has direct access onto the A1. It is connected to Cambridge via the A428. Attracting retail, leisure and employment development to St Neots is challenging due to competition from Bedford and Cambridge.

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1 Source: Research Group, Cambridgeshire County Council mid-2006 population estimates

## St Ives

**3.6** St Ives is an historic market town situated on the northern bank of the River Great Ouse. The town centre contains many original buildings and retains its distinctive medieval street pattern. The town has grown asymmetrically to the north of the river; the extensive floodplain to the south being retained as open land. The historic core of the town developed around the bridge over the River Great Ouse, and along the northern bank of the river. St Ives has developed an extensive base of small specialist shops which have enabled it to successfully compete with other market towns in the area. St Ives is a picturesque town and is a popular destination for tourists and visitors.

## Ramsey and Bury

**3.7** Ramsey is located on the edge of the fenland landscape. The original settlement has effectively merged with the village of Bury, although parts of Bury remain separate. For planning purposes is referred to as the Market Town of Ramsey and Bury. Ramsey has a wide variety of urban character. The 'historic core' is centred on High Street and Great Whyte and the 'Abbey Greens' associated with the former Abbey to the east of the town. Ramsey is relatively remote as it lies off the main road network and this restricts the opportunities for future development. Ramsey continues to be the focus of a number of regeneration initiatives and is developing its heritage assets.

## Villages and the Rural Area

**3.8** Huntingdonshire remains a predominantly rural District with just 6% of its total land in urban use. The agricultural heritage of the District has had a large impact on its landscape appearance. The underlying Oolithic Limestone and stone buildings of the Nene Valley and the dark peat soils and flat landscapes of the Fens ensure that these landscapes are particularly distinctive.

**3.9** Despite the growth that has taken place across the District, many of Huntingdonshire's smaller villages retain their historic form. Buildings clustered around a church or village green and linear patterns are both common. The range of services available in the villages varies significantly as does the population. Development pressures can easily undermine the sensitive character of these settlements if it is not sympathetic to the context of the surrounding area, the size of the settlement and the services available.

## Population

**3.10** The population of Huntingdonshire is generally healthier, and life expectancy higher, than the national average, and incomes are above the national average. There are, however, pockets of deprivation such as the Eynesbury Ward in St Neots, and the Huntingdon North Ward which has the lowest levels of both household income and educational attainment in the District, and is within the 10% most deprived areas in Cambridgeshire<sup>(2)</sup>.

**3.11** Of the District's population 21.7% are aged between 0 -15, 15.5% are within the 16 to 29 age group, 24.4% are within the 30 to 44 age group, 25.5% are within the 45 to 64 age group, 11.45% are within the 65 to 84 age group and 1.49% are 85 or over. The population of the District is expected to rise to over 166,000 by 2026 with over 23% aged 65 and over<sup>(3)</sup>. There is some evidence that immigration from other countries in the European Union may be an increasingly important factor.

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2 Cambridgeshire County Council

3 Cambridgeshire County Council

# The Spatial Vision

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## Landscape, Biodiversity and Ecology

**3.12** The countryside is fertile farmland, much of which is arable with large fields and few hedgerows. The gentle low relief is mainly a clay plateau dissected by the valley of the River Great Ouse and its associated brooks. To the north and east of the District the land levels fall to fen, most of which is below sea-level.

**3.13** Huntingdonshire contains a number of sites of particular importance for biodiversity, such as the Ouse Washes, Woodwalton Fen and Portholme Meadow. There are over 25 Sites of Special Scientific Interest (SSSIs), four Woodland Trust sites, and over 125 County Wildlife Sites. Particular opportunities have been identified by the Cambridgeshire and Peterborough Biodiversity Partnership in a 50 year Wildlife Vision for Cambridgeshire, which recommends a number of priority areas for habitat creation and enhancement. A Strategic Open Space Study was commissioned by Cambridgeshire County Council in 2004 which looks at the provision of open space across the county. Cambridgeshire Sub-Regional Green Infrastructure Strategy (2006), produced by Cambridgeshire Horizons has been developed to provide a strategy for Green Infrastructure. The Great Fen Project is a major habitat restoration project which will create a 3700 hectare wetland between Huntingdon and Peterborough by connecting Holme Fen and Woodwalton Fen, which will also provide new opportunities for recreation and education. There are also significant initiatives to extend Paxton Pits Nature Reserve and to create a new wildlife reserve at Needingworth Quarry.

## Economy

**3.14** Much of the economy has historically been based around agriculture and associated food production. In more recent times a strong specialist manufacturing industry has grown up alongside changes that have seen more jobs in retail, leisure and office based sectors. There has also been significant growth in the high technology sector in recent years in Huntingdonshire.

**3.15** Tourism and leisure are important contributors to the local economy. Visitors are attracted to the District by its strong local historical connections, such as to Oliver Cromwell and Samuel Pepys. Opportunities for sport and informal recreation in the countryside attract many others, with large numbers attending horse races at Huntingdon Racecourse. There are opportunities for varied water-related activities on, the network of waterways in the District, the River Great Ouse and at Grafham Water.

## Infrastructure

**3.16** Growth will generate additional demands on the District's physical and social infrastructure. A key challenge will be the timely provision of adequate and appropriate new infrastructure to meet these demands. Infrastructure requirements reflect more than physical provision of utility services and the highway network; education, health services, recreation, cultural facilities and green infrastructure are all vital to help communities thrive.

**3.17** Cambridgeshire Horizons was established to co-ordinate development and infrastructure implementation and overcome barriers to the development of strategic sites. The District Council will continue to work jointly with Cambridgeshire Horizons to facilitate growth and the delivery of new infrastructure for the benefit of Huntingdonshire.

## Education

**3.18** Huntingdonshire Regional College provides full and part-time education for young people and adults. Based in Huntingdon and St Neots the college also provides learning opportunities in many other locations across the district. State education for those aged 11-18 is provided in 7 establishments, focused in the larger centres of population with Huntingdon and St Neots each having two secondary schools and St Ives, Ramsey and Sawtry each having one with all secondary schools serving quite extensive rural catchments too. Many students in the north of the district fall within the Stanground College catchment located in Peterborough.

**3.19** Huntingdonshire currently has 61 state primary schools catering for children aged 4-11. Of these 26 are located within the Market Towns of Huntingdon, St Neots, St Ives and Ramsey with 35 others spread around the district, mostly in the larger villages.

**3.20** Samuel Pepys and Spring Common schools provide education services to students aged 2-19 with special educational needs and are based in St Neots and Huntingdon respectively.

**3.21** There is a small private education sector, including Kimbolton School which offers boarding facilities, but most students choosing this travel outside the district for education, mainly to Cambridge and Peterborough. Pre-school education is supplied by a range of state, private and voluntary providers.

## Health Care

**3.22** Cambridgeshire Primary Care Trust is responsible for the overall commissioning of health care services in Cambridgeshire. 22 General Practices operate within the District with some having satellite surgeries in villages to provide more local facilities to patients. Opened in 1983 Hinchingsbrooke Hospital provides medical services for residents of Huntingdonshire and some surroundings areas but was threatened with closure in 2006/7. Confirmation was obtained in June 2007 of the hospital's retention with some restructuring of services taking place. A major new treatment centre opened in 2005 has allowed a significant increase in day case patients and a replacement children's ward opened in 2007.

## Transport

**3.23** Huntingdonshire benefits from excellent strategic communication links. The East Coast mainline rail services are accessible at Huntingdon and St Neots. The A1 offers access north – south on the trunk road network. The A14 provides strategic east – west links and facilitates access to Europe via the East Coast ports. East – west linkages are also facilitated by the A428 crossing the southern part of the District. Access to airports is more remote with Stansted, Luton and Birmingham being the nearest major passenger airports to the District.

**3.24** Private car ownership in Huntingdonshire is higher than the national average reflecting the relatively rural nature of most of the District and consequent dependence on private cars for personal transport. The most frequent bus services operate within and between the Market Towns where there are greater concentrations of potential passengers. Only 17 other villages have a bus service timetabled to be hourly or better between 7am and 7 pm Monday to Saturday operating to at least one Market Town, Cambridge, Peterborough or Bedford. Services are due to start on a Guided Busway between Cambridge and St Ives in 2009, with on road services continuing to Huntingdon.

## The Planning Context

**3.25** The development plans system consists of Regional Spatial Strategies and Local Development Frameworks. The East of England Plan has recently been published and guides development through to 2021. To reflect new national guidance a single issue review has commenced to address the needs for gypsy and traveller accommodation, which is expected to be complete in 2009. The East of England Plan is expected to be subject to review very soon, which is likely to cover the period up to 2031 and it is anticipated that it may seek to increase development rates.

## Housing requirements

**3.26** The East of England Plan requires a minimum of 11,200 new homes to be built in Huntingdonshire over the period 2001 to 2021. Taking into account housing completions from 2001 to 2006, this is the equivalent of 550 per year up to 2021. As the plan period is already part way through, as at 2006, about 2890 homes have already been built. Approximately a further 4265 are accounted for in existing allocated sites, many of which are

# The Spatial Vision

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either under construction or have planning permission. A further 1345 are accounted for from non-allocated sites that have planning permission or are identified as urban capacity. Together these sources mean that about 8500 homes are accounted for, which leaves land to be identified for 2,700 homes to be built before 2021. Government guidance in PPS3: Housing requires the Council to ensure that there are locations identified for at least a 15 year supply of land for housing when the Core Strategy is adopted. As the Core Strategy is due to be adopted in 2009 the remaining plan period to 2021 would not achieve this. The East of England Plan advises that the annual housing requirement from 2006 to 2021 should be used for planning purposes during the years after 2021. Therefore an additional 2750 homes will be needed between 2021 and 2026 (five years at the post 2006 annual rate of 550). As the figures in the East of England Plan are to be treated as the minimum, a number of options that went beyond this were considered as part of the issues and options process.

**3.27** Affordable housing is a key issue in Huntingdonshire due to the relatively high level of house prices compared with local incomes. The East of England Plan seeks 35% of all housing across the region to be affordable. Huntingdonshire's Housing Needs Survey Update (2006) demonstrates a high level of need, particularly for social rented housing. The recently published Strategic Housing Market Assessment (SHMA) for the Cambridge Housing Sub Region also identifies a high level of need. It shows that average house prices have risen from 2001 to 2006 by about 70% with average lower quartile prices rising by about 95%. At the same time average earnings have increased by about 28% and lower quartile earnings have increased by just 22%. The effect of these changes is that lower quartile market housing is now only affordable to 46% of the population. The assessment supports seeking affordable housing to address affordability. Meeting the existing and newly arising housing need in the district would require more houses than the annual requirement from the East of England Plan. The Peterborough City Council has also produced a SHMA for the Peterborough area. The Peterborough SHMA covers a small part of Huntingdonshire, to the north of the District. The findings of the Peterborough SHMA have been taken into account for the areas it covers.

## Employment

**3.28** The East of England Plan requires jobs in Cambridgeshire to increase by 75,000, of which it is predicted that at least 13,000 should be created in Huntingdonshire. To support continued economic growth, sufficient land of a suitable quality in the right locations to meet expected needs for industrial and commercial development needs to be identified. As there is no direct link between jobs growth and land availability, the scale of employment land needed will be the product of a complex series of factors shaping the demand for new accommodation and supply of new and existing employment land and property. Some of the key factors are: overall national economic growth, local labour supply and demand, changing conditions for business competitiveness, and increasingly the need to reduce CO<sub>2</sub> emissions and unsustainable modes of transport for employees and the distribution of goods. Most importantly, the growth of jobs and choice in the range of jobs in Huntingdonshire will help to redress the current imbalance of out-commuting.

**3.29** The Employment Land Review looked at the existing supply of employment land and considered the requirements for the LDF. It recommends retaining a number of existing allocations and two scenarios for future requirements. The 'New Usual for Business' approach leads to a requirement for 96ha of land up to 2026. This approach assumes light industrial, warehousing and office developments will be built so that higher job densities will be achieved than previously. The 'Low Carbon Future' approach is more aspirational and requires different attitudes towards employment densities, seeking highly accessible locations and changing ways of working. This could reduce the land requirement to 66ha. For both approaches the required development would be mostly concentrated in the central employment market area around Huntingdon, although housing growth at St Neots will give rise to the need for significant additional new employment opportunities to create a sustainable community.



## Retail Development

**3.30** The East of England Plan identifies Cambridge and Peterborough as regional centres for retail and other town centre purposes with Bedford being classified at the next level as a major town centre. Their close proximity draws significant levels of expenditure away from retail outlets in Huntingdonshire as shoppers seek greater choice of goods. This has the greatest impact on purchase of comparison goods such as furniture, clothing and electrical items. The four Market Town Centres form the core of Huntingdonshire's retail offer and their continued vitality and viability is critical to the success of the local economy.

**3.31** The Huntingdonshire Retail Assessment Study (2005, updated 2007) suggests 20,000m<sup>2</sup> net additional comparison floorspace is needed up to 2021 complemented with 3,900m<sup>2</sup> net additional convenience floorspace for food shopping. PPS6 emphasises the need for a proactive approach to planning for town centres within a strategic hierarchy and identification of opportunities for regeneration and investment.

**3.32** The figures suggested in the Retail Assessment Study allow for a modest increase in the proportion of expenditure retained locally as a result of more attractive retail opportunities being offered. It is considered that this will be a challenging level of development to achieve but provision of local shopping facilities is an integral element of promoting sustainable communities by reducing the need to travel. Distribution of retail development will need to be balanced between the desire to promote sustainable communities by broadly following the distribution of additional housing growth, to achieve successful regeneration and investment attractiveness. This may involve extensions of primary shopping areas and extensions of town centres as a whole to accommodate other main town centre uses.

## A Spatial Vision for Huntingdonshire

**3.33** The Vision for the Local Development Framework has been developed from the key characteristics in the Spatial Portrait, the challenges posed by the Planning Context and the vision from the East of England Plan:

### The Spatial Vision

In 2026 Huntingdonshire will have retained its distinct identity as a predominantly rural area with vibrant villages and market towns. Residents will be happier, healthier and more active and will enjoy an improved quality of life with improved access to a wider range of local jobs, housing, high quality services and facilities and green infrastructure.

### Protection of character

The traditional hierarchy of Market Towns and larger villages serving the smaller settlements within their rural hinterland will be maintained with increasing emphasis on the promotion of sustainable communities.

The character of our towns, villages and their historic cores will be protected and enhanced with care taken to ensure new development is well integrated with its surroundings.

The integrity of our towns and villages will be maintained by ensuring that there is separation between settlements, and in particular between Peterborough and nearby villages in Huntingdonshire. Villages near Peterborough will benefit from development within the city through access to an improved range of amenities and facilities while the areas of countryside and green space around those villages will act as an important resource for the expanded population of Peterborough.

# The Spatial Vision

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The landscape of Huntingdonshire will be protected and enhanced. Housing growth, particularly in the Huntingdon and St Neots areas, will be supported by the protection and enhancement of areas of green space around them including the Ouse Valley, the woodlands around Grafham Water and Brampton and the wetland and woodlands of the Great Fen Project. Further opportunities for improved recreation of these areas and to enhance their biodiversity will be identified together with access to the areas of population.

## **Sustainable patterns of growth and sufficient housing to meet needs**

During this time Huntingdonshire will play a proactive role in accommodating housing growth, including much needed affordable housing, required as part of the London-Stansted-Cambridge-Peterborough growth corridor while respecting, maintaining and enhancing the special character of its natural, historic and built environments. The majority of growth will be concentrated in the most sustainable locations namely the market towns. More limited development will be supported in larger villages to help sustain their existing facilities and amenities, without damaging their character. In our rural areas schemes that sustain and enhance the vitality of established communities will be supported. With the housing growth the appropriate provision of health, education, training, and community, leisure and open space facilities will be secured.

## **Employment that suits the needs of the population and reduces out-commuting**

Future employment development will be located in the most sustainable locations of the market towns. This is primarily in order to ensure delivery of the most marketable sites but it also follows housing growth to ensure the creation of balanced communities. The provision of a wider range of local employment opportunities, particularly in advanced manufacturing, environmental technologies, ICT and creative industries. This will help limit levels of out-commuting to London, Peterborough and Cambridge and ensure the continuing success of the District's economy.

## **Enhanced market towns**

Market towns will be encouraged to respond to pressure from competing centres outside the district in order to further strengthen the District's economy, provide more choice and reduce the need to travel. Appropriate development opportunities will be identified within and close to the town centres to accommodate further investment. Further improvements to the public realm to make the town centres more attractive will be encouraged.

## **Maximise use of previously developed land**

Proactive measures will be taken to maximise the use of previously developed land. However a significant proportion of sites will come forward on Greenfield land given the limited availability of brownfield land in sustainable locations. Redundant military bases in Huntingdonshire will need careful consideration to ensure that any potential re-use or redevelopment maximises the economic benefit to the District.

## **Increased capacity of the transport network**

The proposed A14 improvements will enable much of the development in the Huntingdon area to take place and will improve access to and around the town centre, while the dualling of the A428 in the St Neots area will be promoted to facilitate development there. Improvements in public transport will enable the promotion of sustainable travel options, particularly through the Cambridge to St Ives Guided Bus with associated bus priority measures between St Ives and Huntingdon, and the provision of high quality public transport along the A428 corridor.

## Reasoned Justification

**3.34** The Spatial Vision for Huntingdonshire should flow from the visions set out in the key documents of the East of England Plan and Huntingdonshire's Sustainable Community Strategy. The Core Strategy provides the spatial expression of these for the District and will direct future development to help achieve their visions and objectives. It incorporates the key characteristics that define Huntingdonshire and the ways in which the LDF can address their protection and enhancement. It also seeks to meet the challenges and pressures arising from the issues highlighted in the planning context. The Visions from these two documents are set out below to demonstrate the context in which the Spatial Vision for Huntingdonshire has been developed.

### The Vision of the East of England Plan:

'By 2021 the East of England will be realising its economic potential and providing a high quality of life for its people, including by meeting their housing needs in sustainable inclusive communities. At the same time it will reduce its impact on climate change and the environment, including through savings in energy and water use and by strengthening its stock of environmental assets.'

### The Huntingdonshire Sustainable Community Strategy Vision, 2008:

The Huntingdonshire Strategic Partnership is working together to achieve a long term vision for Huntingdonshire as a place where current and future generations have a good quality of life and can –

- make the most of opportunities that come from living in a growing and developing district;
- enjoy the benefits of continued economic success;
- access suitable homes, jobs, services, shops, culture and leisure opportunities;
- realise their full potential;
- maintain the special character of our market towns, villages and countryside; and
- live in an environment that is safe and protected from the effects of climate change and where valuable natural resources are used wisely.

**3.35** The first is a very broad, high level Vision. The second sets high level aspirations for Huntingdonshire and the people who live and work within the District. The Spatial Vision for the Core Strategy is intended to anchor them into the local context and direct ways in which they might be focused.

## Objectives of the Core Strategy

**3.36** A series of spatial objectives are required for the Core Strategy. These summarise its key policy directions and help provide a framework for developing appropriate indicators and targets for monitoring purposes. The objectives have been devised within the context established by the East of England Plan.

### Objectives

1. To enable required growth to be accommodated in locations which minimise the need to travel and maximise the use of sustainable transport modes, while catering for local needs

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2. To ensure that the types of dwellings built are suited to the requirements of local people, are resilient to projected impacts of climate change and that an appropriate proportion is 'affordable' to those in need
3. To enable specialist housing needs of particular groups to be met in appropriate locations
4. To facilitate business development in sectors that have potential to meet local employment needs and limit out commuting
5. To strengthen the vitality and viability of Huntingdonshire's town centres as places for shopping, leisure and tourism
6. To enable business development in rural areas, in locations and on a scale which helps to provide local jobs, limits commuting and minimises or mitigates against adverse environmental impacts
7. To maintain and enhance the availability of key services and facilities including communications services
8. To maintain, enhance and conserve Huntingdonshire's characteristic landscapes, habitats and species and historic built environment
9. To identify opportunities to increase and enhance major strategic green space
10. To conserve and enhance the special character and separate identities of Huntingdonshire's villages and market towns
11. To ensure that design of new development is of high quality and that it integrates effectively with its setting and promotes local distinctiveness
12. To promote developments that conserve natural resources, minimise greenhouse gas emissions and help to reduce waste
13. To secure developments which are accessible to all potential users, and which minimise risks to health as a result of crime (or fear of crime), flooding or pollution and climate change
14. To increase opportunities for pursuing a healthy lifestyle, by maintaining and enhancing recreation opportunities and encouraging walking and cycling
15. To make best use of existing infrastructure and provide a framework for securing adequate land and infrastructure to support business and community needs
16. To reduce climate change and its effects by minimising greenhouse gas emissions through the use of low carbon and renewable energy sources, reducing the amount of energy used, incorporating adaptation measures in development and facilitating adaptation of biodiversity
17. To enable and prioritise the efficient reuse of sustainably located previously developed land and buildings and minimising the use of Greenfield land.

## Reasoned Justification

**3.37** These objectives summarise the key policy directions. They provide a suitable framework for developing appropriate indicators and targets for monitoring purposes. There may be tension between objectives but the spatial strategy seeks to achieve the best possible overall balance between the objectives. They are also influenced by the many other strategies and plans which have been taken in to account in the preparation of this document, including the East of England Plan and Sustainable Community Strategy.

## 4 The Cornerstone of Sustainable Development

**4.1** Sustainable development is the core principle underpinning planning policy. The aim of sustainable development is to ensure a strong, healthy and just society living within environmental limits both now and in the future. The most commonly used definition of sustainable is “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”<sup>(1)</sup>. It forms an overarching objective that influences all aspects of the Core Strategy. The government’s Sustainable Development Strategy<sup>(2)</sup> forms the basis of the UK agenda to achieve sustainable development and sets out a strategic framework to achieve sustainable development. PPS1 Delivering Sustainable Development sets out how sustainable development can be delivered through planning policies and PPS Planning Climate Change (supplement to PPS1) provides expanded policy on planning’s contribution to mitigating and adapting to climate change.

**4.2** The Council is committed to playing its part in tackling climate change and has signed up to the Nottingham Declaration on climate change. Climate change is also at the heart of the Council’s Sustainable Community Strategy and the Environment Strategy. The Core Strategy implements the spatial elements of the Sustainable Community Strategy and provides a framework to provide policies which promote the adaptability of Huntingdonshire’s built and natural environment to meet the challenge of climate change. The LDF will put the principles of sustainable development at the heart of decisions about spatial planning at a local level in Huntingdonshire.

**4.3** The Core Strategy will provide the local context for considering the long term social, economic and environmental and resource impacts of development up to 2026. The following policy sets out the importance of sustainable development in spatial planning and the key criteria for assessing proposals.

### Policy CS 1

#### Sustainable Development in Huntingdonshire

All plans, policies and programmes of the Council and its partners, with a spatial element, and all development proposals in Huntingdonshire will contribute to the pursuit of sustainable development.

Reflecting environmental, social and economic issues the following criteria will be used to assess how a development proposal will be expected to achieve the pursuit of sustainable development, including how the proposal would contribute to minimising the impact on and adaptability to climate change. All aspects of the proposal will be considered including the design, implementation and function of development. The criteria are:

Making best use of land (including the remediation of contaminated land), buildings and existing infrastructure;

Minimising the use of non renewable energy sources and construction materials and resources and maximising opportunities for renewable and low carbon energy sources and on site renewable energy provision and improving energy efficiency;

Reducing water consumption and wastage, minimising the impact on water resources and water quality and managing flood risk;

1 World Commission on Environment and Development, 1987

2 Securing the Future delivering UK sustainable development strategy 2005

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Minimising and reducing greenhouse gas emissions, oxides of nitrogen, fine particles and other forms of pollution;

Encouraging waste reduction and recycling;

Preserving and enhancing the diversity and distinctiveness of Huntingdonshire's towns, villages and landscapes including the conservation and management of buildings, sites and areas of architectural, historic or archaeological importance and their setting;

Protecting, maintaining and enhancing the range and vitality of characteristic habitats and species to create a viable ecological network;

Promoting sustainable, well designed and accessible places that respect the setting and character of the surrounding area, that are adaptable to meet changing needs and reduce crime, antisocial behaviour and the fear of crime;

Promoting inclusive, cohesive and empowered communities and encouraging community involvement in the design, development and management of places;

Promoting health, wellbeing and active lifestyles by protecting, maintaining and enhancing green space and sport and recreational facilities;

Supporting the local economy and businesses by providing opportunities for lifelong learning and skills development and by enabling the integration of a mix of uses that provide employment opportunities suitable for local people; and

Minimising the need to travel, promoting and increasing opportunities to make necessary journeys by foot, cycle or public transport.

An assessment will be required to accompany any proposal for major development <sup>(3)</sup> to demonstrate how the criteria have been met.

## Reasoned Justification

**4.4** One of the most significant challenges in achieving sustainable development is climate change. Climate change is caused by greenhouse gases that are primarily produced through the burning of fossil fuels. Fossil fuels provide the basis for much of the energy and power used to heat our homes and work places and how we travel. It has far reaching effects on the planet and problems commonly associated with it include rising sea levels, rising temperatures and extreme weather patterns. Cambridgeshire County Council has produced a Climate Change Strategy (2005) which sets out how climate change affects Cambridgeshire and how it can be tackled locally through involving different partners and agencies. Huntingdonshire District Council's Environment Strategy (2008) identifies how climate change is likely to impact upon the District and details measures that the Council is undertaking to help tackle it. Therefore although climate change is a global problem, tackling it at the local level is important. The District Council is committed to this by promoting an integrated system of plans and strategies. Tackling climate change locally can be achieved by minimising the impact of development on the environment through, for example, locating development in places well served by public transport and accessible services so the need to travel is minimised. It also means ensuring that the built and natural environment can adapt, and is

3 The standard definition of 10 or more dwellings or 1000m<sup>2</sup> of employment floorspace is used for major development. For the complete definition please see the General Development Procedure Order (2006 as amended)

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more robust to the challenges of climate change. Spatial planning provides a key mechanism for delivering adaptation as it goes beyond traditional land use planning to incorporate different sectors such as health and transport and brings together different partners.

**4.5** Making the best use of land is a key objective of the planning system in achieving sustainable development. The national target of achieving 60% of all development on previously developed (brownfield) land has been set by central government. The East of England Plan includes a regional target of 60% although it is recognised that the extent to which this target can be achieved across the region will vary.

**4.6** Due to the largely rural nature of the District there are limited opportunities to develop on brownfield land in sustainable locations. The Strategic Housing Land Availability Assessment (SHLAA) has identified the potential land supply across the District and found that brownfield land within the most sustainable locations of the Market Towns is particularly limited, the redevelopment of which will be prioritised in line with government guidance. By making best use of brownfield land in sustainable locations it will also maximise the use of existing infrastructure. However, the limited supply of brownfield land means it will also be necessary to make use of greenfield land in order to accommodate the growth required. In doing so the Council will ensure that only the most sustainable greenfield locations are used and that land is used efficiently by using appropriate densities and design principles.

**4.7** Traditional building materials, such as bricks and concrete are non-renewable, generate a lot of embodied energy when produced and can create a lot of waste. It is essential that the construction of buildings is taken into consideration at the early stages of the planning and design processes to ensure that opportunities for using renewable, recyclable and locally sourced materials are maximised. Construction and demolition waste represents the largest waste stream in the region. Sourcing materials locally and making use of recyclable and reclaimed materials wherever possible cuts down on the amount of CO<sub>2</sub>, one of the biggest contributors to climate change, emitted during their production and transportation. Locally sourced materials also contribute to sustainability by supporting local businesses. Further information on addressing sustainable construction issues has been produced by the Cambridgeshire County Council and Cambridgeshire Horizons <sup>(4)</sup>.

**4.8** The planning system has an important role to play in helping reduce greenhouse gas emissions, particularly CO<sub>2</sub> emissions, through the design of buildings, influencing where and how they are built and the travel mode used. There are four Air Quality Management Areas (AQMAs) in Huntingdonshire – Huntingdon, Brampton, St Neots and Fenstanton. These have been identified because of their particularly high levels of nitrogen dioxide; the main source of which is vehicle emissions. Careful monitoring of the nitrogen dioxide levels occurs within these areas and the District Council is developing an Air Quality Action Plan which will focus on promoting cycling and walking and reducing the need to travel by car. The District Council has published its own Green Travel Plan to encourage its staff to use sustainable modes of transport to get to work and is committed to promoting sustainable transport. The planning system can promote sustainable travel, for example, by locating development in sustainable and accessible locations. Proposals for renewable energy provision will be encouraged in accordance with the PPS1 supplement on Climate Change, and will be considered in the Development Control Policies DPD. Development proposals for renewable energy will need to take into account the Council's SPD on Wind Power.

**4.9** The East of England is one of the driest regions in the country. As a result of climate change weather patterns are likely to get more extreme with significantly drier summers but also increased risks of flooding, particularly in the winter. Reduced levels of rainfall in summer mean that potable water will become a dwindling resource. Significant housing and employment growth will have a significant impact on water resources, as the amount of water used per person is increasing. It is important that water resources are used carefully to protect against potential shortages in the future. Water resources also have significant ecological value providing habitats and food supplies for a variety of species. Huntingdonshire has a very sensitive natural environment and water is a very important feature with the River Great Ouse, Ouse Washes, and fens to the North and East of the District, particularly the Great Fen, providing important wetland habitats. The effects of climate change will mean that we

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have to manage surface water flood risk and water shortages by maintaining and creating flood water storage and reservoirs for potable water. Huntingdonshire is vulnerable to some of the likely impacts of climate change, particularly those parts close to, or below sea level and thus vulnerable to rising sea levels and tidal storm surges. It is therefore important to provide appropriate mechanisms that effectively minimise and manage flood risk. All development proposals will have to ensure that there is no additional risk of flooding and that water efficiency measures are incorporated.

**4.10** Huntingdonshire District Council is one of the best performing local authorities in the country for recycling. In order to maintain this position, new buildings need to be designed to reduce waste generation and encourage recycling by providing space for storage of recyclables and green waste awaiting collection.

**4.11** Huntingdonshire's towns, villages and countryside have very particular characteristics that reflect the unique geography and history of the District. The Spatial Portrait provides an overview of the landscape of Huntingdonshire. The Landscape and Townscape Assessment SPD (June 2007) provides more detailed information on the landscape character areas of the District and the unique characters of its settlements.

**4.12** The Council is committed to ensuring a clean, green and attractive place. The Design Guide SPD (June 2007) provides information on how to improve the quality of new development. Conservation Area Character Statements aim to protect special character areas of particular settlements across the District. All development proposals will be expected to make a positive contribution to the built environment by employing the design principles in the Development Control Policies DPD when adopted and those in the Design Guide SPD.

**4.13** As described in the Spatial Portrait the District has a wide range of sites designated for their sensitive environmental character, flora and fauna and other environmental value. It is critically important that these areas are protected, maintained and where possible enhanced. Development should not adversely affect existing designated environmental areas and, but where this is unavoidable, it will need to provide appropriate mitigation measures. Development can also contribute to maintaining and enhancing biodiversity and green infrastructure outside of these designated areas. Areas of Strategic Green space Enhancement are set out in Policy 9 of the Core Strategy and the accompanying map, and the emerging Development Control Policies DPD contains a detailed policy on protecting and enhancing biodiversity and green infrastructure.

**4.14** It is important to ensure that our built and natural environment is able to adapt to climate change. Planning policies can ensure adaptation is a key consideration in the planning and design of development. The Council uses the Building For Life Standards to assess the quality of new development and ensure that it meets the needs of local communities. Design and Access Statements are a national requirement for most planning applications and ensure that inclusive access is taken into account within a development proposal. All development proposals will have to demonstrate that they are designed appropriately to be inclusive and accessible.

**4.15** As set out in Growing Success the Council is committed to promoting safe, vibrant and inclusive communities. An important element of this is providing opportunities for people to be involved in development proposals. The Statement of Community Involvement (SCI) sets out how and when people can participate in the development of planning proposals. Throughout the preparation of the Core Strategy the Council has undertaken extensive consultation to ensure that the plan reflects the issues important to local communities and is responsive to them. By encouraging community engagement the Council is also helping to promote community cohesion as people come together to have an input in the decision making process. In many cases development proposals can provide significant community benefits by providing new or improved infrastructure. This can also help promote community cohesion and can provide significant health benefits, for example, providing new or improved sport and recreational facilities or cycle/footpath links to encourage active lifestyles. It will need to be demonstrated that there have been opportunities for local communities to get involvement in the planning and design of development proposals in accordance with the SCI. The Council is producing an SPD on Planning Contributions and all major development proposals will have to demonstrate that are providing sufficient contributions towards infrastructure in accordance with the Core Strategy policy 10: Infrastructure requirements and the SPD once adopted.



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**4.16** The draft Local Economy Strategy (2008-2015) identifies a need to maintain a strong local economy in order to promote the vision set out in the Sustainable Community Strategy; the spatial elements of which are implemented by the LDF. Planning has a significant role to play in influence the over the type of employment provided and the location of employment land. Provision of adequate employment development is a key part of creating sustainable communities. Development proposals for employment will have to demonstrate that they are in a sustainable location, are accessible and are of a high quality design.

## 5 The Spatial Strategy

**5.1** The Spatial Strategy sets out how the Council sees the different parts of the District developing. It identifies the different types of settlement within the District and how they will develop. It shows how and where the growth in housing, employment and retailing will be accommodated, and sets out priorities for areas that will be protected from development pressures.

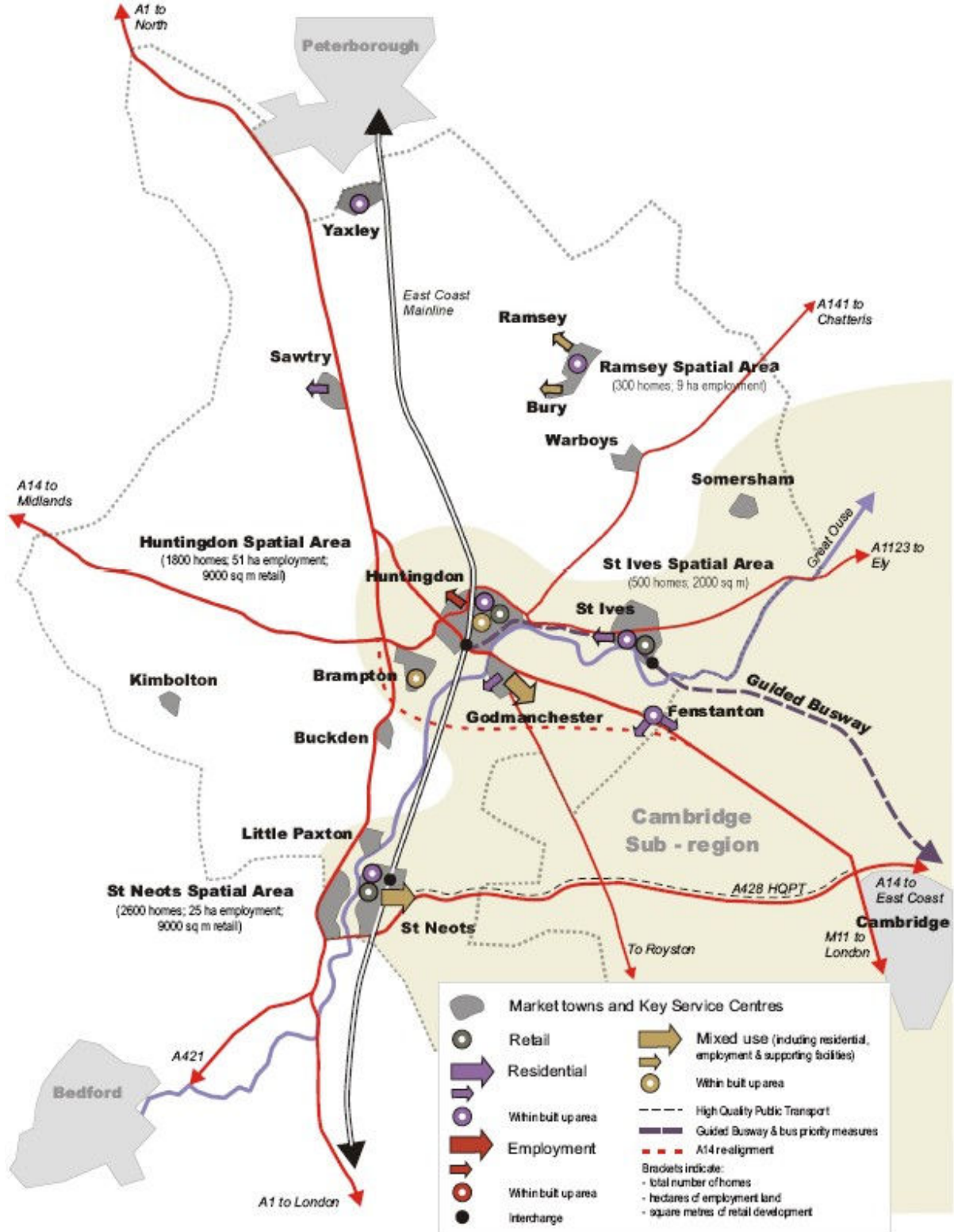
### Key Diagram

**5.2** The Key Diagram illustrates the locations and directions of growth for the new homes, employment land and retail floorspace identified in the Strategic Housing Development, Employment Land and Retail Development policies. For each of the spatial planning areas the total new homes, employment land and retail floorspace are indicated. Also illustrated are planned and identified improvements to the strategic transport network.

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Huntingdonshire Core Strategy Key Diagram



## Strategic Housing Development

**5.3** In spatial planning terms the relationship between the District's four market towns and their nearby settlements is an important consideration. Whilst each settlement possesses its own distinctive character and identity there are strong functional, economic and social links between settlements so that these nearby settlements benefit from greater sustainability than they would otherwise have but also the range of services in the market towns is supported by a larger population than is available in the towns themselves. Within the areas of the market towns and their nearby settlements that have this reciprocal relationship, existing and future residents enjoy greater opportunities to achieve a sustainable lifestyle. For this Strategy these areas have been identified and are referred to as Spatial Planning Areas. Due to the relationship between the settlements in the Spatial Planning Areas the Council has approached each as a whole as it is considered locations within any of the settlements offer similar opportunities for sustainable development. Cambridgeshire County Council has completed an 'Accession' Assessment of the locational and accessibility aspects of the spatial strategy details of which are contained in Volume 2.

**5.4** The Huntingdon Spatial Planning Area includes Huntingdon, Brampton and Godmanchester which already have a physical and functional relationship whilst maintaining different characters and being separated by green spaces and water courses. Together these settlements have around 31,000 residents<sup>(1)</sup>. The majority of services and facilities are concentrated in Huntingdon but are accessible to Godmanchester and Brampton by public transport, cycling and walking. The area is a key driver of the local economy, particularly in the retail, leisure and office based sectors. The Strategic Housing Land Availability Assessment (SHLAA) has identified significant opportunities for development, including previously developed land west of Huntingdon town centre and at RAF Brampton. The realignment of the A14 and proposed removal of the viaduct over the railway will help facilitate further development opportunities after 2015.

**5.5** The St Neots Spatial Planning Area includes St Neots and Little Paxton and has a combined population of around 31,200. Little Paxton has its own distinctive identity and is physically separated from St Neots by the River Great Ouse. However, the key concentration of services and facilities of St Neots town centre are as close to Little Paxton as to many parts of the town itself. Along with land in Bedfordshire around Wyboston, the area is also a key driver of the local economy particularly for the manufacturing and warehousing and distribution sectors. The SHLAA has identified that this area offers significant opportunities for development especially through the creation of a large sustainable urban extension to the east of the town. The capacity of the A428 may be an issue until the section between the A1 and Caxton Gibbet can be upgraded to a dual-carriageway.

**5.6** The St Ives Spatial Planning Area includes the town of St Ives and development at London Road just south of the town in the parishes of Hemingford Grey and Fenstanton. It also includes the business development areas immediately to the east of St Ives in Needingworth parish. This area is smaller in scale than Huntingdon and St Neots with a population of just under 16,000 in 2005. The area has enjoyed recent employment growth, particularly to the east of St Ives and has a relatively small but thriving retail sector. It currently offers fewer opportunities for sustainable development options. Flooding is a major constraint to the south and east of the town. St Ives will see a significant improvement in accessibility with the completion of the guided busway.

**5.7** The Ramsey Spatial Planning Area includes Ramsey, Bury and part of RAF Upwood, but excludes the small villages of Ramsey Forty Foot, Ramsey Heights, Ramsey Mereside and Ramsey St Marys. The population was around 8,000 in 2005. The town serves as a focal point for a significant rural community. Ramsey has relatively poor transport infrastructure as it is well off the main road network and is relatively remote. As a result it has more limited services and facilities than the other three areas. These factors combine to make this a significantly less sustainable location than the other three spatial planning areas.

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1 Cambridge County Council 2005

**5.8** Guidance to assist with the identification of Key Service Centres is contained in the East of England Plan. The guidance indicates that there will be certain factors that will be common within Key Service Centres such as the existence of a primary school and related good access to secondary education, a doctor's surgery, a good range of shops and services that can meet day-to-day needs, local employment opportunities and a frequent public transport service to higher-order centres. The availability of this range of services and facilities means that these villages have potential for some sustainable development that other villages without the range do not. The Council has completed a Settlement Hierarchy background paper that identifies the villages in the district that have this range of services and can therefore be identified as Key Service Centres.

## Policy CS 2

### Strategic Housing Development

During the period, from 2001 to 2026, a total of at least 13950 homes will be provided in Huntingdonshire. This is to meet the requirement of at least 11200 homes from 2001 to 2021 identified in the East of England Plan plus at least an additional 2750 homes for the period from 2021 to 2026. These equate to a target development rate of at least 550 homes per year.

From 2001 to 2006	2890	That have been completed
From 2006 to 2026	4265	That will come from existing allocations in the Local Plan <sup>(1)</sup>
	1345	That will come from non-allocated sites that have planning permission or from urban capacity
	5450	That will be provided in the locations identified below
Total	13950	

1. For more information please refer to the Housing Trajectory in the Implementation Section

Of the 5450 homes for which locations are identified, at least 1575 homes will be on previously developed land and about 3875 homes on greenfield land. About 2150 of these new homes will be provided as affordable housing. Provision will be monitored and the release of locations will be managed and phased during the plan period with the aims of meeting identified needs and demand and maintaining sufficient supply of deliverable sites.

As part of the overall development strategy to concentrate the majority of growth in the Huntingdon and St Neots Spatial Planning Areas whilst observing environmental designations and constraints, it is proposed that strategic housing growth will be located:

In the Huntingdon Spatial Planning Area where at least 1800 homes will be provided. Of these, at least 1000 homes will be on previously developed land, about 800 homes will be on greenfield land and about 700 homes will be affordable. Provision will be in the following general locations:

In a significant mixed use redevelopment in Huntingdon in the area west of the town centre covered by the Huntingdon West Area Action Plan and redevelopment of previously developed land within the built up area of Huntingdon;

In a mixed use redevelopment in Brampton on previously developed land; and

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In Godmanchester as part of a significant mixed use development on greenfield land to the south east/east after the A14 road improvements have been implemented and on greenfield land to the south west.

In the St Neots Spatial Planning Area where at least 2600 homes will be provided. Of these at least 150 homes will be on previously developed land, about 2450 homes will be on greenfield land and about 1050 will be affordable. Provision will be in the following general locations:

In the first phase of a significant mixed use urban extension on greenfield land to the east of the town and as redevelopment of previously developed land within the built up area of the town.

In the St Ives Spatial Planning Area where at least 500 homes will be provided. Of these, at least 100 homes will be on previously developed land, about 400 homes will be on greenfield land and about 200 will be affordable. Provision will be in the following general locations:

In a significant greenfield development to the west of the town; and

In the redevelopment of previously developed land within the built up area of the town.

In the Ramsey Spatial Planning Area where at least 300 homes will be provided. Of these at least 250 homes will be on previously developed land, about 50 will be on greenfield land and about 100 will be affordable. Provision will be made in the following general locations:

In an employment led mixed use redevelopments to the west of the town, to the north of the town and redevelopment of previously developed land within the built up area of the town.

Outside the Spatial Planning Areas, in the Key Service Centres of Fenstanton, Sawtry and Yaxley, about 250 homes will be provided. Of these at least 75 homes will be on previously developed land, about 175 will be on greenfield land and about 100 will be affordable. This provision will be made in all the following general locations, with actual levels being set out in the Planning Proposals DPD:

On land within the built up area and on land to the east and south of Fenstanton;

On land to the west of Sawtry; and

On previously developed land within the built up area of Yaxley.

## Reasoned Justification

**5.9** The East of England Plan sets an allocation of 11,200 new homes to be built in Huntingdonshire for the period 2001 to 2021. Allowing for completions from 2001 to 2006 this is the equivalent of 550 per year up to 2021. As the plan period is already part way through about 8,500 homes have already been built or are accounted for in permissions granted since 2001, as identified in the policy. This leaves 2,700 homes to be achieved before 2021. PPS3: Housing also requires the Council to ensure that there is at least a 15 year supply of land for housing from when the Core Strategy is adopted. As the Core Strategy is due to be adopted in 2009 the plan period to 2021 would not achieve this PPS3 requirement. Regional policy advises that annual averages for housebuilding to 2021 be extrapolated forward. For Huntingdonshire this means rolling forward the 550 annual average to provide for at least a further 2750 new homes between 2021 and 2026. The end date of 2026 will allow for a 15 year land supply upon adoption of the Core Strategy and will mean that the overall District housing figure for the period 2001-26 is at least 13,950 new homes with 5450 to be allocated.

**5.10** The strategy is mainly based on a combination of options. The Cambridge Sub-region is identified in the East of England Plan and previously in the Cambridgeshire and Peterborough Structure Plan (2003). The strategy recognises the significance of the Sub-region by concentrating housing development in the towns and Key Service Centres which lie within it. St Neots has been identified as an important location where there is the opportunity for significant benefits from a large scale urban extension on land to the east of the town and the East Coast Mainline railway. Land in this location will play a significant role, particularly in later phases of the plan period, in ensuring housing delivery is maintained above the annualised rate of 550 and this location offers a unique opportunity to create a truly sustainable community with a new secondary school a higher level of employment than envisaged in the Employment Land Review, and the construction of a viable new District Centre which will complement the town centre. All the options considered were evaluated to ascertain their potential highway impacts. Details of Atkins' Huntingdonshire Spatial Strategy Assessment are given in Volume 2.

**5.11** The approach to affordable housing has been informed by the Huntingdonshire Housing Needs Survey (2003), the update of that survey from 2006, the recently published Cambridge Housing Sub-Region Strategic Housing Market Assessment and policy in the East of England Plan.

**5.12** In line with national and regional policy the approach is to develop sustainable brownfield land first. Due to the predominantly rural character of the District there is not sufficient well located brownfield land to achieve the national target of 60%. However, Brampton and the Huntingdon West area are particularly significant areas where brownfield redevelopment can be achieved. Land east of St Neots offers the best opportunity in the District to create sustainable development on Greenfield land.

**5.13** Other housing will come forward on 'windfall' sites within the built up areas of the towns and villages in line with the scales of development set out in the Settlement Hierarchy. This will be in excess of the 5450 homes planned for through the strategic development opportunities identified above.

**5.14** The SHLAA has considered the potential suitability of sites in market towns and key service centres and while there are sites in and around most settlements capable of being developed for moderate scale development these should accord with the settlement hierarchy. Sites capable of accommodating moderate scale developments will be considered in light of continued monitoring of housing delivery and where appropriate will be allocated in the Planning Proposals DPD along with sites in the locations identified in this policy.

**5.15** The built-up area is considered to be the existing built form excluding buildings that are clearly detached from the main body of the settlement, gardens and other undeveloped land within the curtilage of buildings at the edge of the settlement, especially where these relate more to the surrounding countryside than they do to the built-up parts of the village.

## Settlement Hierarchy

**5.16** The settlement hierarchy provides a framework to manage the scale of housing development appropriate on unallocated sites.

**5.17** The settlement hierarchy continues the strategic aim of concentrating development in the larger sustainable settlements that offer the best levels of services and facilities and protects the character and scale of smaller villages and the countryside. It will help increase the opportunities for sustainable lifestyles, reduce the need to travel and make good use of existing infrastructure.

## Policy CS 3

### The Settlement Hierarchy

The hierarchy identifies;

Huntingdon, St Neots, St Ives and Ramsey and Bury as 'Market Towns' in which development schemes of all scales may be appropriate within the built up area;

Brampton, Buckden, Fenstanton, Godmanchester, Kimbolton, Little Paxton, Sawtry, Somersham, Warboys and Yaxley as 'Key Service Centres' in which development schemes of moderate and minor scale and infilling may be appropriate within the built up area;

Abbotsley, Abbots Ripton, Alconbury, Alconbury Weston, Alwalton, Bluntisham, Brington, Broughton, Buckworth, Bythorn, Catworth, Chesterton, Colne, Conington, Covington, Diddington, Earith, Easton, Ellington, Elton, Farcet, Folksworth, Glatton, Grafham, Great Gidding, Great Gransden, Great Paxton, Great Raveley, Great Staughton, Great Stukeley, Hail Weston, Hamerton, Hemingford Abbots, Hemingford Grey, Hilton, Holme, Holywell, Houghton and Wyton, Keyston, Kings Ripton, Leighton Bromswold, Little Stukeley, London Road (St Ives)<sup>(2)</sup>, Molesworth, Needingworth, Offord Cluny, Offord D'Arcy, Oldhurst, Old Weston, Perry, Pidley, Pondersbridge (part)<sup>(3)</sup>, Ramsey Forty Foot, Ramsey Heights, Ramsey Mereside, Ramsey St Mary's, Southoe, Spaldwick, Stibbington, Stilton, Stonely, Stow Longa, Tilbrook, Toseland, Upton, Upwood, Wansford (part)<sup>(4)</sup>, Waresley, Water Newton, Winwick, Wistow, Woodhurst, Woodwalton, Wyton-on-the-Hill, and Yelling as smaller settlements in which residential infilling will be appropriate within the built up area; and

All other areas as part of the countryside, including those hamlets and isolated groups of buildings where nearly all services and facilities must be accessed in higher order settlements. In this tier residential development will be strictly limited to that which has an essential need to be located in the countryside. Such development will be prescribed in the Development Control Policies DPD.

Development proposals of a larger scale may be allowed where site specific circumstances demonstrate that this secures the most sustainable option for the site. Schemes will be judged on individual merit taking into account the availability of a range of services and public transport appropriate to support the form of the housing to be provided and performance against the criteria set out in Policy CS1. In Smaller Settlements development proposals in excess of minor scale as defined in this policy will require strong justification of how the proposal would make the most efficient use of land and existing infrastructure and how services could be accessed by sustainable modes.

As an indication of the scale of development likely to be acceptable the following definitions should be used:

Large scale development: 60 or more dwellings

Moderate scale development: 10-59 dwellings

Minor scale development: up to 9 dwellings

- 2 The built up area adjoining London Road to the south of St Ives, and lying within the parishes of Fenstanton and Hemingford Grey
- 3 The greater part of this settlement lies within the neighbouring Authority (Fenland)
- 4 The greater part of this settlement lies within the neighbouring Authority (Peterborough)



Residential infilling: up to 3 dwellings

## Reasoned Justification

**5.18** In the Cambridge Sub-Region, the East of England Plan includes the three settlements of Huntingdon, St Neots and St Ives as Market Towns. They have a wider range of facilities and employment opportunities compared to other settlements in the District. Ramsey and Bury lie outside the Cambridge Sub-Region. Ramsey and Bury provide a similar ranges of services and facilities justifying its designation as a Market Town although the scale of provision is below that of the other Market Towns and the availability of employment is comparatively limited. The Market Towns are defined as the first tier in the hierarchy.

**5.19** The East of England Plan identifies the criteria for Key Service Centres as large villages with a good level of services such as a primary school within the village, a secondary school within the village or easily accessible by public transport, primary health care facilities, such as a GP surgery, a range of shops and services that can meet day-to-day needs, local employment opportunities and a reasonable public transport service to higher order settlements. The villages of Brampton, Buckden, Fenstanton, Godmanchester, Kimbolton, Little Paxton, Sawtry, Somersham, Warboys and Yaxley all meet these criteria despite ranging in size and function from sizeable settlements with similar services and facilities to the market towns to large villages with a range of facilities sufficient for most day to day requirements. They are therefore defined as Key Service Centres and form the second tier of the hierarchy.

**5.20** Huntingdonshire has a great many other villages of varying size and character all offering different levels of services and facilities to their residents. These are classed as Smaller Settlements in the third tier of the hierarchy. The main distinction between these Smaller Settlements and the Key Service Centres is that none offer a sufficient range of services and facilities to sustain daily living without the need to access services and facilities elsewhere.

**5.21** The countryside contains a number of hamlets, groups of houses and individual properties typical of an historic and productive agricultural economy. These offer virtually no services for residents and typically contain less than 30 homes. Government policy clearly indicates that such locations should not be a focus for further development.

**5.22** The Council has produced a background paper on the Settlement Hierarchy and the Key Service Centres. Updated in October 2007, this paper provides further information on the criteria used to determine a settlement's position in the hierarchy.

**5.23** Policy CS2 focuses on identifying locations for strategic scales of growth. However, non-strategic housing developments are likely to come forward during the plan period. The indicative scales of development set out in the Settlement Hierarchy are intended to guide the volume of growth likely to be acceptable in different types of location and to protect the overall strategy of focusing growth in the Market Towns.

**5.24** Large scale development is defined as being that of 60 dwellings or more or 2 ha or more of land. Within Huntingdonshire this scale of development is sufficient to have a significant impact on the settlement where it is proposed.

**5.25** Moderate scale growth is defined as being that between 10-59 dwellings, or broadly up to 2 ha of land based on PPS3's recommended minimum density of 30 dwellings per hectare. Proposals of this scale can be sensitively developed within Key Service Centres and occasionally can be integrated into some of the larger Smaller Settlements which benefit from a wider range of services.

**5.26** Minor scale growth accords with the national definition. Residential infilling is defined as the development of a small site within the existing built-up area of a settlement by up to 3 dwellings.

## Addressing Housing Need

**5.27** It has become increasingly difficult for local people on low to modest incomes to gain access to suitable housing. A growing gap between average earnings and housing costs, a limited supply of new affordable properties and the loss of existing social housing through 'right to buy' / 'right to acquire' provisions have all contributed to this problem. The planning system has a key role to play in making more affordable properties available, through securing contributions from market housing schemes and by enabling rural 'exceptions' sites to come forward. It is necessary to define the scope of what constitutes 'affordable housing' in order to develop policies specifying where and when its provision will be required.

**5.28** PPS3 sets out up to date definitions of affordable housing, distinguishing between social rented and intermediate housing tenures which will be used when considering proposals. It acknowledges that to be deemed 'affordable' housing must be made available at a cost low enough for eligible households to afford when compared to local incomes and house prices. It specifies that low cost homes for sale can contribute towards the supply of intermediate housing but specifically excludes low cost market housing from the definition of affordable housing. In order to add to the definition for Huntingdonshire, intermediate housing is housing for people who may not receive sufficient priority to be offered a social rented property but whose incomes are insufficient to enable them to access market priced housing. Rents for intermediate rented housing should not exceed 30% of net median household incomes in Huntingdonshire and housing costs (mortgage and rent) for low cost home ownership (shared equity), should not exceed 30% of gross median household incomes in Huntingdonshire.

**5.29** Housing Needs Surveys in the District have shown a significant demand for affordable housing, far exceeding that likely to be built. Thus, it is important to ensure that provision caters for priority needs. The Housing Needs Surveys have advised that a District-wide target should be set to enable the Council to respond to its responsibility at a District-wide level in order to meet need where it can best do so. A Strategic Housing Market Assessment has recently been completed. Although it is difficult to compare previous surveys and this assessment directly due to differences in the methodologies used, the findings support the previous needs surveys. The affordable housing need identified is well in excess of that which is likely to come forward under existing policies. In such circumstances where need outstrips supply additional provision is required.

### Policy CS 4

#### Affordable Housing in Development

In order to address the need for affordable housing in the district 40% of all housing proposed in developments in the following categories should be provided as affordable housing:

on proposals of 15 or more homes or 0.5ha, or more in all parts of the District; or

on proposals of 3 or more homes or 0.1ha, in all smaller settlements as defined in the settlement hierarchy.

Provision should be made in the form of free serviced land. The affordable housing provision should comprise at least 70% social rented accommodation with the balance being provided as Intermediate housing. These proportions may be varied where justified and with agreement with the Council.

In determining the amount of affordable housing to be delivered, specific site conditions and other material considerations including viability, redevelopment of previously developed land or mitigation of contamination may be taken into account.

Where appropriate for specific sites, criteria setting out variations in the form the contribution should take, including tenure will be provided in the Planning Proposals DPD and the Huntingdon West Area Action Plan. Additional detail will be provided in the Developer Contributions to Affordable Housing SPD.

## Reasoned Justification

**5.30** The East of England Plan includes a target of an average of 35% to be achieved across the region, which applies to all housing development. In order to achieve the average when a site threshold is used, a higher percentage must be sought on eligible sites, as some sites will not contribute because they are below the threshold. Similarly some sites will provide a lower level of affordable housing due to specific site conditions.

**5.31** The SHMA identifies need for Huntingdonshire of 1205 homes per year for the first five years and then once the backlog is clear a need of 534 homes per year. Over the next 15 years this is equivalent to the affordable homes requirement being more than the proposed build targets, by 137%. It is clearly impossible to achieve this level of provision. This evidence of overwhelming need further justifies the levels of affordable housing being sought, which are consistent with the target set by the East of England Plan.

**5.32** PPS3 sets 15 dwellings as a nationally accepted level for the threshold at which a site should have to contribute affordable housing. It is considered that this threshold is appropriate in Market Towns and Key Service Centres in Huntingdonshire. The Council considers it is viable and practical to set requirements for affordable housing from development in rural areas that reflect the need and type of development likely to take place in these areas. With these characteristics in mind the threshold at which affordable housing is sought is lowered to three dwellings. It is also considered appropriate to include site thresholds expressed in both number of homes and in land area in order to promote the most efficient use of land.

## Rural Exceptions Housing

**5.33** House prices, particularly in some of our villages, are unaffordable to many local people leading to significant demand in some locations for provision of affordable housing to prevent people having to move away or to enable those with local connections to return.

**5.34** In the settlement hierarchy most new housing will be built in the Market Towns and to a lesser extent the Key Service Centres, but where rural housing need is high, like in Huntingdonshire it is important to have a mechanism for addressing affordable housing needs that arise within the District's rural areas. The exceptions process is well established. It is so called because an exception to the prevailing policy that determines where and what scale of housing development can take place, is made, as long as it is for affordable housing to meet the needs of local people.

## Policy CS 5

### Rural Exceptions Housing

In exceptional circumstances, affordable housing development will be considered acceptable within or adjacent to the built up area of a Key Service Centre or Smaller Settlement subject to the following criteria:

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The proposal is limited in number and type of housing to that which can be justified by evidence of need from a local needs survey for affordable housing arising from people who are either currently or formerly resident, have an existing family or employment connection or some other connection as agreed with the Council, in the individual settlement or adjacent settlements;

There is reasonable access to at least a basic range of services appropriate to the form of housing proposed; and

Appropriate safeguards are put in place that ensure that the housing will remain affordable for successive occupiers.

## Reasoned Justification

**5.35** In settlements that are unlikely to see significant housing development, housing need may go unmet if left to normal market forces and the proportion of affordable housing sought through policy CS4. In order to try to tackle housing need in these locations exceptions to the normal housing policies are made for development of purely affordable housing. It is considered appropriate to include Key Service Centres in the settlements able to take advantage of this policy because this is an enabling policy and the Council is determined to tackle housing need across the district and as such it would be wrong to artificially exclude settlements that are rural in character and where housing need may need addressing.

**5.36** It is considered important that in order for occupiers of new properties to be able to live as sustainably as possible they should have access to at least a basic level of facilities appropriate to their needs, to help reduce their need to travel. For instance access to a food shop and also a primary school where the houses will be occupied by families would be expected. The level of services available locally along with the form and location of affordable housing will be informed by Parish Plans where they are available.

## Gypsies, Travellers and Travelling Showpeople

**5.37** The Government, in Circular 01/2006, requires local authorities to provide for the housing needs of gypsies and travellers through a rural exception sites policy and the allocation of sites in a Development Plan Document. The Circular considers rural sites, where not subject to special planning constraints, to be acceptable in principle; and points to the benefits that sites can bring to previously developed, untidy or derelict land. Circular 01/2006 defines Gypsies and Travellers while Circular 04/2007 defines Travelling Showpeople.

**5.38** Land in urban areas which is suitable for housing may also be suitable for Gypsy and Traveller sites but may have land prices which are effectively beyond the reach of the Gypsy and Traveller community.

**5.39** The East of England Regional Assembly (EERA) is preparing a single issue review of the East of England Plan which will address the needs of Gypsies and Travellers across the region. EERA published a draft policy which was subject to consultation from February to May 2008. The draft policy sets the number of additional permanent residential pitches to be provided in Huntingdonshire at 20 pitches for the period up to 2011 and thereafter provision to be made for an annual 3% increase, to be calculated from overall planned provision in 2011.

**5.40** This is generally consistent with the Gypsy and Traveller Accommodation Assessment (GTAA) for the wider Cambridge Sub-Region which was published in May 2006; it identified the need in Huntingdonshire for the period to 2011 to be for an additional 15 to 25 pitches. In Huntingdonshire at the time of the survey (2005) there were 20 pitches (with a capacity for 36 caravans) on the County Council owned site at St Neots, while the average number of unauthorised caravans 2002-2004 was 14 caravans.

**5.41** Huntingdonshire is committed to preparing a Development Plan Document (DPD) for Sites for Gypsies and Travellers and the programme for its preparation is set out in the Local Development Scheme. The programme reflects the need to ensure that the DPD is consistent with the RSS policy and policies in the Core Strategy.

## Policy CS 6

### Gypsies, Travellers and Travelling Showpeople

Account will be taken of the need to ensure that Gypsies, Travellers and Travelling Showpeople are accommodated in sustainable locations where essential services such as water and sewerage are provided and with good access by foot, cycle or public transport to services such as education and health. Account will also be taken of the rural nature of Huntingdonshire where the availability of public transport is limited.

Providing sites in appropriate locations will help prevent the social exclusion of Gypsies, Travellers and Travelling Showpeople and conflict with settled communities. Consideration will be taken of the preference of many Gypsies, Travellers and Travelling Showpeople for a rural location with a degree of separation from the settled community.

The number of pitches should be appropriate to the size of the site and the availability of infrastructure and services and facilities in accordance with the general principles set out in the settlement hierarchy. The following criteria will guide the provision of sites:

there would be no significant adverse effect on the amenity of nearby residents or operations of adjoining land uses;

the development should not adversely impact on the character of the landscape and appropriate landscaping and boundaries should be provided;

adequate schools, shops and other community facilities are within reasonable travelling distance, and can be reached by foot, cycle or public transport;

the site is served (or can be served) by an adequate water supply and appropriate means of sewage disposal which meets national standards;

the health and safety of occupants are not put at risk including through unsafe access to sites, poor air quality and unacceptable noise (as for example close to trunk roads) or unacceptable flood risk so that the quality of the environment is at the same acceptable standard as for the settled community;

there should be adequate space for operational needs including the parking, turning and servicing of vehicles.

### Reasoned Justification

**5.42** Circular 01/2006 requires the Core Strategy to set out the criteria for the location of gypsy and traveller sites, as the Government sees this as a strategic issue, which will be used to guide the allocation of sites in the DPD and to meet demand which may result in planning applications on land as a rural exception site either before the DPD is prepared or in addition to sites allocated.

## Economic Development

**5.43** The Employment Land Review (ELR) and the draft Local Economic Strategy both identify the strong economic performance that Huntingdonshire has enjoyed recently. Both the number of jobs and the number of businesses being created have been well above the national and regional averages. The East of England Plan identifies a target for jobs growth in Cambridgeshire of 75,000, but gives only limited guidance as to how this figure might be made up from jobs growth in the local authorities in the County. However, forecasts predict that at least 13,000 jobs will be created in Huntingdonshire.

**5.44** The ELR looks at various models that seek to predict the amount of employment growth during the plan period, and compares this with evidence of land take up in recent years. The ELR concludes that of the two approaches considered planning for a 'low carbon future' is the most appropriate model and that at least 66ha of land for employment uses should be identified. The Strategy aspires towards the 'Low Carbon Future' approach, as this is recognised as the most sustainable, making the most efficient use of land and limiting impact of climate change. However the need to retain flexibility and ensure an adequate supply of deliverable land in locations where significant housing growth will be delivered is recognised and so a balance between the two approaches is taken.

**5.45** Most of the jobs growth in recent years has been centred in and around Huntingdon and this trend is predicted to continue. However, to support the creation of sustainable communities it is necessary to increase the amount of employment land provided in Godmanchester, Brampton and St Neots.

**5.46** Alconbury airfield has been identified as a strategic employment site in the saved structure plan Policy P2/3 in recognition of the warehouse commitment on this site that is still outstanding. As at 2008 it is being used for a variety of manufacturing and storage uses with temporary permission. The existing commitment is not likely to be implemented and the future potential of Alconbury Airfield (together with Wyton airfield) will need to be considered in the longer term as part of the next review of the Regional Spatial Strategy. That review will need to take into account wider strategic issues for the region and the range of sustainable options available.

### Policy CS 7

#### Employment Land

At least 85ha of new land for employment will be provided before 2026 in order to support the creation of at least 13,000 jobs and reduce the significant level of out commuting. Of this at least 15ha will be on previously developed land. Provision will be monitored regularly and the release of locations will be managed and phased during the plan period with the aims of meeting identified needs and demand and maintaining sufficient supply of deliverable sites.

As part of the overall development strategy to concentrate the majority of growth in the Huntingdon and St Neots Spatial Planning Areas, whilst observing environmental designations and constraints, strategic employment growth will be located:

In the Huntingdon Spatial Planning Area where 51ha of land will be provided, of which at least 13ha will be on previously developed land and about 38ha will be on greenfield land. Provision will be made in the following general locations:

In a mixed use redevelopment in Huntingdon, for B1<sup>(5)</sup> uses to the west of the town centre covered by the Huntingdon West Area Action Plan, and in greenfield development for B1, B2 and B8 uses to the north west of the town.

In a mixed use redevelopment for B1 uses on land within Brampton; and

In Godmanchester as part of significant, mixed use, greenfield development to the south east/east of Godmanchester, after the A14 road improvements have been implemented.

In the St Neots Spatial Planning Area where 25ha of land, all of which is greenfield land, will be provided in the following general location:

In a significant mixed use urban extension for B1, B2 and B8 uses on greenfield land to the east of St Neots.

In the St Ives Spatial Planning Area;

On existing commitments which might come forward during the plan period.

In the Ramsey Spatial Planning Area where at least 9ha of land, of which at least 2ha will be on previously developed land and about 7ha will be on greenfield land, will be provided in the following general locations:

In an employment led mixed use redevelopment for B1 and B2 uses to the west of Bury; and

In a mixed use development in a previously identified location to the north west of Ramsey.

Outside of the Spatial Planning Areas, in the Key Service Centres of Little Paxton, Sawtry and Yaxley, on existing commitments which might come forward during the plan period.

## Reasoned Justification

**5.47** This approach is based on the ELR which concludes that the most sustainable option is the provision of at least 66ha of additional employment land by 2026. Past development has been at various densities and the move to more efficient use of land and the nature of the locations that will be identified (less warehousing land for instance) indicate that it will be possible to achieve much higher job densities than before and hence the need for less land.

**5.48** The Council's Economic Strategy is promoting jobs that will feed off the growth in the high tech economy centred around the Cambridge area and is seeking higher quality, more sustainable locations to achieve this. These will tend to be closer to the town centres and built at higher densities and often on previously developed industrial sites. Other local jobs will be created in the retail, leisure and tourism sectors as a result of population growth. The area of land identified has, however, been increased to take into account a number of factors. To reflect the main market preference for new employment land, the potential locations available and as Huntingdon has been identified as having the best balance between jobs and homes, it is considered appropriate to identify locations for additional local employment opportunities in the Huntingdon Spatial Planning Area. This would help to ensure an adequate supply of deliverable sites around Huntingdon. All the options considered were evaluated to ascertain their potential highway impacts. Details of the Huntingdonshire Spatial Strategy Options Assessment are given in Volume 2.

5 For definitions of all use classes refer to the Use Classes Order revised 2006

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**5.49** In St Neots, the target of 25ha of employment land is higher than the requirement identified in the ELR, in order to have a balance in the Spatial Strategy with its emphasis on substantial residential growth in the St Neots Spatial Planning Area. This also reflects the Spatial Strategy Options Assessment which noted that in most of the proposed growth options considered, the housing provision for St Neots was relatively large compared to the employment provision. Given that workforce internalisation is already high there were concerns that this could lead to an increase in out-commuting. The higher level will help ensure more balanced communities with less out-commuting as the employment land will be integrated with new housing development and will maximise opportunities for residents to live and work in close proximity.

**5.50** St Ives has outstanding commitments for employment which are considered to be sufficient to match the growth and market pressure for land.

**5.51** There have been significant efforts to bring forward regeneration projects for Ramsey in recent years and to stimulate appropriate employment. To bring the supply of employment land into better balance with prospective demand the ELR recommended adjustments to the allocations put forward in the 1995 Local Plan for Ramsey. Therefore new directions of growth and approximate land areas involved are identified in the policy.

**5.52** Little Paxton, Sawtry and Yaxley have significant outstanding commitments which are considered to be sufficient to meet expected growth and market pressures for land.

## Retail

**5.53** Huntingdonshire faces a number of challenges over the plan period in terms of retailing and the District's town centres. These have been identified as the need to retain more of the retail expenditure in the District to the benefit of the town centres and the wider economy of the District, to continue to improve the environment and public realm in town centres and to provide opportunities for residents to access town centre services sustainably.

**5.54** National planning policy for town centres requires local authorities to identify where new retail facilities will be focused. Huntingdon and St Neots, being the main foci for growth, will take the larger proportion of retail development. Retail development in the other key settlements is important for maintaining services, providing sustainable options for residents and retaining retail expenditure.

### Policy CS 8

#### Land for Retail Development

At least 20,000m<sup>2</sup> of comparison floorspace and 4,000m<sup>2</sup> of convenience floorspace will be provided before 2026. As part of the overall development strategy to concentrate the majority of growth in the Huntingdon and St Neots Spatial Planning Areas:

At least 9,000m<sup>2</sup> of comparison floorspace will be located in Huntingdon, concentrated in the town centre and complementary and appropriate development in significant mixed use redevelopment in the area west of the town centre covered by the Huntingdon West Area Action Plan;

At least 9,000m<sup>2</sup> of comparison floorspace will be located in St Neots, concentrated in the town centre and complementary and appropriate development as part of significant mixed use urban extension on greenfield land to the east of the town;

At least 2,000m<sup>2</sup> of comparison floorspace will be located in St Ives concentrated in the town centre; and



At least 4,000m<sup>2</sup> of convenience floorspace will be located to serve population growth in town centres across the District.

## Reasoned Justification

**5.55** The Huntingdonshire Retail Assessment Study (HRAS) was completed in September 2005 and updated in 2007. The Study (2005) included forecasts of floorspace requirements for both the comparison and convenience retail sectors over several different time periods, and contained advice on how best to accommodate identified requirements. The Update gives a range of comparison retail floorspace requirements for Huntingdonshire ranging between 13,900m<sup>2</sup> and 20,000m<sup>2</sup>. Of these it was recommended that the higher of these two should be the Council's policy target in order to claw back lost retail expenditure to other centres.

**5.56** The scale of convenience retail floorspace requirements identified was modest at around 3,900m<sup>2</sup>, which was to be predominantly generated by expenditure increases after 2011 and so there was no immediate need to identify sites for further major foodstore provision in the short term. Although it was noted that after 2011 it is likely that further development will be required. A discount foodstore in Huntingdon town centre could be supported on qualitative grounds and there may be scope for other schemes that could bring qualitative enhancements to individual centres.

**5.57** In order to recognise the comparatively strong retail and leisure operator demand for locations in Huntingdon, and the relative size and growth potential, retail expenditure available and level of operator interest in St Neots, the amount of floorspace was distributed in equal amounts to these two centres. The residue was directed to St Ives where there is already a relatively strong representation of the comparison goods sector. Further retail growth in Ramsey would be treated in the same way as other key settlements.

**5.58** Huntingdon is the higher order centre within the District and market demand for further retail development is greatest. The implementation of the Chequers Court Phase II scheme in Huntingdon town centre is the Council's top retail priority as this comprises a previously developed site within the existing town centre. Delivery of this scheme is expected to attract additional comparison goods retailers to Huntingdon offering a greater diversity of shopping opportunities which is critically important for the retention of comparison retail expenditure. Compared to the other Market Towns Huntingdon has more opportunities for use of previously developed land in and adjacent to the town centre to strengthen the range of retail provision in locations most easily accessed by sustainable modes of transport.

**5.59** St Neots has been identified as the location for the majority of residential growth. Easy access to shops and services by sustainable modes of transport will be vital to promoting this as a sustainable community. The town centre should benefit from increased consumer demand and expenditure and opportunities should be maximised to provide additional retail floorspace within the town centre to reduce residents' need to travel elsewhere to shop. To promote social cohesion the urban extension will include a new district centre incorporating shops and other services that residents will require on a day to day basis. This should complement the town centre not compete with it.

**5.60** St Ives has many specialist independent retailers and competes well with other market towns. In order to maintain its competitiveness a modest amount of comparison floorspace is considered appropriate.

**5.61** Ramsey has an outstanding convenience floorspace commitment in the form of a new supermarket at the northern end of the town which was taken into account in the Huntingdonshire Retail Assessment before the figure of 3,900m<sup>2</sup> was recommended.

**5.62** The Development Control Policies DPD will provide more detailed guidance on the preferred scale and location of retail development, including the focus on town centre shopping and provision of local shopping facilities.

# The Spatial Strategy

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**5.63** Future retail demand is particularly difficult to predict beyond about a 10 year horizon as it is such a dynamic part of the economy. Thus, it is very important to monitor development and review provision requirements.

## Areas of Strategic Greenspace Enhancement

**5.64** Huntingdonshire's countryside needs to respond to changing economic and environmental circumstances. Improving the ecological, visual and recreational value of the countryside brings environmental, social and health benefits. It can also boost the local economy through increased visitor spending. It is something that should be addressed by all proposals within or adjoining the countryside and some particular opportunities for significant enhancement have been identified. Access to quality green space is a priority for the Council as set out in Growing Success, the Corporate Plan. Green space forms an important part of the District's Green Infrastructure which can come under considerable pressure as a result of new development. Green Infrastructure is essential to enhancing biodiversity by providing important green linkages for species and helping to protect against habitat fragmentation.

**5.65** Green infrastructure and particularly green space has an important role to play in tackling the effects of climate change. Green space provides important cooling, shading and filtering effects that will become even more significant as temperatures rise as predicted. Trees and woodland in particular have a role to play as they store carbon dioxide and intercept rainfall which can help to reduce erosion and prevent flooding.

**5.66** The following areas of 'Strategic Green space Enhancement' reflect the targets for habitat creation identified in the Structure Plan, the Biodiversity Partnership for Cambridgeshire and Peterborough's 50 Year Wildlife Vision. They also reflect the Green Infrastructure Initiatives set out in the Cambridgeshire Horizons Green Infrastructure Strategy. The process of improving and linking these corridors and habitats is known as 'strategic green space enhancement.'

### Policy CS 9

#### Strategic Green Space Enhancement

Areas of Strategic Green space Enhancement, along with new and enhanced green corridors connecting them with areas of population growth in order to form a coherent network are identified as follows and depicted in the figure below 'Policy CS9 - Strategic Greenspace Enhancement':

The Great Fen Project area with links to the Peterborough Green Parks, Ramsey and Huntingdon;

The Grafham Water / Brampton Woodlands area with links to Huntingdon and St Neots; and

The Great Ouse Valley area with links between St Neots and Earith.

Within these areas and along the corridors coordinated action will be taken via consultation with statutory and other agencies to:

safeguard existing and potential sites of nature conservation value, including ancient woodlands and historic landscape features;

create new wildlife habitats;

contribute to diversification of the local economy and tourist development through enhancement of existing and provision of new facilities;

create appropriate access for a wide range of users to enjoy the countryside; and  
contribute where possible to enhanced flood protection.

It is particularly important that resources are concentrated in these areas in the early part of the plan period in order to create opportunities for additional outdoor recreation facilities for the growth in population expected and the early creation of new green corridors.

In the longer term the enhancement of the following green corridors will provide additional corridors and connections with key areas across Cambridgeshire and Peterborough and enhancement of a coherent network:

Grafham Water area with the Great Fen Project area

The Great Fen project area with Needingworth Wet Fen (Fen Edge project) and South Peterborough Green Park

The Great Ouse and the East of St Neots area with the proposed Forest of South Cambridgeshire.

## Reasoned Justification

**5.67** Huntingdonshire is a predominantly rural area with a variety of green spaces including rivers, gardens, parks, farmland and woods which make up a large proportion of the District. These green spaces support a great variety of plants and animals. Focusing countryside enhancement efforts on the areas identified in Policy 9 will give maximum scope for consolidating and linking important habitats, and enable complementary access improvements to be pursued. Within the defined areas, it will be important to ensure that development proposals do not conflict with this vision and, when development does occur, that the design, landscaping and any community benefits contribute to its realisation.

**5.68** The Cambridgeshire Horizons Green Infrastructure Strategy (Cambridgeshire Green Vision) is a valuable source of information that seeks to enhance, reinstate and create green infrastructure and a network of corridors connecting the key areas across Cambridgeshire. The corridors will allow sites important for biodiversity to be connected thus encouraging the spread of wildlife and will also create opportunities for countryside recreation including walking and cycling.

**5.69** Green infrastructure is defined as a network of protected sites, nature reserves, green spaces (including local parks, sports grounds, cemeteries, school grounds, allotments, commons and historic parks and gardens) woodlands (including Ancient Woodlands) and green-way links. It offers opportunities to provide for a number of functions, including recreation and wildlife as well as landscape enhancement. Policy CS9 aims to promote green corridors and habitat linkages within and between the identified areas to form a network of connected green space.

**5.70** Ensuring a clean, green and attractive environment is a key priority of the Council. One of the aims in the Corporate Plan is to maintain existing areas of open and green space and provide strategic new areas. This is supported by the Sustainable Community Strategy (SCS) which aims to promote efficient resource use and an environment that is protected from and adaptable to the effects of climate change. Policy 9 implements these spatial elements of the Corporate Plan and the SCS.

**5.71** The Great Fen Project encompasses an area that incorporates Woodwalton Fen and Holme Fen. Woodwalton Fen is a RAMSAR site of international significance and both Fens are important National Nature Reserves. The project involves a major initiative of landscape scale restoration in partnership with other agencies to protect and enhance Fenland habitats and to link Woodwalton Fen and Holme Fen National Nature Reserves.

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A masterplan and management plan will be produced to balance the need to enhance biodiversity, provide areas for public access and countryside recreation, provide visitor facilities, undertake hydrological engineering and provide flood storage and further economic activity compatible with the aims of the project. The area of strategic green space created will complement the rapid rise in population in the northern part of the London Stansted Cambridge Peterborough growth area. Additionally it will contribute to the economic regeneration of north east Huntingdonshire in and around the market town of Ramsey where the local economy has been in decline in parallel with the decline in the agricultural workforce as farming becomes more efficient. It will also enable habitats to adapt to the long term effects of climate change. Policies will be included in the Development control DPD to promote and control development within the project area and surrounding area to ensure that the restoration is enabled and not prejudiced.

**5.72** Grafham Water offers opportunities for water and land based recreation together. It also has scope for the creation of wildlife habitats and better links to nearby woodlands such as Brampton Wood as well as other links to green space for people and wildlife through green corridors incorporating sustainable access routes where possible. A major focus of initiatives in this area will be the provision of improved linkages for biodiversity corridors and habitats. Existing habitats and species will be protected and the scope for wider enhancement and development considered. The County Biodiversity Action Plan provides guidance on specific species and habitats to target.

**5.73** The Great Ouse Valley is a distinctive lowland landscape of extensive areas of wetlands, including major areas of water filled sand and gravel pits such as Paxton Pits and Needingworth Quarry, and meadows which require sensitive agricultural management. It is close to centres of population and there needs to be a balance struck between the needs of recreation and biodiversity. A focus of initiatives in this area will be enhanced access for all and by sustainable means including foot, cycle, horse and boat. Gaps in the network should be addressed including suitable bridging points where feasible. Existing and new routes should act as biodiversity corridors as well as access points. The demands of access will need to be carefully managed to protect sensitive environments and balanced with the need to promote and enhance the local diversity. Again, the County Biodiversity Action Plan provides guidance on specific species and habitats to target.

**5.74** As emphasised in policy CS9 by the inclusion of the green corridor to the Forest of South Cambridgeshire, links with green infrastructure initiatives outside of the District are important. The aim of policy CS9 is to create a well connected network of green corridors which integrates into the wider green corridor network of neighbouring Districts.

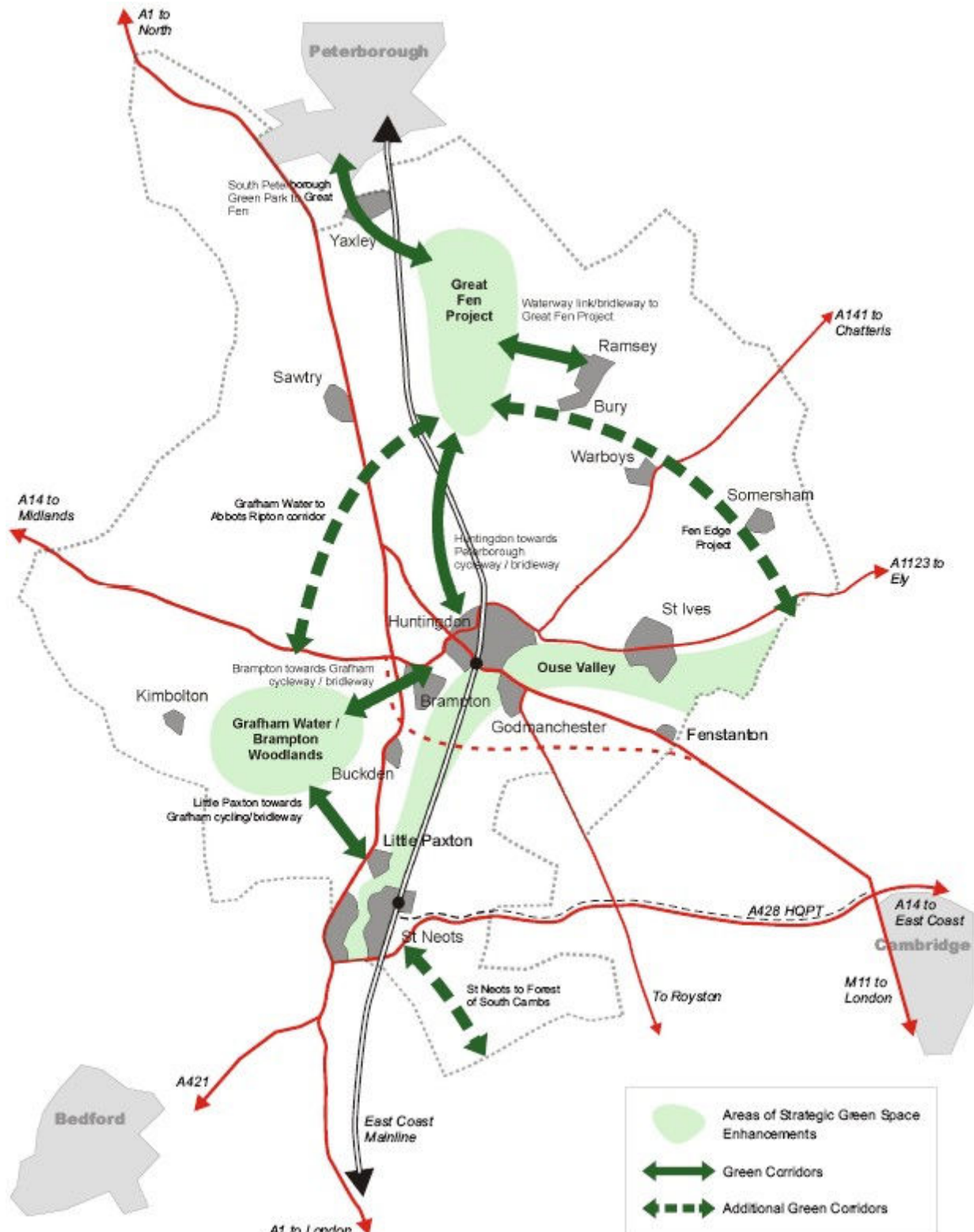
**5.75** Other types of green space outside of the identified strategic areas of green space enhancement also make an important contribution to biodiversity and the character and attractiveness of places. Although not identified in the same way as strategic areas of green space enhancement, these additional areas make up part of the green infrastructure of Huntingdonshire. Such areas may be locally recognised and designated, for example Hinchingsbrooke Country Park which is a County Wildlife Site, or they may simply be footpaths or roadside verges. These areas are important to protecting and enriching biodiversity as they provide important green corridors and are home to a variety of species. They also provide opportunities for people to interact with and learn about wildlife on their doorsteps and, in conjunction with open space and recreational facilities, encourage healthy and active lifestyles by giving people opportunities to walk, cycle and play. The Council is committed to ensuring the promotion of quality open space and has carried out an audit and assessment of open space provision in the District. Development proposals will be required to contribute to open space provision and should not entail the loss or partial loss of open space in accordance with the emerging policies on sports and recreational facilities and open space in the Development Control Policies DPD. Hinchingsbrooke Country Park in particular, provides many opportunities including events and activities run by the Ranger at the Country Park. Improvements to Hinchingsbrooke Country Park will be identified in the emerging Huntingdon West Area Action Plan.

**5.76** All policies within the LDF will be carefully assessed as part of the Sustainability Appraisal process which aims to ensure that policies are sustainable. There are a number of sustainability objectives which relate to green space and a summary of the conclusions drawn from the Sustainability Appraisal can be found in Volume 2 of the Submission Core Strategy. An Appropriate Assessment has been carried out to ensure that the Core Strategy will not have significant effects on sites of international importance such as Woodwalton Fen.

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## Policy CS9 - Strategic Greenspace Enhancement



## Infrastructure and Implementation

**5.77** The delivery of growth and development is dependant on the timely delivery of supporting infrastructure. The ability to deliver infrastructure and the timing of its delivery are critical determinants of the scale, location and timing of development. Transport infrastructure and services play a key role in creating sustainable travel patterns to, from and within development areas. Equally water, energy and green infrastructure are all important requirements in achieving development which is sustainable. Social infrastructure must be provided that can meet the emerging demands from new communities and anticipated changes in the existing population.

### Existing Delivery Mechanisms

**5.78** The District Council's delivery roles and responsibilities sit within a wider partnership structure operating from the local to the regional and even national level. The Cambridgeshire Together Board has jointly established a Vision for Cambridgeshire to be a county of strong, growing, prosperous and inclusive communities supported by excellent services where people can fulfil their potential; live longer, healthier lifestyles; and influence decision-making.

**5.79** Cambridgeshire's Local Area Agreement (LAA) will be the three year delivery plan for this vision. The LAA, alongside the Action Plans developed by other key partnerships, will focus on delivery of outcomes that will make a difference on the ground. In order to fulfil the requirement of having a LAA framework that builds on the work of district-based LSPs the main priorities identified in Cambridgeshire's five Community Strategies have been consolidated and integrated in to the LAA.

**5.80** Growth in the Cambridge sub-region is coordinated by Cambridgeshire Horizons whose aim is to drive forward the development of new communities and infrastructure in the area. To ensure this is done in an integrated, coherent and consistent manner a Joint Strategic Growth Implementation Committee has been established to provide a strategic mechanism for each authority and Cambridgeshire Horizons to explore the issues relating to growth. Delivery boards currently exist for Northstowe and (Cambridge) Urban Fringes as these will see significant growth; consideration is being given to the establishment of a Market Towns delivery board too.

**5.81** The Huntingdonshire Strategic Partnership (HSP) involves representatives from agencies including Cambridgeshire County Council, Huntingdonshire District Council, Huntingdonshire Primary Care Trust, Cambridgeshire Police, local businesses and voluntary sector organisations. These agencies provide important services to the public such as health care, community safety, transport, education, environmental protection, leisure, economic development and planning. These agencies have teamed up to work together more effectively to tackle the 'big issues' in the area and improve quality of life. They do this by 'joining-up' their activities to make the best use of resources and by sharing knowledge and expertise.

**5.82** The Cambridgeshire Voluntary Sector Infrastructure Consortium was established in 2004 and, as at June 2008, 22 infrastructure organisations were members including Councils for Voluntary Service, Directions Plus, Care Network, Cambridgeshire and Peterborough Council for Voluntary Youth Services, Cambridgeshire Independent Advice Centre and Cambridgeshire ACRE. The Consortium's main role has been to identify gaps in VCS infrastructure service provision and deliver a funded programme of improvements linked to such prioritised objectives as ICT and governance.

**5.83** The lead agencies in the delivery of transport projects are Cambridgeshire County Council, the Highways Agency, the Department for Transport and Network Rail. Cambridgeshire County Council delivers projects through the Local Transport Plan (LTP). Funding for the LTP is obtained from a number of sources the major ones being:

- Central Government Integrated Transport block
- Developer funding
- Growth Areas Fund (GAF)

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- Community Infrastructure Fund (CIF)
- Transport Innovation Fund (TIF)
- Kickstart.Bus Funding (DfT)

**5.84** The Highways Agency is responsible for directing funds to the strategic road network, which would include the proposed improvements to the A14 Ellington to Fen Ditton and the A428 Caxton to St Neots.

## Infrastructure Requirements

**5.85** Infrastructure is provided by a variety of commercial and public bodies through a range of different funding and delivery mechanisms. Decisions about the prioritisation and delivery are taken at different levels varying from the national level, through regional to the local level, or at a combination of these. As a result coordination can be problematic. Decisions relating to development contributions and prioritisation are taken at the local level with regard being had to other funding and delivery mechanisms.

**5.86** Huntingdonshire District Council's approach to funding delivery will be set out in a Local Investment Framework (LIF) for the District commissioned in March 2008. Initial research for this has informed this section. This approach will allow consideration and understanding of potential funding available to underpin delivery of the spatial strategy and establish the relevant bodies and agencies roles and responsibilities who will be instrumental in delivering the strategy and act together as a delivery vehicle. This will determine:

- the specific local and regional infrastructure requirements identified on a phased basis
- a cost plan for this provision
- the likely scale of public sector funding for these works
- the level of contribution from private sector development
- the technical justification for these levels of contribution
- the potential funding gaps between infrastructure requirements and likely available public and private funding sources
- proposals for land value capture mechanisms, delivery mechanisms and accountable body arrangements
- guidance on the inter-agency approach and roles and responsibility of each of the public sector bodies including the local authorities, infrastructure providers and delivery agencies
- the future monitoring and review process

**5.87** The provision of infrastructure will be dependant on significant levels of mainstream public sector funding sources (LTP, LSC) as well as Growth Area Funding (GAF) and Community Infrastructure Funding (CIF). Justifying the level of expenditure will require a comprehensive business plan-led solution that links the infrastructure provision to growth trajectories. A principle concern is the relatively short timescale of public sector funding programmes, for instance three years for GAF funding cycles. To add to the complexity, utilities works and funding are subject to their own five year Asset Management Plans.

**5.88** The Core Strategy has been determined following consultation with the bodies responsible for infrastructure delivery. Whilst the views of those bodies have been used in testing the strategy for robustness of delivery and underpin the strategy, there remain some areas which will require further detailed evidence based assessment in consultation with the responsible bodies and agencies. The principle reason for this is differences in the planning cycles of some organisations and the Core Strategy. This is a particular issue for utility companies because the regulators do not permit them to spend unlimited sums on the provision of infrastructure that may or may not be required. The utility companies must justify their proposals and the impact this will have on their customers. Essentially, the utility companies plan the strategic works that need to be undertaken in five year periods. The decisions taken are often based on assumptions regarding growth trajectories, either sub-regionally or at specific locations, and whilst the overall provision is intended to meet each utility company's statutory obligations in a cost effective manner, developers may be faced with large off-site costs if the available supply is remote from their



proposed development. Certain works have long lead-in times and developers have to allow for this and the impact that has on their construction programmes and cash flow. Huntingdonshire District Council will work in partnership with service providers and developers to ensure that necessary infrastructure is provided in a timely fashion.

**5.89** In Huntingdonshire the critical areas of dependency between development and infrastructure arise in transport and access including public transport provision; the provision of utilities including water supply and sewage treatment, and supporting community infrastructure including health facilities and education. The key dependencies between the delivery of the spatial strategy and infrastructure provision are set out below.

**5.90** Research for the Council's emerging Watercycle Study has identified where current treatment infrastructure has insufficient capacity for development in its catchment. The scale of proposed development at St Neots is such that a new treatment works and increase in discharge consent is likely to be required. The design, construction and commissioning period for a new treatment plant is in the order of 5 years and, if land purchase negotiations are added, the period could be 8 years. This constraint could have a significant impact on the timing of growth at St Neots, particularly if funding is not obtained until the period 2015 – 2020.

**5.91** The transport network across Huntingdonshire is dominated by the north-south corridor of the A1(M) and East Coast mainline and east-west A14(T) route. Existing infrastructure contributes to the dominance of the car both in physical terms as a barrier and in operational terms through congestion. The A14 Ellington to Fen Ditton improvement scheme will alleviate the situation, with the preferred route having been confirmed. The Cambridgeshire Guided Busway is programmed to commence operation in spring 2009. Phasing of strategic greenfield sites close to the A14 within the plan period will be required to coincide with the associated works with the A14 improvements. Junction improvements will be required to the A428 to overcome objections to further development in St Neots. Any further works to the road network (such as the A1 at Buckden) that are identified during the plan period may affect the phasing of sites where it is proven that the development is significantly dependant on that infrastructure.

**5.92** The proposed growth in St Neots would require a new primary substation (10-12MW). For Huntingdon and St Ives improvement to the grid is being undertaken along with additional circuits to provide increased capacity and reliability of supply within EDF's control. These are expected to be completed in 2013. Godmanchester is expected to require around £3-4 millions of improvements. For Ramsey the scale of development may trigger the need for a second circuit transformer. For Sawtry existing supplies are expected to be adequate for the limited scale of housing growth envisaged but may not be for any high demand employment use. Significant problems reinforcing the supply to Peterborough previously have resulted in difficulties increasing the supply beyond what is now available.

**5.93** Housing and employment growth within Huntingdonshire needs also to address the District's current deficits in social and community infrastructure. The rural nature of the district creates problems in relation to social infrastructure development due to a lack of critical mass. This is reflected in relatively poor access to education, childcare and health care services in the more rural parts of the District particularly in villages to the north and west.

**5.94** With extensive population growth centred around existing larger settlements the demand for social and community facilities will grow significantly. Furthermore, social and community facilities can often be the anchor that draws different communities together and so will play an increasing role in the District to ensure that new and existing communities become integrated. The level of social infrastructure (and housing typology) will need to reflect the future demographics of the District, with an ageing population expected, creating a higher level of dependents in the latter age ranges and a lower proportion of children aged 0-14 years.

**5.95** Although there is spare capacity within the District's existing network of schools, new provision will be required in conjunction with major new housing developments to ensure adequate proximity and promote opportunities for children to reach school by foot or cycle. Adequate community and leisure centres will be required to meet the needs of residents in new residential areas to contribute to achieving the Core Strategy's objectives

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for healthy, socially cohesive communities. The Market Towns are currently reasonably well served by police stations. There are seven fire stations and three ambulance stations with poorer services generally to the north of the District where there are lower concentrations of residents. Adequate emergency and essential services will be required to accompany new development.

**5.96** Cambridgeshire Primary Care Trust is responsible for the overall commissioning of health care services in Cambridgeshire. National and local health policy is seeking to provide a greater range of health care services in accessible locations, closer to patients' homes. Considerable expansion and improvements to the community based health infrastructure in Huntingdonshire will be required during the period covered by the Core Strategy. The PCT identifies potential sources of capital and revenue funding for health infrastructure, including contributions from new housing developments.

## Co-ordinating Delivery and Implementation

**5.97** The District Council will work with Cambridgeshire Horizons, members of the HSP, private sector delivery agencies and service providers as appropriate in preparing the LIF and identifying key roles and responsibilities for delivering the LIF. The District Council has endeavoured to consider the implications of known infrastructure requirements in devising the spatial strategy. However, significant delay or non-delivery of major infrastructure projects, such as the A14 improvements, may trigger a review of the Core Strategy.

### Statement of Intent

The District Council will work with Cambridgeshire Horizons, members of the HSP, private sector delivery agencies and service providers as appropriate in preparing the LIF and identifying key roles and responsibilities for delivering the LIF.

The HSP Growth and Infrastructure Group will become the Project Board responsible for coordinating delivery of the LIF projects, priorities and interventions.

The District Council and the HSP Growth and Infrastructure Group will be responsible for identifying the infrastructure and project priorities, and therefore investment decisions, which are needed to support the Huntingdonshire housing and employment trajectories. HDC and the HSP Growth and Infrastructure Group will liaise, as appropriate, with the LAA Board and Cambridgeshire Horizons as these priorities and investment decisions are identified to ensure consistency with projects and investment at the sub-regional level.

HDC will investigate the extent to which the Huntingdonshire tariff/ Community Infrastructure Levy (CIL) arrangement can be coordinated with tariff proposals being developed by Cambridgeshire Horizons.

**5.98** The detailed framework for delivering infrastructure requirements identified in the LIF and for calculating and negotiating necessary obligations will be set out in separate Supplementary Planning Documents which will be updated on a regular basis. Consideration will be given to the possibility of the CIL replacing some obligations in due course. Huntingdonshire forms part of a wider growth area, and some of the items for which contributions will be required may be strategic in nature (such as strategic open space). Contributions from individual developments may be pooled where appropriate, but in all such cases the nature and scale of contributions sought will be related to the size of scheme and the extent to which it places additional demands upon the area.

## Policy CS 10

### Contributions to Infrastructure Requirements

Development proposals will be expected to provide or contribute towards the cost of providing appropriate infrastructure, and of meeting social and environmental requirements, where these are necessary to make the development acceptable in planning terms where this complies with the requirements set out in Circular 5/2005 or successor documents.

Contributions may also be required to meet the management and maintenance of services and facilities provided through an obligation where this complies with the requirements set out in Circular 5/2005. The appropriate range and level of contributions will be assessed in a comprehensive manner, taking into account strategic infrastructure requirements and using standard charges where appropriate. Standards and formulae for calculating contributions will be set out in separate Supplementary Planning Documents or Development Plan Documents. Where appropriate, the particular requirements of specific sites, including any additional or special requirements will be set out in other DPDs.

In order to prevent avoidance of contributions any requirement will be calculated on the complete developable area, rather than the area or number of homes/ floorspace of a proposal, where the proposal forms a sub-division of a larger developable area.

The nature and scale of any planning obligations sought will be related to the form of development and its potential impact upon the surrounding area. Where appropriate, any such provision will be required to be provided on site. Where this is not possible, a commuted payment is likely to be sought. In determining the nature and scale of any planning obligation, specific site conditions and other material considerations including viability, redevelopment of previously developed land or mitigation of contamination may be taken into account.

Contributions that may be required include the following:

- affordable and key worker housing;
- open space and recreation (including leisure and sports facilities);
- strategic green infrastructure;
- transport (including footpaths, bridleways, cycleways, highways, public transport, car parks and travel planning);
- community facilities (including meeting halls, youth activities, play facilities, library and information services, cultural facilities and places of worship);
- education, health and social care and community safety;
- utilities infrastructure and renewable energy;
- emergency and essential services;
- environmental improvements;
- drainage / flood prevention and protection;
- waste recycling facilities; and

public art, heritage and archaeology.

## Reasoned Justification

**5.99** Increased investment in infrastructure is required to mitigate the impact of development and enable growing communities to be as sustainable as possible. Development can place additional demands upon physical infrastructure and social facilities, as well as having impacts upon the environment. In many cases planning obligations will be required, so that provision is made for the necessary improvements to services and facilities, or to secure compensatory provision for any loss or damage arising, for instance the loss of open space. Obligations may also be necessary for corporate planning objectives to be secured, in particular, the provision of affordable and key worker housing where this is justified.

**5.100** This approach highlights the general principle that obligations will be required where necessary in planning terms, and indicates the broad range of matters that may need to be addressed. The detailed framework for calculating and negotiating obligations will be set out in separate Supplementary Planning Documents which will be updated on a regular basis. Huntingdonshire forms part of a wider regional and sub-regional growth area, and some of the items for which contributions will be required will be strategic in nature.

## 6 Monitoring

**6.1** Monitoring and review are key aspects of the development plan system with its emphasis on delivery of sustainable development and sustainable communities. Local Development Frameworks should be regularly reviewed and revised to ensure that components of the framework are updated to reflect changing circumstances nationally, regionally and locally. In the Core Strategy there should be a focus on implementation, setting out agreed delivery mechanisms to ensure that policies achieve desired results in the required time frame. Monitoring will evaluate progress being made towards delivering the spatial vision and objectives through the implementation of policies. The results of such monitoring should provide the basis for any contingencies to be implemented or the need for a review to be undertaken.

**6.2** PPS3 requires Local Planning Authorities to set out a housing trajectory to illustrate the expected rate of housing delivery for the plan period. Housing trajectories show past performance and estimate future performance in relation to housing delivery, thus supporting the 'plan, monitor, manage' approach of the planning system. A trajectory illustrates this data in graphical form, enabling local planning authorities to monitor any shortfall or surplus in housing supply, and to manage future provision to ensure the required amount of housing is delivered.

**6.3** When preparing the strategic housing development policy for consultation, completion data was only available up to March 2006. Therefore the total housing target was derived from this data and has not been changed in order to avoid confusion. The trajectory below has been updated to include completions from April 2001 to March 2007. The projected annual completions are based on information included within the Strategic Housing Land Availability Assessment.

**6.4** PPS3 places significant emphasis on achieving efficient use of land. Local Planning Authorities are required to set out how they will achieve this having regard to the targets set out in National and Regional policy. The National and Regional targets for the reuse of previously developed land (PDL) for housing are both set at 60%. The East of England Plan, however identifies that this target will not be achievable in some districts while in others substantially more will be possible due to the character of the authority in question. Huntingdonshire, as set out in " 'A Spatial Portrait of Huntingdonshire'", does not have the heritage of PDL of more urban or industrialised authorities. The Council is committed to achieving sustainable development and to the reuse of previously developed land where it is well located. To this end the Council has established a sequence of development that promotes the use of well located PDL in advance of greenfield land. The sequence is defined by the planned provision of infrastructure. In the short to medium term delivery mainly comes from existing commitments, which can mostly be delivered without significant additional infrastructure provision. This is then followed by the development of PDL in locations identified in policy CS2, particularly in Huntingdon. Again these locations are not dependant on significant additional infrastructure provision. The next phase will see the start of strategic greenfield development, particularly near St Neots. This phase will be dependant on provision of a significant amount of local infrastructure, in particular water supply and education infrastructure will be required in St Neots. The last phase will be that greenfield development around Huntingdon that is dependant on the improvements to the A14 and will therefore not be able to go ahead until about 2015 when the improvements are complete and the changes to the local road network in Huntingdon have been made.

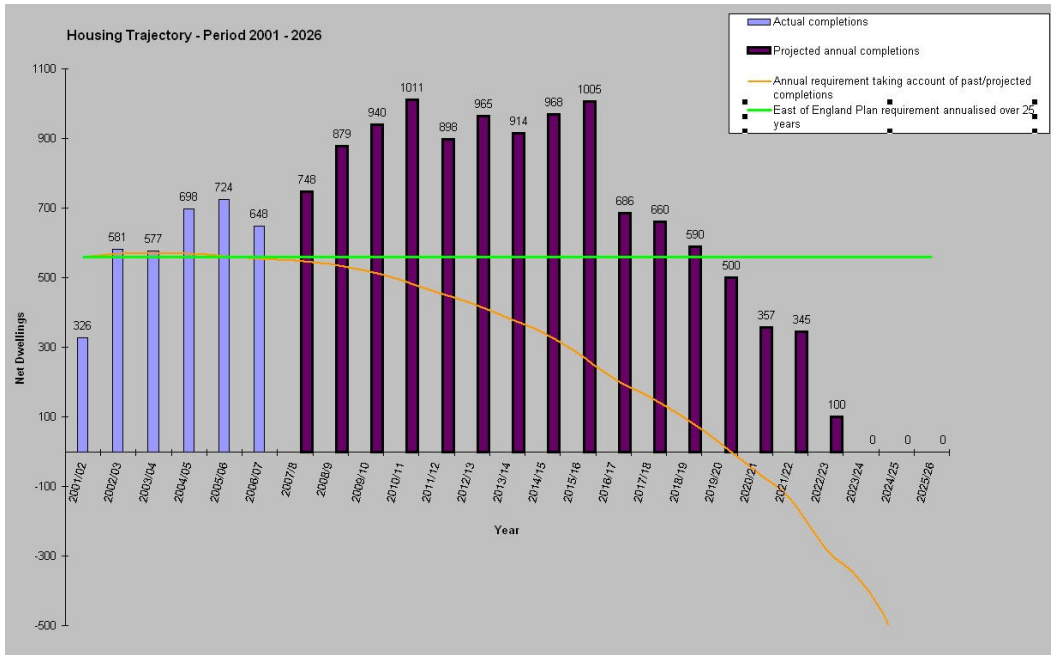
# Monitoring

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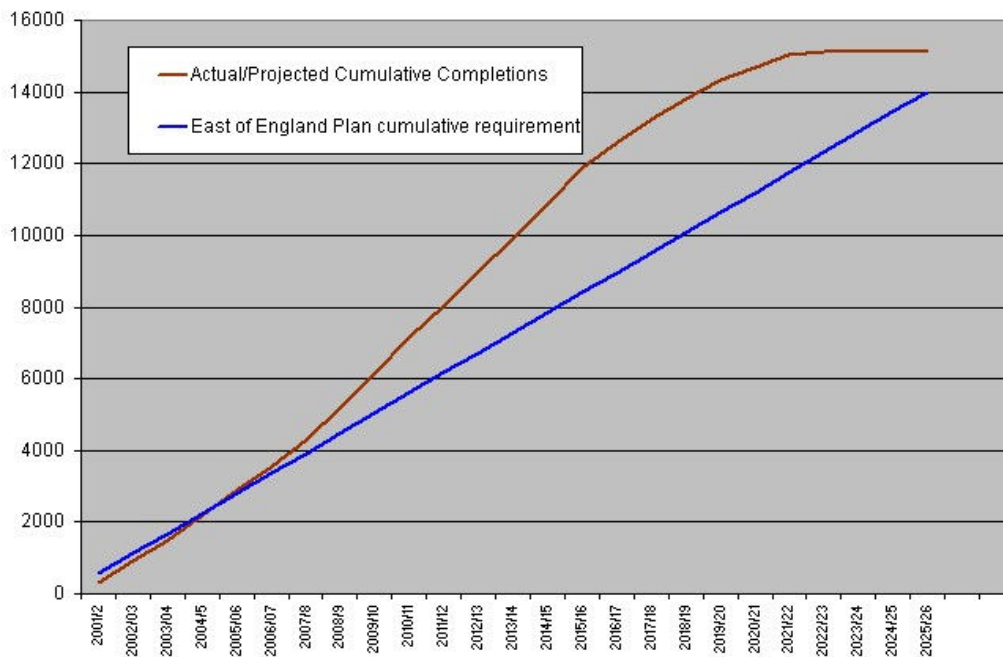
## Annual Completions and Projections Data as at 31 March 2007

Period 2001 - 2026	COMPLETIONS										PROJECTIONS															
	Year	01/02	02/03	03/04	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Actual completions	326	581	577	698	724	648																				
Projected annual completions							748	879	940	1011	898	965	914	968	1005	686	660	590	500	357	345	100	0	0	0	0
Annual requirement taking account of past/projected completions	560	570	569	569	563	555	550	539	519	492	458	426	385	341	284	212	159	97	26	-53	-135	-280	-373	-560	-1120	
East of England Plan requirement annualised over 25 years	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560

## Housing Trajectory 2001 to 2026 as at 31 March 2007



## Actual and Projected Cumulative Completions and Projections against the East of England Plan requirements



# Monitoring

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**6.5** In accordance with the Planning and Compulsory Purchase Act 2004, the Council will produce an Annual Monitoring Report (AMR) containing an assessment of Local Development Document preparation against milestones set out in the Local Development Scheme (LDS), and the extent to which policies set out in Local Development Documents are being achieved and targets being met. The AMR will be the main mechanism for assessing the LDF's performance and effect. As well as linking with spatial objectives and policies, indicators in the AMR will also link to sustainability appraisal objectives in order to identify the significant effects of policy implementation. If, as a result of monitoring, areas are identified where a policy is not working, or key policy targets are not being met, this may give rise to a review of the Core Strategy or other parts of the LDF. Information on housing delivery in terms of net additional dwellings, in the form of the housing trajectory will be set out in the AMR .

**6.6** The following table sets out performance indicators and targets which will form the basis for identifying where the spatial strategy needs to be strengthened, maintained or revised.



## Performance indicators and targets

Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy	Target	Responsible Agencies	Implementation
<b>Land, Water and Resources</b>							
Number of dwellings completed (net)	Core indicator, Significant effects	1, 2, 3	16	CS2	550 per annum	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
% housing completions on previously developed land	Core output, Significant effects	8, 12	1	CS2	29%	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions, SPDs and UDFs
Estimated household water consumption	Local output, Significant effects	12	2	CS1	Reduce per capita water consumption rates	Huntingdonshire District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.	Core output, Significant effects	2, 13	2, 6	CS1	Reduce number of planning permissions granted contrary to EA advice.	Huntingdonshire District Council	Through development control decisions
<b>Biodiversity</b>							
Change in areas and populations of biodiversity importance:	Core output, Significant effects	8, 9	1, 3, 12	CS1 & CS9	Increase the number of ha of specified target habitats	Huntingdonshire District Council, Cambs Biodiversity Partnership, Natural England, RSPB	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs, Countryside Services Initiatives
1. change in priority habitats and species (by type)							
2. change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional or local significance							
<b>Landscape, Townscape and Archaeology</b>							

# Monitoring

Huntingdonshire District Council | Core Strategy - Submission Version - Volume One

Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy	Target	Responsible Agencies	Implementation
Large scale housing sites meeting 'Building for Life' equivalent standards	Local output, Significant effects	10, 11, 12, 13	4, 5, 10, 13	CS1	60% to achieve Silver Standard equivalent	District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs, Conservation initiatives
<b>Climate Change and Pollution</b>							
% household waste which is recycled or composted	Local output, Significant effects	12	8	CS1	50% by 2011 56% by 2016 60% by 2021	District Council, Cambridgeshire County Council	Provision of recycling facilities, Recycling campaigns, Cambridgeshire and Peterborough Joint Waste Strategy
% of housing completions in Market Towns and Key Service Centres	Local output, Significant effects	1, 12, 13	7, 9	CS2 & CS3	Maximise the % of housing completions in Market Towns and Key Service Centres	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
<b>Inclusive Communities</b>							
% of housing completions on qualifying sites which are affordable	Core output, Significant effects	2, 3	15, 16	CS4 & CS5	40%	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions
Amount of new residential development within 30 mins public transport time of GP, hospital, primary and secondary school, areas of employment and a major retail centre	Core output, Significant effects	1	14, 15	CS1	Maximise the amount of new residential development within 30 mins public transport time of GP, hospital, primary and secondary school, areas of employment and a major retail centre	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
Number of permissions granted for new public or private Gypsy, Traveller & Travelling Showpeople sites, or expansion of existing sites	Core output	3	15, 16	CS6	Increase provision of pitches available on legal sites for Gypsies, Travellers & Travelling Showpeople	County Council, Registered Social Landlords, Private Sector	Through Gypsies and Travellers DPD and development control decisions
<b>Economic Activity</b>							

Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy	Target	Responsible Agencies	Implementation
Amount and % of employment floorspace developed on previously developed land	Core output, Significant effects	6, 8, 12	1	CS7	Maximise the % of completed employment floorspace on previously developed land	Huntingdonshire District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
Amount of land for which planning permission has been granted for employment uses	Local output, Significant effects	4, 6, 15	17, 18	CS7	Annual average 4.3 ha	Huntingdonshire District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
% of retail completions in Huntingdon and St Neots	Local output, Significant effects	5, 7	14, 17, 18	CS8	Ensure a balance between the two main market towns of Huntingdon and St Neots	Huntingdonshire District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs

## Appendix 1 Glossary

### **Adoption**

The point at which the final agreed version of a document comes fully into use.

### **Affordable Housing**

Housing available at a significant discount below market levels so as to be affordable to householders who cannot either rent or purchase property that meets their needs on the open market. It can include social-rented housing and intermediate housing. It is defined in PPS3: Housing.

### **Amenity**

A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquility.

### **Annual Monitoring Report (AMR)**

Document produced each year to report on progress in producing the *Local Development Framework* and implementing its policies.

### **Areas of Strategic Greenspace Enhancement**

Areas which have been identified as having opportunities to expand and create strategic greenspace.

### **Biodiversity**

The whole variety of life on earth. It includes all species of plants and animals, their genetic variation and the ecosystems of which they are a part.

### **Brownfield**

Previously developed land (PDL). In the sequential approach this is preferable to Greenfield land. Previously developed land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings), and associated fixed surface infrastructure. The definition includes the curtilage of the development. Previously developed land may occur in both built-up and rural settings. A precise definition is included in Planning Policy Statement 3 'Housing'.

### **Built-up area**

Excludes buildings that are clearly detached from the main body of the settlement, and gardens and other undeveloped land within the curtilage of buildings at the edge of the settlement, especially where those gardens relate more to the surrounding countryside than they do to the built-up parts of the settlement.

### **Community Infrastructure**

Facilities available for use by the community that provide for the health, welfare, social, educational, leisure, recreational and cultural needs of the community. Examples include village halls, doctors' surgeries, pubs, churches and children play areas. It may also include areas of informal open space and sports facilities.

### **Comparison Floorspace**

Shops retailing items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.

### **Compulsory Purchase Order (CPO)**

The power given to the Local Authority to acquire land for redevelopment which may include development by private developers.

## **Conservation Area**

A designated area of special architectural and/or historical interest, the character or appearance of which it is desirable to preserve or enhance. It is a recognition of the value of a group of buildings and their surroundings and the need to protect not just individual buildings but the character of the area as a whole.

## **Convenience Floorspace**

Shops retailing everyday essential items, including food, drinks, newspapers/magazines and confectionery.

## **Core Strategy**

The main document in the *Local Development Framework*. It is a *Development Plan Document* containing the overall vision, objectives, strategy and key policies for managing development in Huntingdonshire.

## **County Structure Plan**

An existing document containing strategic planning policies and proposals for the county. Under the Planning and Compulsory Purchase Act 2004 it will be phased out and replaced by policies in the *Regional Spatial Strategy* and *Development Plan Documents*.

## **Curtilage**

The area occupied by a property and land closely associated with that property. E.g. in terms of a house and garden, the garden normally forms the curtilage of the property, but fields and paddocks would be outside of the curtilage.

## **Department for Communities and Local Government (DCLG)**

The Government department responsible for planning and production of planning guidance

## **Development Plan**

The documents which together provide the main point of reference when considering planning proposals. The Development Plan includes the *Regional Spatial Strategy* and *Development Plan Documents*.

## **Development Plan Documents**

A document containing local planning policies or proposals which form part of the *Development Plan*, which has been subject to independent examination.

## **European Sites**

Consist of Special Protection Areas (SPAs), Special Areas of Conservation (SACs), RAMSAR sites and sites on draft lists for protection as outlined in Regulation 10 of the Habitats Regulations 1994.

## **Examination**

Independent inquiry into the soundness of a draft *Development Plan Document* or *Draft Statement of Community Involvement*, chaired by an Inspector appointed by the Secretary of State, whose recommendations are binding.

## **Green Infrastructure**

Network of protected sites, nature reserves, green spaces (including local parks, sports grounds, cemeteries, school grounds, allotments, commons and historic parks and gardens) woodlands (including Ancient Woodlands) and green-way links. It offers opportunities to provide for a number of functions, including recreation and wildlife as well as landscape enhancement.

## **Greenfield**

Land which has not been developed before. Applies to most sites outside built-up area boundaries.

## **Habitat**

The natural home or environment of a plant or animal.

# Glossary

Huntingdonshire District Council | Core Strategy - Submission Version - Volume One

## **Housing Needs Assessment**

An assessment of housing needs in the local area. This assessment plays a crucial role in underpinning the planning policies relating to affordable housing. In addition, the information on local needs is required to determine the location of such housing and guide new investment.

## **Infrastructure**

A collective term for services such as roads, electricity, sewerage, water, education and health facilities.

## **Issues and Options preliminary consultation document**

This is the first stage in the production of development plan documents. The Council brings possible issues and options for the District into the public domain, in order to generate responses to aid the development of the 'Preferred Options' development documents.

## **Key Workers**

Essential public sector workers such as nurses, teachers and social workers.

## **Landscape Character Assessment**

An assessment to identify different landscape areas which have a distinct character based on a recognisable pattern of elements, including combinations of geology, landform, soils, vegetation, land use and human settlement.

## **Large scale development**

The creation of 60 or more dwellings on one site.

## **Local Development Document**

The collective term for *Development Plan Documents*, the *Proposals Map*, *Supplementary Planning Documents* and the *Statement of Community Involvement*.

## **Local Development Framework**

The collection of documents to be produced by Huntingdonshire District Council that will provide the planning policy framework for the District.

## **Local Development Scheme**

Sets out the Council's programme for preparing and reviewing statutory planning documents.

## **Local Strategic Partnership**

A group of public, private, voluntary and community organisations and individuals that is responsible for preparing the Community Strategy.

## **Major Development**

Development above a particular scale as defined in the General Development Procedure Order (2006) as amended.

## **Market Housing**

Private housing for rent or sale where the price is set in the open market.

## **Material consideration**

Factors that may be taken into account when making planning decisions.

## **Minor scale development**

The creation of up to 9 dwellings on one site.

## **Mitigation measures**

These are measures requested/ carried out in order to limit the damage by a particular development/ activity.

**Moderate scale development**

The creation of between 10 and 59 dwellings on one site.

# Glossary

Huntingdonshire District Council | Core Strategy - Submission Version - Volume One

## **Open Space and Recreational Land**

Open space within settlements includes parks, village greens, play areas, sports pitches, undeveloped plots, semi-natural areas and substantial private gardens. Outside built-up areas this includes parks, sports pitches and allotments.

## **Planning Policy Guidance Notes (PPG)/ Planning Policy Statements (PPS)**

Central Government produce Planning Policy Guidance Notes, to be replaced by Planning Policy Statements which direct planning in the country.

## **Preferred Options**

Public consultation on the intended content of a *Development Plan Document*, prior to the DPD itself being drafted. It is a statutory stage of the Local Development Framework preparation for the District.

## **Previously Developed Land (PDL)**

(See definition for *Brownfield*.)

## **Regional Spatial Strategies (RSS)**

Plan covering the East of England as a whole, and setting out strategic policies and proposals for managing land-use change.

## **Registered Social Landlords**

These are independent housing organisations registered with the Housing Corporation under the Housing Act 1996. Most are housing associations, but there are also trusts, co-operatives and companies.

## **Residential infilling**

The development of a small site within the built-up area or defined limits of a settlement by up to 3 dwellings.

## **Rural Exception Site**

Sites solely for the development of affordable housing on land within or adjoining existing small rural communities, which would not otherwise be released for general market housing.

## **Sequential Approach**

A planning principle that seeks to identify, allocate or develop certain types or locations of land before others. For example, brownfield sites before greenfield sites, or town centre retail sites before out-of-centre sites. In terms of employment a sequential approach would favour an employment use over mixed use and mixed use over non-employment uses.

## **Settlement Hierarchy**

Settlements are categorised in a hierarchy based on the range of services, facilities and employment opportunities in the settlement, access to education and non-car access to higher-order centres.

## **Social rented**

Social Rented Housing is housing available to rent at below market levels. Lower rents are possible because the Government subsidises local authorities and registered social landlords in order to meet local affordable housing needs.

## **Spatial Planning**

Spatial planning goes beyond traditional land use planning. It brings together and integrates policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. This will include policies which can impact on land use, for example, by influencing the demands on or needs for development, but which are not capable of being delivered solely or mainly through the granting of planning permission and may be delivered through other means.



**Stakeholders**

Groups, individuals or organisations which may be affected by or have a key interest in a development proposal or planning policy. They may often be experts in their field or represent the views of many people.

**Statement of Community Involvement**

Document setting out the Council's approach to involving the community in preparing planning documents and making significant development control decisions.

**Statement of Compliance**

A report or statement issued by the local planning authority explaining how they have complied with the Town and Country Planning Regulations 2004 and their Statement of Community Involvement during consultation on Local Development Documents.

**Statutory Development Plan**

The Development Plan for an area which has been taken to statutory adoption. In other words, it has been through all the formal stages and has been approved by the relevant Government office and adopted by the Council.

**Statutory Organisations**

Organisations the Local Authority has to consult with at consultation stages of the Local Development Framework.

**Strategic Green space**

These are areas of greens pace that serve a wider population than just the District, for example Paxton Pits, The Great Fen and Hinchbrooke Country Park.

**Strategic Housing Land Availability Assessment**

A study intended to assessment overall potential for housing development in an area, including the identification of specific housing sites with development potential over a 15 year time span.

**Strategic Housing Market Assessment**

A study intended to review the existing housing market in an area, consider the nature of future need for market and affordable housing and to inform policy development.

**Submission**

Point at which a draft *Development Plan Document* (or the draft *Statement of Community Involvement*) is published for consultation. At the same time it is submitted to the Secretary of State in advance of its *examination*.

**Supplementary Planning Guidance**

Provides additional guidance on the interpretation or application of policies and proposals in the *Local Plan* or *Structure Plan*. Under the Planning and Compulsory Purchase Act 2004 this will be phased out and replaced by *Supplementary Planning Documents*.

**Supplementary Planning Documents**

Provides additional guidance on the interpretation or application of policies and proposals in a *Development Plan Document*.

**Sustainable Development**

In broad terms this means development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The Government has set out five guiding principles for sustainable development in its strategy "*Securing the future - UK Government strategy for sustainable development*". The five guiding principles, to be achieved simultaneously, are: Living within environmental limits; Ensuring a strong healthy and just society; Achieving a sustainable economy; Promoting good governance; and Using sound science responsibly.

# Glossary

Huntingdonshire District Council | Core Strategy - Submission Version - Volume One

## **Sustainable Drainage System**

Previously known as Sustainable Urban Drainage Systems, these cover a range of approaches to surface water drainage management including source control measures such as rainwater recycling and drainage, infiltration devices to allow water to soak into the ground, vegetated features that hold and drain water downhill mimicking natural drainage patterns, filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed and basins and ponds to hold excess water after rain and allow controlled discharge that avoids flooding.

## **Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA)**

The Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development. Sustainability appraisal is a systematic appraisal process. The purpose of sustainability appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document from the outset of the preparation process. This will ensure that decisions are made that accord with sustainable principles.

## **Tenure**

Refers to the way in which a property is held e.g. freehold, leasehold, shared equity or rented.

## **Tests of Soundness**

These are tests to ensure that the document produced is sound. For further guidance please refer to 'Development Plans Examination - A Guide to the Process of Assessing the Soundness of Development Plan Documents' produced by the Planning Inspectorate (2005).

## **Use Class Orders**

Planning regulations outlining a schedule of uses to which a given premises or building can be put. Some changes of use require planning permission.

## **Vitality and Viability**

In terms of retailing, vitality is the capacity of a centre to grow or to develop its level of commercial activity. Viability is the capacity of a centre to achieve the commercial success necessary to sustain the existence of the centre.

## **Windfall site**

A previously developed site not specifically allocated for development in a development plan, but which unexpectedly becomes available for development during the lifetime of a plan. Most "windfalls" are referred to in a housing context.

## **Zero carbon building**

A building with a net energy consumption of zero over a typical year. This can be measured in different ways relating to cost, energy or carbon emissions.

## Appendix 2 Evidence Base

### National

Securing the Future - UK Government Sustainable Development Strategy, (HM Government 2005)

### Regional

A Sustainable Development Framework for the East of England, (Sustainable Round Table for the East of England 2001)

Sustainable Communities in the East of England, (ODPM 2003)

Towards Sustainable Construction - A Strategy for the East of England (EP, CE, GO East, PECT, 2003)

### Sustainable Development

Huntingdonshire Community Strategy, (HDC, 2004)

Huntingdonshire Sustainable Community Strategy, (HDC forthcoming 2008)

Huntingdonshire Landscape and Townscape Assessment SPD, (HDC 2007)

Huntingdonshire Design Guide SPD, (HDC, 2007)

Environment Strategy, (HDC, 2007)

Statement of Community Involvement, (2006)

Health Impact Assessment (Partial), (HDC, 2007)

Sustainable Construction in Cambridgeshire - A Good Practice Guide, (Cambridgeshire Horizons and Cambridgeshire County Council 2006)

Climate Change Strategy, (Cambridgeshire County Council 2005)

### Housing

Huntingdonshire Housing Needs Survey, (HDC 2002)

Huntingdonshire Housing Needs Assessment Update, (HDC 2006)

Huntingdonshire Housing Strategy 2006 - 2011, (HDC 2006)

Cambridge Housing Sub Region Strategic Housing Market Assessment, (Cambridgeshire Horizons 2008)

Huntingdonshire Housing Land Availability Study, (HDC 2007)

Huntingdonshire Strategic Housing Land Availability Assessment, (HDC 2008)

Huntingdonshire Settlement Hierarchy Background Paper Update, (HDC 2007)

Homes for the Future - More Sustainable, More Affordable, (DCLG, 2007)

# Evidence Base

**Huntingdonshire District Council** | Core Strategy - Submission Version - Volume One

Cambridge Sub Region Traveller Needs Assessment (Cambridgeshire County Council 2006)

## **Employment**

Employment Land Review, (Warwick Business Management Ltd on behalf of HDC 2007)

Huntingdonshire Local Economy Strategy 2008 - 2015, (HDC 2008)

## **Retail**

Huntingdonshire Retail Assessment Study, (Roger Tym and Partners on behalf of HDC 2005)

Huntingdonshire Retail Assessment Study Update, (Roger Tym and Partners on behalf of HDC 2007)

## **Strategic Green space**

50 Year Wildlife Vision for Cambridgeshire and Peterborough, (Cambridgeshire County Council 2002)

Green Infrastructure Strategy (Cambridgeshire Green Vision), (Cambridgeshire Horizons 2006)

Open Space, Sport and Recreation Needs Assessment, (PNP on behalf of HDC 2006)

Great Fen project brochure, (2006)

Habitats Regulations Assessment, (Scott Wilson Ltd on behalf of HDC 2008)

Natural Environment and Rural Communities Act (2006)

## **Infrastructure**

Huntingdonshire Strategic Flood Risk Assessment, (Mott MacDonald on behalf of HDC 2004)

Water Cycle Strategy, (EDAW on behalf of HDC forthcoming 2008)

Huntingdonshire Spatial Strategy Options Assessment, (Atkins on behalf of HDC forthcoming 2008)

Local Investment Framework, (EDAW on behalf of HDC forthcoming 2008)

Cambridgeshire Local Transport Plan 2006-2011 (Cambridgeshire County Council 2006)

# Saved Policies to be Superseded

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## Appendix 3 Saved Policies to be Superseded

### Saved policies from the Local Plan 1995 that are superseded by Core Strategy Policies

Saved Policies	Subject	Core Strategy Policy
H22	Agricultural Land Protection	CS1 Sustainable Development
H44	Gypsy Sites	CS6 Gypsies, Travellers and Travelling Showpeople
E9	Employment in Ramsey	CS7 Employment
E13	Employment Development Causing Environmental Problems	CS1 Sustainable Development
S15	Vacant floorspace over shops in town centres	CS1 Sustainable Development
T21	Public Transport Services	CS10 Infrastructure Provision
R14	Grafham Water	CS9 Areas of Strategic Greenspace Enhancement
R16	After Use of Gravel and Claypits	CS9 Areas of Strategic Greenspace Enhancement
R18	Provision for Art	CS10 Infrastructure Provision

### Saved Policies from the Local Plan Amendment 2002 that are superseded by Core Strategy Policies

Saved Policies	Subject	Core Strategy Policy
STR1	The Huntingdonshire settlement hierarchy	CS3 Settlement Hierarchy
STR2	Housing development definitions	CS3 Settlement Hierarchy
STR3	Settlements designated as market towns	CS3 Settlement Hierarchy
STR4	Yaxley designated as a rural growth village	CS3 Settlement Hierarchy
STR5	Settlements designated as group villages	CS3 Settlement Hierarchy
STR6	Settlements designated as infill villages	CS3 Settlement Hierarchy
HL7	Previously developed land and buildings	CS1 Sustainable Development
HL8	Scale of development appropriate in group villages	CS3 Settlement Hierarchy
HL9	Scale of development appropriate in infill villages	CS3 Settlement Hierarchy
AH4	Site targets for affordable housing	CS4 Affordable housing
AH5	Rural exceptions policy	CS4 Affordable housing and P5 Rural exceptions
OB1	Nature and scale of obligations sought	CS10 Infrastructure requirements

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# Core Strategy - Submission Version - Volume Two

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## Introduction

### Introduction to the Submission Plan

The Submission Core Strategy has been set out in two volumes. Volume 1 is the draft Plan with policies and their reasoned justification. Volume 2 sets out the process of how the final approach was decided upon. The information in volume 2 therefore forms the evidence base and the audit trail for the development of the Submission Core Strategy.

Each topic addressed in this volume is set out in a standard format as described below.

Heading	Description
Key sources	A table setting out the key policy sources which have guided the approach taken.
Core Strategy Issues and Options	A statement setting out the issues, options and questions raised previously in the main Issues and Options consultation document.
Reasonable Alternatives	Any alternatives put forward in the main Issues and Options consultation document which the Council considered could be a feasible alternative way of approaching the topic.
Summary of Initial Sustainability Appraisal on Issues and Options	An Initial Sustainability Appraisal was undertaken of the main Issues and Options consultation document and distributed for consultation alongside it. This is the first stage of a systematic process intended to assess the extent to which emerging policies and proposals will help to achieve relevant environmental, social and economic objectives.
Consultation Responses to Issues and Options	The main Issues and Options consultation document was extensively distributed to specific and general consultation bodies <sup>(1)</sup> and to other interested parties. A summary of the responses is given including an indication of overall levels of support or opposition to the issues and options raised.
Further Options Consultation (Towards a Spatial Strategy)	Once responses had been received to the broad issues and options raised more detailed consultation material was produced concerning the spatial vision, spatial strategy and strategic growth options. These were also informed by the Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Review, prepared in consultation with landowners and agents. This material was then used to engage a number of key stakeholders, including parish and county councils, highways and environment agencies and key service providers, in further consultation.
Initial Sustainability Appraisal on Towards a Spatial Strategy	An Initial Sustainability Appraisal was undertaken of 'Towards a Spatial Strategy' to assist in selection of the preferred approaches.
Key Stakeholder Responses	Responses received to the detailed options presented in Towards a Spatial Strategy.

1 As defined in the Town and Country Planning (Local Development) (England) Regulations 2004

# Introduction

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Assessment of Responses and Alternative Approaches	The Council's consideration of responses received including an analysis of any alternative approaches suggested by the Council or raised through the consultation process.
Core Strategy Preferred Options	A statement setting out the Preferred Option for the approach to be taken.
Reasonable Alternatives	Any alternatives put forward in the Preferred Options consultation document which the Council considered could be a feasible alternative way of approaching the topic.
Summary of the draft Final Sustainability Appraisal	A draft Final Sustainability Appraisal was undertaken of the Preferred Options consultation document and distributed for consultation alongside it. This is the second stage of a systematic process intended to assess the extent to which emerging policies and proposals will help to achieve relevant environmental, social and economic objectives.
Summary of Appropriate Assessment	Habitats Regulations Assessment has been completed of the preferred options document and revised to take account of changes made for the submission version.
Consultation Responses	The Preferred Options document was made widely available for consultation. A summary of the responses is given including an indication of overall levels of support or opposition to the Preferred Options put forward.
Assessment of Responses and Alternative Approaches	The Council's consideration of responses received at the Preferred Options stage including an analysis of any alternative approaches suggested by the Council or raised through the consultation process. Where appropriate in response to representations further assessment of alternative approaches has been given.
Changes made	A summary of the changes made between the Preferred Options document and the Submission document.
Tests of Soundness	Throughout the preparation of material relating to each topic attention has been paid to the need to adhere to the requirements of the tests relating to procedures, conformity and coherence, consistency and effectiveness. All the preferred options presented are believed to be sound. Where aspects of concern were identified in the course of preparing the preferred options these are highlighted and the remedial action taken noted. Added to this section are the responses from GO East where potential problems with meeting the tests of soundness were identified in their representations on the Preferred Options. Detail of the action taken to mitigate these issues is also included.
Approach Taken	Statement cross-referring to the location of the relevant approach taken in Volume 1.

One of the central assessments that will be made of any DPD at the Submission stage is whether the document passes the Tests of Soundness. To ensure that the document can pass the tests at Submission the Preferred Options have been assessed and modified where appropriate.

The Tests of Soundness are as follows:

Procedural

- i. It has been prepared in accordance with the local development scheme;
- ii. It has been prepared in compliance with the statement of community involvement, or with the minimum requirements set out in the Regulations where no statement of community involvement exists;
- iii. The plan and its policies have been subjected to sustainability appraisal;

#### Conformity

- iv. It is a spatial plan which is consistent with national planning policy and in general conformity with the regional spatial strategy for the region and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas;
- v. It has had regard to the authority's community strategy;

#### Coherence, consistency and effectiveness

- vi. The strategies or policies in the plan are coherent and consistent within and between development plan documents prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant;
- vii. The strategies or policies represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base;
- viii. There are clear mechanisms for implementation and monitoring; and
- ix. The plan is reasonably flexible to enable it to deal with changing circumstances.

Of these, tests i) to iii) are tested for the Core Strategy as a whole. For test i) the Core Strategy is identified in the Local Development Scheme March 2007. However, preparation of the Core Strategy actually began under the LDS of March 2006 after which major revisions were required which affected the timeframe and required the adoption of a new LDS. The LDS March 2007 proposed preparation of the Core Strategy between mid 2007 and 2008 with Submission to the Secretary of State timetabled for spring 2008. Due to limited staff resources and the additional phase of Issues and Options consultation with key stakeholders the time table has been particularly challenging and it was decided to delay submission until July. The additional stage of Issues and Options consultation was carried out in order to consider further particular issues that were raised from the consultation process. The consultation document Towards a Spatial Strategy for Huntingdonshire therefore focused on the vision, spatial strategy and other strategic issues, namely the policy for Gypsies, Travellers and Travelling Showpeople. Responses to Towards a Spatial Strategy informed preparation of the Preferred Options Report and meant that the plan was more responsive to local issues raised by local people.

The Council has been advised by Go-East not to revise the LDS in advance of new Regulations being published. A new LDS will be published in due course.

The Statement of Community Involvement (SCI) was adopted in November 2006. The Core Strategy has been prepared in line with the SCI and therefore meets test ii).

Test iii) has been met as demonstrated by the inclusion of summaries from the Initial Sustainability Appraisal of Issues and Options consultation, including Towards a Spatial Strategy for Huntingdonshire and the draft Final Sustainability Appraisal.

The Core Strategy is a spatial plan and each policy is in conformity with the East of England Plan. At all stages of plan development the Community Strategy and emerging Sustainable Community Strategy has been taken into account. More information on how this has been achieved can be found in the Core Strategy DPD Soundness Self-Assessment. It can therefore be demonstrated that the plan meets conformity tests iv) and v).

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In terms of tests for coherence, consistency and effectiveness tests vi) and viii) are the most straightforward. As the Core Strategy is the first Development Plan Document (DPD) to be produced and the central strategy for the LDF there are no other DPDs with which to be consistent at this stage. It will be more important for subsequent DPDs to be consistent with the Core Strategy. There is a clear interaction between all the policy areas in the Core Strategy and in particular those of the Spatial Strategy. Where applicable aspects of concern have been highlighted and the remedial action that has been taken in order to maintain coherency and consistency between policy areas is noted. Test vi) is therefore considered to be met. The inclusion of the Implementation and Monitoring chapter satisfies test viii).

Tests vii) and ix) are more subjective than the others. The Council believes that these tests are met by the Core Strategy Submission document. This volume details the consideration of alternatives and the evidence base that was used in selection of the draft Plan as submitted. In selection of the Submission Approaches the best way forward needs to incorporate flexibility and be capable of dealing with changing circumstances. Again, where applicable, aspects of concern have been highlighted and the remedial action that has been taken in order to maintain flexibility is noted in the relevant sections of this document.

## Habitats Regulations Assessment

A Habitats Regulations Assessment (HRA) is required by the European Directive on Habitats and has been carried out on the Preferred Options Core Strategy by consultants Scott Wilson. The Screening Assessment of the HRA identified that an Appropriate Assessment (AA) was required and this was also carried out by Scott Wilson. The consultants have taken into account the changes made for the submission Core Strategy in their HRA and AA and have made recommendations to mitigate potential effects on the European sites listed in the assessment.

Scott Wilson was appointed by the District Council to carry out a Habitats Regulation Assessment (HRA) for the Preferred Options Core Strategy in November 2007. The HRA tests the impacts of a plan on Natura 2000 which include Special Protection Areas (SPA) for birds and Special Areas of Conservation (SAC) for species and habitats. The HRA also covers Ramsar wetland sites and European marine sites. Natura 2000 sites (SACs and SPAs) are identified and protected against development through "appropriate assessment" under the Directive on Conservation of Natural Habitats and of Wild Fauna and Flora 92/43/EEC (the "Habitats Directive").

Prior to carrying out the HRA, Scott Wilson gathered information on relevant European sites, their conservation objectives and other relevant plans or projects which may affect these sites in combination with the Council's Core Strategy. In total, eight sites were identified that could be affected by the Core Strategy either on its own or in combination with other plans or projects. These sites were:

- Portholme SAC
- Fenland SAC
- Ouse Washes SAC/SPA and Ramsar
- Orton Pit SAC
- Rutland Water SPA
- Eversden and Wimpole Woods SAC
- Barnack Hills and Holes SAC
- Nene Washes SPA

Scott Wilson then carried out the screening assessment which assessed the individual policies of the Core Strategy against the conservation objectives for each site. It was possible to 'screen out' any potential significant effects of the plan on Eversden and Wimpole Woods SAC and Barnack Hills and Holes SAC. Similarly, policies within the Core Strategy that did not promote or govern the distribution of development were able to be screened out.

Those remaining policies relating to Spatial Planning Areas, Settlement Hierarchy, Employment, Retail and Infrastructure Requirements were carried forward into the screening assessment and, where applicable, to the Appropriate Assessment stage.

It was concluded that the plan could have significant effects on recreational pressure for Portholme, Rutland Water and Orton Pit and the plan could impact upon water resources and quality. The AA therefore suggested a number of mitigation measures which focused on phasing of development and associated infrastructure such as open space and water treatment and resource infrastructure. These recommendations have been incorporated into the plan as part of the monitoring proposals. More detail on the AA process and the results is given throughout this document in the relevant sections.

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## The Spatial Vision

### A Spatial Vision for Huntingdonshire

**Table 2 Key Sources for the Spatial Vision**

National	PPS1: Delivering Sustainable Development PPS1 Supplement: Planning and Climate Change PPS3: Housing Consultation paper on PPS4 Planning for Sustainable Economic Development PPS6: Planning for Town Centres PPS7: Sustainable Development in Rural Areas, Securing the Future - Delivering UK Government Sustainable Development Strategy (HM Government) 2005
Regional	East of England Plan Green Infrastructure Strategy for the Cambridge Sub-Region (2006), Cambridgeshire Biodiversity Action Plan (2004)
Local	Huntingdonshire Community Strategy (2004) Sustainable Community Strategy for Huntingdonshire (2008) Housing Land Availability Study (HLAS) (2007) updated and adapted to form the Strategic Housing Land Availability Assessment (SHLAA) (2008) Settlement Hierarchy Background Paper Update (2007) The Employment Land Review (2008) Huntingdonshire Retail Assessment Study (2005) and Update (2007) Huntingdonshire Strategic Flood Risk Assessment (2004)

### Core Strategy Issues and Options

#### Issues and Options identified for Consultation

Issue 1: The need to define a vision for Huntingdonshire to guide the overall philosophy of the Core Strategy.

Option 1: Use the vision from the Huntingdonshire Community Strategy:

'Huntingdonshire will continue to provide a good quality of life as a place which offers:

- continued economic success;
- opportunities for everyone to gain access to suitable homes, jobs and services; and
- an attractive environment which is conserved and enhanced.'

Question 1: Do you consider this an appropriate vision for the District?

Question 2: Are there other aspects it should incorporate?

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## Reasonable Alternatives

.1 No alternatives were put forward.

## Summary of Initial Sustainability Appraisal on Issues and Options

.2 The vision was not appraised separately as it was derived directly from the Community Strategy which aims to promote sustainability across the District as a whole.

## Consultation Responses to Issues and Options

.3 The majority of respondents supported the vision. However, there was some concern that it was not sufficiently locally distinctive. A number of respondents sought additions to the vision. These included increasing the emphasis on sustainable development and the need to reduce the carbon footprint of the District. The Vision was considered to not be specific enough to the character of Huntingdonshire and the issues and challenges faced over the plan period. One respondent was particularly concerned that the RSS vision for sustainable and inclusive communities be included, along with the vision from the Community Strategy.

## Further Options Consultation

### Towards a Spatial Strategy

The Vision put forward was:

In 2026, Huntingdonshire will have retained its distinct identity as a predominantly rural area of villages and market towns whilst accommodating the development for the homes and jobs required as part of a major growth area, taking advantage of the economic vitality of the Cambridge Sub-Region, in a sustainable manner which respects, maintains and enhances the special characters of its towns, villages and countryside. Its residents will have an improved quality of life with increased access to local jobs, housing and high quality services, facilities and green infrastructure.

Question 1: It is considered that this vision captures all the required aspects and that it is not possible to present alternative visions. Do you agree that this vision adequately covers all aspects? If not please give details of how you think it could be changed.

### Towards a Spatial Strategy

The Council was concerned that to include a substantial amount of spatial detail in the Vision would make the Vision cumbersome and would take it away from the high level succinct statement that it should be. To tackle the requirement for more spatial detail the Council decided that it would draw up a set of Spatial Principles that would give more information about the way in which the Council thought the issues and challenges that the District should be faced in the plan period.

The Spatial Principles identified were:

Huntingdonshire will play a proactive role in accommodating future growth in the Cambridge-sub region. The majority of growth will be concentrated in the most sustainable locations of Huntingdon, St Neots and St Ives where there is access to existing and improving public transport, new road infrastructure and where the use of amenities and facilities can be maximised.



RAF Brampton and the industrial estate west of Huntingdon town centre will provide significant opportunities for development on previously developed land within the District. Further opportunities to maximise the use of previously developed land on a smaller scale will be encouraged within the market towns of the Cambridge-Sub region.

The visual quality, viability and vitality of the four market town centres in Huntingdonshire will be enhanced by identifying and implementing opportunities to improve the public realm. Improvements to the public realm will focus on improving the quality of place and culture in our market towns to ensure the District remains a popular location for visitors. The regeneration of run down areas will be encouraged and particular attention will be paid to areas of deprivation within St Neots, Huntingdon and Ramsey through neighbourhood management and regeneration projects.

Opportunities for retail growth will be maximised within all market towns and key service centres in order to respond to competitive pressure from other centres and further strengthen the District's economy. A large proportion of future retail growth will be accommodated within the town centre of Huntingdon, with additional, complementary development to the west of the town centre facilitated through an Area Action Plan. Further growth will be accommodated in St Neots and a lesser scale of growth in St Ives and Ramsey.

Future employment development will be located in the most sustainable locations at the market towns and will be commensurate with housing growth to ensure the creation of balanced communities. The provision of local employment opportunities will help limit levels of out commuting to London, Peterborough and Cambridge and ensure the continued success of the District's economy.

Growth of key service centres will be restricted to a level that will help sustain the existing facilities and amenities, without encouraging growth in these less sustainable locations. In smaller settlements future housing will be restricted to only that necessary to meet local housing needs. This will be achieved through the identification of exception sites for affordable housing in those settlements with access to higher order centres.

The further expansion of Peterborough will respect the separate identities of Yaxley, Facet, Stilton and Alwalton by maintaining an appropriate degree of green separation. However, it is important to ensure those settlements that have experienced significant growth in the past enjoy the benefits of future of development within Peterborough through improved access to a greater range of amenities and facilities. The areas of greenspace around those settlements close to the boundary of Peterborough will become important areas of open space resource for the expansion of Peterborough.

The landscape and countryside of the Huntingdonshire will be protected and enhanced. Areas identified for enhancement include the wetlands along the Ouse Valley, the woodlands around Grafham Water, the wetland and woodlands that will form the Great Fen area and the limestone villages of the north west and the uplands in the west of the District. The accessibility for informal recreation these areas will be improved. Further opportunities for recreation and biodiversity/green infrastructure across the District will be identified and improved. The growth of both Huntingdon and St Neots will reinforce the need to protect and enhance areas of greenspace around them.

The proposed improvements to the new A14 may create significant opportunities for new development in the Huntingdon area. It could help solve the access problems in the town centre and facilitate the extension of the town centre in a westerly direction through the means of an Area Action Plan. Improvements to the transport network will influence the delivery of housing and employment growth in more sustainable locations, projects with particular importance in relation to delivery of development include the A14 improvement

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scheme, the Cambridge to St Ives Guided Bus and the A428 road improvements and High Quality Public Transport Corridor. Further improvements to public transport will enable the promotion of sustainable travel options for the District.

The redundant military bases in Huntingdonshire will need careful consideration to ensure that any potential re-use or redevelopment maximises the benefit to the District. RAF Brampton, subject to its release by the MoD, offers the opportunity for mixed use development of an appropriate scale in a sustainable location within the plan period. Whilst the future potential for developments at Alconbury Airfield and Wyton Airfield need to be considered in the longer term in the context of the economic benefits they may bring to Huntingdonshire, if no sequentially better sustainable options are available and also in the context of the wider strategic needs of the Region through the next review of the East of England Plan.

## Summary of Initial Sustainability Appraisal on Towards a Spatial Strategy

.4 The Spatial Vision meets the majority of the SA Objectives and is considered to be well balanced in meeting the need to promote sustainable development. Specific commitments to accommodating growth in a sustainable manner and taking advantage of economic vitality is balanced against the need to protect the landscape character and ecology of the District.

.5 The sustainability appraisal process found that the Principles met the majority of the sustainability appraisal objectives. However, there were some omissions, for example, no reference to managing flood risk - identified as a key sustainability issue for the District in the Scoping Report - or reducing crime. The appraisal suggested that these issues may need to be considered for the later stages of plan development.

## Key Stakeholders' Responses

.6 Most key stakeholder respondents considered the vision to be appropriate and more locally specific than previous versions. Some thought that it could still be more locally specific and make reference to growth that would take place and where. Some also considered that it was important to stress that proposed growth is to be delivered in a sustainable manner and to do so appropriate solutions would need to be developed. These would involve addressing additional environmental pressures on water supply, waste disposal facilities, greenhouse gas emissions, biodiversity and flood risk. An integrated approach to the development of Huntingdonshire should also be emphasised, reflecting the need for different forms of environmental infrastructure.

.7 Nine of the 17 respondents supported the Spatial Principles as presented. The main areas of concern raised by other respondents were how the Spatial Principles fitted with the Spatial Vision, greater clarity was sought on the future roles of RAF bases in the District and additions were sought to address building standards, locational and infrastructure issues.

## Assessment of Responses and Alternative Approaches

.8 The original option has been discounted because it is considered that it does not respond to the key characteristics of the District, the issues and challenges, raised through consultation on the LDF, in an appropriate manner. It is considered that the links with the vision of the East of England Plan are not sufficiently clear. It is also considered to be "placeless" and not sufficiently distinctive to Huntingdonshire.

.9 The Vision presented in the 'Towards a Spatial Strategy' document required modification following respondents' comments regarding its readability. The Spatial Principles support the Vision giving more detail about the issues and challenges Huntingdonshire faces during the plan period and how the Council proposes to tackle them. The lack of spatial detail is acknowledged and the Spatial Principles have been supplemented to address this.

.10 The need for greater clarity on the spatial distribution of development and how strategic infrastructure projects would influence the strategy is accepted. Clarification is also required regarding the role military bases would have in the Spatial Strategy.

.11 Concerns raised through the Sustainability Appraisal regarding flooding and crime have been addressed through the spatial objectives where this level of detail is considered more appropriate.

## Core Strategy Preferred Options

### Spatial Vision put forward for participation on preferred options

In 2026, Huntingdonshire will have retained its distinct identity as a predominantly rural area of villages and market towns whilst accommodating the development for the homes and jobs required as part of a major growth area. It will have taken advantage of the economic vitality of the Cambridge Sub-Region, in a sustainable manner while respecting, maintaining and enhancing the special characters of its towns, villages and countryside. Its residents will have an improved quality of life with improved access to a wider range of local jobs, housing and high quality services, facilities and green infrastructure.

### Spatial Principles put Forward for Participation on Preferred Options

Huntingdonshire will play a proactive role in accommodating future growth in the Cambridge-sub region. The majority of growth will be concentrated in the most sustainable locations of Huntingdon, St Neots and St Ives where there is access to existing and improving public transport, new road infrastructure and where the use of amenities and facilities can be maximised.

RAF Brampton and the industrial area west of Huntingdon town centre will provide significant opportunities for development on previously developed land within the District. Further opportunities to maximise the use of previously developed land on a smaller scale will be encouraged within the market towns of the Cambridge-Sub region.

The visual quality, viability and vitality of the four market town centres in Huntingdonshire will be enhanced by identifying and implementing appropriate development opportunities and opportunities to improve the public realm. Improvements to the public realm, improving the quality of both place and culture, will encourage local people to use local facilities and will attract visitors.

The regeneration of run down areas will be encouraged with particular attention paid to areas of deprivation within St Neots, Huntingdon and Ramsey through neighbourhood management and regeneration projects.

Opportunities for retail growth will be encouraged within all market towns and in larger villages which are identified as key service centres in order to respond to competitive pressure from other centres and further strengthen the District's economy. A large proportion of future retail growth will be accommodated within the

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town centre of Huntingdon, with additional, complementary development to the west of the town centre facilitated through an Area Action Plan. Further growth will be accommodated in St Neots where a large scale urban extension to the east of the town will require a district centre which will complement the town centre. There will be a lesser scale of growth in St Ives and Ramsey.

Future employment development will mostly be located in the most sustainable locations of the market towns and will be commensurate with housing growth to ensure the creation of balanced communities. The provision of a wider range of local employment opportunities will help limit levels of out commuting to London, Peterborough and Cambridge and ensure the continued success of the District's economy.

Development in most of the key service centres outside the Spatial Planning Areas will be restricted to a level that will help sustain the existing facilities and amenities, without encouraging growth in these less sustainable locations. In smaller settlements future housing will be restricted to small scale development and that necessary to meet local housing needs.

The further expansion of Peterborough will respect the separate identities of Yaxley, Facet, Folksworth, Stilton and Alwalton by maintaining green separation. However, it is important to ensure those settlements enjoy the benefits of future of development within Peterborough through improved access to a greater range of amenities and facilities. The areas of greenspace around those settlements close to the boundary with Peterborough will also be important areas of open space resource for the expanded population of Peterborough.

The landscape and countryside of Huntingdonshire will be protected and enhanced. Areas identified for enhancement include the Ouse Valley from St Neots to Earith, the woodlands around Grafham Water and Brampton and the wetland and woodlands of the Great Fen Project. These areas will also have improved access for informal recreation. Further opportunities for improved recreation and biodiversity/green infrastructure will be identified. The growth in the Huntingdon and St Neots areas will reinforce the need to protect and enhance areas of greenspace around them.

The A14 improvements will create significant opportunities for new development in the Huntingdon area. The changes will improve access problems to the town centre and facilitate the extension of the town centre in a westerly direction. Other improvements to the transport network will also influence the delivery of housing and employment growth in more sustainable locations. Projects with particular importance include the Cambridge to St Ives Guided Bus, the A428 road improvements and High Quality Public Transport Corridor and the A15 improvements at Hampton near Peterborough. Improvements in public transport will enable the promotion of sustainable travel options.

Any redundant military bases in Huntingdonshire will need careful consideration to ensure that any potential re-use or redevelopment maximises the economic benefit to the District. RAF Brampton, subject to its release by the MoD, offers the opportunity for mixed use development on an appropriate scale in a sustainable location within the plan period. The future potential of Alconbury Airfield and Wyton Airfield will need to be considered in the longer term as part of the next review of the Regional Spatial Strategy. That review will need to take into account wider strategic issues for the region and the range of sustainable options available.

## Reasonable Alternatives

.12 Consultation responses for Preferred Options indicated that the Spatial Vision could be significantly improved. A number of respondents suggested that the Spatial Vision was not locally specific and did not give a clear articulation of where growth is proposed and many respondents suggested incorporating elements of the Spatial Principles. The reasonable alternative assessed below looks at ways in which the Spatial Vision can be strengthened.

.13 As a result of consultation the following reasonable alternatives have been identified:

- Incorporating elements of Spatial Principles into the Spatial Vision
- Deleting the Spatial Principles altogether

## Summary of Draft Final Sustainability Appraisal

.14 The spatial vision and spatial principles are sustainable and reflect local context. They set out the key challenges posed to the District and the opportunities that may arise in the period up to 2026 and sets out a sustainable way in which to accommodate the growth whilst protecting and enhancing the District's landscape character and ecology. The economic opportunities arising from growth are identified. However, no reference is made to the need to manage flood risk, the need to improve cycle routes, footpaths and bridleways, promote renewable technologies, reduce waste and encourage recycling and reduce crime.

.15 The Spatial Principles are strongly sustainable in the protection of the natural and built environment and will contribute to other objectives of creating more sustainable communities. However, social cohesion is mentioned only in brief without any supporting statement as to how this should be achieved and no mention is given to promoting economic growth. The difference in assessment relates to the extent they directly quote or are linked to the objective. The Spatial Principles are therefore explicitly sustainable in the majority of areas – specifically those relating to environmental objectives however, is less so in terms of social or economic objectives, some of which are not explicitly referenced.

.16 It was suggested that consideration be given to ensuring criteria relating to social and economic objectives are more explicit, reflecting the wording of the SA objectives to ensure that there is more consistency which better reflect the three areas of sustainable development.

## Consultation Responses

.17 Approximately 57% of respondents explicitly objected to the proposed spatial vision. The main concern arose from the vision not being spatially specific and not setting out where growth will be. One respondent was unclear about the meaning of some of the words in the vision suggesting that the terms "economic vitality" and "sustainable manner" were ambiguous. It was suggested that, in order to improve the vision and make it more spatially specific, elements of the Spatial Principles could be incorporated. Other respondents also suggested that greater emphasis on the historic environment and biodiversity and sport and recreation should be included. Of those who supported the spatial vision respondents were pleased that the protection of the District's identity and character of its settlements was highlighted.

.18 The Spatial Principles generated the most responses in this particular chapter with 73 people commenting on them. Of these 73 responses, 41 stated that they opposed the Spatial Principles. It is clear from the responses that people do not fully understand the relationship between the Spatial Principles and Spatial Vision or indeed understand the purpose of the Spatial Principles. As with the comments on the Spatial Vision it was suggested that some of the Spatial Principles be incorporated into the Spatial Vision. It was considered that more information on timing of major infrastructure developments (such as the A14) needs to be given and that there should be a specific principle relating to biodiversity. It was also highlighted by a number of respondents that insufficient detail on the development of Ramsey had been included. A number of respondents also objected to the restrictions placed on Key Service Centres, suggesting that more growth is needed in these settlements in order to sustain the rural economy. The issue of airfields was also raised with one respondent suggesting that redundant airfields should be given preference over Greenfield land and that the future of Alconbury should not await the RSS review. The fact that the Principles did not mention RAF Upwood was also raised. Another respondent suggested that

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the Council's intentions for redundant airfields should be made clearer. A number of respondents also identified that the Council had not had proper regard to PPS1 Climate Change and that insufficient emphasis on the need to manage and minimise flood risk in line with PPS25 has been given.

## Assessment of Responses and Alternative Approaches

A number of respondents clearly objected to the Council's preferred Spatial Vision. Concerns focused on its lack of spatial specificity and not setting out where growth will go. Furthermore, other respondents suggested that additions could be included to improve the Spatial Vision.

It is important to have a Spatial Vision in order to set out the Council's aspirations of the future development for the District. It is closely linked to the objectives which form the basis for monitoring implementation of the policies in the Core Strategy. Therefore, not including a Spatial Vision is not a reasonable alternative. Although the Council did consider the preferred Spatial Vision to be adequate in terms of clearly setting out the future development of the District, following consultation on preferred options it is recognised that the Spatial Vision needs significant amendment to address the concerns raised by some respondents. The changes made are set out below.

Responses clearly identified that there was widespread confusion as to how the Spatial Principles fit with the rest of the Core Strategy, particularly the Spatial Vision.

Including elements of the Spatial Principles would ensure that the Spatial Vision is locally distinctive and spatially specific. However, the Council had previously considered that incorporating all of the Spatial Principles into the Spatial Vision would make it too lengthy. It is however considered necessary to respond to the issues raised through preferred options consultation and make the Vision more spatially specific by incorporating those elements of the Spatial Principles which clearly articulate the Council's Spatial Strategy.

The Spatial Principles were included in order to give further detail on the spatial elements of the Council's Vision. It is therefore considered inappropriate to delete them entirely as this would lose the specificity and distinctiveness that needs to be included in the Vision.

The Spatial Principles respond to the challenges identified in the planning context and seek to enhance the District's identity as outlined in the Spatial Portrait. It is therefore important that they are included in some form within the plan.

## Changes Made

The Council has responded to issues raised through consultation by significantly restructuring the Spatial Vision. Spatially specific elements of the Spatial Principles have been added. The Spatial Principles that have been included and amended where necessary are set out in the Changes made for Spatial Principles of this volume. The decision on which principles to incorporate centred on the responses to consultation and looked at those principles that best articulated the Council's spatial strategy. Details of where growth will be focused have also been added to give a broad scenario of the District's intended character in 2026. In order to more fully reflect the spatial strategy it has also been decided to move the key diagram from the end of Volume 1 (p. 31) to the beginning of chapter 6 which sets out the Council's spatial strategy.

The Spatial Principles are no longer included as a separate section. Elements have been incorporated into the Spatial Vision as follows in order to more clearly articulate and more closely link to the Council's Spatial Strategy.

Parts of paragraph 5.34 of the Preferred Spatial Principles have been included and strengthened to include reference to the urban extension east of St Neots which will accommodate the majority of Huntingdonshire's future housing development along with significant development opportunities in Huntingdon, St Ives, Ramsey, Brampton and Godmanchester.

Paragraph 5.39 is amended and elaborated to emphasise the concentration of employment in the Market Towns and to recognise the importance of market attractiveness in promoting delivery

Paragraph 5.40 is clarified in order to set out more clearly how key service centres will contribute to accommodating further growth whilst maintaining their character.

Elements of paragraphs 5.35 and 5.44 are incorporated in order to set out clearly the Council's preference for previously developed land. However, the need to make use of sustainable Greenfield options where necessary in order to accommodate the required growth is also identified. Further clarification on the Council's priority of previously development land was raised by respondents to Preferred Options consultation. Similarly, the Council has clarified its Strategy for the re-use of military sites in response to issues raised from consultation.

Elements of paragraph 5.41 have been incorporated to emphasise the importance of green space separation between settlements in the north and Peterborough.

A specific emphasis has been placed on the importance of Huntingdonshire's historic environment in response to issues raised through consultation as has the need to protect and enhance the District's greenspace, with specific areas of strategic greenspace enhancement identified, thereby incorporating paragraph 5.42.

The impacts and opportunities arising from the A14 improvements have been emphasised, as has the need to improve public transport. This incorporates elements of paragraph 5.43.

## Tests of Soundness

**.19** The main concern when considering the Vision in relation to the Tests of Soundness was test (v) for having regard to the Community Strategy. The Community Strategy and the Draft Sustainable Community Strategy (SCS) seek to address the particular issues and challenges that Huntingdonshire faces. The Vision has been modified through the plan process to reflect better the characteristics, issues and challenges faced by the District over the plan period. Additionally there has been extensive collaboration in preparation of the Local Development Framework and the draft SCS so far, which will continue. The Vision is therefore considered to pass test (v) and is considered to be sound.

**.20** Go-East considered that the Preferred Option Spatial Vision was not spatially specific and failed to adequately explain where growth will be accommodated. They were not clear how the Spatial Principles fit within the rest of the Core Strategy structure. It was recommended that the Council incorporate elements of the Spatial Principles into the Spatial Vision in order to address some of the issues raised in their representation and those not relevant deleted to avoid unnecessary duplication..

## Approach Taken

**.21** The approach taken is detailed in Volume 1 on page **X**.

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## The Spatial Objectives

**Table 3 Key Sources for the Objectives**

National	PPS1: Delivering Sustainable Development, PPS7: Sustainable Development in Rural Areas
Regional	East of England Plan policy SS1 Sustainable Construction in Cambridgeshire - a good practice guide (Cambridge Horizons and Cambridgeshire County Council 2006)
Local	Sustainable Communities Strategy

## Core Strategy Issues and Options

### Issues and Options identified for Consultation

Issue 2: To define a series of objectives for the Core Strategy to provide a focus for what it aspires to achieve.

Option 2: To minimise the impact on climate change by:

- enabling required development to be accommodated in locations which limit the need to travel whilst catering for local needs
- promoting developments that conserve natural resources and minimise greenhouse gas emissions

Option 3: To increase housing opportunities for people by:

- ensuring that the quantity and types of dwellings built meet the requirements of local people
- ensuring that an appropriate proportion of new housing is affordable to those in need
- enabling the specialist housing needs of particular groups to be met in appropriate locations

Option 4: To realise the economic potential of Huntingdonshire and its residents by:

- facilitating business development in sectors that have potential to meet local employment needs and limit out-commuting
- enabling business development in rural areas, in locations and on a scale which helps to provide local jobs, limits commuting and avoids adverse environmental impacts
- strengthening the vitality and viability of Huntingdonshire's town centres as places for shopping and leisure

Option 5: To improve the quality of life for local people by:

- providing a framework for securing adequate land and infrastructure to support business and community needs
- increasing opportunities for pursuing a healthy lifestyle by maintaining and enhancing recreation opportunities and encouraging walking, cycling and horse riding

Option 6: To improve and conserve Huntingdonshire's environment by:

- enhancing the distinctive identities of our villages and market towns



- enhancing our characteristic landscapes, habitats and species
- promoting areas of strategic greenspace enhancement

Question 3: Do you agree with the suggested objectives?

Question 4: Are there any additional objectives we should include?

## Reasonable Alternatives

.22 There is an infinite number of objectives that could be proposed for the Core Strategy. However, once it is adopted, the Core Strategy and the Regional Spatial Strategy will form the development plan for the District. Therefore, it is logical that the objectives of the Core Strategy form a local interpretation of the Regional Spatial Strategy's objectives.

## Summary of Initial Sustainability Appraisal on Issues and Options

.23 The Initial Sustainability Appraisal of the Issues and Options paper did not include the objectives but this was undertaken for the Initial Sustainability Appraisal for the Towards a Spatial Strategy and the draft Final Sustainability Appraisal.

## Consultation Responses to Issues and Options

.24 A significant number of respondents expressed concern that it was not sufficiently clear whether the alternative objectives were to be considered as a whole and could only be chosen as a complete group or not at all, or whether they could be selected individually.

## Further Options Consultation

### Towards a Spatial Strategy

Objectives put forward were:

- To maintain, enhance and conserve Huntingdonshire's characteristic landscapes, habitats and species
- To conserve and enhance the special character and separate identities of Huntingdonshire's villages and market towns
- To ensure that design of new development integrates effectively with its setting and promotes local distinctiveness
- To promote developments that conserve natural resources, minimise greenhouse gas emissions and help to reduce waste
- To secure developments which are accessible to all potential users, and which minimise risks to health as a result of crime (or fear of crime), flooding or pollution and climate change
- To enable required growth to be accommodated in locations which limit the need to travel, while also catering for local needs
- To ensure that the types of dwellings built are suited to the requirements of the local population, and that an appropriate proportion of units is 'affordable' to those in need
- To enable specialist housing needs of particular groups to be met in appropriate locations
- To facilitate business development in sectors that have potential to meet local employment needs and limit out commuting

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## Summary of Initial Sustainability Appraisal for Towards a Spatial Strategy

.25 The Initial Sustainability Appraisal compared the Sustainability Appraisal objectives against the draft plan objectives. There were a number of relationships that were identified as being uncertain - these related primarily to minimising water, reducing waste generation and energy consumption and objectives concerning residential and employment development. This was because although waste, water use and energy use will inevitably be increased by development, there are a number of mitigation measures that can be implemented to help address this issue. Nevertheless, overall the objectives were either appraised to have no relationship or a potentially positive relationship.

## Key Stakeholders' Responses

.26 All but 2 respondents broadly supported the objectives put forward. Limited concerns were expressed regarding the need for more emphasis on infrastructure and provision of affordable and elderly persons housing. The ability to achieve the objectives in the face of major growth requirements was also questioned.

### Assessment of Responses and Alternative Approaches

.27 The Objectives have been expanded to better address business development, services and facilities in villages and the vitality and viability of town centres. Also added are objectives covering healthy lifestyles and recreation and infrastructure for business and community needs.

.28 The objectives have been re-ordered to better reflect the priorities of the Spatial Strategy.

## Core Strategy Preferred Options

### Objectives put Forward for Participation on Preferred Options

1. To enable required growth to be accommodated in locations which limit the need to travel, while catering for local needs
2. To ensure that the types of dwellings built are suited to the requirements of the local population, and that an appropriate proportion is 'affordable' to those in need
3. To enable specialist housing needs of particular groups to be met in appropriate locations
4. To facilitate business development in sectors that have potential to meet local employment needs and limit out commuting
5. To strengthen the vitality and viability of Huntingdonshire's town centres as places for shopping and leisure
6. To enable business development in rural areas, in locations and on a scale which helps to provide local jobs, limits commuting and avoids adverse environmental impacts
7. To maintain and enhance the availability of key services and facilities including communications services
8. To maintain, enhance and conserve Huntingdonshire's characteristic landscapes, habitats and species
9. To identify opportunities to increase and enhance major strategic greenspace
10. To conserve and enhance the special character and separate identities of Huntingdonshire's villages and market towns
11. To ensure that design of new development integrates effectively with its setting and promotes local distinctiveness
12. To promote developments that conserve natural resources, minimise greenhouse gas emissions and help to reduce waste

13. To secure developments which are accessible to all potential users, and which minimise risks to health as a result of crime (or fear of crime), flooding or pollution and climate change
14. To increase opportunities for pursuing a healthy lifestyle, by maintaining and enhancing recreation opportunities and encouraging walking and cycling
15. To provide a framework for securing adequate land and infrastructure to support business and community needs

## Reasonable Alternatives

.29 Consultation on the Preferred Options identified useful additions which could be included in the objectives to strengthen them. Additional objectives could have been included in order to respond to the issues raised.

## Summary of Draft Final Sustainability Appraisal

.30 The Sustainability Appraisal Objectives were tested against the Core Strategy objectives in a compatibility matrix. It was found that the objectives on the whole have a positive relationship or no identified links. However, a number of uncertain relationships were identified although these were largely unavoidable and result from development, for example, minimising water, reducing waste and energy consumption.

## Consultation Responses

.31 Responses to the objectives were evenly split with around 50% supporting and 50% objecting. Those objectives that were cited by respondents as being good were objectives 7, 8, 9, 12, and 14. Objectives which were cited for objection included 1, 2, 3, 6, 13 and 15. In most cases respondents offered alternative ways of phrasing the objectives to make them more appropriate. However, it was suggested that more emphasis needs to be put on the historic environment, that better use of information relating to health should underpin the objectives and Core Strategy as a whole, and that an objective on climate change should be included.

## Assessment of Responses and Alternatives

As objectives form the basis of the monitoring framework it is important that they are specific, measurable, appropriate, reasonable and can be measured in a specific timeframe (SMART). Additional objectives reflecting some of the issues raised through consultation such as climate change would be beneficial. It is more appropriate to edit some of the existing objectives to respond to other concerns. It is also important that the objectives be closely reflected in the monitoring indicators. Due to difficulty in gathering data for some indicators, as identified in the Annual Monitoring Report and the Sustainability Appraisal Scoping Report, the Council is somewhat limited in the objectives which can be included and adequately monitored.

## Changes Made

Further clarification as to the purpose of the objectives and their relationship to the spatial vision has been included. This was an issue raised through the consultation process.

# The Spatial Vision

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A number of objectives have been strengthened by including additional wording and references to issues raised through the consultation process. Specific regard has been had to the historic environment, climate change, sustainable travel and tourism for this reason. Two additional objectives have been incorporated to address climate change and the priority to be given to redevelopment of brownfield land. The objectives that have been strengthened are 1,2, 5, 6 , 8, 11 and 15.

## Tests of Soundness

.32 There are no particular concerns with compliance with the Tests of Soundness.

.33 Go-East did not comment on the objectives.

## Approach taken

.34 The approach taken is set out in Volume 1 on page x.

## The Cornerstone of Sustainable Development

**Table 4 Key Sources for Sustainable Development**

National	<p>PPS1: Delivering Sustainable Development                  PPS1 Supplement: Planning and Climate Change                  PPS7: Sustainable Development in Rural Areas                  Securing the Future - Delivering UK Government Sustainable Development Strategy (HM Government) 2005</p>
Regional	<p>East of England Plan                  Sustainable Construction in Cambridgeshire - a good practice guide (Cambridge Horizons and Cambridgeshire County Council 2006),                  A Sustainable Development Framework for the East of England (Sustainable Development Round Table for the East of England 2001),                  Sustainable Communities in the East of England (ODPM, 2003)                  Towards Sustainable Construction - A Strategy for the East of England (EP, CE, GOEast, PECT, 2003)</p>
Local	<p>Huntingdonshire Community Strategy (2004)                  Sustainable Community Strategy for Huntingdonshire (2008)</p>

### Core Strategy Issues and Options

#### Issues and Options identified for Consultation

Issue 3: The requirement to promote sustainable development to ensure that the needs of our residential, business and interest communities are met whilst not compromising the ability of future generations to meet their own needs.

Option 7: Policies will indicate that all development proposals should contribute to the pursuit of sustainable development.

Criteria could be set out to assess how a development proposal will achieve this. These could reflect social, economic and environmental issues including how the proposal would contribute to minimising the impact on climate change.

An assessment could be required to accompany any proposal for major development to demonstrate how these have been met.

Question 5: What criteria do you consider most important in assessing how a development proposal will contribute to sustainable development?

Question 6: Should those promoting a major development be required to complete an assessment to show how they have addressed these criteria?

# The Cornerstone of Sustainable Development

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## Reasonable Alternatives

.1 None. The promotion of sustainable development is required by national and strategic guidance, and criteria are necessary to indicate how this objective will be interpreted.

## Summary of Initial Sustainability Appraisal on Issues and Options

.2 The appraisal process identified the option as being sustainable. It did suggest that the policy would need to be carefully worded in order to address all aspects of sustainable development.

## Consultation Responses to Issues and Options

.3 Many respondents thought this was important and supported the principles identified. Some respondents considered the assessment proposed as part of this approach to be unnecessary and would be likely to duplicate information required through other established requirements.

### Assessment of Responses and Alternative Approaches

.4 Care has been taken to ensure that the criteria in the Preferred Approach represent a balance between the three areas of economic, social and environmental sustainability.

.5 Care has also been taken to try to ensure that the criteria are straightforward and do not encroach significantly into aspects of development that are assessed or appraised by other established requirements.

## Core Strategy Preferred Options

### Policy Wording put Forward for Participation on Preferred Options

All plans, policies and programmes of the Council and its partners, with a spatial element, along with all development proposals in Huntingdonshire will contribute to the pursuit of sustainable development.

Reflecting environmental social and economic issues the following criteria will be used to assess how a development proposal will be expected to achieve the pursuit of sustainable development including how the proposal would contribute to minimising the impact on and of climate change. All aspects of proposals will be considered including the design, implementation and function of development. The criteria are:

making best use of land and existing infrastructure;

minimising the use of non-renewable energy sources and construction materials and maximising opportunities for renewable energy;

minimising water consumption, and the impact on water resources and flood risk;

curtailing greenhouse gas emissions and other forms of pollution;

encouraging waste reduction and recycling;

preserving the diversity and distinctiveness of Huntingdonshire's towns, villages and landscapes including the conservation of buildings, sites and areas of architectural or historic importance;

# The Cornerstone of Sustainable Development

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maintaining and enhancing the range and vitality of characteristic habitats and species;

creating places that are attractive, respond well to their surroundings, adaptable, and which are accessible and safe to use for all sections of the community and encouraging regeneration;

contributing to social cohesion;

supporting the local economy and businesses; and

limiting the need to travel, and increase opportunities to make necessary journeys by foot, cycle or public transport.

An assessment will be required to accompany any proposal for major development to demonstrate how the criteria have been met.

## Reasonable Alternatives

.6 As a result of Preferred Options consultation a number of suggestions were made as to how this policy could be strengthened. Some respondents also indicated that this policy is not necessary as it simply repeats requirements to contribute to sustainable development already within the planning process. The reasonable alternatives assessed below are:

- Strengthen existing policy
- Remove the policy

## Summary of Draft Final Sustainability Appraisal

.7 The policy is strongly sustainable in areas of protection of the natural and built environment and these will contribute to other objectives of creating more sustainable communities. However, social cohesion is mentioned only in brief without any support statement as to how this should be achieved and no mention is given to promoting economic growth. The difference in assessment relates to the extent the policy directly quotes or is linked to the objective. The policy is therefore explicitly sustainable in the majority of areas – specifically those relating to environmental objectives however, is less so in terms of social or economic objectives, some of which are not explicitly referenced.

.8 It was recommended that consideration be given to ensuring criteria relating to social and economic objectives are more explicit, reflecting the wording of the SA objectives to ensure that there is more consistency which better reflect the three areas of sustainable development.

## Summary of Appropriate Assessment

.9 The Appropriate Assessment states that additional housing delivered through the Core Strategy will lead to additional water abstraction from the Ouse Washes which could cause damage to the sensitive features of the site by either reducing the incidence of flooding or causing actual drought. Potential significant effects on water resources arising from development have also been identified for Portholme, Rutland Water and the Nene Washes

.10 Although the need for sufficient water supply is addressed by the Environment Agency, local authorities have a role to play and policy 1 (sustainable development) clearly identifies the need to minimise water consumption, although no measures are provided against which this can be monitored.

# The Cornerstone of Sustainable Development

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## Consultation Responses

.11 Responses to the preferred policy were fairly evenly split with 15 out of 32 respondents clearly stating that they support the policy and 17 opposing it. A clear objection that was apparent related to the concern that the policy replicated other requirements when submitting planning applications and that sustainable development should be incorporated into the emerging Development Control Policies DPD as it is a specific, not strategic issue. Other respondents suggested that the policy did not have proper regard to the requirements of PPS25 and PPS1 Climate Change and that these pieces of national policy need to be explicitly referenced. Furthermore, it was suggested that the policy failed to consider adequately the issues of health, community cohesion, biodiversity and provision of sports and recreation facilities and that these should each form a separate criteria. A number of respondents recommended policy wording changes such as the need to strengthen the criteria for the historic built environment.

### Assessment of Responses and Alternatives

A number of responses did indicate that this policy was not needed as the requirement to achieve sustainable development is covered elsewhere in the planning process, for example, when submitting a planning application it is a requirement to cover all information listed within the new 1 App system, which includes a sustainability assessment; sustainability issues are also covered within Design and Access Statements. The forthcoming requirements of the Code for Sustainable Homes were also mentioned in a number of responses as further evidence of how proposals are currently required to contribute to sustainable development. The policy is intended to add to these requirements by including specific criteria that will need to be met by proposals. Furthermore, it provides guidance to cover the interim period until the Code for Sustainable Homes is mandatory for all new homes.

The supplement to PPS1 on climate change had not been published when the preferred approach was prepared so its implications needed to be taken into account for the submission version. A number of respondents made helpful suggestions as to how the policy could be improved by including more information on, for example, health and community cohesion.

### Changes Made

In response to issues raised through Preferred Options consultation criteria covering the following have been included:

- health, active lifestyles and sport and recreational facilities;
- community cohesion, empowerment and involvement in the design, planning and management of proposals.

In addition, a number of criteria have been strengthened and include reference to issues raised through the consultation process. This relates specifically to making the best use of land, renewable energy, reducing water consumption and minimising flood risk and minimising waste. Furthermore, the importance of the historic and archaeological environments has been emphasised as has the need to create sustainable and well designed places which respond to the surrounding context.

The reasoned justification has been significantly expanded in order to explain how proposals will be expected to comply with the criteria. It also responds to other issues raised such as the need for the policy to consider adaptation to climate change.



## Tests of Soundness

.12 There are no particular concerns with compliance with the Tests of Soundness.

.13 Go East did not comment on policy wording 1.

## Approach Taken

.14 The approach taken is detailed in Volume 1 on page 15.

# The Spatial Strategy

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## The Spatial Strategy

### Strategic Housing Growth

**Table 1 Key Sources for Strategic Housing Growth**

National	PPS1: Delivering Sustainable Development PPS1 Supplement: Planning and Climate Change PPS3: Housing PPS7: Sustainable Development in Rural Areas PPS25: Development and Flood Risk Development and Flood Risk: A Practice Guide Companion to PPS25 A 'Living Draft' consultation paper
Regional	East of England Plan Cambridge Sub Region Strategic Housing Market Assessment (2008) Saved policy P9/4 Cambridgeshire and Peterborough Structure Plan 2003
Local	Housing Land Availability Study (HLAS) (2007) updated and adapted to form the Strategic Housing Land Availability Assessment (SHLAA) (2008) Settlement Hierarchy Background Paper Update (2007) Huntingdonshire Housing Needs Survey (2002) and Update (2006) Huntingdonshire Housing Strategy 2006-11 (2006) Huntingdonshire Strategic Flood Risk Assessment (2004)

### Core Strategy Issues and Options

#### Issues and Options identified for Consultation

Issue 4: Identification of areas where development could be focused to promote sustainable opportunities for access to jobs, services and facilities.

Huntingdon area: this includes Huntingdon, Brampton and Godmanchester and had 31,000 residents in 2005. The area is a key driver of the local economy. The Housing Land Availability Study (HLAS) (2007) identified that this area offers significant opportunities for development. The realignment of the A14 could have implications for development opportunities, particularly post 2015.

St Neots area: this includes St Neots and Little Paxton and had a population of 31,200 in 2005. Coupled with land in Bedfordshire around Wyboston, the area is also a key driver of the local economy. The HLAA identified that this area offers significant opportunities for development.

St Ives: is smaller in scale than Huntingdon and St Neots with a population of just under 16,000 in 2005. It offers fewer opportunities for sustainable development options. The HLAA identified a limited number of suitable sites with flooding being a major constraint. However, St Ives is within the prosperous Cambridge sub-region and will see significant changes in accessibility with the completion of the guided bus route.

Ramsey area: this includes Ramsey and Bury, but excludes Ramsey Forty Foot, Ramsey Heights, Ramsey Mereside and Ramsey St Marys, and had a population of around 8,000 in 2005. Major housing growth was discounted by the Inspector during the 2002 Local Plan alteration due to Ramsey's poor sustainability. It has relatively poor transport infrastructure and, despite previous allocations, has limited employment opportunities.

Option 8: To use the spatial planning areas described above when identifying strategic directions of growth. These would be used for assessing potential development sites for allocation within the Planning Proposals DPD or the Huntingdon West AAP.

Question 7: Do you agree with the approach of considering potential Market Towns in conjunction with the adjoining settlements identified above solely for the purposes of assessing strategic development allocations?

## Reasonable Alternatives

.1 Strategic growth allocations could be focused only within the four largest towns in the District with no recognition of the role or potential land availability in Key Service Centres.

### Issues and Options identified for Consultation

We need to make fundamental choices on whether the District should pursue a very intense urban focus for new growth or a more dispersed approach; whether priority should always be given to re-use of brownfield land or whether in some circumstances developing greenfield land with very good access to services and facilities is preferable. Rather than put forward a particular choice the options are deliberately left wide open to incorporate a number of possible alternatives.

Issue 6: The need to identify strategic directions of growth to guide where sites will be allocated for development.

A series of maps follows in this section which indicate possible directions of growth from each of the larger settlements in the District. These are coded alphabetically and provide an indication of the possible scale of development that could be accommodated. The maps indicate a wide range of alternatives not all of which will be needed to achieve the scale of growth required in the Regional Spatial Strategy. They show possible directions for housing, employment and mixed use development.

It is likely that many growth areas will accommodate a mixture of housing and employment uses to help develop balanced, sustainable communities and provide viable transport choices. However, to best ascertain people's preferences housing, employment and retail are discussed separately below.

### Huntingdon and St Neots Areas

Option 10: Policies could propose that the Huntingdon area should get most of the growth.

Option 11: Policies could propose that the St Neots area should get most of the growth.

Option 12: Policies could propose both areas to grow at a similar rate.

Question 11: What proportion of growth should be focused in the two main urban areas?

# The Spatial Strategy

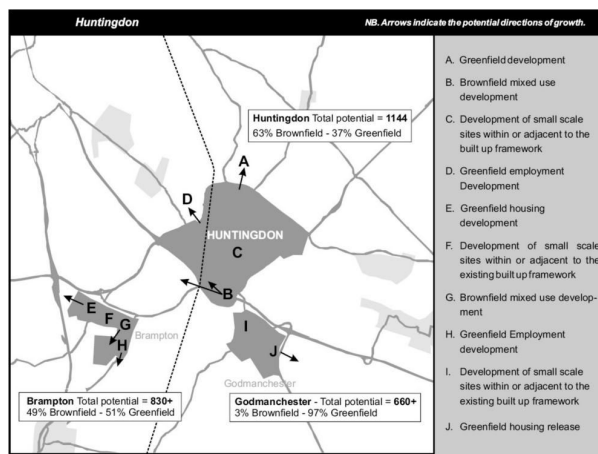
## Huntingdonshire District Council | Core Strategy - Submission Version - Volume Two

Question 12: Which of these options would you prefer and why?

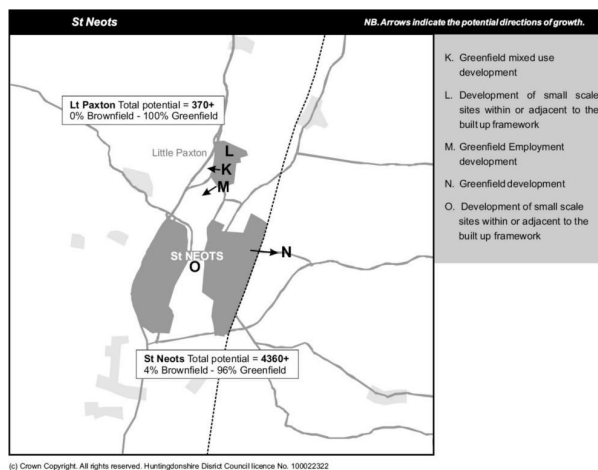
Question 13: Are there any other options which should be considered?

Question 14: To achieve your chosen option which of the directions of growth shown on the maps would you rather see developed?

**Figure .1 Huntingdon Area**



**Figure .2 St Neots Area**



### St Ives and Ramsey

Strategic guidance indicates that St Ives and Ramsey should receive a smaller level of growth. When considering development in these two locations the following options have been identified.

Option 13: Strategic directions of growth could allow growth only within the existing built framework in Ramsey and/ or St Ives.

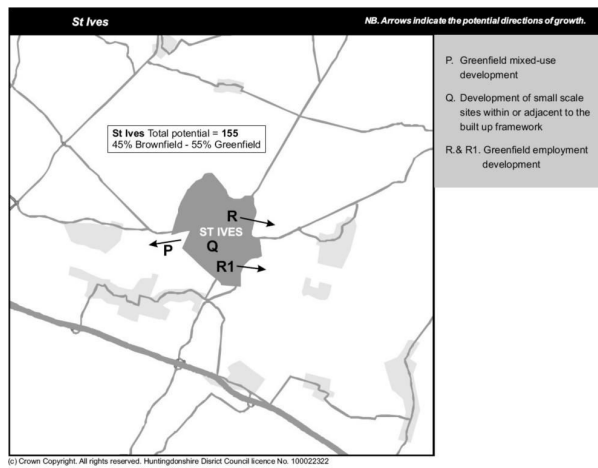
Option 14: Strategic directions of growth could allow growth within small-scale extensions to Ramsey and/or St Ives.

Question 15: Which of these options would you prefer and why?

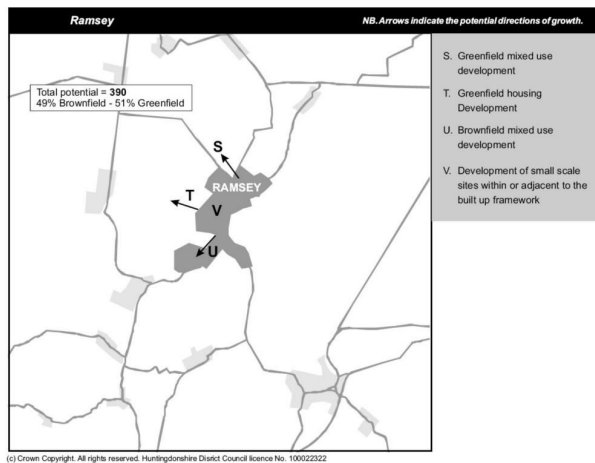
Question 16: Are there any other options which should be considered?

Question 17: Which of the directions of growth shown on the maps would you rather see developed?

**Figure .3 St Ives Area**



**Figure .4 Ramsey and Bury Area**



## Key Service Centres

When considering development in possible Key Service Centres that are not closely linked with a Market Town the following options have been identified.

# The Spatial Strategy

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Option 15: Development could be distributed across all Key Service Centres broadly in proportion to their existing size and level of facilities.

Option 16: Development could be more limited in those settlements which have recently received high levels of growth.

Question 18: Which of these options would you prefer and why?

Question 19: Are there any other options which should be considered?

Question 20: Which of the directions of growth shown on the maps would you rather see developed?

Figure .5 Fenstanton

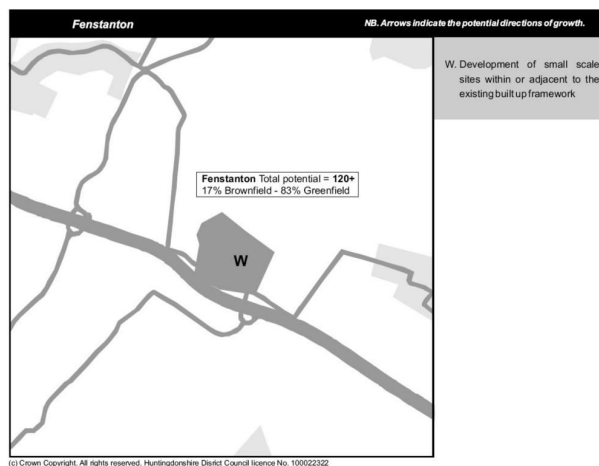


Figure .6 Sawtry

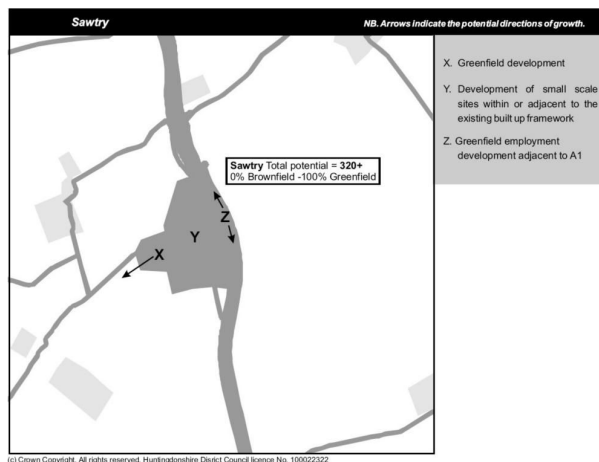
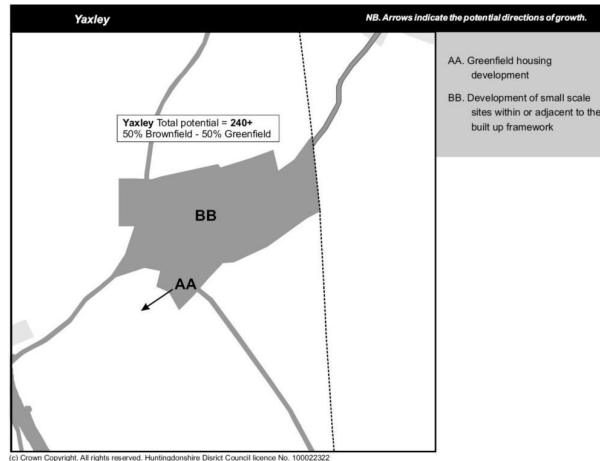


Figure .7 Yaxley



## Reasonable Alternatives

.2 The maps presented above included a wide range of options which could be amalgamated in very many ways to produce alternative packages of growth options.

## Summary of Initial Sustainability Appraisal of Issues and Options

.3 The identification of spatial planning areas for strategic growth was considered sustainable in terms of focusing growth in areas that reduce the need to travel and maximise brownfield opportunities. The reasonable alternative, which proposed that growth would be limited to the four market towns, was considered to be less sustainable as it may limit the opportunity to use brownfield land outside of the market towns.

.4 Huntingdon and St Neots areas: all three options were identified as being sustainable. However, Option 11 was considered to be less sustainable than Option 10 as it would result in increased greenfield development which is contrary to Government guidance. Concern was also noted for the impact of development on one settlement. Option 12 was identified as being a good way to distribute growth across the two settlements, although the use of greenfield land was recognised.

.5 St Ives and Ramsey: both options were identified as being sustainable as they direct growth towards market towns. However, it was suggested that option 14 may reduce the need to direct further growth to less accessible settlements and improve accessibility to services and facilities.

.6 Key service centres: Option 15 was identified as being the most sustainable as it helps ensure development is located in areas where services and facilities are available and reduces the need to travel. It also maximises the use of brownfield land compared to option 16.

## Consultation Responses to Issues and Options

.7 There was some opposition to the concept of spatial planning areas with some people thinking that the towns would subsume nearby settlements resulting in their loss of identity. Others, however, supported the concept as a pragmatic way of achieving sustainable development. In particular, a number of respondents considered that greater emphasis should be given to growth around Huntingdon and St Neots. Concern was expressed over the relationship between the spatial planning areas and the settlement hierarchy.

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.8 It was suggested that Buckden should be considered as part of either the Huntingdon Area or the St Neots Area and that Needingworth, Hemingford Grey and Houghton should be part of a St Ives strategic planning area. There was also the suggestion that another spatial planning area should be designated to the north of the District close to Peterborough which would include Yaxley, Stilton and Farcet on the basis that development close to Peterborough would be more sustainable than more remote locations.

.9 There was strong support for clear indication of the preferred directions of growth although obviously many differing opinions on where growth should be focused with many representations promoting specific sites for development. A number of representations stressed the general principle of making best use of previously developed land irrespective of its location.

.10 There was an equal balance between support for concentrating growth in Huntingdon or St Neots with most respondents favouring a reasonably equal distribution. Of greater concern to many respondents was the capacity of the infrastructure to absorb significant growth, particularly with regard to the transport impacts.

.11 A number of respondents sought a higher level of growth in St Ives citing its greater sustainability than Ramsey. Others, however, were concerned over flooding and environmental capacity issues in St Ives.

.12 There was general support for provision of some development in all Key Service Centres to help reinforce their role as focal points for surrounding villages.

## Further Options Consultation

### Towards a Spatial Strategy

Four options considered for overall distribution of growth including housing.

#### *Cambridge Sub-region Focused Growth*

This option sought to concentrate growth in the towns and key service centre villages of the Cambridge Sub-region. The housing growth was to be distributed roughly equally between the Huntingdon and St Neots Areas with a significant amount in St Ives. This is illustrated in figure 1 and in table 1.

#### *Huntingdon Area Focused Growth*

This option sought to concentrate growth mainly in the Huntingdon Area. There was to be most of the housing growth in the Huntingdon Area of Brampton, Godmanchester and Huntingdon, with St Neots a lesser, although still significant amount. St Ives would see less housing while other settlements would have some growth. This is illustrated in figure 2 and in table 2.

#### *St Neots Area Focused Growth*

This option sought to concentrate growth mainly in the St Neots Area. There was to be most of the housing growth in the St Neots Area of Little Paxton and St Neots, with the Huntingdon Area having a lesser, although still significant amount. St Ives would see less housing while other settlements would have some growth. This is illustrated in figure 3 and in table 3. This option was considered to have significant merits not least of all for the potential to master plan a significant extension to the town and the opportunities to ensure comprehensive service provision. However following detailed consideration

#### *Dispersed Growth*



This option sought to distribute growth throughout the District. The housing growth was to be distributed roughly equally between the Huntingdon and St Neots Areas with a significant amount in St Ives but a significant amount was to be distributed to Ramsey and Bury and key service centre villages. This is illustrated in figure 3 and in table 3.

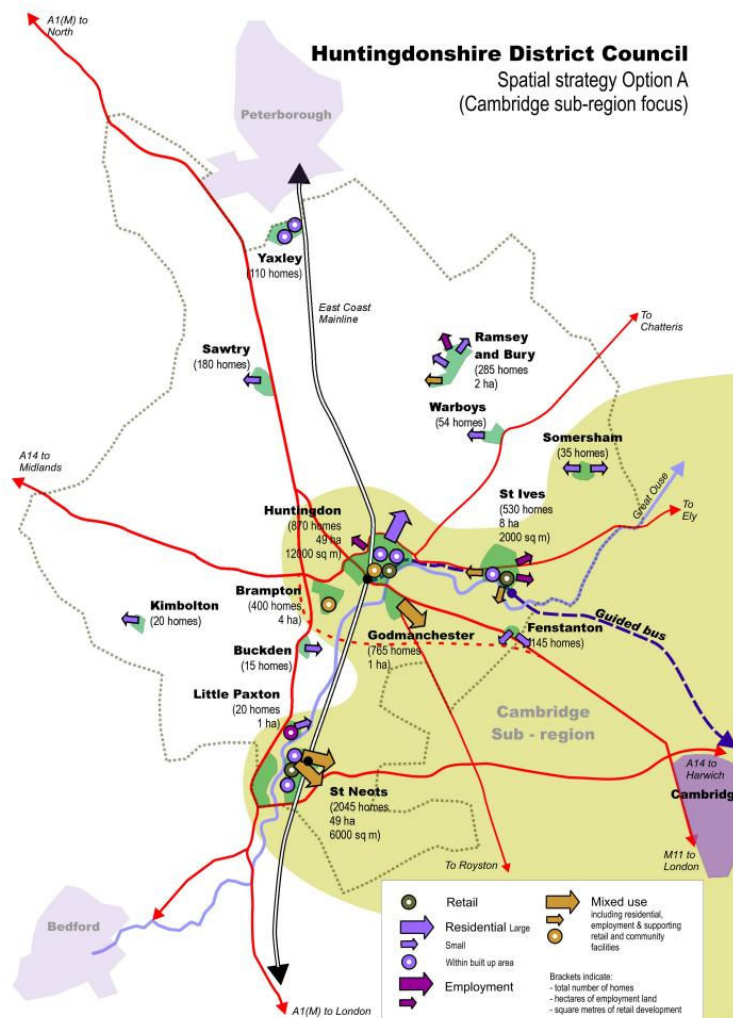
.13

**Table 2 Distribution of Development for the Cambridge Sub-region Focus Option**

Settlement	Housing Provision (Dwellings)	Employment Provision (ha)	Retail Comparison Floorspace Provision (sqm)
<b>Huntingdon Area</b>	2060	50	12,000
Huntingdon	970	41	12,000
Godmanchester	690	5	
Brampton	400	4	
<b>St Neots Area</b>	2100	50	6,000
St Neots	2080	49	6,000
Lt Paxton	20	1	
St Ives	525	8	2,000
Ramsey and Bury	240	2	-
Buckden	15	-	-
Fenstanton	135	-	-
Kimbolton	25	-	-
Sawtry	150	-	-
Somersham	35	-	-
Warboys	55	-	-
Yaxley	110	-	-
<b>Total</b>	5450	110	20,000

# The Spatial Strategy

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**Table 3 Distribution of Development for the Huntingdon Area Focus Option**

Settlement	Housing Provision (Dwellings)	Employment Provision (ha)	Retail Comparison Floorspace Provision (sqm)
<b>Huntingdon Area</b>	<b>2655</b>	<b>65</b>	<b>12,000</b>
Huntingdon	1140	56	12,000
Godmanchester	690	5	-
Brampton	825	4	-
<b>St Neots Area</b>	<b>1765</b>	<b>40</b>	<b>6,000</b>
St Neots	1745	39	6,000
Little Paxton	20	1	-
St Ives	345	3	2,000
Ramsey and Bury	240	2	-
Buckden	15	-	-

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Fenstanton	55	-	-
Kimbolton	25	-	-
Sawtry	150	-	-
Somersham	35	-	-
Warboys	55	-	-
Yaxley	110	-	-
<b>Total</b>	<b>5450</b>	<b>110</b>	<b>20,000</b>

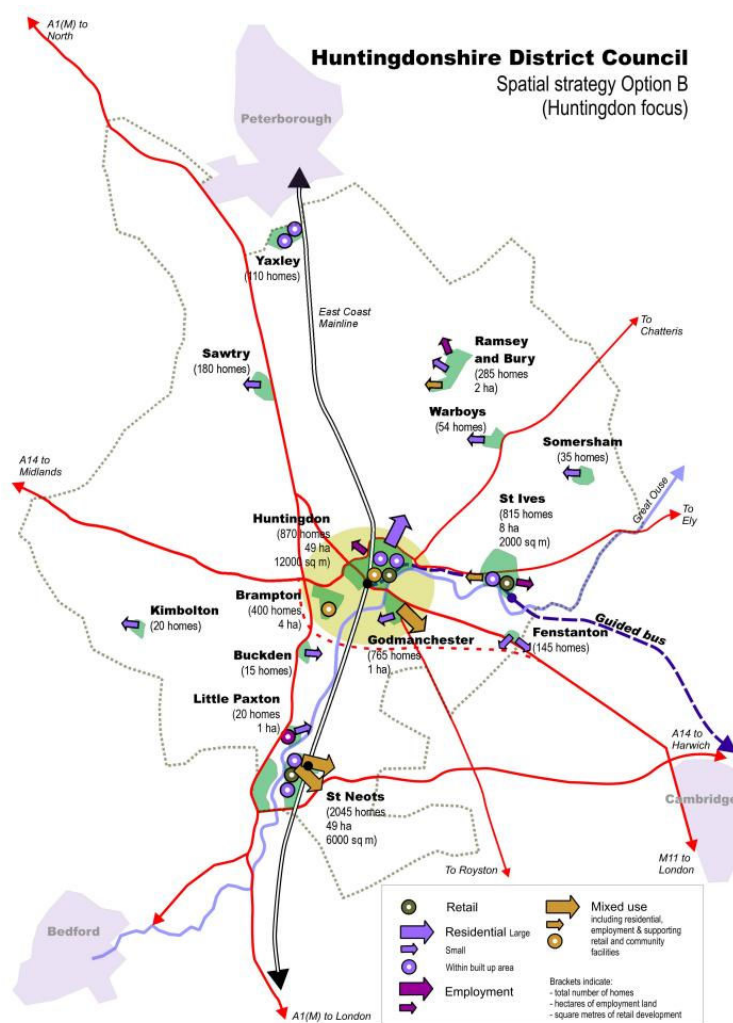


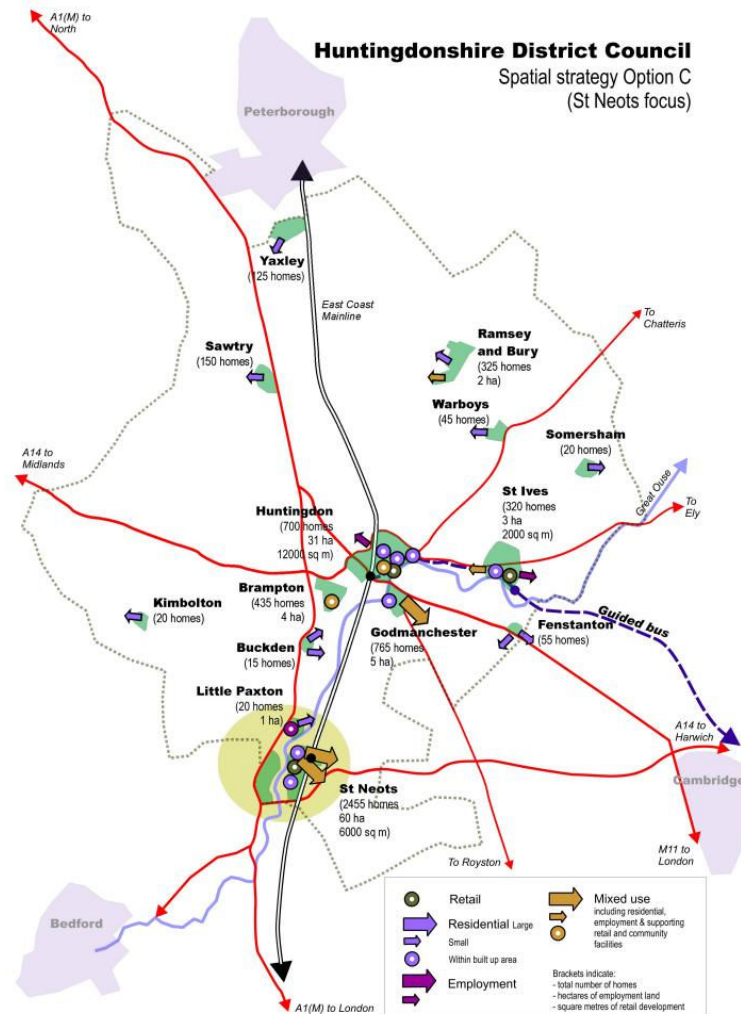
Table 4 Distribution of Development for the St Neots Area Focus Option

Settlement	Housing Provision (Dwellings)	Employment Provision (ha)	Retail Comparison Floorspace Provision (sqm)
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# The Spatial Strategy

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<b>Huntingdon Area</b>	<b>1220</b>	<b>40</b>	<b>9,000</b>
Huntingdon	680	36	9,000
Godmanchester	140	-	-
Brampton	400	4	-
<b>St Neots Area</b>	<b>3220</b>	<b>65</b>	<b>9,000</b>
St Neots	3210	64	9,000
Little Paxton	20	1	-
St Ives	315	3	2,000
Ramsey and Bury	240	2	-
Buckden	15	-	-
Fenstanton	55	-	-
Kimbolton	25	-	-
Sawtry	150	-	-
Somersham	35	-	-
Warboys	55	-	-
Yaxley	110	-	-
<b>Total</b>	<b>5450</b>	<b>110</b>	<b>20,000</b>



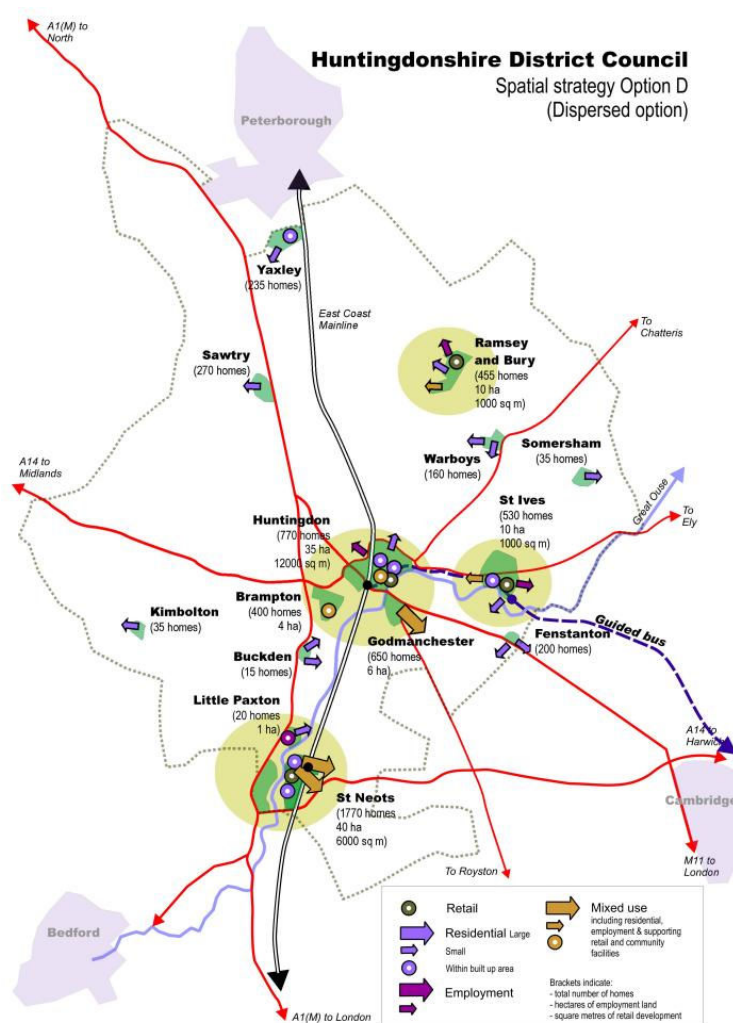
**Table 5 Distribution of Development for the Dispersed Option**

Settlement	Housing Provision (Dwellings)	Employment Provision (ha)	Retail Comparison Floorspace Provision (sqm)
<b>Huntingdon Area</b>	<b>1410</b>	<b>46</b>	<b>12,000</b>
Huntingdon	870	42	12,000
Godmanchester	140	-	-
Brampton	400	4	-
<b>St Neots Area</b>	<b>1745</b>	<b>46</b>	<b>6,000</b>
St Neots	1725	45	6,000
Little Paxton	20	1	-
St Ives	525	8	1,000

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Ramsey and Bury	510	10	1,000
Buckden	75	-	-
Fenstanton	135	-	-
Kimbolton	50	-	-
Sawtry	270	-	-
Somersham	35	-	-
Warboys	190	-	-
Yaxley	235	-	-
<b>Total</b>	<b>5450</b>	<b>110</b>	<b>20,000</b>



## **Towards a Spatial Strategy - Options for Additional Growth**

Recent government guidance has urged local planning authorities to consider going beyond the level of growth advocated in the emerging RSS where need and demand for housing are high. Towards a Spatial Strategy considered three options for additional growth. These focused on provision of extra housing assuming that commensurate growth in employment and retailing would follow.

### *Enhanced Growth in the St Neots Area*

This option supplemented the St Neots Area Focused Growth option with a further 1,000 homes to the east of the town.

### *Enhanced Growth in the Cambridge Sub-region*

This option supplemented the Cambridge Sub-region focused growth option with a further 1,800 homes in the Huntingdon and St Neots areas and in the Key Service Centres within the Cambridge sub-region.

### *A New Eco-town*

This option saw growth in any one of the spatial options considered coupled with a new eco-town at either Alconbury or Wyton airfields. Use of Wyton airfield could result in an increase from 5,450 new homes in the District to 12,000. Use of Alconbury could see an increase to 15,000 new homes. Both choices would involve delivery of homes extending beyond the 2026 plan period.

## **Summary of Initial Sustainability Appraisal for Towards a Spatial Strategy**

**.14** Both the Huntingdon Area focused growth and St Neots Area focused growth scored consistently well in the appraisal process. Although the St Neots Area focused growth directs large scale growth towards greenfield land, this is in the most sustainable location and would facilitate the provision of social and physical infrastructure. These options were also less affected by flood risk than the other options. Both options direct employment and retail growth towards areas with strong market demand and in both options the status of Huntingdon, as the principal town, in the District can be enhanced and its competitiveness against the higher order centres of Cambridge, Peterborough and Bedford is improved.

**.15** The Cambridge-Sub Region focus is constrained by flood risk and the identification of some locations in St Ives were considered to pose an unacceptable flood risk. The Dispersed option is considered to be the least sustainable of all the options as growth would be directed towards settlements with a reduced range of services and transport infrastructure compared to market towns and would possibly increase car dependency.

**.16** The appraisal of the additional options for growth showed that the options for enhanced growth in the Cambridge-Sub Region and St Neots area scored consistently higher than the Eco Town option. However, key sustainability issues that were raised within the Cambridge Sub-Region and St Neots area options were the flood risk posed for the former option and the potential integration issues raised from major growth towards greenfield land in St Neots. It was considered that the Eco Town option, although providing significant opportunities for housing and employment provision, would require substantial new infrastructure provision. As there are other, potentially more sustainable locations outside the District that can accommodate large scale growth, it is considered that this option requires consideration at a wider forum.

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## Key Stakeholders' Responses

.17 The Cambridge sub-region focused growth option gained qualified support from 5 out of 17 respondents who thought it offered the most balanced option and would maximise the use of existing infrastructure and services. The main concerns expressed over this option were flooding, especially in St Ives, and the spread of development resulting in contributions to infrastructure being diluted.

.18 The Huntingdon area focused growth option received qualified support from 8 out of 21 respondents. They considered it to offer a central location in the District with good and improving communication links and to respond best to market preferences for employment and retail growth. The main concerns expressed were over the environmental capacity of the local area to absorb more growth and congestion implications.

.19 The St Neots area focused growth option received qualified support from 7 out of 18 respondents who thought it was most likely to deliver a sustainable new neighbourhood with good local services, employment and infrastructure. The main concerns were the high reliance on use of greenfield land and the limited scope for additional development in St Neots town centre.

.20 The Dispersed growth option received qualified support from 7 out of 19 respondents who generally believed it would reduce the impact of development on any one existing settlement. The main concerns expressed were that this option offered a more or less sustainable approach to development depending on the respondents viewpoint and that the shortage of rural employment opportunities would result in this option giving rise to greater dependency on car transport.

.21 Regarding the options for additional growth that proposed enhanced growth in the St Neots area obtained qualified support from 7 out of 13 respondents. The option proposing enhanced growth in the Cambridge sub-region was only supported by 2 out of 11 respondents. 5 out of 12 respondents considered there to be some merit in exploring the option of a new eco-town either in addition to or instead of other options with Alconbury being favoured over Wyton. However, concerns were expressed about this being progressed outside the RSS process.

### Assessment of Responses and Alternative Approaches

Although a number of variations to the original Spatial Planning Areas were suggested there was no consistent justification for any of the suggestions.

The SHLAA has identified limited brownfield land availability in the four largest towns. Restricting the identification of strategic directions for growth only to locations within and around these settlements would limit the opportunity to maximise the re-use of brownfield sites which are located within the spatial planning areas but outside the market towns. Therefore, the alternative considered would not represent the most efficient use of land.

It was therefore decided that the Spatial Planning Areas should remain unchanged. However, it was considered important to be clearer about the implications of the designations.

The principle of identifying clear directions of growth was strongly supported in the initial consultation phase and this was carried through into the presentation of further options in Towards a Spatial Strategy to help provide certainty. Support was expressed for allowing some development in Key Service Centres to help maintain their role and directions of growth were put forward in the further options.



The four main options presented in Towards a Spatial Strategy took into account the policies of the then emerging East of England Plan, which set out an order of preference for locating development in the Cambridge sub-region focusing on land within or on the peripheries of the sub-region's market towns and within key services centres (or on their peripheries), after land within or on the edge of Cambridge and the new town of Northstowe.

All options were based on the housing requirements set out in the emerging East of England Plan up to 2021 and the need to ensure a 15 year supply of housing land after adoption of the DPD as required in PPS3.

Capacity figures for potential housing developments have been identified through the preparation of a Strategic Housing Land Availability Assessment. This was considered necessary to determine whether delivery of the options could reasonably be achieved. The options identified mainly concentrate housing development in the Market Towns and their immediate neighbouring settlements as alternative ways of sustainably accommodating the required growth. A dispersed option was also included in response to known concerns over maintaining the viability of services in villages and anticipated representations proposing development sites in village locations either in response to consultation on the Core Strategy or future consultation on the Planning Proposals DPD.

The Cambridge Sub-region option was considered to have significant merits in terms of a balanced distribution of growth and market attractiveness to help ensure delivery. This option relies heavily on a high proportion of small sites. This will reduce opportunities for substantial contributions to infrastructure improvements, may undermine achievement of targets for affordable housing and renewable energy/ energy efficiency as these are likely to be applicable above certain thresholds. In addition, following further consultation with the Environment Agency it was concluded that a number of potential locations in St Ives were unlikely to be deliverable due to unacceptable risk of flooding. This option was not considered to be the most sustainable and could not be implemented fully.

The Huntingdon Area option was considered to have significant merits, in particular its market attractiveness for employment and retail growth. This option would make use of all known capacity in the Huntingdon area, some of which would be less sustainable than locations elsewhere in the District. A major constraint on this option is the potential impact of traffic generated from this volume of development on the A14 prior to its intended upgrade, or the need to delay significant volumes of development until after this is completed. Following consideration of the environmental capacity of the local area to cope with more growth and congestion the option was rejected as it could not be implemented fully within a reasonable timeframe.

The St Neots Area option was considered to have significant merits not least of all for the potential to master plan a significant extension to the town and the opportunities to ensure comprehensive service provision. Focusing development in St Neots, the southernmost of Huntingdonshire's Market Towns, would further perpetuate the distinction between this area and north and west Huntingdonshire. A particular challenge for this option would be delivery of the level of employment growth included given the market preference for Huntingdon locations indicated in the Employment Land Review. The concerns expressed by respondents about reliance on a small range of greenfield locations were not considered to be insurmountable, but would affect phasing of the strategy if this option were selected.

The Dispersed Option was considered to be generally less sustainable than other options considered, mainly due to greater dependency on car transport. As detailed above for the Cambridge Sub-region, locations in St Ives were discounted due to unacceptable risk of flooding. The Dispersed Option could not be implemented fully and it was discounted due to concerns about how environmentally sustainable the option would be.

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It was considered that aspects of all options except the Dispersed Option would, if carefully phased, be the best combination in terms of sustainability, impact on infrastructure and the environmental capacity of the District. Therefore, this approach was progressed in the Preferred Options.

The additional options for growth generated little consensus although St Neots was favoured over spreading growth across the Cambridge sub-region. There was also a limited amount of support for exploring the possibility of an eco-town with some respondents seeking this as an alternative to any of the options put forward. Given the scale and infrastructure implications of developing an eco-town this is not considered to be a viable alternative for the Core Strategy. It will need to be considered through the wider arena of the RSS review to ensure the most sustainable locations for the potential scale of growth is determined in the regional context.

## Core Strategy Preferred Options

### Wording put Forward for Participation on the Preferred Options

The Huntingdon Spatial Planning Area includes Huntingdon, Brampton and Godmanchester which have a clear physical and functional relationship. Together these settlements have around 31,000 residents (2005). The majority of services and facilities are concentrated in Huntingdon but are accessible to Godmanchester and Brampton by public transport, cycling and walking. The area is a key driver of the local economy, particularly in the retail, leisure and office based sectors. The Housing Land Availability Study (HLAS) identified significant opportunities for development, including previously developed land west of the town centre and at RAF Brampton. The realignment of the A14 and proposed removal of the viaduct over the railway will help facilitate development opportunities after 2015.

The St Neots Spatial Planning Area includes St Neots and Little Paxton and had a combined population of around 31,200 in 2005. Little Paxton has its own distinctive identity and is physically separated from St Neots by the River Great Ouse. However, the key concentration of services and facilities of St Neots town centre are as close to Little Paxton as to many parts of the town itself. Along with land in Bedfordshire around Wyboston, the area is also a key driver of the local economy particularly for the manufacturing and warehousing and distribution sectors. The HLAS identified that this area offers significant opportunities for development especially through the creation of a large sustainable urban extension to the east of the town. The capacity of the A428 is an issue until the section between the A1 and Caxton Gibbet is upgraded to a dual-carriageway.

The St Ives Spatial Planning Area includes the town of St Ives and development at London Road just south of the town in the parishes of Hemingford Grey and Fenstanton. This area is smaller in scale than Huntingdon and St Neots with a population of just under 16,000 in 2005. The area has enjoyed recent employment growth, particularly to the east of St Ives and has a relatively small but thriving retail sector. It offers fewer opportunities for sustainable development options. Flooding is a major constraint to the south of the town. St Ives will see significant improvement in accessibility with the completion of the guided bus route.

The Ramsey Spatial Planning Area includes Ramsey, Bury and part of RAF Upwood, but excludes the small villages of Ramsey Forty Foot, Ramsey Heights, Ramsey Mereside and Ramsey St Marys. The population was around 8,000 in 2005. The town serves as a focal point for a significant rural community. Ramsey has

relatively poor transport infrastructure as it is well off the main road network and is relatively remote and has more limited services and facilities than the other three areas. These factors combine to make this a significantly less sustainable location than the other three spatial planning areas.

## Policy Wording put Forward for Participation on Preferred Options

At least 5450 homes will be provided before 2026 at a rate of at least 550 per year. Of these at least 1575 homes will be on previously developed land and about 3875 homes on greenfield land. About 2150 will be provided as affordable housing. Provision will be monitored regularly and the release of locations will be managed and phased during the plan period with the aims of meeting identified needs and demand and maintaining sufficient supply of deliverable sites.

As part of the overall development strategy to concentrate the majority of growth in the Huntingdon and St Neots Spatial Planning Areas, it is proposed that strategic housing growth will be located:

In the Huntingdon Spatial Planning Area where at least 1800 homes will be provided. Of these, at least 1000 homes will be on previously developed land, about 800 homes will be on greenfield land and about 700 homes will be affordable. Provision will be in the following general locations:

In a significant mixed use redevelopment in the area west of the town centre covered by the Huntingdon West Area Action Plan and redevelopment of previously developed land within the built up area of Huntingdon;

In Brampton on previously developed land; and

In Godmanchester as part of a significant mixed use development to the south east/east after the A14 road improvements have been implemented and on greenfield land to the south west.

In the St Neots Spatial Planning Area where at least 2600 homes will be provided. Of these at least 150 homes will be on previously developed land, about 2450 homes will be on greenfield land and about 1050 will be affordable. Provision will be in the following general locations:

In the first phase of a significant mixed use urban extension on greenfield land to the east of the town and as redevelopment of previously developed land within the built up area of the town; and

In Little Paxton where a small number of homes will be developed.

In the St Ives Spatial Planning Area where at least 500 homes will be provided. Of these, at least 100 homes will be on previously developed land, about 400 homes will be on greenfield land and about 200 will be affordable. Provision will be in the following general locations:

In a significant greenfield development to the west of the town; and

In the redevelopment of previously developed land within the built up area of the town.

In the Ramsey Spatial Planning Area where at least 300 homes will be provided. Of these at least 250 homes will be on previously developed land, about 50 will be on greenfield land and about 100 will be affordable. Provision will be made in the following general locations:

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In an employment led mixed use redevelopments to the west of the town, to the north of the town and as development of land within the built up area of the town.

Outside the Spatial Planning Areas, in the Key Service Centres of Fenstanton, Sawtry and Yaxley, about 250 homes will be provided. Of these at least 75 homes will be on previously developed land, about 175 will be on greenfield land and about 100 will be affordable. Provision will be made in the following general locations:

On land within the built up area and on land to the east and south of Fenstanton;

On land to the west of Sawtry; and

On previously developed land within the built up area of Yaxley.

## Reasonable Alternatives

.22 Consultation responses tended to focus on promoting individual sites or locations for development. No fundamentally different strategies were put forward. However, some concern was expressed that no clearly defined allowance was made in the policy for non-implementation or delayed delivery. A proposal was put forward that 10% be added to the 5,450 new homes sought which would result in the policy proposing at least 6,000 new homes.

## Summary of Highway Impacts Assessment

.23 Atkins were commissioned to undertake an assessment of the potential highway impact of the four options put forward in Towards and Spatial Strategy and the Preferred Option. The detailed report is submitted as part of the evidence base (Atkins - Huntingdonshire Spatial Strategy Options Assessment, 2008). The assessment modelled transport scenarios at 2025 assuming that the new A14 alignment is in place by then but with variations to account for the A14 Huntingdon viaduct both being removed or left in place. There are certain parts of the highway network that are expected to experience delays at 2025 before any of the growth associated with the Core Strategy is included. These include:

- the approach roads to St Neots
- northbound on the A1 at Buckden
- B1090 between the A1 and A141
- Kings Ripton Road approach to Huntingdon
- A1123 approach to Huntingdon
- A141 approach to Huntingdon

.24 With the additional trips associated with the Core Strategy in all five options considered it is these areas of the network that are expected to see the greatest impact and an increase in delays. All the options added delay to the network and in terms of delays no single option stands out as the 'best case' across the network, there are positive and negative aspects to each. A comparison of where on the network there is likely to be an increase in link delay as a result of the additional trips associated with each option has demonstrated that Options A, B,C and D each cause an increase in delay in some part of the network that is worse than any other option. For each of the locations analysed one of the alternative options always generates a greater increase in delay than the Preferred Option. In some areas of the network the Preferred Option performs better than all of the other four options.

.25 The total travel time and vehicle kilometre indicators demonstrate that Option D will generate the most external trips within the traffic network and that Option C has the least impact. However, Option C has the greatest impact on the trunk roads. Again these indicators have shown that there are positive and negative aspects to each option. However, the Preferred Option is relatively consistent in its ranking in the middle of the five options.

.26 The results of the Assessment do not identify a clear best option for the distribution of growth in the Core Strategy. However, in drawing comparisons between the performance of each option it is clear that the Preferred Option performs no worse than any of the other options. Indeed, in some cases the Preferred Option performs better than the alternatives.

## Summary of Draft Final Sustainability Appraisal

.27 All spatial planning areas are considered sustainable with the majority of the SA Objectives being met in a positive way. Growth is directed towards the most sustainable locations, with all available brownfield land used and where greenfield development is necessary, it is achieved in the most sustainable locations in the District. Strategic growth in any of the spatial planning areas will impact upon biodiversity and green infrastructure. Any form of development will have an impact on biodiversity – even in brownfield locations which often sustain high levels of biodiversity. It will be important to ensure that any potential negative impacts are minimised and mitigated against. However, development will also provide opportunities to enhance biodiversity through, for example, design and landscaping. Similarly, the provision of cycle routes, footpaths and bridleways is an important part of Green infrastructure and provides ways to mitigate against habitat fragmentation. Accessibility to key destinations such as a hospital is slightly reduced in the St Neots Spatial Planning area as the town does not have its own hospital, similarly, St Ives does not have a hospital although in the medium term, once the Guided Busway is complete, accessibility to Hinchingsbrooke Hospital will be improved. Pressure may be placed on existing primary services, in all scenarios, although if development is of a sufficient scale it will generate the provision of additional services.

## Summary of Appropriate Assessment

.28 The findings of the Appropriate Assessment concluded that because of the number of homes delivered through the strategic housing policy and settlement hierarchy policies it is not possible to state that the policies would not contribute cumulatively to recreational pressure on Portholme SAC to a damaging degree.

.29 With the re-routing of the A14 it has been concluded that the levels of traffic on the road past Portholme can be expected to decrease or at least remain the same with the new development proposed in policies 2 (strategic housing development), 3 (settlement hierarchy), 7 (employment), 8 (retail) and 10 (infrastructure requirements). It is concluded that the criteria set out in policy 1 sustainable development means that the Core Strategy contains all the measures necessary to ensure that it has done all it can to reduce the likelihood of adverse effects on Portholme.

.30 The AA is unable to state that the Core Strategy is unlikely to have a significant adverse effect on Portholme as a result of increased water abstraction from the River Ouse to service new housing as no standards are proposed against which minimisation of water can be measured.

## Consultation Responses

.31 The Spatial Planning Areas have been identified from evidence in the Strategic Housing Land Availability Assessment which identifies where potential land is located. Their identification has also been informed by the Village Facilities Survey that was carried out as part of preparation for the Settlement Hierarchy Background Paper. Within the Spatial Planning Areas the main focus for growth is within the built up area on brownfield land followed by strategic greenfield sites on the periphery of urban areas. Smaller settlements such as Brampton and

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Godmanchester have been included within the Huntingdon Spatial Planning Area and Little Paxton within the St Neots Spatial Planning Area. These smaller settlements have been included on the basis of their functional relationships to the Market Towns and their proximity to a wide range of accessible services and facilities.

.32 Some respondents thought that there was a over concentration on development occurring in the Huntingdon and St Neots Spatial Planning Areas and considered that other Spatial Planning Areas and Key Service Centres could sustainably accommodate more growth.

.33 Policy wording 2 sets out the Council's preferred locations for strategic housing development and includes details on where this is to be located. It generated a very high response rate with 119 responses in total. Of these, around 80 indicated that they opposed the policy, this equates to about 67% objecting to the policy as it is currently worded. Some respondents did identify minor word changes that were needed in order to make it more sustainable. However, a vast majority of responses raised a number of issues which have been taken into account in the submission Core Strategy. A significant number of representations made reference to the fact that the relationship between the strategic housing policy (P2) and the settlement hierarchy (P3) is not clear. A clearer explanation was sought on how the Spatial Planning Areas and Key Service Centres had been identified and how the Council had identified the levels of growth proposed in each area. A number of objectors also considered that the assessment of alternatives in Volume 2 was inadequate and needed a better explanation of how these alternative options had been identified and why they had been rejected. A number of respondents considered the evidence on which the Council is basing their housing requirements on to be inadequate and proposed that the Council should be planning for high levels of housing growth. Related to this, a number of respondents also suggested that more explanation needs to be given on how the Council has derived its figures with detailed information on, for example, existing commitments and allocations within the policy. Further clarification on the delivery of some sites was also sought, with a general consensus for more information on the phasing and timing of development.

.34 There were a number of representations which promoted specific sites and a number of comments gave detailed information about these particular sites. It was apparent that people were confused about the level of growth that is proposed for Little Paxton as it is referenced in policy wording 2, yet no indicative arrow is provided on the key diagram. People also sought more growth in particular settlements with a number of respondents suggesting that more growth in St Ives is needed because of the guided busway. Others suggested that more growth is needed in Ramsey to stimulate regeneration - however a number of respondents did oppose the level of growth in Ramsey purely because of the lack of infrastructure that the town has and its location outside of the Cambridge Sub-Region. Similar arguments were presented for Sawtry, with some respondents supporting the growth proposed and suggesting that more can be accommodated, whilst others objected to the level of growth proposed. A number of respondents also commented on growth proposed to the south east of Godmanchester. Again, comments on this site were mixed, with some supporting it and others arguing that it is unsustainable.

.35 Consultation responses indicated that there had been insufficient consideration given to how the alternatives had been identified and why they had been rejected. Issues that were also raised through consultation concerned a lack of clarity over how policy wording 2 and policy wording 3 relate and that more information needs to be given on how the levels of proposed growth were arrived at as well as existing commitments. The reasonable alternatives assessed below concern how the policy can be strengthened.

## Assessment of Responses and Alternative Approaches

As a result of representations made for preferred options consultation the Council has sought to strengthen the existing strategic housing development policy. It is acknowledged that insufficient information on the evidence base that underpins this policy was given for Preferred Options and that the information given on existing commitments was not clear enough. This has been addressed within the strategic housing development policy in the Submission Core Strategy.

The overall target figure of 5,450 is put forward as a minimum in accordance with the approach in the RSS therefore it is not considered necessary to increase the requirement. As the SHLAA has identified more than adequate sites to ensure delivery of this number no allowance is made for windfall sites in accordance with PPS3. It is reasonable to expect that small sites will continue to come forward through normal planning application processes and will add to the total number of new homes delivered.

To clarify the reasons why reasonable alternatives have been rejected further details have been incorporated within this volume and in the draft Final Sustainability Appraisal. The Council maintains that the strategic housing development policy put forward in the submission Core Strategy is the most sustainable for the District. The Issues and Options consultation undertaken by the Council was comprehensive and looked at all the reasonable alternatives that were available to the Council. It has been made clear how the Issues and Options consultation has informed preparation of the Preferred Options in the draft Final Sustainability Appraisal. This volume sets out further information on how the Preferred Options consultation has informed preparation of the Submission Core Strategy. It should be read alongside the Final Sustainability Appraisal which also outlines how the consultation process has influenced plan preparation.

## Changes Made

Further information on how Key Service Centres have been identified has been included in the supporting text which responds to a number of concerns that too much emphasis has been placed on urban areas.

The policy wording has been amended to identify clearly the number of completions from 2001-2006 and from 2006-2026 the number of dwellings that have either full or outline planning permission as well as the number of dwellings that will come from existing Local Plan allocations. It also sets out the total number of homes that the District will be providing from 2001-2026. This was in response to concerns that insufficient information regarding existing commitments had been included and that the Council were planning for too few homes. The policy also clearly sets out the number of homes that will be provided on previously developed land and those to be provided on greenfield land. The reference to Little Paxton has been removed.

The supporting text has been enhanced to explain the role of the SHLAA in identifying potential capacity and continuing contribution of small and moderate scale developments. In addition a clearer definition of the built up area is given.

## Tests of Soundness

**.36** There are a number of uncertainties that have been taken into account which centre around the availability of locations for development. A number of locations are dependant on decisions concerning the redundancy of military bases, while others are dependant on changes to the A14 and the local road network. The Preferred Approach is considered to be sufficiently flexible that these uncertainties will not undermine delivery of the objectives in this policy area.

**.37** Go East did not comment on policy wording 2.

## Approach Taken

**.38** The approach taken is detailed in Volume 1 on page x.

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## Settlement Hierarchy

**Table 5 Key Sources for the Settlement Hierarchy**

National	PPS1: Delivering Sustainable Development PPS1 Supplement: Planning and Climate Change PPS3: Housing PPS7: Sustainable Development in Rural Areas
Regional	East of England Plan
Local	Housing Land Availability Study (HLAS) (2007) updated and adapted to form Strategic Housing Land Availability Assessment (SHLAA) (2008) Settlement Hierarchy Background Paper Update (2007) Huntingdonshire Community Strategy (2004) Sustainable Community Strategy for Huntingdonshire (2008)

## Core Strategy Issues and Options

### Issues and Options Identified for Consultation

Issue 5: The need to define an appropriate settlement hierarchy to manage non-allocated growth in different types of location.

Option 9: The Core Strategy will need to identify a settlement hierarchy for use in determining the scale of non-allocated development appropriate in different locations.

The hierarchy could:

- identify Huntingdon, St Neots, St Ives and Ramsey and Bury as 'Market Towns'
- identify Brampton, Buckden, Fenstanton, Godmanchester, Kimbolton, Little Paxton, Sawtry, Somersham, Warboys and Yaxley as 'Key Service Centres'
- List other villages as 'Smaller Settlement'

Question 8: Do you agree with the overall approach taken to the settlement hierarchy?

Question 9: Do you agree with the identification of Huntingdon, St Neots, St Ives and Bury as 'Market Towns'?

Question 10: Do you agree with the identification of Brampton, Buckden, Fenstanton, Godmanchester, Kimbolton, Little Paxton, Sawtry, Somersham, Warboys and Yaxley as 'Key Service Centres'?

### Issues and Options Identified for Consultation

Issue 9: To identify the appropriate scale of housing permissible on unallocated sites to ensure development is concentrated in sustainable locations.

Option 28: Policies will define the scale of housing development of different types. This could be defined as:



- Major development: 60 or more dwellings
- Moderate development: 10-59 dwellings
- Minor development: up to 9 dwellings
- Residential infilling: development of a small site within the built-up framework or defined limits of a settlement by up to three dwellings.

Option 29: Policies need to define the location of development of differing scales. This could be that housing development on unallocated sites could be limited to the following:

- within the defined limits of Market Towns: major, moderate and minor housing development, and residential infilling
- within the defined limits of Key Service Centres: moderate and minor housing development, and residential infilling
- within the built-up framework of Smaller Settlements: residential infilling
- within the countryside: limited and specific forms of housing development with an essential need to be in the countryside

Question 32: Do you agree with the four categories suggested for scale of housing growth?

Question 33: Should any other categories be considered and if so, what should these be

Question 34: Do you agree with the level of development permissible in:

- a. Market Towns;
- b. Key Service Centres;
- c. Smaller Settlements; and
- d. the countryside?

Question 35: Should minor development proposals of up to 9 dwellings be permitted in Smaller Settlements where it can be demonstrated that the settlement concerned offers at least a basic range of services and public transport appropriate to the form of the housing to be provided and it secures the most sustainable solution for the site?

Question 36: Are there any other options that should be considered?

## Reasonable Alternatives

**.39** The hierarchy could be changed in a number of ways to facilitate a wider or more restricted distribution of growth. This was an issue which raised significant responses to consultation on the original submitted Core Strategy (April 2006). Various suggestions have been raised involving more or less different categories within the hierarchy. A significant alternative is the previously proposed distinction between two categories of Key Centre in an attempt to distinguish further between additional growth and ease of access to shops, services and employment facilities.

**.40** A further alternative is to base the settlement hierarchy on the physical capacity of different settlements to accommodate growth, taking into account their form, character and land availability, rather than access to services and facilities. However, this would not ensure that national and regional policies to reduce the need to travel are being addressed most effectively.

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.41 In the previously submitted Core Strategy just three categories of housing development were proposed: major - 10 or more dwellings, minor - up to 9 and infill up to 3. This could be simpler to interpret, but allows less flexibility. A significant number of representations opined that the major category was too broad and the minor category too restrictive. However, the definitions of each category could be changed in many different permutations.

.42 The previously submitted Core Strategy proposed two categories of Key Centre and allowed for major development proposals in the larger of these. This made no distinction between the scale of development permissible in Market Towns and the six largest Key Centres. A greater amount of development could be permitted in Key Service Centres by allowing major housing schemes and in Smaller Settlements by allowing minor housing schemes in some or all of them. Either approach would lead, particularly in the case of allowing major development in KSCs, to a more dispersed form of development contrary to strategic policies which require most new housing to be located in larger settlements. There is no evidence, particularly for minor development that greater dispersal would have a significant effect in retaining village facilities, and additionally it would be likely to increase the need to travel. Encouragement of greater levels of development in the countryside would be contrary to national guidance.

## Summary of Initial Sustainability Appraisal of Issues and Options

.43 Option 9 outlines a hierarchy of settlements based on current size and accessibility to existing services and amenities. This option ensures that growth is located in the most sustainable locations and is consistent with national and regional guidance to reduce the need to travel. It directs growth towards town centres which will promote their viability and vitality.

.44 Two reasonable alternatives were proposed. The first proposes additional development in rural areas by designating more growth centres. This could contribute to affordable housing provision where there is a need and promote employment opportunities for rural areas. However, it could lead to growth being spread out too thinly which may affect settlement character and dispersed growth may generate more car dependency.

.45 The second reasonable alternative proposes that the settlement hierarchy could be based on the physical capacity of settlements to accommodate growth rather than access to services and facilities. This was considered the least sustainable in terms of reducing the need to travel as it only takes into account the physical capacity of settlements to accommodate growth - not access to services and facilities.

.46 Option 9 was considered to be more sustainable than the reasonable alternatives.

.47 Defining the scale of housing growth in terms of major, moderate, minor and infill was considered to be more flexible in relating the scale of housing development to the settlement hierarchy and therefore able to facilitate better integration of new development with the existing built form. This option was favoured over the reasonable alternative which proposed a more limited number of categories.

## Consultation Response to Issues and Options

.48 There was general support for the preferred approach and a recognition of the need to include a settlement hierarchy in the Core Strategy. There was also support for the suggestion of a single category of Key Service Centre, removing the previous distinction between potential and limited growth. Most objections related to requests to move particular villages into the potential Key Service Centres category. Examples cited include Stilton, Farcet and Earith.

.49 There was a considerable amount of uncertainty about the definition of scales of growth to guide suitability in specific types of location. A number of respondents did not see a distinction between the scale of growth that is allocated and that which would be considered acceptable from windfall development. It was thought by a number of respondents that the levels were arbitrarily drawn up. Others raised concerns about situations that might arise

where sites that would generally be considered suitable for a level of development were just above that which was proposed as appropriate for the location. Although the responses were varied there was support for the principle of setting levels of development for different locations.

## Assessment of Responses and Alternative Approaches

**.50** The definition of Key Service Centre was taken from the emerging East of England Plan. This makes no allowance for the alternative approach of distinguishing between settlements with different levels of services and facilities as put forward in the alternative approach. The Settlement Hierarchy background paper indicates a clear distinction in the level of services and facilities available in the villages suggested to be Key Service Centres than in others. Although there is some variation in this it can be addressed through consideration of a particular Key Service Centre's potential for strategic growth.

**.51** It was considered that the variation in responses to consultation indicated that the levels identified were about right. The uncertainty, however, showed that it would be important to explain more clearly how the scales of growth would work with the other parts of the Spatial Strategy. To facilitate a clearer explanation it was decided to combine the scales of growth with the Settlement Hierarchy.

**.52** To enable a better response to site specific circumstances and to reflect the variation in the level of services and sustainability of the many villages in the Smaller Settlements category, greater flexibility needed to be introduced.

## Core Strategy Preferred Options

### Policy wording put Forward for Participation on Preferred Options

The hierarchy identifies:

Huntingdon, St Neots, St Ives and Ramsey and Bury as 'Market Towns' in which development schemes of large, moderate and minor scale will be appropriate;

Brampton, Buckden, Fenstanton, Godmanchester, Kimbolton, Little Paxton, Sawtry, Somersham, Warboys and Yaxley as 'Key Service Centres' in which development schemes of moderate and minor scale will be appropriate

The following villages as 'Smaller Settlements';

Abbotsley, Abbots Ripton, Alconbury, Alconbury Weston, Alwalton, Bluntisham, Brington, Broughton, Buckworth, Bythorn, Catworth, Chesterton, Colne, Conington, Covington, Diddington, Earith, Easton, Ellington, Elton, Farcet, Folksworth, Glatton, Grafham, Great Gidding, Great Gransden, Great Paxton, Great Raveley, Great Staughton, Great Stukeley, Hail Weston, Hamerton, Hemingford Abbots, Hemingford Grey, Hilton, Holme, Holywell, Houghton and Wyton, Keyston, Kings Ripton, Leighton Bromswold, Little Stukeley, London Road (St Ives)<sup>(2)</sup>, Molesworth, Needingworth, Offord Cluny, Offord D'Arcy, Oldhurst, Old Weston, Perry, Pidley, Pondersbridge (part)<sup>(3)</sup>, Ramsey Forty Foot, Ramsey Heights, Ramsey Mereside, Ramsey St Mary's, Southoe, Spaldwick, Stibbington, Stilton, Stonely,

- 2 The built up area adjoining London Road to the south of St Ives, and lying within the parishes of Fenstanton and Hemingford Grey
- 3 The greater part of this settlement lies within the neighbouring Authority (Fenland)

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Stow Longa, Tilbrook, Toseland, Upton, Upwood, Wansford (part)<sup>(4)</sup>, Waresley, Water Newton, Winwick, Wistow, Woodhurst, Woodwalton, Wyton-on-the-Hill, and Yelling; in which residential infilling will be appropriate. In exceptional circumstances, development schemes of minor scale may be allowed where it can be demonstrated that the settlement concerned offers at least a basic range of services and public transport appropriate to the form of the housing to be provided and it secures the most sustainable solution for the site;

All other areas as part of the countryside, including those hamlets and isolated groups of buildings where nearly all services and facilities must be accessed in higher order settlements. In this tier residential development will be limited to that which has an essential need to be in the countryside.

The scale of housing development schemes is defined as:

Large scale development: 60 or more dwellings

Moderate scale development: 10-59 dwellings

Minor scale development: up to 9 dwellings

Residential infilling: up to 3 dwellings

## Reasonable Alternatives

**.53** Responses to consultation on the Preferred Options indicated that there was insufficient detail given as to how housing categories have been identified and settlements have been positioned in the hierarchy. The following reasonable alternatives have been identified and are discussed in more detail below:

- A distinction made between more or less sustainable key service centres, with more sustainable centres being able to accommodate a greater level of growth
- A criteria based policy based on the services available within the settlement
- Different scales of housing development including more scales or fewer scales

## Summary of Draft Final Sustainability Appraisal

**.54** This policy approach aims to steer development towards those locations where it will improve the sustainability and vitality of communities in proportion to their size and accessibility. Implicitly it aims to improve the attractiveness of the largest centres to reduce the loss of services and employment to Peterborough and Cambridge.

## Summary of Appropriate Assessment

**.55** This policy could not be screened out due to the impact of new housing development partially delivered through this policy. Although not referenced in relation to any one particular site, it is considered that the cumulative effects arising from this and other policies could result in significant effects on some of the sites assessed.

## Consultation Responses

**.56** The proposed policy generated a high response rate with 83 in total. Of these roughly 66% clearly objected to some aspect of the policy. There was broad support for the designation of the four Market Towns and for the principle of having Key Service Centres. However, there were varied opinions over which settlements should qualify for Key Service Centre status. In particular, a number of respondents objected to the inclusion of Fenstanton,

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4 The greater part of this settlement lies within the neighbouring Authority (Peterborough)

Warboys and Buckden as Key Service Centres. Others suggested that other settlements, particularly Hemingford Grey, Holme and Great Gransden, should be designated Key Service Centres. Furthermore, a number of respondents also suggested that the Key Service Centres be subdivided according to their accessibility to services and size, and that those which are more sustainable be permitted more growth.

**.57** A recurrent theme raised was the lack of explanation provided for the scale of housing growth categories with concerns that they were arbitrary and overly restrictive. Allied to this were comments that differing levels of growth should be allowed in different smaller settlements according to their individual level of services and accessibility to higher order centres. There was quite significant support for greater flexibility for developments of up to 9 homes in smaller settlements to respond to site specific circumstances.

**.58** Another issue that was raised concerned the proposed deletion of settlement boundaries. Although this issue is not specifically referred to in policy wording 3 and will be dealt with within the Development Control Policies DPD, a number of respondents opposed their proposed deletion as suggested in the Settlement Hierarchy Background Paper.

**.59** Respondents also considered the policy to be inflexible and not facilitating making efficient use of land as a result of the housing categories. Other respondents suggested that growth for Key Service Centres such as Warboys be included in the Key Diagram. Another respondent suggested that reference to RAF Brampton should not be included in the Core Strategy as it is not certain that the site will be available for redevelopment. One respondent indicated that the reliance on the Housing Land Availability Study as the main source of evidence was inappropriate.

## Assessment of Responses and Alternatives

It was apparent from the responses that people felt the categories put forward relating to the scale of housing development that might be allowed in different locations were arbitrary and that insufficient explanation as to how they had been identified had been given. It was also clear that the scales were considered to be overly prescriptive. In particular a number of respondents suggested that a distinction should be made between those settlements capable of accommodating more development. This was the approach taken for the Core Strategy that had to be withdrawn and, although responses received during each consultation stage for the previous Core Strategy cannot be considered in the context of current plan preparation, it was evident that separating settlements, particularly key service centres, in this way was not popular. The Council therefore considered making a distinction between settlements in this way to be inappropriate.

Throughout the various stages of consultation for the Core Strategy there was consensus that development should be appropriate to the settlement; that it should not be so significant that it damages the character of the settlement or places a burden on local services and facilities that would potentially undermine them. To this end the hierarchy was drawn up to categorise the different types of settlement in the district. In addition to this, different scales of development were considered for the different levels of the hierarchy. This has proved a difficult area to find consensus on, however the Council believes that the scales now represent the best compromise. In combination with the flexibility offered by the policy to allow for unforeseen sites that offer opportunities for sustainable development to come forward it is considered to ensure that development is appropriate to its location.

A number of different respondents suggested that settlements be re-classified. As part of the evidence base being put together for the Core Strategy, the Council updated the Settlement Background Hierarchy Paper in 2007. Although a number of changes to the hierarchy were carefully considered, on the basis of regional guidance in the East of England Plan, it was decided that the hierarchy should remain as it is.

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The Council decided not to include a criteria policy based on the services available as, although being potentially more flexible, it would not provide sufficient certainty to developers or applicants. It would also have the potential to undermine local service provision and could be damaging to settlement character.

Reducing the number of categories in the scale of housing development would be in line with the definition of major and minor development as offered in the GDPO (as amended 2006). However, it was felt that this would be too vague and not provide sufficient guidance for applicants. It was considered that additional categories, although potentially providing more flexibility, would risk further confusion.

The Council considers that the policy in the Submission Core Strategy is sound and reaches a compromise that reflects issues raised during the consultation process. It is clear that no consensus will arise as to the position of settlements in the hierarchy or how it should be structured but that the policy put forward reaches a sustainable compromise.

## Changes Made

The policy has been strengthened by giving further clarification on where development can take place. Reference to the built-up area is included in the policy wording as is more information on development in hamlets and isolated groups of villages with reference being made to restrictions for development in the countryside and cross reference to the Development Control Policies DPD. An emphasis has been placed on the need for access to services to higher order settlements in such cases where development may be permitted.

An additional paragraph has been added to provide greater flexibility over the scale of development permitted in different categories of settlement. The indicative nature of the scale for housing development has been emphasised in response to a number of comments suggesting that the categories are too prescriptive to take into account locational and site specific circumstances.

## Tests of Soundness

.60 There are no particular concerns with compliance with the Tests of Soundness.

.61 Go East indicated that the figures provided in policy wording for scales were too prescriptive. It was recommended that the submission Core Strategy provide indicative figures for the scales large, moderate, minor and infill.

## Approach Taken

.62 The approach taken is detailed in Volume 1 on page **x**.

## Addressing Housing Need

**Table 6 Key Sources for Affordable Housing**

National	PPS1: Delivering Sustainable Development PPS1 Supplement: Planning and Climate Change PPS3: Housing Delivering Affordable Housing Good Practice Guide (DCLG)
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	PPS7: Sustainable Development in Rural Areas, Circular 05/2005 (Planning Obligations) Homes for the future, more affordable, more sustainable - Housing Green Paper (DCLG, 2007)
Regional	East of England Plan Cambridge Sub Region Strategic Housing Market Assessment (2008)
Local	Housing Land Availability Study (HLAS) (2007) updated and adapted to form Strategic Housing Land Availability Assessment (SHLAA) (2008) Huntingdonshire Community Strategy (2004)  Sustainable Community Strategy for Huntingdonshire (2008) Developer Contributions Towards Affordable Housing SPD - Consultation Draft (June 2007), Huntingdonshire Housing Strategy 2006-2011, Huntingdonshire Housing Needs Survey 2002 and Update 2006 Local Plan Alteration 2002 policy AH4

## Core Strategy Issues and Options

### Issues and Options identified for consultation

Issue 10: The need to set target(s) and thresholds for affordable housing that reflects local circumstances.

Option 30: Policies will set a target of 40% of all housing on eligible sites throughout the District to be provided as 'affordable housing'.

Option 31: Thresholds could be set only requiring the provision of affordable housing on sites for 15 or more houses wherever they are located.

Option 32: Thresholds could be set requiring the provision of affordable housing on sites categorised as major or moderate development wherever they are located.

Option 33: Policies could set a threshold for seeking affordable housing on development sites of less than 15 houses in Smaller Settlements.

Question 37: Do you agree that a target should be set of seeking 40% of all housing on eligible sites throughout the District to be provided as 'affordable housing'?

Question 38: Which option do you prefer and why?

Question 39: Do you think a threshold should be included for seeking affordable housing on sites of less than 15 houses in Smaller Settlements? If so what should be the minimum site size eligible for seeking affordable housing?

### Reasonable Alternatives

**.63** Targets could be set at 40% within the Cambridge sub-region and 30% within the rest of the District of the total number of dwellings on eligible developments. The average target of 35% included in the Regional Spatial Strategy could be used but this is an average for the region and within Huntingdonshire the need for affordable

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homes is greater than elsewhere in the region. A further variation would be to increase the target to 50% for the Cambridge sub-region and 40% elsewhere. This would bring Huntingdonshire in line with the targets sought in South Cambridgeshire and Cambridge City and have the advantage of promoting a consistent approach throughout the wider area.

**.64** PPS3 sets a national indicative minimum site size threshold of 15 dwellings. Policies are required to set thresholds to determine whether sites should be eligible to provide affordable housing. The higher the threshold is set the lower the potential for achieving affordable housing because fewer sites will be eligible to contribute. However, the need for affordable housing has to be balanced with the viability of its provision.

**.65** Many permutations could be developed of site size threshold and different types of location. In particular, it may be appropriate to relate the thresholds for seeking affordable housing to the scale of development permissible in different categories within the settlement hierarchy. Option 31 above adheres strictly to PPS3 guidance with no recognition of local circumstances. Option 32 attempts to respond to the high level of local need for affordable housing and the concentration of housing development in Market Towns and Key Service Centres as the only locations where it is suggested that developments of 10 or more houses will be permitted.

**.66** PPS3 also states that lower thresholds can be set where viable and practicable, including in rural areas. This would be in addition to any affordable housing from 'rural exceptions' sites allowed solely for affordable housing in small rural communities. Policies could set a threshold for seeking affordable housing on development sites of less than 15 houses in Smaller Settlements. The previously submitted Core Strategy suggested a minimum site size threshold of 3 dwellings to try to generate provision of some affordable housing on infill sites within Smaller Settlements. A number of concerns were expressed over the viability and management implications of providing affordable housing at such a low threshold. However it is considered that this will be both viable and practical.

## Summary of Initial Sustainability Appraisal of Issues and Options

**.67** Option 30: the target of 40% of housing provision to be affordable on eligible sites was considered to be the most deliverable option compared to the two other reasonable alternatives. Reasonable alternative 1 suggested that 50% of housing on eligible sites to be affordable. Although this would facilitate the biggest contribution to affordable housing provision it was not considered to be realistic for the District and may impact upon the viability of delivering sites for development. Reasonable alternative 2 suggested that a lower target of 30% could be set. This was considered to be more deliverable than reasonable alternative 1, but would make a significantly lower contribution towards meeting the need for affordable housing in the District.

**.68** Option 31: the requirement of affordable housing on sites of 15 or more dwellings was considered to be the most appropriate for the District and is consistent with national guidance. Setting a lower threshold, as proposed in Option 33 may have the potential to emphasise social divisions between affordable and market housing on the same site.

## Consultation Responses to Issues and Options

**.69** Respondents' opinions on the provision of affordable housing within development schemes were very diverse. Some supported the 40% target, others wanted it tempered with considerations of site specific conditions and viability. A number of respondents proposed a target of 35% arguing that this would be in line with the emerging Regional Spatial Strategy. A few respondents thought the target should await completion of the Strategic Housing Market Assessment. Seeking affordable housing provision within any developments over the threshold of 15 dwellings was broadly accepted. However, provision at a lower threshold within Smaller Settlements provoked a



split in responses between parish councils who were keen to see affordable housing provided within any developments in their villages and developers/ landowners who objected to the lower threshold citing concerns over viability.

## Assessment of Responses and Alternative Approaches

**.70** A number of respondents sought a target of 35% affordable housing provision arguing that this would be in accordance with the emerging RSS. The emerging RSS looks for 35% of housing coming forward to be affordable. However, affordable housing cannot be sought on all developments as some are below the appropriate site size/ numbers threshold. Therefore, to achieve 35% of all development as affordable housing a higher proportion needs to be achieved on eligible sites to counter-balance the lack of provision on ineligible sites.

**.71** One of the alternative approaches considered would involve seeking a 50% contribution of affordable housing on eligible sites in line with South Cambridgeshire and Cambridge City. However, the housing market in Huntingdonshire differs from that in South Cambridgeshire and Cambridge City with comparable properties being significantly less expensive in Huntingdonshire than is typical in these areas and so this approach would not reflect the variation in house and land prices. The initial Sustainability Appraisal raised concerns over the viability of seeking this proportion and its potential impact on delivery of new affordable homes.

**.72** Another alternative would be to maintain the current distinction between the Cambridge sub-region and the north and west of Huntingdonshire. However, the Housing Needs survey update indicated a decrease in the discrepancy between house prices in the two areas coupled with clear indications of high levels of need for affordable housing throughout the district. Hence, this distinction is not considered to be justified.

**.73** The use of a lower threshold at which to seek affordable housing in smaller settlements resulted in a split in responses between those living in such places who typically saw the need for provision of affordable housing to help their communities and potential developers who were concerned about viability. PPS3 allows for the use of lower thresholds but at the same time requires account to be taken of factors such as viability. The preferred approach recognises the impact of site specific conditions on the provision of affordable housing.

## Core Strategy Preferred Options

### Policy Wording put forward for participation on Preferred Options

The definition of Affordable Housing in PPS3 will be used.

40% of all housing proposed in developments in the following categories should be provided as affordable housing:

on proposals of 15 or more homes or 0.5ha or more in all parts of the District; or

on proposals of 3 or more homes or 0.1ha, in all parishes with less than 3000 population.

In order to prevent avoidance of contributions the requirement will consider the complete developable area rather than the area or number of homes of a proposal where it forms a sub-division of a larger developable site.

In determining the amount of affordable housing, site conditions including redevelopment of previously developed land or mitigation of contamination will be considered. Where evidence shows that site conditions or other material considerations may affect the amount of affordable housing, criteria will set out the priorities for achieving affordable housing. Similarly criteria will be set for the form the contribution should take and the circumstances in which these may be varied.

## Reasonable Alternatives

.74 No new reasonable alternatives were identified.

## Summary of draft Final Sustainability Appraisal

.75 The proposal addresses one of the key components of the government's policy on sustainable communities whilst reflecting local conditions. Further guidance is available in the SPD Developer Contributions Towards Affordable Housing.

## Consultation Responses

.76 Approximately 65% of respondents objected to this policy. The primary issue raised was the lack of an evidence base to propose a 40% target which is not in conformity with the 35% proposed in the East of England Plan. Furthermore, it was considered by a number of respondents that the proposed thresholds for affordable housing provision in smaller settlements are too low and will affect viability of developing such sites. A number of respondents suggested that it was inappropriate to set a target in advance of the final publication of the Cambridge Sub Region Strategic Market Housing Assessment. One respondent suggested that no definition of affordable housing had been provided and another suggested that the policy should include reference to "villages" not "parishes." A number of respondents suggested that the policy needs to clearly reference the 'Developer Contributions Towards Affordable Housing SPD' and that clarification on criteria that set priorities for achieving affordable housing need to be included in the policy wording. A couple of respondents also identified that the policy reference to contributions appears to be inconsistent with the policy on infrastructure (policy wording 10) later in the document. One respondent also indicated that the policy or supporting text also fails to specify targets for social rented or intermediate housing provision.

## Assessment of Responses and Alternatives

It was very clear that a significant number of respondents objected to the policy arguing that it is not in conformity with the proposed target in the RSS. The RSS now identifies a target for some 35% of housing coming forward through planning permissions granted after publication of the RSS to be affordable. Given that a proportion of housing sites are ineligible for seeking affordable housing on this deficit must clearly be made up through higher proportions of affordable housing on other sites. The Council considers that the assessment of alternatives is sufficient and, furthermore, that the proposed target of 40% is supported by the Cambridge Sub Region Strategic Market Housing Assessment.

A number of respondents identified that the Council had not included targets for social rented or intermediate housing provision which needs rectification. It is accepted that additional information needs to be included on the priorities for achieving affordable housing provision. It is also accepted that the policy should refer to separate targets for social rented and intermediate housing targets.

### Changes made

The policy has been modified to identify targets for social rented and intermediate housing provision. The Development Control Policies DPD, Huntingdon West Area Action Plan DPD and Planning Proposals DPD are clearly signposted as future sources of more detailed guidance. Reference is also made to the Developer Contributions Towards Affordable Housing Provision SPD. The requirement for the complete developable area to be considered as a whole to prevent avoidance of contributions has been moved to the infrastructure and implementation chapter as it applies to more than just affordable housing.

### Tests of Soundness

**.77** Through the consultation on Issues and Options the Council looked at consistency with neighbouring authorities. The Reasonable Alternatives included consideration of a target of 50% for the Cambridge sub-region and 40% elsewhere. This was considered as it would bring Huntingdonshire in line with the targets sought in South Cambridgeshire and Cambridge City. It would also have the advantage of promoting a consistent approach throughout the wider area. However, the Council is concerned that the housing market in Huntingdonshire differs from that in South Cambridgeshire and Cambridge City and that this approach would not reflect the differences in the housing market. The Council is satisfied that there is robust evidence that justifies the Preferred Approach and that it would not be appropriate to set a higher percentage.

**.78** Go East identified that the policy failed to set separate targets for social rented and intermediate housing or adequately set out the approach for seeking developer contributions or type and size of housing. Despite further detail provided in the SPD Developer Contributions towards Affordable Housing, Go East recommended that the policy in the Core Strategy should provide an indication of what the criteria are for material considerations affecting the provision of affordable housing or reference where they can be found. These have been addressed in the submission policy.

### Approach taken

**.79** The approach taken is detailed in Volume 1 on page x.

## Rural Exceptions Affordable Housing

**Table 7 Key Sources for Rural Exceptions Housing**

National	The Housing Act 1996 Statutory Instrument 1997/623 PPS3: Housing Delivering Affordable Housing (DCLG 2006) PPS7: Sustainable Development in Rural Areas (ODPM 2004)
Regional	East of England Plan Cambridge Sub Region Strategic Housing Market Assessment (2008)

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Local	Housing Land Availability Study (HLAS) (2007) updated and adapted to form the Strategic Housing Land Availability Assessment (SHLAA) (2008) Huntingdonshire Housing Needs Survey (2002) and Update (2006)  Huntingdonshire Housing Strategy 2006-11 (2006)  Huntingdonshire Site Assessment (LDA Design, 2006)  Huntingdonshire Community Strategy (2004) Sustainable Community Strategy for Huntingdonshire (2008)
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## Core Strategy Issues and Options

### Issues and Options Identified for Consultation

Issue 11: The need to provide affordable housing in Smaller Settlements to meet local needs.

Option 34: Policies will set out criteria to assess proposals in locations or on a scale that would not otherwise be acceptable where the development is solely to provide affordable housing to meet local needs.

Question 41: Should the provision of affordable housing be allowed in locations and on a scale that would not otherwise be permitted for general housing where it is solely to provide for local needs?

Question 42: Should 'rural exceptions' housing be concentrated in settlements with at least a basic level of services or should it be encouraged wherever there is need?

Question 43: Should sites for 'rural exceptions' housing be allocated in the Planning Proposals DPD?

### Reasonable Alternatives

**.80** No allowance could be made for 'rural exception' sites, but this would not enable identified needs for affordable housing in rural areas to be addressed.

**.81** Exception sites could be allowed at all rural settlements, regardless of the level of facilities available within them. However, this would mean that some residents of the new properties would not have easy access to a basic level of services and facilities, increasing their need to travel which would be contrary to the need to promote a more sustainable pattern of development.

### Summary of Initial Sustainability Appraisal of Issues and Options

**.82** Option 34: sets out criteria for rural exception sites. This offers flexibility to affordable housing policies and benefits in keeping workers close to the land and in the local community rather than transplanting them to urban areas to receive affordable housing. This option conforms to policy on sustainable settlements. There were two reasonable alternatives identified - exceptions sites could be allowed in all rural settlements or no provision could be made for rural exception sites. Both of these options are contrary to policy on sustainable settlements and the former option may result in an increased need to travel as provision would be allowed in all rural settlements, regardless of access to facilities or services.

## Consultation Responses to Issues and Options

**.83** General support was expressed for allowing rural exception sites of a scale appropriate to respond to identified local needs. However, concern was expressed over the sustainability implications of allowing rural exceptions housing to be built in any settlement. A balance was generally sought between the desirability of responding to identified local needs with the need for future residents to be able to access services.

### Assessment of Responses and Alternative Approaches

**.84** The Preferred Approach responds to the consensus of comments received and sets out the criteria for affordable housing development on exceptions sites. It seeks a balance between ensuring that there are a basic level of services and allowing exceptions development in a broad range of locations that would benefit from an appropriate level of affordable housing.

## Core Strategy Preferred Options

### Policy Wording put forward for participation on Preferred Options

In exceptional circumstances, affordable housing development will be considered acceptable within or adjacent to the built up areas, subject to the following criteria:

The proposal is limited in number and type of housing to that which can be justified by evidence of need for affordable housing arising from people who are either currently resident, have an existing family or employment connection or have some other unambiguous local connection in the parish or individual settlement;

The settlement is a small rural community that is below 3000 population(vii) that offers at least a basic range of services appropriate to the form of housing to be provided;

Appropriate safeguards are put in place that ensure that the housing will remain affordable for successive occupiers; and

It can be demonstrated that there is no land in a more suitable location that is available.

## Reasonable Alternatives

**.85** Responses to consultation on Preferred Options indicated that insufficient assessment to alternatives had been given. The following reasonable alternatives have been identified through the consultation process and are assessed below:

- Rely on national guidance (PPS3, para 30)
- Strengthen the existing policy

## Summary of draft Final Sustainability Appraisal

**.86** This policy approach is sustainable and reflects local conditions. By providing opportunities for local people to live in affordable houses and work in rural communities it will reduce the need for people to live in larger settlements away from their family and employment opportunities. Provision of affordable housing based on need may also help generate the critical mass needed to sustain local services thereby improving the vitality of the rural economy.

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## Consultation Responses

.87 9 out of 16 respondents clearly objected to the policy. The two general issues that have been raised from these responses concern a lack of substantiated evidence to justify the policy and that it repeats national policy in PPS3 and is therefore not locally specific. Other respondents suggested that an additional criteria relating to impact on the historic environment is required and that rural exceptions should be allocated in the Planning Proposals DPD.

### Assessment of Responses and Alternative Approaches

As a result of consultation on preferred options further assessment of alternatives was required. It was suggested by Go East that the preferred policy is not locally specific. As such the Government Office suggested that the Council could rely on national guidance and include a statement to that effect. Due to the rural nature of the District and the evidence of identified housing need in rural communities it is considered necessary to have a rural exceptions policy. The decision to have a policy means there are a number of ways that it can be strengthened, for example, defining the basic range of services appropriate. By strengthening the policy it can be demonstrated that consultation responses have been taken into account.

### Changes made

The policy has been strengthened to apply specifically to Key Service Centres and Smaller Settlements, removing the 3,000 population threshold. The criteria for eligible people have been expanded to include those in adjacent settlements in recognition of the need to provide affordable housing for people living in very small settlements without a basic range of services.

## Tests of Soundness

.88 There are no particular concerns with compliance with the Tests of Soundness.

.89 Go East expressed concern that the policy is not locally specific. It was recommended that a paragraph explaining that the Council intends to rely on national policy, PPS3, para 30, would suffice.

## Approach taken

.90 The approach taken is detailed in Volume 1 on page **x**.

## Gypsies, Travellers and Travelling Showpeople

Table 8 Key Sources for Gypsies, Travellers and Travelling Showpeople

National	PPS3: Housing Circular 01/06 Planning for Gypsy and Traveller Caravan Sites Circular 04/07 Planning for Travelling Showpeople SS25 Housing Act 2004
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Regional	East of England Plan Gypsy and Traveller Accommodation Assessment (2006) (Sub Regional), RSS Single Issue Review - Planning for Gypsy and Traveller Accommodation in the East of England (Issues and Options) (May 2007). Draft Policy (February 2008). Cambridge Sub Region Strategic Market Housing Assessment (2008)
Local	Housing Land Availability Study (2007) updated and adapted to form Strategic Housing Land Availability Assessment (SHLAA), (2008) Saved Local Plan 1995 policy H44

## Issues and Options

### Issues and Options Identified for Consultation

Issue 20: The need to ensure identified accommodation needs of gypsies, travellers and travelling showpeople are adequately met.

Option 22: Policies will set out criteria to ensure sites are provided which meet the identified accommodation needs of gypsies, travellers and travelling showpeople.

Question 23: Do you think a criteria based approach will adequately meet the identified accommodation needs of gypsies, travellers and travelling showpeople? (Please give reasons)

Question 24: What criteria would you like to see included in this policy?

**.91** This issue was originally raised as part of the Development Control Policies DPD. However, due to changing national policy it has been moved to the Core Strategy.

### Reasonable Alternatives

**.92** None. The provision of sites to meet identified accommodation needs of gypsies, travellers and travelling showpeople is a requirement of national and strategic guidance. The above option represents the most appropriate means to meet the identified accommodation needs of this group. The need for allocations will be considered in the context of preparing a separate DPD.

### Summary of Initial Sustainability Appraisal of Issues and Options

**.93** The option was considered sustainable.

### Consultation Responses

**.94** Responses were supportive of a criteria based approach based on sustainability issues.

### Further Options Consultation

#### Towards a Spatial Strategy

The Option put forward was:

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The Core Strategy policy will have to take account of the need to ensure that Gypsies and Travellers are accommodated in sustainable locations where essential services such as water and sewerage are provided and with good access by foot, cycle or public transport to services such as education and health. It will also need to take account of the rural nature of Huntingdonshire where the availability of public transport is limited. Providing sites in appropriate locations will also help prevent the social exclusion of Gypsies and Travellers. At the same time it will need to take into account that Gypsies and Travellers often prefer a rural location with a degree of separation from the settled community.

The criteria will also need to guide the provision of sites into areas where the health and safety of occupants are not put at risk. This will mean, for example avoiding areas close to trunk roads where access may be unsafe, air quality is poor and there is unacceptable noise constraint. Similarly there should not be an unacceptable flood risk.

However, it will be important to ensure that the criteria include protection for the environment, so that sites do not harm other interests such as the character of the landscape and wildlife, nor have an unacceptable adverse impact on the settled community.

## Summary of Initial Sustainability Appraisal of Towards a Spatial Strategy

.95 The option is positive in promoting the needs of the gypsy and traveller community.

### Key Stakeholders' Responses

.96 Respondents acknowledged the current government priority on ensuring adequate provision is made for the gypsy and traveller communities. Responses were positive stressing the importance of convenient access to services, such as health care, to reduce inequalities, but seeking a balance with protecting the interests of local residents.

### Assessment of Responses and Alternative Approaches

.97 The Preferred Approach takes forward the option presented in the 'Towards a Spatial Strategy' document with minor amendments as suggested by respondents.

## Core Strategy Preferred Options

### Policy Wording put forward for participation on Preferred Options

Account will be taken of the need to ensure that Gypsies, Travellers and Travelling Showpeople are accommodated in sustainable locations where essential services such as water and sewerage are provided and with good access by foot, cycle or public transport to services such as education and health. Account will also be taken of the rural nature of Huntingdonshire where the availability of public transport is limited.

Providing sites in appropriate locations will help prevent the social exclusion of Gypsies, Travellers and Travelling Showpeople and conflict with settled communities. Consideration will be taken of the preference of many Gypsies, Travellers and Travelling Showpeople for a rural location with a degree of separation from the settled community.

The following criteria will guide the provision of sites:



adequate schools, shops and other community facilities are within reasonable travelling distance, and can be reached by foot, cycle or public transport;

the site is served (or can be served) by adequate water and sewerage connections;

there would be no significant adverse effect on the amenity of nearby residents or operations of adjoining land uses;

the health and safety of occupants are not put at risk including through unsafe access to sites, poor air quality or unacceptable flood risk.

## Reasonable Alternatives

**.98** The need for a policy on Gypsies, Travellers and Travelling Showpeople is set out in national guidance, therefore not including a policy is not a reasonable alternative. The consultation responses indicated that the policy could be more locationally specific as it currently is focused on amenity issues. The reasonable alternative assessed below is the need to strengthen the policy and the inclusion of additional criteria.

## Summary of draft Final Sustainability Appraisal

**.99** The approach is sustainable and consistent with government guidance. Although no reference to the provision of waste or recycling is made within the policy wording, this is considered to be too specific for a strategic policy. Due to the relatively small number of pitches the District needs to accommodate many effects are assumed to be neutral. This approach meets a significant proportion of the social objectives, for example, reducing inequalities. Further guidance will be provided in the forthcoming Gypsy & Traveller Sites DPD.

## Consultation Responses

**.100** Responses to this policy were fairly mixed with 6 out of 11 respondents clearly objecting to it. A number of responses did not give a clear indication of whether they supported or objected to it. A number of the objectors highlighted that the policy as worded is not locationally specific and is geared more towards the amenity impact of sites. It was suggested that additional criteria need to be included, for example, the location of site relative to settlement position in the settlement hierarchy and the range of services available. Furthermore, one respondent suggested that another criteria relating to the impact on the form of character is required. It was also noted by one respondent that the supporting text makes reference to circular 01/2006 which has been updated by 04/2007.

## Assessment of Responses and Alternative Approaches

Consultation responses clearly indicated that the preferred policy is not locationally specific. A number of respondents suggested the inclusion of additional criteria to strengthen the policy relating to settlement position in the hierarchy and services available. As previously mentioned, not having a policy on Gypsies, Travellers and Travelling Showpeople in the Core Strategy is not a reasonable alternative as it is required by national guidance. It had previously been included in the Issues and Options Development Control Policies

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DPD until consultation responses highlighted that this was not in accordance with national guidance. The alternative approach taken up through the changes made as shown below is to strengthen the policy by addition of more detailed criteria.

## Changes made

The policy has been supplemented to require pitch provision to be appropriate to settlement position in the settlement hierarchy and services available. This was included in response to concern that the policy was not taking into account the settlement hierarchy. Additional criteria have been included which protect the landscape character of settlements and ensure adequate provision of boundary treatment. Criteria covering the need for adequate vehicular access and turning circles is also included. The final criteria has been strengthened to reflect concern that the health and wellbeing of the gypsy and traveller community were not adequately being protected. The policy now protects the gypsy and traveller community against unacceptable noise or flood risk in line with that offered for the settled community. Reference to Circular 04/07 has been added.

## Tests of Soundness

**.101** In selection of the Preferred Approach the Council has been concerned with ensuring consistency, as far as it is possible to do so, with the single issue review of the Regional Spatial Strategy on planning for Gypsies and Traveller accommodation. The Council is satisfied that at this strategic level there are no problems with conformity. The Council has committed to producing a DPD for this policy area which will provide the opportunity for greater detail in order to mete the regional policy to provide certain numbers of pitches.

**.102** Go East recommended that the submission Core Strategy includes reference to the most up-to-date government guidance and suggested that the Council make reference to circular 04/07 and that additional criteria is included relating to settlement position in the settlement hierarchy and services available.

## Approach taken

**.103** The approach taken is detailed in Volume 1 on page **x**.

## Employment

**Table 9 Key Sources for Employment Growth**

National	PPS1: Delivering Sustainable Development PPS1 Supplement: Planning and Climate Change PPG 4: Industrial, commercial development and small firms Consultation paper on PPS4 Planning for Sustainable Economic Development PPS7: Sustainable Development in Rural Areas Employment Land Review Guidance Note PPS25: Development and Flood Risk Flood Risk: A Practice Guide Companion to PPS25 A 'Living Draft' consultation paper
Regional	East of England Plan

Local	The Employment Land Review (2007) Housing Land Availability Study (2007) updated and adapted to form Strategic Housing Land Availability Assessment (SHLAA) (2008)
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## Core Strategy Issues and Options

### Issues and Options Identified for Consultation

#### Overall scale

There are a number of ways in which the overall scale of employment land need can be calculated. One approach is to project recent trends - in effect as 'business as usual' approach. The most significant alternative is to take into account the impact of changing economic, social and environmental conditions and try to help develop a 'low carbon future'. The following options allow for a 15 year supply of employment land from the anticipated adoption date of the DPD (2009).

Option 17: The Core Strategy could plan for a net requirement of 110 ha. This is based on a projection of development trends over the five years from 2002. It assumes continued relatively high rates of economic growth, no constraints on the availability of labour and no concessions to climate change.

Option 18: The Core Strategy could plan for a net requirement of 80 ha. This lower figure reflects the constraints to growth that could arise from the limited availability of local labour to work in additional businesses. It also reflects higher priority being given to reducing our impact on climate change by concentrating large scale warehouses at multi-modal locations and the replacement of buildings which are energy inefficient with new zero carbon buildings.

Question 21: Which of these of options would you prefer and why?

Question 22: Are there any other options which should be considered?

#### Overall distribution

There are many ways that the additional employment land could be distributed across the District. We need to consider how much of the total should be located to follow population growth and how much should be located in accordance with market demand for locations in the Huntingdon area, the St Neots area and St Ives as opposed to other areas where a number of allocations remain undeveloped.

Option 19: Development could be distributed in locations to follow population growth.

Option 20: Development could follow the market preference for location in the Huntingdon area, the St Neots area and to a lesser extent St Ives.

Question 23: Which of these options would you prefer and why?

Question 24: Are there any other options which you think we should consider?

Question 25: To achieve your chosen option which of the directions of growth shown would you rather see developed?

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## Reasonable Alternatives

.104 The alternatives were put forward within the options and questions raised.

## Summary of Initial Sustainability Appraisal of Issues and Options

.105 Overall scale: option 18 was favoured over option 17 as it made a more positive contribution to the achievement of the SA objectives. Option 18 takes into account climate change and the need to replace old building stock with zero carbon development. As it has a lower land requirement it also takes into consideration constraints on the availability of labour and places less pressure on undeveloped land.

.106 Overall distribution: no in-depth appraisal of option 19 was made as it was considered difficult to complete this process without determining the distribution of population growth. It was suggested that limiting development to the market preference of Huntingdon, St Neots and a limited extent to St Ives would potentially result in population growth without employment growth and may result in an increased need to travel. However, due to the sustainability of all three settlements in terms of services and facilities provided and their accessibility, it was considered that the impact may be limited.

## Consultation Responses to Issues and Options

.107 There was confusion expressed between the two options based on the draft Employment Land Review. Many respondents thought that in order to redress the balance between jobs and homes and tackle out-commuting it would be necessary to provide a high level of employment land and so expressed a preference for the business as usual option. It has been argued that with a high level of people travelling outside the District for work that we are currently in a high carbon scenario and the best way to reduce this level would be to address the high numbers of out commuters by facilitating a broad range of employment sites providing jobs suitable for people who currently travel out of the District to work.

## Further Options Consultation

### Towards a Spatial Strategy

All options in Towards a Spatial Strategy proposed a figure of 110ha based on calculations from the draft Employment Land Review. This assumed continued relatively high rates of economic growth, no constraints on the availability of labour and no concessions to climate change.

#### *Cambridge Sub-region Focused Growth*

An equal distribution of 50ha each was ascribed to the Huntingdon area and St Neots area, a further 8ha to St Ives and 2ha to Ramsey and Bury.

#### *Huntingdon Area Focused Growth*

In line with the extra housing growth proposed for the Huntingdon area in this option 65ha of employment land was proposed. 40ha were proposed in the St Neots area with 3 ha in St Ives and 2ha in Ramsey and Bury.

#### *St Neots Area Focused Growth*

In line with the extra housing growth proposed for the St Neots area in this option 65ha of employment land was proposed. 40ha were proposed in the Huntingdon area with 3ha in St Ives and 2ha in Ramsey and Bury.

## *Dispersed Growth*

This option proposed a more dispersed distribution of employment in line with the more dispersed housing distribution proposed. An equal distribution of 46ha each was ascribed to the Huntingdon area and St Neots area, a further 8ha to St Ives and 10 ha to Ramsey and Bury.

### **Summary of Initial Sustainability Appraisal for Towards a Spatial Strategy**

**.108** The Cambridge Sub-Region focus and Huntingdon area focus both propose a high proportion of employment land in accessible locations with high market demand. These options propose a significant proportion of growth for Huntingdon which has demand and capacity to accommodate additional employment development. Although St Neots has a relatively strong market for employment, it is not as buoyant as Huntingdon and presents different challenges. However, it will be important to provide appropriate employment opportunities in the St Neots option to help limit out commuting. Provision of employment for Ramsey and Bury in the dispersed option may help to regenerate the town and promote opportunities to contribute to the rural economy.

### **Key Stakeholders' Responses**

**.109** Stakeholders considered the options as a package of housing, employment and retail growth with responses typically considering the implications of growth as a whole rather than the individual elements.

**.110** The Cambridge sub-region focused growth option gained qualified support from 5 out of 17 respondents who thought it offered the most balanced option and would maximise the use of existing infrastructure and services. The main concerns expressed over this option regarding employment were the likelihood of employment proposals to the east of St Ives impacting on the functional floodplain.

**.111** The Huntingdon area focused growth option received qualified support from 8 out of 21 respondents. They considered it to offer a central location in the District with good and improving communication links and to provide the best response to market preferences for employment growth. Opposition was expressed to the extension of employment land to the north of Huntingdon and its potential impact on the Stukeleys.

**.112** The St Neots area focused growth option received qualified support from 7 out of 18 respondents who thought it was most likely to deliver a sustainable new neighbourhood with good local services, employment and infrastructure. Some respondents thought it offered the best response to the need for more employment opportunities in St Neots.

**.113** The dispersed growth option received qualified support from 7 out of 19 respondents who generally believed it would reduce the impact of development on any one existing settlement. The main concerns expressed were that the shortage of rural employment opportunities would result in this option giving rise to greater dependency on car transport and that there are insufficient local rural employment opportunities to justify dispersed housing growth.

### **Assessment of Responses and Alternative Approaches**

**.114** The main Issues and Options consultation document suggested two alternatives: planning for either 110ha or 80 ha of employment land. The higher figure is a 'business as usual' approach; the lower figure took into account the impact of changing economic, social and environmental conditions and sought to help develop a 'low carbon future'. Both of these have been superseded by further refinement to the Employment

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Land Review which has given rise to a further alternative seeking 82ha of employment land. This looks to reflect the desire for a low carbon future with the need to target the stimulation of employment growth and address out-commuting in St Neots.

.115 Responses mainly favoured concentrating employment growth in Huntingdon and St Neots with widespread recognition of the key role each plays in the local economy. Huntingdon was considered to potentially be slightly more appealing to the market than St Neots but a number of respondents supported the boost that the combination of housing, employment and retail growth could give to St Neots. Significant concerns were expressed about the other two options put forward in Towards a Spatial Strategy. The Cambridge sub-region focus gave rise to concerns over employment growth to the east of St Ives and the impact on the floodplain if this option was pursued. Further discussions with the Environment Agency have raised issues over the feasibility of providing adequate flood mitigation to deliver a strategic scale of growth in this location. The dispersed growth option gave rise to significant concerns over increasing dependency on car transport and although some rural employment may be delivered through this approach it is likely to generate increased commuter traffic.

## Core Strategy Preferred Options

### Policy Wording put forward for participation on Preferred Options

At least 82ha of employment land will be provided before 2026 in order to support the creation of at least 13,000 jobs and reduce the significant level of out commuting. Of this at least 15ha will be on previously developed land. Provision will be monitored regularly and the release of locations will be managed and phased during the plan period with the aims of meeting identified needs and demand and maintaining sufficient supply of deliverable sites.

As part of the overall development strategy to concentrate the majority of growth in the Huntingdon and St Neots Spatial Planning Areas, strategic employment growth will be located:

In the Huntingdon Spatial Planning Area where 51ha of land will be provided, of which at least 13ha will be on previously developed land. Provision will be made in the following locations:

In a mixed use redevelopment for B1 uses to the west of the town centre covered by the Huntingdon West Area Action Plan, and in greenfield development for B1, B2 and B8 uses to the north west of the town.

In a mixed use redevelopment for B1 uses on land within Brampton; and

In Godmanchester as part of significant mixed use greenfield development to the south east/east of Godmanchester after the A14 road improvements have been implemented.

In the St Neots Spatial Planning Area where 25ha of land, all of which is greenfield land, will be provided in the following location:

In a significant mixed use urban extension for B1, B2 and B8 uses on greenfield land to the east of St Neots.

In the St Ives Spatial Planning Area;

On existing commitments and other sites within the built up area of St Ives, which might come forward during the plan period.

In the Ramsey Spatial Planning Area where at least 4ha of land, of which at least 2ha will be on previously developed land, will be provided in the following locations:

In a mixed use redevelopment for B1 and B2 uses to the west and to the north of Ramsey.

Outside of the Spatial Planning Areas, in the Key service Centre of Yaxley, 2ha of land will be provided for B1, B2 and B8 uses to the north east of the village.

## Reasonable Alternatives

**.116** Consultation responses indicated that respondents were not supportive of the overall amount of employment land to be planned. It was apparent that the majority of respondents felt a higher proportion of employment land should be planned for. The reasonable alternatives raised from the consultation process are no different from those put forward at Issues and Options; plan for a higher target or plan for a lower target. Alternatives to the broad locations set out could be offered as suggested by a number of respondents promoting specific sites.

## Summary of Highway Impacts Assessment

**.117** Atkins were commissioned to undertake an assessment of the potential highway impact of the four options put forward in Towards and Spatial Strategy and the Preferred Option. The detailed report is submitted as part of the evidence base (Atkins - Huntingdonshire Spatial Strategy Options Assessment, 2008). For an overall summary relating to the four options considered in Towards a Spatial Strategy and the Preferred Option please refer to the Strategic Housing Growth section. Some elements of the Assessment were of particular relevance to employment and commuting trips.

**.118** Based on 2001 Census data 52.6% of Huntingdon's residents live and work within the town, closely followed by 47.3% of St Neots' residents living and working there. St Ives and Ramsey demonstrate higher levels of out-commuting at 33.8% and 35.5% internalisation levels respectively. For Options A and B the proportion of housing provision is relatively high compared to the employment provision in Huntingdon which could see an increase in workforce internalisation. In most of the proposed growth options the housing provision for St Neots is relatively large compared to the employment provision and an increase in out-commuting may result. The Assessment suggests that although the demand for housing may increase due to significant increase in the elderly population, the demand for jobs is likely to remain at the current level. If this is the case, the employment provision within Huntingdonshire is likely to result in an increase in internalisation and the impact of the proposed growth options on the highway network should reduce.

## Summary of Draft Final Sustainability Appraisal

**.119** All spatial planning areas for employment development are considered sustainable with the majority of the SA Objectives being met in a positive way. Employment growth is directed towards the most sustainable locations, with all available brownfield land used and, where greenfield development is necessary, it is achieved in the most sustainable locations in the District. All spatial planning areas have potential uncertain effects on biodiversity and green infrastructure. Any form of development will have an impact on biodiversity – even in brownfield locations which are known to potentially sustain a high level of biodiversity. It will be important to ensure that any potential negative impacts are minimised and mitigated. However, development will also provide opportunities to enhance biodiversity through, for example, design and landscaping. Similarly, the provision of cycle routes, footpaths and

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bridleways is an important part of Green infrastructure and provides ways to mitigate against habitat fragmentation. Providing local employment opportunities throughout the District will be important to help reduce levels of out commuting and will also be beneficial for the District's economy in terms of its viability and vitality.

## Consultation Responses

**.120** The vast majority of respondents objected to the proposed policy. Approximately 80% of respondents clearly opposed the proposed policy with a significant number of objectors suggesting the amount of employment land planned for is insufficient to meet the requirements of the RSS, RES and limit out-commuting which is a significant problem for the District. A significant number of respondents considered that the balance of employment provision between St Neots and Huntingdon is inappropriate and that more consideration should be given to supporting the redevelopment of existing poorly performing employment areas, particularly in St Neots. The reliance on strategic public transport improvements around St Neots that have yet to be finalised was raised as being inappropriate and contrary to PPG13 and PPS1 Supplement on Planning and Climate Change. Employment development north west of Huntingdon was thought to be potentially detrimental to the landscape by a few.

**.121** Concern was also raised about the level of growth proposed for Key Service Centres. A number of respondents suggested that the policy was overly focused on urban areas and failed to encourage small scale employment development in Key Service Centres which is important to protect their vitality and viability. Respondents suggested that no explanation had been given as to how the proposed locations for employment development had been identified and that more consideration for potential environmental impacts was needed. It was also noted that the requirements of PPS1 Climate Change and draft PPS4 Planning for Sustainable Economic Development had not been considered. One respondent suggested that the consultation on the Employment Land Review was inadequate as it only involved landowners and did not go out to Parish or Town Councils or the public.

**.122** The policy also generated a number of comments which specifically related to individual sites. A number of respondents proposed or promoted specific sites for employment, particularly in relation to St Ives as respondents considered that the settlement needed more employment provision in order to improve its workforce to jobs ratio. It was also noted that there is inconsistency between policy 2 (strategic housing growth) and this policy with regards to Little Paxton as the settlement should be identified as an area for employment development. There were mixed responses to proposed employment provision as part of mixed use development south east of Godmanchester. It was suggested that more clarity was needed within the policy about employment types and levels for this area.

### Assessment of Responses and Alternative Approaches

The vast majority of respondents felt that 82ha of employment land for the entire District was inadequate to meet the requirements of the RSS and RES but none provided justification for an alternative figure. It should also be noted that much employment growth will be in other sectors, not just those occupying B1, B2 and B8 type premises dealt with in this policy.

The objectives put forward in the Core Strategy clearly set out the Council's aspirations to promote enhanced sustainability within the District, to make the best use of land and to reduce the effects of climate. In conjunction with national policies to tackle climate change it is considered reasonable to aspire towards the Low Carbon Future approach for employment whilst acknowledging that changes to employment premises and ways of working will take time. In the medium term the approach would require less land to deliver the same number of jobs as at present as the buildings and their surrounding land would be used more efficiently. The detailed policies steering how this will be achieved will be set out in the Development Control Policies DPD.



It was suggested by a number of respondents that there had not been sufficient explanation given as to how the sites had been identified. A large number of sites were identified through the Issues and Options consultation following requests to landowners, agents and developers for information on aspirations for sites that might have potential for development. These were then considered as packages of sites that might make particular broad locations of growth realistic to deliver.

A number of respondents indicated concern over the balance of employment land distributed between St Neots and Huntingdon and that more employment land should be proposed for St Ives, Ramsey and Bury and key service centres to support the rural economy. The locations identified reflect the main market preference and have been informed by the Employment Land Review. This was an extensive study carried out to identify potential new sites which stakeholders were invited to submit. They were assessed against a set of criteria focusing on issues such as accessibility and sustainability. It is considered that the locations proposed represent the most sustainable opportunities for employment development and reflect current market conditions. Additional land has been proposed in St Neots to that suggested by the Employment Land Review in order to promote a more balanced mix of uses in the strategic growth area identified to the east of the town. The Core Strategy only identifies strategic levels of growth; it is the role of the Planning Proposals DPD to put forward specific sites and the need for non-strategic employment allocations in Key Service Centres will be considered when this document is prepared. Implementation of the policy will be carefully monitored to ensure that supply meets demand and, if necessary, further sites brought forward.

### Changes made

The total land area allowed for in the policy is increased to 85ha. Ramsey is increased to 9ha to acknowledge the mixed use development proposals to the north west of the town which have not yet a formal planning permission. For consistency 2ha of land specified to the north east of Yaxley is removed as it is an existing commitment not a new proposal. Existing commitments in Little Paxton, Sawtry and Yaxley are acknowledged. The reasoned justification is supplemented with further reference to the Council's Economic Strategy and the Employment Land Review.

### Tests of Soundness

- .123 There are no particular concerns with compliance with the Tests of Soundness.
- .124 Go East did not make specific comments for this policy.

### Approach taken

- .125 The approach taken is detailed in Volume 1 on page **x**.

## Retail

**Table 10 Key Sources for Planning for Retail**

National	PPS1: Delivering Sustainable Development
	PPS1 Supplement: Planning and Climate Change
	PPS6: Planning for Town Centres

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	PPG13: Transport
Regional	East of England Plan
Local	Huntingdonshire Retail Assessment Study (2005) and Update (2007)

## Core Strategy Issues and Options

### Issues and Options identified for Consultation

#### Overall scale

The Retail Assessment Study Update (2007) suggested that the Core Strategy should endeavour to increase the proportion of available expenditure which is spent locally. One way of encouraging this is to provide a greater quantity and choice of shops for people to use which has the added benefit of reducing the need to travel further afield for certain purchases. A target is suggested of 20,000m<sup>2</sup> net of additional comparison retail floorspace and a further 3,900m<sup>2</sup> net of convenience floorspace in the District for the period 2006-2021. This is based on the aspiration of a slow, steady increase in the proportion of expenditure being retained locally.

Option 21: The Core Strategy could plan for a target of 20,000m<sup>2</sup> net additional comparison retail floorspace and 3,900m<sup>2</sup> net additional convenience floorspace.

Option 22: The Core Strategy could plan for a higher target.

Option 23: The Core Strategy could plan for a lower target.

Question 26: Which of these options do you prefer and why?

Question 27: If you prefer a lower or higher target what should it be and why?

#### Overall distribution

A target of 20,000m<sup>2</sup> net additional comparison floorspace is suggested above. The Retail Assessment Study identified comparatively strong demand from retailers wishing to open in Huntingdon and an encouraging level of interest in St Neots which has traditionally been considered less attractive by investors. The distribution given in the option below was suggested by the Retail Assessment Study. Government guidance dictates that new retail facilities should be in town centres and edge of centre and out of centre locations only considered where this cannot be reasonably achieved. The Retail Assessment Study suggested that although the level of quantitative need for convenience floorspace appears low there may be opportunities for provision based on qualitative grounds in order to increase the range of facilities available. In particular it noted the need for a discount foodstore in Huntingdon town centre. Compared with other centres Huntingdon is the higher order centre where pressure for further retail development is greatest. It also has more opportunities to regenerate and thus strengthen the range of uses on the back of retail expansion with sites in the town centre and sites beyond the town centre.

Option 24: Development could follow the market preference resulting in around 12,000m<sup>2</sup> net of comparison retail growth in Huntingdon, around 6,000m<sup>2</sup> net in St Neots and 2,000m<sup>2</sup> net in other settlements.

Option 25: Development could be distributed equally between St Neots and Huntingdon and a lesser amount allowed in St Ives and Ramsey

Question 28: Which of these options would you prefer and why?

Question 29: Are there any other options which you think we should consider?

## Reasonable Alternatives

.126 The alternatives were put forward within the options and questions.

## Summary of Initial Sustainability Appraisal on Issues and Options

Overall scale:

.127 Option 21: is based on the floorspace targets in the Retail Assessment Study. It assumes that development would be focused in the town centres and reduces pressure on undeveloped land. It would also allow for a slow, steady increase for the proportion of expenditure being retained locally. The targets in the Retail Assessment Study reflect demand in the District and are tailored to meet local need.

.128 Proposing higher targets (option 22) would increase the range of facilities available and help the market towns compete against higher order centres. However, the benefits of this option would be limited to availability of sites within town centres and the targets suggested in the Retail Assessment have taken into account retail interests in the District therefore there may not be the demand for higher targets.

.129 Using a lower target, as proposed in option 23, may not sustain the vitality and viability of market towns to adequately compete with higher order centres such as Bedford.

Overall distribution:

.130 Option 24: by following market preference retail development would be directed towards Huntingdon - the principal centre in the District - where pressure for retail development is greatest. This would increase Huntingdon's competitiveness with other higher order centres outside of the District thereby increasing the town's vitality and viability. Option 25 proposes an equal distribution of retail growth between St Neots, Huntingdon and St Ives. Although a broader distribution would potentially increase accessibility for a wider range of people, the markets in St Neots and St Ives are not as strong as Huntingdon. In St Neots and St Ives there are limited brownfield sites within the town centres and greater development pressure would be placed on greenfield land.

## Consultation Responses to Issues and Options

.131 There was general support for the provision of 20,000m<sup>2</sup> of retail floorspace in accordance with the recommendations of the Retail Study to help Huntingdonshire's town centres compete with other surrounding towns. Some consultation responses questioned the bias towards Huntingdon in the Retail Study and considered that St Neots should have higher figures but others recognised the greater likelihood of delivery of retail development in Huntingdon due to market preference and potential availability of sites. There was some concern that the targets would not be achievable although most people were supportive of trying to keep local spending in the local area. An alternative was put forward of a large scale district centre on land adjacent to current residential development to the east of St Neots.

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## Further Options Consultation

### Towards a Spatial Strategy

All options in Towards a Spatial Strategy proposed a figure of 20,000 sq m of comparison retail floorspace provision based on the recommendations of the Huntingdonshire Retail Study. The figure recommended for convenience retail floorspace was considered to be too low to justify identification of strategic directions of growth.

#### *Cambridge Sub-region Focused Growth*

Reflecting market demand 12,000m<sup>2</sup> of floorspace was ascribed to the Huntingdon area and 6,000m<sup>2</sup> to the St Neots area with a further 2,000m<sup>2</sup> to St Ives.

#### *Huntingdon Area Focused Growth*

Reflecting market demand 12,000m<sup>2</sup> of floorspace was ascribed to the Huntingdon area and 6,000m<sup>2</sup> to the St Neots area with a further 2,000m<sup>2</sup> to St Ives.

#### *St Neots Area Focused Growth*

To balance market demand with recognition of the level of housing growth proposed in the St Neots area this option proposed 9,000m<sup>2</sup> floorspace in each of the St Neots area and the Huntingdon area. Again 2,000m<sup>2</sup> was proposed in St Ives.

*Dispersed Growth* This option again looked to market demand for a lead in distribution of retail floorspace proposing 12,000m<sup>2</sup> in the Huntingdon area, 6,000m<sup>2</sup> in the St Neots area then proposing 1,000m<sup>2</sup> in each of St Ives and Ramsey and Bury.

## Summary of Initial Sustainability Appraisal of Towards a Spatial Strategy

**.132** All options recognise the strong position of Huntingdon as the principal centre in the District and direct significant proportions of retail development towards the town centre. Huntingdon has a strong market demand and spare capacity as identified in the Retail Assessment Study and further growth would enhance its competitiveness against other higher order centres outside the District. The St Neots Area focused growth proposes less retail development for Huntingdon and more for St Neots. Although the market is strong in St Neots, it is not as strong compared to Huntingdon and presents different challenges. There are also limited brownfield sites within the town centre and growth would be directed towards greenfield land. The creation of a retail area outside of the existing town centre would need to be complementary and not jeopardise existing retail provision in St Neots.

## Key Stakeholders' Responses

**.133** Stakeholders considered the options as a package of housing, employment and retail growth with responses typically considering the implications of growth as a whole rather than the individual elements.

**.134** The Cambridge sub-region focused growth option gained qualified support from 5 out of 17 respondents who thought it offered the most balanced option and would maximise the use of existing infrastructure and services. Supporters considered that existing retail centres could cope with expansion.

**.135** The Huntingdon area focused growth option received qualified support from 8 out of 21 respondents. They considered it to offer a central location in the District with good and improving communication links and to best respond to market preferences for employment and retail growth. The option was felt to strengthen Huntingdon's position as the principal retail centre in the District but the limited growth elsewhere would help to maintain other centres' vitality and viability.

**.136** The St Neots area focused growth option received qualified support from 7 out of 18 respondents who thought it was most likely to deliver a sustainable new neighbourhood with good local services, employment and infrastructure. The limited scope for additional development in St Neots town centre was a major point of concern to respondents. The suggestion was put forward of incorporating a new retail centre within developments to the east of St Neots.

**.137** The Dispersed growth option received qualified support from 7 out of 19 respondents who generally believed it would reduce the impact of development on any one existing settlement. Local support considered it would help retain the retail base in Ramsey. Concern was also expressed that none of the options gave sufficient support to smaller settlements and sustaining village services.

## Assessment of Responses and Alternative Approaches

Respondents were broadly satisfied with the future level of retail growth suggested for the District as a whole accepting that it was a balance between trying to enhance the proportion of local spending retained in the market towns and recognition of their location between three higher order competing centres. There was broad recognition of Huntingdon's role as the principal retail centre in the District but some desire to try to redress the balance by boosting the retail economy in St Neots.

An alternative was suggested through the consultation responses of a large scale district centre on land adjacent to current residential development to the east of St Neots. This has been incorporated into the preferred option for growth which puts forward a major new neighbourhood to the east of St Neots which would incorporate a mixture of uses, including an appropriate scale of retail development to promote its sustainability, although not necessarily on the specific site put forward nor at the scale envisaged.

## Core Strategy Preferred Options

### Policy wording put forward for participation on preferred options

At least 20,000m<sup>2</sup> of comparison floorspace and 4,000m<sup>2</sup> of convenience floorspace will be provided before 2026. As part of the overall development strategy to concentrate the majority of growth in the Huntingdon and St Neots Spatial Planning Areas, retail growth will be located:

In 9,000m<sup>2</sup> of comparison floorspace in Huntingdon, concentrated in the town centre and complementary and appropriate development in significant mixed use redevelopment in the area west of the town centre covered by the Huntingdon West Area Action Plan;

In 9,000m<sup>2</sup> of comparison floorspace in St Neots, concentrated in the town centre and complementary and appropriate development as part of significant mixed use urban extension on greenfield land to the east of the town;

In 2,000m<sup>2</sup> of comparison floorspace in St Ives concentrated in the town centre; and

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In 4,000m<sup>2</sup> of convenience floorspace located to serve population growth in town centres across the District.

## Reasonable Alternatives

**.138** Consultation responses indicated that insufficient evidence had been provided to support the need for additional retail development outside of existing town centres. This was reflected in a number of respondents questioning the level of retail development proposed for St Neots which does not reflect market demand and objecting to proposed development outside of existing centres in Huntingdon and St Neots. In response to comments received, the reasonable alternative identified is to strengthen the existing policy.

## Summary of draft Final Sustainability Appraisal

**.139** The policy is consistent with settlement and housing hierarchies established by other policies. It provides sustainable spatial priorities which direct the majority of retail development towards town centres which have strong market demand as identified in the Retail Assessment Study 2005 and Update 2007.

## Consultation Responses

**.140** Responses to this policy were fairly evenly split with 9 out of 21 respondents explicitly supporting it and 11 objecting to it. The main issues raised were the lack of evidence to support the policy, in particular the lack of proven need for an out of town retail centre in St Neots and a lack of regard for PPS 6 and its sequential tests. A number of respondents were concerned that the Council had failed to apply these tests adequately when considering possible locations for retail development arguing that development should be concentrated in Huntingdon, not St Neots. Other respondents were concerned that the proposed expansion of town centres away from existing centres would detrimentally affect current independent retailers and the character of towns. It was also suggested that there was no proper explanation of how the sites had been identified and no consideration for environmental impacts or the impacts on the historic environment. It was suggested that greater clarity was needed with regards to location and phasing of retail development in Huntingdon. The absence of provision for Ramsey also raised concern.

## Assessment of Responses and Alternative Approaches

The Council considers the Retail Assessment Study (2005) and update (2007) which informed the retail policy to be robust. The Study (2005) was carried out by external consultants and provided forecasts of convenience and comparison floorspace based on an assessment of market preference and existing town centres. The update (2007) used more up-to-date technical data to provide improved forecasting. It also takes into account more detailed information in relation to phase II of the Chequers Court development being completed in Huntingdon.

With regard to Ramsey, comparison goods retail growth is unlikely to be successfully promoted at a strategic scale due to competition from Hampton and Peterborough. The existing convenience floorspace commitment was taken into account when the suggested target of 3,900 m<sup>2</sup> was calculated.

It is however, recognised that insufficient explanation as to how the sites have been identified has been provided and that more detailed reference needs to be made to the evidence base underpinning the policy. The Council has therefore strengthened the reasoned justification.

### Changes made

No changes have been made to the preferred option for the policy but the reasoned justification has been significantly enhanced to explain the role of different settlements in the retail hierarchy and the aspiration to retain more retail expenditure locally.

### Tests of Soundness

- .141 There are no particular concerns with compliance with the Tests of Soundness.
- .142 Go East did not make specific comments for this policy.

### Approach taken

- .143 The approach taken is detailed in Volume 1 on page **x**.

## Areas of Strategic Greenspace Enhancement

**Table 11 Key Sources for Areas of Strategic Greenspace Enhancement**

National	Natural Environment and Rural Communities Act 2006 PPS7: Sustainable Development in Rural Areas PPS9: Biodiversity and Geological Conservation Planning for Biodiversity and Geological Conservation a Good Practice Guide
Regional	East of England Plan Green Infrastructure Strategy for the Cambridge Sub-Region (2006) Cambridgeshire Biodiversity Action Plan (2004)
Local	Huntingdonshire Community Strategy (2004) Sustainable Community Strategy for Huntingdonshire (2008)  Great Fen project  Open Space, Sport and Recreation Needs Assessment and Audit (2006)

## Core Strategy Issues and Options

### Issues and Options identified for Consultation

Issue 7: The need to identify areas of 'Strategic Greenspace Enhancement' and to promote environmental, economic and social gains within these areas.

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Option 26: Policies will define areas of Strategic Greenspace Enhancement and identify green corridors connecting them and indicate how development proposals could contribute to improving their biodiversity, landscape and recreational value.

## Reasonable Alternatives

.144 None. The identification of areas for large-scale habitat enhancement is required by strategic guidance, while ensuring that development proposals contribute positively to its achievement is necessary if the objective is to be achieved.

## Summary of Sustainability Appraisal for the Issues and Options paper

.145 The option is clearly sustainable and has a positive impact on a number of the sustainability appraisal objectives, in particular those relating to open space, nature conservation and enhancement.

## Consultation Responses to Issues and Options

.146 The majority of respondents were supportive. Several respondents sought inclusion of reference to the Green Infrastructure Strategy and clarification of where the boundaries of Strategic Greenspace Enhancement areas would be defined. A small number were concerned that more detailed investigation of potential for habitat extensions should be conducted.

## Assessment of Responses and Alternative Approaches

.147 A map has been included in the preferred options document illustrating the areas of strategic green space enhancement and green corridors and reference made to the Strategic Green Infrastructure Strategy. It was considered appropriate to concentrate on the core areas and the corridors connecting them so that funding and enhancement work can be targeted to the areas where it will be most effective. As such the list proposed at Issues and Options has been reduced.

## Core Strategy Preferred Options

### Policy Wording put forward for participation on Preferred Options

Areas of Strategic Greenspace Enhancement along with green corridors connecting them are identified in Figure 8.1. Within these areas, coordinated action will be taken via consultation with statutory and other agencies to:

- safeguard potential sites of nature conservation value
- create new wildlife habitats
- contribute to diversification of the local economy and tourist development
- create appropriate access for a wide range of users to enjoy the countryside
- contribute where possible to enhanced flood protection



The creation or enhancement of green corridors connecting these areas will be promoted. It is particularly important that resources are concentrated in these areas in the early part of the plan period and to promote the early creation or enhancement of green corridors connecting these areas with areas of population, to form a coherent network:

The Great Fen Project;

The Grafham Water / Brampton Woodlands; and

The Great Ouse Valley (St Neots to Earith)

## Reasonable Alternatives

**.148** Consultation responses indicated that additional green corridors could be added and that the Council should taken into account green infrastructure initiatives outside of the District. These two reasonable alternatives are assessed below.

### Summary of draft Final Sustainability Appraisal

**.149** This policy approach is clearly sustainable and will work towards promoting areas of habitat creation as identified in the Biodiversity Partnership for Cambridgeshire and Peterborough's 50 year Wildlife Vision.

### Summary of Appropriate Assessment

**.150** This policy allows for the creation of large new areas of accessible green space in the vicinity of Huntingdon, Brampton and Godmanchester. In doing so, this could help to counteract any increased recreational pressure placed on Portholme SAC resulting from development in the Huntingdon Spatial Planning Area. The policy also identifies areas of green space creation around Ramsey (notably the Great Fen Project and associated green corridors) which could serve to reduce any recreational pressure on Orton Pit SAC arising from development proposed in the Ramsey Spatial Planning Area. However, the AA states that insufficient information is given on the timing of green space creation for it to definitively state that adverse effects on Portholme or Orton Pit would be unlikely.

## Consultation Responses

**.151** The comments in general were very supportive of this policy, with 16 out of 32 respondents explicitly stating support for the policy and a lot of others putting forward positive suggestions in order to improve and strengthen the policy. It was pointed out that no reference had been made to Green Infrastructure initiatives outside of the District such as the Nene Valley Strategy. One respondent suggested that another criteria related to tourism development and Greenspace Enhancement Areas needs to be added. A number of respondents identified additional green corridors that should be included on the map such as the South Cambridgeshire Woodlands and the River Nene. One respondent also suggested emphasising the connections between Cambourne and Cambridge.

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It was suggested that the reasoned justification needs to be strengthened by referencing the health benefits associated with greenspace, and the Open Space, Sport and Recreation Needs Assessment and Audit (2006) as well as the important role that green space plays in adapting to climate change.

## Assessment of Responses and Alternative Approaches

The responses were clearly supportive of the policy. Responses largely focused on how to improve the policy by adding wording and including reference to other green corridors and green infrastructure initiatives. The Council has taken these into account when revising the policy.

## Changes made

The policy has been restructured for greater clarity and the reasoned justification strengthened. The policy wording now clearly sets out areas of strategic green space enhancement and these are also identified on the strategic green infrastructure map. The criteria included in the policy which sets out action that will be taken within these areas have been enhanced with reference to ancient woodland, historic landscape and additional detail added for how tourist development and the local economy will be promoted. These additions have been included as a result of consultation responses. The connectivity of green corridors into the surrounding area is also acknowledged.

The reasoned justification includes a clear definition of what the Council means when using the term green infrastructure as some respondents indicated that a definition had not been provided. Throughout the reasoned justification the importance of green infrastructure in tackling climate change is emphasised as is the significance of areas of green infrastructure not identified in the policy wording or on the map. It also takes into account representations received on the lack of reference made to green infrastructure initiatives outside of the District.

## Tests of Soundness

.152 There are no particular concerns with compliance with the Tests of Soundness.

.153 Go East did not comment on this policy.

## Approach taken

.154 The approach taken is detailed in Volume 1 on page **x**.

## Infrastructure and Implementation

Table 12 Key Sources for Infrastructure Requirements

National	PPS3: Housing PPG13: Transport Circular 05/2005 - Planning Obligations Planning and Compensation Act 1991
Regional	East of England Plan

Local	Huntingdonshire Community Strategy (2004) Sustainable Community Strategy for Huntingdonshire (2008) Planning Contributions SPD (forthcoming) Developer Contributions Towards Affordable Housing SPD - November 2007 Huntingdonshire District Council Open Space, Sport and Recreation Needs Assessment and Audit (2006), Local Plan Alteration 2002 policies OB1 and OB2
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## Core Strategy Issues and Options

### Issues and Options identified for Consultation

Issue 12: The need to ensure appropriate, timely provision of any infrastructure requirements associated with new development.

Option 35: Policies will require development proposals to contribute towards the cost of providing infrastructure, and of meeting social and environmental requirements, where this is necessary to make a scheme acceptable in planning terms.

Criteria will be proposed to allow assessment of the scale and nature of development proposals where contributions are likely to be required.

Question 44: What criteria should be used to determine if contributions are necessary?

### Reasonable Alternatives

**.155** None. Existing national guidance (Circular 5/2005) requires development plans to set out policies indicating the circumstances in which planning obligations will be sought and indicates that formulae and standard charges may be used where appropriate.

### Summary of Initial Sustainability Appraisal for the Issues and Options paper

**.156** The approach is clearly sustainable and socially just ensuring that developers help to mitigate pressures placed on social, economic and physical infrastructure that arise from their proposals. It is also consistent with national guidance.

### Consultation Responses to Issues and Options

**.157** Most respondents considered this to be an important area of policy coverage, although there was only limited consensus on what should be included. General concerns were expressed regarding the importance of provision of services and facilities in conjunction with any new development. Several respondents sought provision of detailed criteria for infrastructure requirements in a Supplementary Planning document, with only one opposing

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this. The impact of requirements on viability was raised by several respondents with the suggestion that requirements be prioritised. The range of infrastructure issues to be addressed was considered too narrow by a few with suggestions of more emphasis on health, education, utilities and indoor sport and recreation.

## Assessment of Responses and Alternative Approaches

.158 It was considered appropriate to include a list of areas that contributions are likely to be sought for. While it is not a comprehensive list it does cover the most likely areas, some additions have been made in drafting the preferred option to reflect concerns expressed by respondents. The Council is committed to producing SPD to support this policy area that will give more information.

## Core Strategy Preferred Options

### Policy Wording put forward for participation on Preferred Options

Development proposals will be expected to provide or contribute towards the cost of providing appropriate infrastructure, and of meeting social and environmental requirements, where these are necessary to make the development acceptable in planning terms.

Contributions may also be required to meet the management and maintenance of services and facilities provided through an obligation. The appropriate range and level of contributions will be assessed in a comprehensive manner, taking into account strategic infrastructure requirements and using standard charges where appropriate. Standards and formulae for calculating contributions will be set out in separate Supplementary Planning Documents. Where appropriate, the particular requirements of specific sites will be set out in other DPDs.

The nature and scale of any planning obligations sought for this purpose will be related to the form of development and its potential impact upon the surrounding area. Where appropriate, any such provision will be required to be provided on site. Where this is not possible, a commuted payment will be sought. The range and level of contributions will be assessed in a comprehensive manner, taking into account strategic infrastructure requirements and using standard charges or tariff where appropriate.

Contributions may be required for the following:

- affordable and key worker housing

- open space and recreation (including leisure and sports facilities)

- strategic green infrastructure

- transport (including footpaths, bridleways, cycleways, highways, public transport, car parks and travel planning)

- community facilities (including meeting halls, youth activities, library services, cultural facilities and places of worship)

- education, health and social care

- utilities infrastructure

emergency services  
environmental improvements  
drainage / flood prevention and protection  
waste recycling facilities  
public art

## Reasonable Alternatives

**.159** The consultation raised a number of issues which whilst not putting forward alternatives as such, identified potential omissions from the policy and the reasoned justification supporting it. The reasonable alternative identified by the Council is to strengthen the policy and the reasoned justification.

## Summary of draft Final Sustainability Appraisal

**.160** Although many of the effects of this policy are judged to be positive and it meets many of the social and environmental objectives however there are many variables involved in the implementation of this policy. Further guidance on this policy will be set out in a separate Planning Contributions SPD.

## Summary of Appropriate Assessment

**.161** Although policy 10 (infrastructure requirements) alludes to the need for development to contribute to utilities infrastructure, it is suggested that this needs to be expanded before it can be concluded that development under the Core Strategy is unlikely to lead to a significant effect on Fenland SAC (Woodwalton Fen), or the Ouse Washes.

## Consultation Responses

Responses to this policy were evenly split with 10 respondents expressing support and 18 out of 33 respondents explicitly opposing the policy. Other respondents did not explicitly state whether they objected or supported the policy but made a comment, for example, identifying where additional requirements will be needed. The main issues raised concerned the evidence base, particularly the need for a Water Cycle Strategy to provide a framework for planning and infrastructure provision. Further comments suggested that the policy needs to be far more detailed in order to provide certainty about what, how and when requirements and financial contributions will be sought. It was suggested that such detail cannot be adequately covered in a SPD alone and that this will have to build on a clear strategic policy. One respondent identified that development needs to take account of its impact on local communities and cited development in St Ives and the additional risk of flooding from surface water flooding as an example. Other respondents identified a need for community infrastructure to be included and improvements to the historic environment.

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It was clear that reference to open space and green infrastructure was supported by respondents with 3 representations citing these requirements as being particularly good. Other respondents simply registered their support in principle without specifying the area.

## Assessment of Responses and Alternative Approaches

The consultation process raised a number of issues, namely concern at an insufficient evidence base to underpin this policy and a lack of detailed criteria to provide certainty for developers. It was evident from consultation responses that the policy is necessary, therefore the reasonable alternative is focused on strengthening the existing policy and responding to the issues raised.

## Changes made

The supporting text has been significantly supplemented following receipt of initial research towards the Local Investment Framework. Policy development has also been informed by extensive consultation with bodies and agencies involved in delivering infrastructure. The limitations placed on the Council in setting out detailed requirements are explained. In response to a number of representations the text gives further information on the forthcoming Water Cycle Strategy for the District with specific detail on development and water supply challenges in St Neots.

The revised policy gives further information on why contributions are required, where they may be expected and how they will be assessed. Reference is made to the the intention to produce SPDs to provide a detailed framework for infrastructure delivery and to set out how calculations for contributions will be made.

## Tests of Soundness

**.162** There are no particular concerns with compliance with the Tests of Soundness.

**.163** Go East suggested that the policy does not provide enough detailed information on how contributions will be sought, when and by whom. It was suggested that these criteria are needed in order to provide developers with certainty over what contributions will be expected.

## Approach taken

**.164** The approach taken is detailed in Volume 1 on page x.

## Monitoring

### Core Strategy Issues and Options

.1 Monitoring aspects of the Core Strategy were not addressed in the Issues and Options consultation phase. Production of an Annual Monitoring Report is required under the Planning and Compulsory Purchase Act 2004 so proposing not to monitor the DPD is not a reasonable alternative. It was considered to be too early in the preparation of the DPD to propose monitoring methodologies or potential indicators until some firmer indication of the proposed content of the Core Strategy was known.

## Core Strategy Preferred Options

### Wording put forward for participation on Preferred Options

Table 13 Performance indicators and targets

Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy Wording	Target	Responsible Agencies	Implementation
<b>Land, Water and Resources</b>							
Number of dwellings completed (net)	Core indicator, Significant effects	1, 2, 3	16	2	550 per annum	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
% housing completions on previously developed land	Core output, Significant effects	8, 12	1	2	29%	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
Estimated household water consumption	Local output, Significant effects	12	2	1	Reduce pro capita water consumption rates	Huntingdonshire District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development



Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy Wording	Target	Responsible Agencies	Implementation
							control decisions SPDs and UDFs
<b>Biodiversity</b>							
Change in areas and populations of biodiversity importance:	Core output, Significant effects	8, 9	1, 3, 12	1, 9	Increase the number of ha of specified target habitats	Huntingdonshire District Council, Cambs Biodiversity Partnership, Natural England, RSPB	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs, Countryside Services Initiatives
1. change in priority habitats and species (by type)							
2. change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional or local significance							
<b>Landscape, Townscape</b>							

# Monitoring

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Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy Wording	Target	Responsible Agencies	Implementation
<b>and Archaeology</b>							
Large scale housing sites meeting 'Building for Life' equivalent standards	Local output, Significant effects	10, 11, 12, 13	4, 5, 10, 13	1	60% to achieve Silver Standard equivalent	District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs, Conservation initiatives
<b>Climate Change and Pollution</b>							
% household waste which is recycled	Local output, Significant effects	12	8	1	50% by 2011 56% by 2016 60% by 2021	District Council, Cambridgeshire County Council	Provision of recycling facilities, Recycling campaigns, Cambridgeshire and Peterborough Joint Waste Strategy
% of housing completions in Market Towns and Key Service Centres	Local output, Significant effects	1, 12, 13	7, 9	2, 3	Maximise the % of housing completions in Market Towns and Key Service Centres	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development

Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy Wording	Target	Responsible Agencies	Implementation
<b>Inclusive Communities</b>							
% of housing completions on qualifying sites which are affordable	Core output, Significant effects	2, 3	15, 16	4, 5	40%	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions
Amount of new residential development within 30 mins public transport time of GP, hospital, primary and secondary school, areas of employment and a major retail centre	Core output, Significant effects	1	14, 15	1	Maximise the amount of new residential development within 30 mins public transport time of GP, hospital, primary and secondary school, areas of employment and a major retail centre	Huntingdonshire District Council, Private Sector, Registered Social Landlords	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
Number of permissions granted for new public or private Gypsy,	Core output	3	15, 16	6	Increase provision of pitches available on legal sites for	County Council, Registered Social Landlords, Private Sector	Through Gypsies and Travellers DPD and

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Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy Wording	Target	Responsible Agencies	Implementation
Traveller & Travelling Showpeople sites, or expansion of existing sites					Gypsies, Travellers & Travelling Showpeople		development control decisions
<b>Economic Activity</b>							
Amount and % of employment floorspace developed on previously developed land	Core output, Significant effects	6, 8, 12	1	7	Maximise the % of completed employment floorspace on previously developed land	Huntingdonshire District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
Amount of land for which planning permission has been granted for employment uses	Local output, Significant effects	4, 6, 15	17, 18	7	Annual average 4.3 ha	Huntingdonshire District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development control decisions SPDs and UDFs
% of retail completions in Huntingdon and St Neots	Local output, Significant effects	5, 7	14, 17, 18	8	Ensure a balance between the two main market towns of Huntingdon and St Neots	Huntingdonshire District Council, Private Sector	Through Planning Proposals DPD, Huntingdon West AAP, development

Indicator	Indicator Type	Related Spatial Objective(s)	Related SA Objective(s)	Related Policy Wording	Target	Responsible Agencies	Implementation
							control decisions SPDs and UDFs

# Monitoring

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## Reasonable Alternatives

.2 Consultation responses put forward a limited number of suggestions for additional indicators.

## Summary of draft Final Sustainability Appraisal

.3 Current government guidance requires the draft Sustainability Report to make proposals for monitoring to detect the effects of plan policies. In practice the Council retains responsibility for monitoring the LDF and also the effect of individual DPD policies. Its monitoring plan cannot be finalised until the DPD has been adopted, and therefore our contribution at this stage is to propose an outline monitoring programme based on the indicators listed in the Scoping Report, adapted to reflect any issues identified during the SA.

## Summary of Appropriate Assessment

### Consultation Responses

.4 Few responses were received on the monitoring proposals put forward. Some additional indicators were suggested primarily concerning biodiversity, climate change and recreation issues. Only one indicator was challenged - that of accessibility to key services being measured by being within 30 minutes public transport time.

### Assessment of Responses and Alternative Approaches

The responses mainly dealt with very detailed aspects of development the monitoring of which is better suited to the Development Control Policies DPD where specific policies influencing the details of development will be provided. The accessibility indicator is a national 'Core output' indicator required by government to facilitate comparable national and regional monitoring.

### Changes made

The household waste indicator has been changed to include composting.

## Tests of Soundness

- .5 There are no particular concerns with compliance with the Tests of Soundness.
- .6 Go East did not comment on this policy.

## Approach taken

.7 The approach taken is detailed in Volume 1 on page **x**.

# Issues not taken forward to Submission

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## Issues not taken forward to Submission


### Energy Use

#### Core Strategy Issues and Options

##### Issues and Options identified for Consultation

Issue 8: The need to reduce CO<sub>2</sub> emissions.

Option 27: Policies will promote energy efficiency and will set a requirement for the percentage of energy to come from on-site renewable energy developments.

Question 30: Should the plan require 10% of energy requirements to be met by on-site renewable energy sources or should a higher target be required? If a higher target should be required what should this target be?

Question 31: What size threshold should be used to determine whether on-site renewable energy technologies will be required?

#### Reasonable Alternatives

.1 The alternatives were identified within the options and questions given.

#### Summary of Initial Sustainability Appraisal for the Issues and Options paper

.2 The option is clearly sustainable in that it supports a high-profile international obligation on energy efficiency. The impact on the cost of providing affordable housing units is difficult to determine precisely, but there is assumed to be some uplift in price in the short term, which would be offset by falling costs of energy technology in the longer term rendering its impact neutral.

.3 Question 30 asks whether the target for on-site renewable energy generation should be 10% or higher. The 10% target should be readily achievable without a significant effect on house prices. A higher target would make a much stronger contribution towards reducing the use of non-renewable energy sources and reducing emissions of greenhouse gases, however this would have a more significant effect on house prices, particularly in the short term.

# Issues not taken forward to Submission

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## Consultation Responses to Issues and Options

.4 Responses to the options suggested that respondents accepted the need to reduce carbon emissions. Many supported the introduction of on-site renewable energy technologies although a few concerns were expressed about their potential impact on viability of developments. Quite strong support was expressed for a target of 10% of energy requirements to be met by on-site renewable energy sources with suggestions that these should be progressively increased or higher levels aspired to further in the future. Some respondents saw the Code for Sustainable Homes as a methodology for achieving carbon neutral developments in combination with use of building regulations and considered planning policy on the issue to be superfluous. A 10 dwelling threshold was the most frequent put forward with some support for applying on-site renewable technologies to all developments. A few respondents thought 50 dwellings a more appropriate threshold or that a site by site basis should be used.

### Assessment of Responses and Alternative Approaches

.5 Following the government's announcement of its intention to make the Code for Sustainable Homes mandatory it was deemed unnecessary to address the details of energy use in the Core Strategy. Therefore, the issue was not taken forward at the preferred options stage.

## Tests of Soundness

.6 As this has been incorporated into other policy areas it is not considered necessary to consider this against the Tests of Soundness.

## Approach taken

.7 Respondents' overall concern with the need to reduce carbon emissions has been taken into account in changes made to the objectives. Consideration of energy use has been transferred to the Development Control Policies DPD which will address the requirement for detailed policies suitable for helping to determine individual planning applications.


## Re-use of Military Sites

### Core Strategy Issues and Options

#### Issues and Options identified for Consultation

Issue 13: The need to identify the most appropriate future use of military sites which are, or become, redundant.

Option 36: Policies could set out the strategic approach to re-use of military sites and include criteria against which to assess potential suitability of different types of use.



# Issues not taken forward to Submission

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Option 37: The Core Strategy could state that due to the potential scale of development that could be accommodated consideration of the future of Alconbury Airfield should await consideration at the first review of the Regional Spatial Strategy.

Question 45: What uses would you like to see RAF Upwood put to?

Question 46: Should the Future of Alconbury Airfield await consideration at the first review of the Regional Spatial Strategy?

Question 47: Disregarding the potential timing of any redevelopment, what uses would you like to see Alconbury Airfield put to?

Question 48: What uses would you like to see the airfield part of RAF Wyton put to?

Question 49: If it becomes available, what uses would you like to see RAF Brampton put to?

## Reasonable Alternatives

.8 The alternatives were identified within the options and questions given.

## Summary of Initial Sustainability Appraisal for the Issues and Options paper

.9 Although it is difficult to fully appraise either option without knowing what type of development may be proposed, it is considered that, in principle, redevelopment of these areas would be sustainable. Redevelopment of airfields would use significant areas of brownfield land and reduce pressure for greenfield development. It was suggested that proposals for the re-use of military sites would have to take into account their accessibility and the impact of development on the surrounding area.

## Consultation Responses to Issues and Options

.10 Responses to the options suggested for the four main military bases that may have potential for re-development during the plan period were understandably mixed. Some respondents considered that the airfield element of any of them should be allowed to return to nature. RAF Upwood received reasonable support for re-use by a mixture of housing and employment within the existing built area. RAF Wyton received general support for a mixed housing and employment redevelopment with some favouring the whole area and others just within the existing built area. RAF Brampton received support for a housing led mixed use redevelopment. Most respondents considered the fate of RAF Alconbury should await the RSS review or that the existing employment permission should be implemented.

## Further Options Consultation

### Towards a Spatial Strategy

In consideration of options for further growth in the 'Towards a Spatial Strategy' document the airfields at Alconbury and Wyton were identified as possible locations for Eco-town development. These airfields are both significant brownfield sites within the District. As two potential sites were identified the option was considered in two parts considering these two locations for the new settlement.

# Issues not taken forward to Submission

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A New Settlement at Wyton Airfield would potentially give rise to an estimated 6,700 homes. An Eco-town at Alconbury Airfield would potentially give rise to an estimated 9,500 homes. Both would require significant development of employment, shops, infrastructure, services and facilities to ensure that they are sustainable. It is estimated that development would continue well beyond the end of the extended plan period of 2026 even if these options were taken forward at this time.

It was emphasised that the future of Alconbury Airfield could only be considered through review of the Regional Spatial Strategy.

## Summary of Initial Sustainability Appraisal for Towards a Spatial Strategy

.11 Both options for an Eco-Town were considered sustainable as they both direct growth towards substantial brownfield sites in the District, although they would require significant infrastructure provision. In terms of accessibility, it was considered that Wyton Airfield is potentially more sustainable as it could be served by an extended Guided Busway route in the future. However, the Eco-Town option was considered more appropriate for future considerations as there are more sustainable locations to create an Eco-Town outside of the District.

## Key Stakeholders' Responses

.12 The suggestion that RAF Alconbury could be developed as an eco-town to provide a long-term solution to growth pressures in the district received a reasonable degree of support although many concerns were expressed over potential timing and the need to await the RSS review.

## Assessment of Responses and Alternative Approaches

.13 The approach to redevelopment of military sites is incorporated into the Spatial Strategy where this is appropriate. The re-use of military sites is reflected in the spatial principles and the strategic growth options for the District. Although not proposed allocations at this stage, the key diagram shows strategic directions of growth indicating the potential for mixed use redevelopment at RAF Brampton and RAF Upwood.

.14 RAF Alconbury has an outstanding consent for employment use although it is acknowledged that this is extremely unlikely to be implemented. Due to the potential scale of development that could be accommodated consideration of the future of Alconbury Airfield should await the review of the Regional Spatial Strategy.

## Tests of Soundness

.15 As this has been incorporated into other policy areas it is not considered necessary to consider this against the Tests of Soundness.

## Approach taken

.16 Part of the option has been incorporated into the employment policy of the Submission Core Strategy. It was felt necessary to include Alconbury Airfield as a number of representations objected to the Preferred Options not being clear on the Council's intentions regarding Alconbury Airfield. In terms of potential redevelopment of Alconbury Airfield, this is not an issue that the Council is considering prior to an RSS review. It was put forward for consideration in Towards A Spatial Strategy for Huntingdonshire as a potential site for an Eco-Town. When

# Issues not taken forward to Submission

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consulted on this document, key stakeholders indicated that Alconbury should be favoured over Wyton - another site put forward for an Eco Town - but expressed concern at this process being progressed outside of the RSS and the RSS review.

## Appendix 1 Accession Assessment

### Transport Policy and Strategy / New Communities

#### Response to Huntingdonshire Core Strategy 2007 – Preferred Options

**1.1** This response to the Huntingdonshire Core Strategy 2007 – Preferred Options consultation considers the sustainable transport issues raised by the proposals for housing growth.

**1.2** The response is divided into two sections. The first outlines the broad principles that we believe should guide the selection of preferred housing development sites in the Core Strategy, while the second section applies accessibility mapping to the identified option sites to assess their suitability in terms of sustainable transport accessibility to key services and destinations.

**1.3** Please note that the housing sites that were modelled for the LDF Issues and Options consultation response in June 2007 have also been used in this modelling exercise. The methodology however has been considerably improved, in that the assessment now considers a greater number of key services and destinations. More details are given in the section, 'Modelling of Option Sites'.

#### General Principles

**1.4** The preferred housing sites should abide by principles set out in national and regional policy, as well as those of the Cambridgeshire Local Transport Plan.

**1.5** The key objective is to integrate land use and transport so that travel by sustainable modes is made more practicable and attractive, thus reducing reliance on the private car. To achieve this, new developments must be situated in the most accessible locations.

**1.6** High trip generating development such as employment and retail uses should be concentrated in areas well served by public transport and within low distances of large populations to encourage travel by foot or bicycle. As such town centre and edge of centre sites should generally be favoured. Similarly residential development is best located at sites close to and linked by public transport to a range of services.

**1.7** All development will contribute, to some extent, to pressure on the road network and on sustainable travel options. It is therefore expected that all developments will contribute towards measures to mitigate these pressures. When determining where to allocate development it should be considered that some option sites offer more potential for sustainable travel improvements at a lower cost than other options. Suitable infrastructure and services will need to be provided to realise this potential.

**1.8** For any development there must be sufficient capacity in the road network to support development-generated trips by all modes. This cannot be assessed at the present stage in the LDF process. When more detailed proposals for sites come forward during subsequent stages the capacity of the road network will be a key factor for consideration.

**1.9** It is also important to recognise the contribution that transport makes to building liveable communities.

#### Modelling of Option Sites

**1.10** Building on the above principles we have assessed the accessibility of each of the option sites considered in the Huntingdonshire Core Strategy – Preferred Options paper.

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**1.11** Accession, the Geographical Information System (GIS) application, was used to assess the accessibility of each of the potential broad housing locations. The following methodology and assumptions underpin the model:

## Accession-based housing site assessment

The assessment considers accessibility in two ways:

- The time it takes to travel from the site by *public transport* to key services and destinations
- The *distance* to travel from the site using the road network to key services and destinations – this acts as a proxy for how accessible a site is by walking and cycling, since distance is the major determining factor in why people choose to travel by these modes

The following key services and destinations are included in the assessment:

- Area of town centre activity
- Secondary School
- Primary School
- Supermarket
- Large Supermarket
- Leisure Centre
- G.P. Surgery
- Hospital with outpatient facility
- Hospital with accident and emergency facility – to act as a proxy for a large-scale hospital
- Library
- Retail Centre
- Area of Employment with more than 500 employees
- Area of Employment with more than 1000 employees
- Area of Employment with more than 2000 employees
- Area of Employment with more than 5000 employees (nb there are 6 such sites within Cambridgeshire: 3 in Cambridge, 1 in the ward of Milton, 1 in Huntingdon and 1 in Wisbech. Peterborough has 3 such sites)
- Area of Employment with more than 10000 employees (nb there are just two such sites within the vicinity of Huntingdonshire: 1 in Cambridge and 1 in Peterborough)

**1.12** The following points need to be considered when viewing the results of the GIS assessment:

- The assessment focuses on sustainable transport accessibility alone. It does not reflect the capacity of the road network to support increased trip levels, nor any non-transport related development control issues, such as deliverability or service provision.
- Each site has been assessed in isolation from all other option sites. The results therefore do not reflect the cumulative impact of developing several sites or land uses in one area (i.e. were a large-scale employment site to be developed close to a housing site, this would improve the accessibility of the housing site since it would be located close to one of the key services).
- The assessment only considers presently available transport infrastructure and services, not those that would be brought forward through the developments. The suitability of a site for development could be improved as a result of transport enhancements made as part of the development.

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- A walk distance of 800 metres has been assumed in the public transport modelling to represent the maximum distance that travellers would be prepared to walk to the nearest stop/station.
- The key destinations selected for assessing residential site options have been drawn from a variety of different sources including the County Council’s Local Transport Plan and LDF Annual Monitoring 3b Indicators. Cross-boundary data has been obtained.
- Different time periods were used in the model for the public transport calculations, depending on the key destination – for example the time period used for accessibility to the areas of employment was 7-9am, the time period for accessibility to the nearest G.P. Surgery was 9am-12pm, whilst the time periods for accessibility to the nearest supermarket was both 9am-12pm and 6-9pm.
- Different criteria was used to determine what represented very good / good / acceptable / poor / very poor accessibility to different key destinations. For example, based on Planning Policy Guidance (PPG) 13 the criteria applied to the majority of destinations for the distance calculations was as follows:
  - Very good = less than 1km to key destination
  - Good = less than 2km to key destination (Maximum distance that walking is considered a viable alternative to the car according to PPG 13)
  - Acceptable = less than 5 km to key destination (Maximum distance that cycling is considered a viable alternative to the car according to PPG 13)
  - Poor = less than 8km to key destination
  - Very poor = more than 8km to key destination.

**1.13** For the majority of the public transport calculations the following criteria was used to determine the appropriate level of accessibility from each site to the key destinations:

- Very good = less than 10 minutes total travel time to key destination
- Good = less than 20 minutes total travel time to key destination
- Acceptable = less than 30 minutes total travel time to key destination (this is the threshold for public transport trips according to Government LDF Annual Monitoring Indicator 3b Guidance)
- Poor = less than 40 minutes total travel time to key destination
- Very Poor = more than 40 minutes total travel time to key destination.

## Results

**1.14** The option sites were assessed and grouped into one of five possible categories representing accessibility by sustainable modes to key destinations, based on the current road network and current public transport services. Table 1 below shows the average accessibility score of the housing locations for each spatial planning area:

**Table 9 Table 1: Accessibility Ranking of Potential Housing Locations**

Spatial Planning Area	No. of Homes Allocated	Avg. Score	Accessibility Rating	Key	
				Score	Accessibility Rating
Huntingdon Spatial Planning Area	1800 homes	2.29	Good	1 to 1.79	Very Good
St Ives Spatial Planning Area	500 homes	2.55	Good	1.8 to 2.59	Good
St Neots Spatial Planning Area	2600 homes	2.63	Acceptable	2.6 to 3.39	Acceptable

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Ramsey Spatial Planning Area	300 homes	3.20	Acceptable	3.4 to 4.19	Poor
Key Service Centres of Fenstanton, Sawtry and Yaxley	250 homes	3.34	Acceptable	4.2 to 5	Very Poor

1.15 Table 2 below shows the average accessibility score of each housing location modelled in the assessment:

**Table 10 Table 2: Accessibility Ranking of Potential Housing Locations**

Housing Site	Housing Description	Av. Score	Accessibility Rating	Key	
				Score	Accessibility Rating
Huntingdon B1	Brownfield, close to town centre	1.56	Very Good	1 to 1.79	Very Good
Huntingdon B2	Brownfield, close to town centre	1.78	Very Good		
Huntingdon C	Within built framework of town	1.81	Good	1.8 to 2.59	Good
Hunt'don (Godmanchester) I	Within built Framework of village	2.00	Good	2.6 to 3.39	Acceptable
St Neots O	Within built framework of town	2.00	Good	3.4 to 4.19	Poor
St Ives Q	Within built framework of town	2.28	Good	4.2 to 5	Very Poor
Huntingdon A	Greenfield, to north of town	2.44	Good		
Huntingdon (Brampton) G	Brownfield, extending to south	2.56	Good		
Huntingdon (Brampton) F	Within Built Framework of village	2.59	Good		
St Neots N	Greenfield, to east of town	2.59	Good		
Hunt'don (Godmanchester) J	Greenfield, to east of village	2.75	Acceptable		
Ramsey V	Within built framework of town	2.78	Acceptable		
St Ives P	Greenfield, to west of town	2.81	Acceptable		
St Neots (Little Paxton) L	Within built framework of village	2.91	Acceptable		
Yaxley BB	Within built framework of village	2.91	Acceptable		
St Neots (Little Paxton) K	Greenfield, to west of village	3.00	Acceptable		

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Huntingdon (Brampton) E	Greenfield, to west of village	3.09	Acceptable
Fenstanton W	Within built framework of village	3.25	Acceptable
Ramsey S	Greenfield, to north of town	3.25	Acceptable
Ramsey U	Brownfield, to southwest of town	3.31	Acceptable
Sawtry Y	Within built framework of village	3.38	Acceptable
Ramsey T	Greenfield, to west of village	3.44	Poor
Sawtry X	Greenfield, to west of village	3.59	Poor
Yaxley AA	Greenfield, to southwest of village	3.59	Poor

## Map showing accessibility assessment of potential locations for housing

**1.16** This can be found on the following page (below). Each star represents the centre point of each housing location. The colour of each star represents the average accessibility rating of each housing location.

### Analysis of Results – by Spatial Planning Area

**1.17** Table 1 shows that the average accessibility rating for sites within the Huntingdon and St Ives Spatial Planning Areas is ‘good’. The average accessibility rating of sites within the St Neots and Ramsey Spatial Planning Areas is ‘acceptable’, as is the average accessibility rating of sites within the key service centres of Fenstanton, Sawtry and Yaxley.

#### *Huntingdon Spatial Planning Area*

**1.18** The Huntingdon Spatial Planning Area scored highest overall largely because the town of Huntingdon has 15 of the 16 key services located within its environs (the only key service Huntingdon does not have is an area of employment with more than 10,000 employees) and the villages of Godmanchester and Brampton are relatively close to the key services within Huntingdon.

**1.19** The time it takes to travel from the sites within the Huntingdon Spatial Planning Area to the key services located within Huntingdon by public transport is good.

#### *St Ives Spatial Planning Area*

**1.20** The St Ives Spatial Planning Area scored well largely because the majority of the key services are located within the town of St Ives. The only services not located within St Ives are an area of employment with more than 5,000 employees, an area of employment with more than 10,000 employees, a hospital with an outpatient facility and a hospital with an A&E department.

**1.21** The time it takes to travel from the sites within the St Ives Spatial Planning Area to the key services located within St Ives and Huntingdon by public transport is good.

#### *St Neots Spatial Planning Area*



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**1.22** The St Neots Spatial Planning Area has very similar characteristics to the St Ives Spatial Planning Area. The majority of the key services are located within the town of St Neots. The only services not located within St Neots are an area of employment with more than 5,000 employees, an area of employment with more than 10,000 employees, a hospital with an outpatient facility and a hospital with an A&E department.

**1.23** The time it takes to travel from the sites within the St Neots Spatial Planning Area to the key services located within St Neots and Huntingdon by public transport is good.

## *Ramsey Spatial Planning Area*

**1.24** Sites within the Ramsey Spatial Planning Area scored lower than the other market town spatial planning areas because it has less key services located within its environs. The key services that are not located within Ramsey are areas of employment with more than 1000/2000/5000/10000 employees, an area of town centre activity, a hospital with outpatient facility and a hospital with an A&E department.

## *Key Service Centres of Fenstanton, Sawtry and Yaxley*

**1.25** Like Ramsey, the Key Service Centres of Fenstanton, Sawtry and Yaxley scored lower than the larger market towns because they have a lower number of key services located within or close to their environs. None of the potential housing sites within these villages are located close to a supermarket, large supermarket or areas of employment with more than 5000/10000 employees.

## **Analysis of Results – by town / village**

**1.26** Table 2 shows the accessibility rating for each location assessed in the modelling exercise. It can be seen that the top four sites are all contained within the Huntingdon Spatial Planning Area and the top two sites, both in Huntingdon, achieved an accessibility rating of 'very good'.

**1.27** All sites within the town of Huntingdon achieved a rating of either 'very good' or 'good'. Both sites in St Neots achieved a rating of 'good'.

**1.28** Sites in St Ives, Godmanchester and Brampton achieved accessibility ratings of both 'good' and 'acceptable'. All sites in Little Paxton and Fenstanton achieved accessibility ratings of 'acceptable'.

**1.29** Sites in Ramsey, Yaxley and Sawtry achieved accessibility ratings of both 'acceptable' and 'poor'.

## **Huntingdon**

### *Huntingdon B1*

**1.30** Public transport accessibility to all key services was rated as 'very good' from this site apart from accessibility to the nearest primary school, GP and area of employment with more than 10000 employees. However even for accessibility to these three key services the site achieved a rating of 'good' (the site achieved a rating of 'good' public transport accessibility to an area of employment with more than 10000 employees due to the proximity of the railway station, which makes it possible to travel to the nearest site in Peterborough in less than 30 minutes). Therefore in terms of public transport accessibility this site is excellent.

**1.31** In terms of accessibility by walking and cycling, this site is located very close to nearly all key services and therefore achieved a score of 'very good' or 'good' for each key service, the exceptions being accessibility to the nearest primary school for which it achieved a score of acceptable and area of employment with more than 10000 employees.

**1.32** Overall therefore this site achieved the highest sustainable transport score possible of 'very good'.

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## *Huntingdon B2*

**1.33** This site scored similarly to *Huntingdon B1* and also achieved the highest sustainable transport score possible of 'very good'. It scored marginally worse than *B1* for public transport accessibility to the nearest area of town centre activity, retail centre and leisure centre. It also scored worse than *Huntingdon B1* in terms of distance to the following key destinations: area of town centre activity, library, retail centre, GP, leisure centre, supermarket and large supermarket.

**1.34** However this site scored better than *B1* in terms of the distance to the nearest areas of employment with more than 500/1000/2000 and 5000 employees, primary school, secondary school, hospital with outpatient facility and hospital with an A&E department.

## *Huntingdon C and Huntingdon A*

**1.35** These sites both achieved an overall score of 'good' accessibility to key services. They scored less well than the *Huntingdon B* sites due to being located further from a number of the key services and having correspondingly longer public transport journey times.

## **St Neots**

**1.36** St Neots site *O*, located in the centre of town within the built framework, achieved an overall score of 'good' accessibility, as did St Neots *N*, located to the east of the town centre.

**1.37** Although they are both ranked within the same overall score of 'good' accessibility, *St Neots O* scored more highly than *St Neots N* in terms of the distance to the following key services: area of town centre activity, library, area of employment with more than 2000 employees, primary school, retail centre, GP, leisure centre, supermarket and large supermarket.

**1.38** *St Neots O* also scored better than *St Neots N* in terms of public transport accessibility to the following key services: area of town centre activity, library, area of employment with more than 1000 and 2000 employees, secondary school, retail centre, GP, leisure centre and large supermarket.

**1.39** It is anticipated however that since the development to the east of St Neots is likely to include several of the key services mentioned in the paragraphs above, the site's actual accessibility rating is likely to be higher than has been modelled here.

## **St Ives**

**1.40** St Ives site *Q*, located within the built framework of the town, achieved an overall score of 'good' accessibility, whilst St Ives site *P*, located to the west of St Ives, achieved an overall score of 'acceptable' accessibility.

**1.41** *St Ives Q* scored more highly than *St Ives P* in terms of the distance to the following key services: area of town centre activity, library, area of employment with more than 500/1000 and 2000 employees, primary school, retail centre, GP and large supermarket.

**1.42** *St Ives Q* also scored better than *St Ives P* in terms of public transport accessibility to the following key services: area of town centre activity, library, area of employment with more than 10000 employees, primary school, retail centre, GP, hospital with outpatient facility, supermarket and large supermarket.

**1.43** It ought to be noted that the accessibility score of both these sites is likely to improve with the introduction of the Guided Busway, bus priority measures between St Ives and Huntingdon and employment opportunities at the new town of Northstowe.

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## **Godmanchester**

**1.44** Godmanchester site *I*, located within the built framework of the village, achieved an overall score of 'good' accessibility, whilst Godmanchester site *J*, located to the south-east of the village, achieved a score of 'acceptable' accessibility.

**1.45** It is possible to reach all 16 modelled key services within an acceptable public transport time frame from site *I*, whilst it is possible to reach all apart from an area of employment with more than 10000 employees from site *J*.

**1.46** Site *I* scored more highly than Site *J* in terms of distance to the following key services: area of town centre activity, library, primary school, retail centre, GP, hospital with outpatient facility, hospital with A&E department, supermarket and large supermarket.

**1.47** Site *I* also scored better than Site *J* in terms of public transport accessibility to the following key services: area of town centre activity, library, area of employment with more than 1000/2000 and 10000 employees, primary school, secondary school, retail centre, GP surgery, hospital with outpatient facility, leisure centre, supermarket and large supermarket.

## **Brampton**

**1.48** Brampton site *F*, located within the built framework of the village, and site *G*, a brownfield development extending to the south of the village, both achieved a score of 'good' accessibility. Site *E*, a greenfield site to the west of the village, achieved a score of acceptable accessibility.

**1.49** Each site within Brampton is within an acceptable distance of the following key services: area of employment with more than 500/1000/2000 and 5000 employees, primary school, secondary school, GP surgery, hospital with outpatient facility and hospital with A&E. Sites *F* and *G* were also within an acceptable distance of the nearest retail centre and leisure centre.

**1.50** It is possible to reach the following key services by public transport within an acceptable timeframe from each site in Brampton: area of town centre activity, library, area of employment with more than 500/1000/2000 and 5000 employees, primary school, secondary school, retail centre, GP Surgery, hospital with outpatient facility, hospital with A&E, leisure centre, supermarket and large supermarket. I.e. all key services modelled apart from area of employment with more than 10000 employees.

**1.51** Site *E*, located to the west of Brampton, scored less well than sites *F* and *G* because it is located further from the centre of Brampton and therefore further from the key services.

## **Little Paxton**

**1.52** Both sites in Little Paxton achieved an overall accessibility score of 'acceptable'.

**1.53** Both sites are within an acceptable distance of the following key services: area of town centre activity, library, area of employment with more than 500/1000 and 2000 employees, primary school, secondary school, retail centre, GP Surgery, leisure centre, supermarket and large supermarket.

**1.54** Likewise both sites within Little Paxton are within an acceptable public transport timeframe of the following key services: area of town centre activity, library, area of employment with more than 500/1000/2000 and 5000 employees, primary school, secondary school, retail centre, GP Surgery, leisure centre, hospital with A&E department, supermarket and large supermarket.

## **Fenstanton**

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**1.55** The site at Fenstanton is within an acceptable distance of the following key services: area of town centre activity, library, area of employment with more than 500/1000 and 2000 employees, primary school and retail centre.

**1.56** This site is also within an acceptable public transport timeframe of the following key services: area of town centre activity, library, area of employment with more than 500/1000/2000/5000 and 10000 employees, primary school, secondary school, retail centre, GP Surgery, hospital with A&E, leisure centre, supermarket, large supermarket.

## **Ramsey**

**1.57** Three of the four sites in Ramsey achieved an overall score of 'acceptable' accessibility: site *V*, located within the built framework of the town, site *S*, located to the north of Ramsey and site *U*, located to the southwest of Ramsey. Site *T*, located to the west of Ramsey, achieved an overall score of 'poor' accessibility.

**1.58** As explained above in 'Analysis of Results – by Spatial Planning Area', sites in Ramsey do not score as well as the other market towns because Ramsey has fewer of the key services located within its environs.

**1.59** Site *V*, although falling in the same overall band as *S* and *U*, scored better than all the other sites in Ramsey in terms of distance to the following key services: library, primary school, retail centre, GP Surgery, leisure centre and supermarket. Site *V* also scored better than all the other sites in terms of public transport accessibility to the following key services: primary school and GP surgery.

**1.60** Ramsey site *T* scored lower than all other sites in Ramsey in terms of public transport accessibility to the nearest GP Surgery and Supermarket.

## **Yaxley**

**1.61** Yaxley site *BB*, located within the built framework of the village, achieved a score of acceptable accessibility, whilst site *AA*, located to the southwest of the village, achieved a score of 'poor' accessibility.

**1.62** Both sites in Yaxley are within an acceptable distance of the following key services: library, area of employment with more than 500/1000 and 2000 employees, primary school and GP Surgery.

**1.63** Both sites are also within an acceptable public transport timeframe of the following key services: library, area of employment with more than 500,1000, 5000 and 10000 employees, primary school, secondary school, GP Surgery, hospital with an A&E department, leisure centre, supermarket and large supermarket.

**1.64** Site *AA* achieved the lower score of 'poor' accessibility because it scored lower than site *BB* in terms of distance to the following key services: library, area of employment with more than 500 employees, primary school, secondary school, GP Surgery and leisure centre and because it scored lower than site *BB* in terms of public transport accessibility to the following key services: area of town centre activity, library, area of employment with more than 500/2000/5000 and 10000 employees, primary school, secondary school, retail centre, GP Surgery, hospital with outpatient facility and leisure centre.

## **Sawtry**

**1.65** Sawtry site *Y*, located within the built framework of the village, achieved a score of 'acceptable' accessibility, whilst site *X*, a greenfield development located to the west of the village, achieved a score of 'poor' accessibility.

**1.66** Both sites in Sawtry are within an acceptable distance of the following key services: library, area of employment with more than 500 employees, primary school, secondary school, GP surgery and leisure centre.

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**1.67** Both sites are within an acceptable public transport timeframe of the following key services: library, area of employment with more than 500 and 1000 employees, primary school, secondary school, GP Surgery and leisure centre.

**1.68** Site X achieved the lower score of 'poor' accessibility because it scored lower than site Y in terms of distance to the following key services: library and secondary school and because it scored lower than site Y in terms of public transport accessibility to the following key services: library, area of employment with more than 2000 employees, primary school, secondary school and retail centre.

## Conclusions

**1.69** This Accession-based assessment has provided an indication of which potential broad locations have the best accessibility under current transport conditions and are therefore most suitable for development.

**1.70** The study has shown that the spatial planning areas of Huntingdon, St Neots and St Ives are more appropriate to accommodate further housing development than the spatial planning area of Ramsey and the key service centres of Fenstanton, Sawtry and Yaxley. These results provide support to the preferred options for housing growth outlined by Huntingdonshire, which focus the majority of development on St Neots and Huntingdon.

**1.71** The capacity of the road network surrounding all the locations modelled in this study would first have to be assessed in detail in order to confirm the suitability of these locations for larger developments.

**1.72** All locations are likely to require a significant investment in transport infrastructure or services. Locations that performed less well are likely to require a proportionately greater investment if they are to sustainably support development.

# Accession Assessment

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Figure 1.1 Map of Accessibility of Hunts Potential Housing Sites



# Schedule of Representations

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## Appendix 2 Schedule of Representations

**2.1** This section sets out a summary of the representations received during the consultation on Preferred Options that took place between 30 November 2007 and 11 January 2008. Also set out here is the officer response to the representations and the action taken to modify the Core Strategy as part of the production of the Submission Version.

**Table 11 Representation Key**

Type	Description of Representation
O	Oppose
C	Comment
S	Support

**2.2** Please note that in some cases it has been necessary to amend summaries provided by consultees or to write summaries if they were not provided by the consultee.

# Schedule of Representations

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Table 12 Representations received on the Introduction of the Preferred Options Core Strategy

Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Edwards			6	C	An urgent review of roads including the A14, the A428 and the A1 is needed. Without improvements the growth in housing and businesses will not be possible.	The Core Strategy has been informed by a Transport Assessment to assess the impacts of development on the strategic highway network. The review the consultee seeks need to be carried out by the Highways Agency as the District Council is not responsible for the strategic highway network. Improvements to the A14 will alleviate problems of congestion and the physical barrier caused by the road. The Council recognises that careful phasing of greenfield development near to the A14 will need to be phased to coincide with A14 improvements.	Submission plan revised to include information provided by the Spatial Strategy Options Assessment in Appendix 1 of Volume 2.
Maydo Pitt	GO-East		67	S	Clear and concise particularly spatial strategy	Comments noted.	None needed.
Maydo Pitt	GO-East		69	C	Submission version will need to identify which extant saved local plan policies will be replaced/ superseded by the Core Strategy.	This information will be included in the Submission version of the Core Strategy.	Submission plan revised to include information in Appendix 3.
Geoff Keeble	Highways Agency		66	C	No attempt made to address the impact of the preferred option on the strategic highway network through modelling, and no comparison of the options in Towards a Spatial Strategy provided. Much of the development in the preferred option is reliant upon major transport improvement schemes (eg	The impact of development on the strategic highway network was being completed as the Preferred Options was published. The Council had been informed of progress made on the modelling which had informed the choice of Preferred Option. The modelling work will be complete for the Submission	Submission plan revised to include information in Appendix 1 Volume 2.



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					Ellington to Fen Drayton) which the Report does not acknowledge. In addition, no reference is made to demand management or measures to reduce travel in a meaningful way.	Core Strategy and this will clearly set out the impact on the strategic highway network for the Preferred Option.	
Ms Diane Millis	Woodland Trust		58	C	Incorporate the Woodland Trusts aims as listed.	These are too detailed to be included in the Core Strategy.	None
Mr Steven Harvey	n/a		134	O	Object to lack of objectives/policies relating to provision for rural services and emphasis on urban concentration which also fails to consider provision of appropriate growth. Include policy to support the provision of jobs, affordable homes, leisure and community facilities within existing rural communities.	Due to the nature of the Core Strategy the objectives and policies concentrate mainly strategic scale development. It is unrealistic to expect the Core Strategy to identify in detail development opportunities in rural areas as these are likely to be small scale, diverse and numerous. Provision is made in the Core Strategy for development in Key Service Centres and Smaller Settlements and for specific types of development in the countryside. Further references and clarification of these provisions will be included in the submission version.	Submission plan revised to clarify provision of rural housing in Policy CS5.
P Bryant	Somersham PC		90	C	Support strategy based on objectives and vision however, these should be properly drafted so as to avoid misinterpretation and should be used consistently.	The monitoring proposals will ensure that the objectives will be implemented consistently.	None needed.
Mr David Reavell	O&H Properties Ltd		204	S	Very clear and concise. We commend the concise nature of the Core Strategy	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Martin Leyland	Barratt Strategic		222	C	Very clear and concise.	Comments noted.	None needed.
Jockey Club Racecourses	Jockey Club Racecourses		626	C	The Core Strategy should contain a policy on tourist accommodation covering the development of camp sites chalets, or cabins for tourist accommodation that should be allowed in the countryside subject to environmental criteria as these facilities are becoming increasingly important in allowing the diversification and growth of rural businesses.	Suggestion not accepted. Tourist Accommodation is not considered to be a Core Strategy issue and will be covered in the Development Control Policies DPD.	None needed.
Marlborough Developments Ltd	Marlborough Developments Ltd		516	S	Very clear and concise	Support noted.	None needed
Kevin Walker	Hinchingbrooke Health Care NHS Trust		623	S	Support. Emphasise that HDC will need to work with Cambridgeshire PCT to ensure that all GP practices – those in St Neots in particular - are configured in an efficient and accessible way for the increased population in that area as a result of preferred spatial strategy. Adequate consideration needs to be given to access into the Hospital site for emergencies and to traffic generated by other nearby developments eg Regional College. Development needs to support the "Sustainable Hospital Project"	A Transport Assessment has been carried out using modelling work to forecast the potential impact of development on the strategic highway network and will be included in the Submission version. The Core Strategy is too high level to detail specific issues relating to development sites eg access into the Hospital site. This will be considered in more detail in the Huntingdon West Area Action Plan and Planning Proposals DPD.	Submission plan revised to include information taken from the Transport Assessment Appendix 1 of Volume 2.

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Huntingdonshire District Council | Core Strategy - Submission Version - Volume Two

Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Councillor Jennifer Bird	St. Neots TC		638	C	Identifies significant infrastructure requirements in St Neots prior to further development including: 1) road network, 2) town centre revitalisation, 3) adequate leisure facilities, 4) a new cemetery, 5) A428/A1 improvements, 6) land for employment, 7) secondary school provision, 8) foul water and sewage improvements and 9) adequate surface water drainage.	The Core Strategy is intended to be a high level document covering the whole District. It does not cover specific issues arising from potential development. Information relating to infrastructure requirements and phasing will be dealt with in a Masterplan, and submitted application as well as the Planning Proposals DPD. The forthcoming Planning Contributions SPD will give further guidance on infrastructure requirements expected from development.	None needed.
Tom Gilbert-Wooldrige	English Heritage	2	114	O	Not enough reference to how the environment (inc historic) will be maintained and enhanced. Reference is made in P1 Sustainable Development but not supported by other policies. Include locally distinctive policies relating to the historic built and natural environment with explicit reference to environment issues. Listed documents in evidence base relating to landscape and townscape not sufficient.	While it is acknowledged that more could be included concerning protection and enhancement of the environment it should be remembered that policies are to be read in conjunction with other policy documents such as the Landscape and Townscape SPD. Therefore it should not be necessary to have repetitive references to protection of the environment in each policy.	None needed.
Maydo Pitt	GO-East	2.10	68	C	Volume 1 should contain more cross references to Volume 2. Not always immediately clear in the reasoned justification which of the options considered at earlier consultation stages was taken forward eg housing and employment strategies.	Comments noted. Cross referencing and explanation of preferred options will be considered carefully for future documents.	Submission plan revised to include more cross referencing. More detailed information on previously considered options is provided in Volume 2.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr John Chase	Buckden PC	3.1	131	C	Support. Core Strategy addresses provision of infrastructure and employment as well as housing. Support concentration of growth east of St Neots although concerned over future development A428	Support noted.	None needed.
Mr Gary Parsons	Anglian Water	4.5	7	C	Recommends undertaking a water cycle strategy.	A Watercycle Study is being prepared.	Submission plan has been revised to take account of the Local Infrastructure Framework which also includes a Watercycle Study.
Ian Burns	Cambes PCT	4.6	159	S	Support intention to take into account SCS for LDF particularly important for health and well being.	A key requirement of the LDF is that regard is had to the Sustainable Community Strategy. The Council has always tried to ensure that the LDF has more than just regard to the SCS and that the two are prepared in tandem.	None needed.
Rose Freeman	The Theatres Trust	4.6	362	C	Support, especially recognition of cultural and leisure opportunities.	Support noted.	None needed.
Ian Burns	Cambes PCT	4.9	161	C	Hunts LSP has endorsed the new Sustainable Community Strategy and it is this which should be detailed	Both the CS and the SCS have been referenced as the SCS was in production when the Core Strategy Preferred Options were being prepared.	Submission plan revised to include appropriate references.
Rose Freeman	The Theatres Trust	4.11	363	C	Notes significance of the emerging Huntingdonshire Cultural Strategy	Comments noted.	Huntingdonshire Cultural Strategy has been added as a supporting document.
Geoff Keeble	Highways Agency	4.12	62	C	No transport assessment has been provided for the spatial strategy and although modelling work is underway, the results are still in the future. Unclear how HDC are able to take into account the	Transport Assessment is underway. Any required amendments will be made for Submission of the Core Strategy.	Submission plan revised to include information provided by the Transport Assessment in Appendix 1 of Volume 2.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Paul Cronk	Home Builders Federation	4.12	96	C	Evidence base needs to include a Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment.	A draft SHMA was available for the Preferred Options. The final version will inform the Core Strategy for submission.	Submission plan revised to take account of the completed SHMA.
Ian Burns	Cambs PCT	4.12	163	C	Not confident that recommendations of the rapid Health Impact Assessment were adequately taken into account; particularly important given the scale and location of housing proposals in St Neots. HIA should be added to the list of reference documents.	The referenced document has been taken into account, however the Council cannot give full weight to it as assessment of options A and D was not included.	Submission plan revised to include reference to Health Impact Assessment in Appendix 2 Volume 1.
Ian Burns	Cambs PCT	4.12	164	C	Recommend that future LDF development is informed by the Overarching Health Needs Assessment published in 2007 by Cambridgeshire PCT (Cambs PCT) and any subsequent Joint Strategic Needs Assessments (JSNAs) due to be published in 2008 be added.	The Core Strategy has been developed in close consultation with the Cambridgeshire PCT and the submission version responds to a number of issues raised (see subsequent representations). Any requirements for additional facilities will be taken into account. The Joint Strategic Needs Assessment was not available during preparation of the Core Strategy Submission Report and the Overarching Needs Assessment does not provide sufficient information on the number of facilities needed to be able to inform the Core Strategy.	Further work with the PCT will be required for subsequent DPDs.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Chris Blackman	Cambs CC	4.12	467	C	Acknowledge the Cambridgeshire and Peterborough Structure Plan Saved Policies in policy context boxes, along with the Draft RSS and relevant National Guidance. Reference could be made to the Sustainable Construction in Cambridgeshire Good Practice Guide and design guide (2007).	Reference to documents identified in the representation has been made in Volume 2. Further references in section 4 will be considered.	Submission plan revised to include Saved Policies in Appendix 3 and reference is made to Sustainable Construction in Cambridgeshire Good Practice and Design Guide in Appendix 2 of Volume 1. Volume 2 details the policy context boxes.
Adam Ireland	Environment Agency	4.12	533	C	Strategic Flood Risk Assessment sound to inform Core Strategy. Will need to be updated for future documents eg Planning Proposals	The SFRA has informed preparation of the Core Strategy. The Council has also been engaged in extensive consultation with the Environment Agency to ensure strategic development is directed away from areas of flood risk.	The SFRA will be updated for subsequent DPDs.
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	4.12	646	C	All documents contributing to the evidence base should be listed in the Core Strategy.	Volume 2 of the Preferred Options makes detailed reference to documents that have formed part of the evidence base for the relevant section. It is intended that a full list of documents will be included in the Submission Core Strategy.	Submission plan revised to include a list of documents that make up the evidence base in Appendix 2 of Volume 1.
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	4.12	647	C	No reference is made to a housing trajectory (or to an infrastructure trajectory) as forming part of the evidence base.	It is not clear as to what the consultee is referring when reference is made to an Infrastructure Trajectory.	Submission plan revised to include a Housing Trajectory in Chapter 6 Monitoring. The supporting text and reasoned justification for the infrastructure policy have been strengthened.

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Table 13 Representations received on Ch 5 Spatial Vision

Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr David Reavell	O&H Properties		216	O	To be an accurate portrait, the Spatial Portrait should include a paragraph on the dispersed pattern of smaller settlements - and the relationship between them and surrounding areas - which characterises much of Huntingdonshire.	Comments accepted. Detail as described will be included in the Spatial Portrait.	Submission plan revised to include reference to the historic form of villages common across the District in paragraphs 3.8 and 3.9 of Volume 1.
Martin Leyland	Barratt Strategic		228	O	To be an accurate portrait, the Spatial Portrait should include a paragraph on the dispersed pattern of smaller settlements - and the relationship between them and surrounding areas - which characterises much of Huntingdonshire	Comments accepted. Detail as described will be included in the Spatial Portrait.	Submission plan revised to include reference to the historic form of villages common across the District in paragraphs 3.8 and 3.9 of Volume 1.
Marlborough Developments Ltd	Marlborough Developments Ltd		517	C	To be an accurate portrait, the Spatial Portrait should include a paragraph on the dispersed pattern of smaller settlements - and the relationship between them and surrounding areas - which characterises much of Huntingdonshire	Comments accepted. Detail as described will be included in the Spatial Portrait.	Submission plan revised to include reference to the historic form of villages common across the District in paragraphs 3.8 and 3.9 of Volume 1.
Ian Burns	Camb's PCT	5.3	165	S	Supports the encouragement of regeneration of areas of deprivation within St. Neots, Huntingdon and	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr S Ross	n/a	5.4	98	O	Ramsey, which will reduce health inequalities and promote social inclusion. Adjoining Peterborough and the Hamptons, Yaxley lies in a particularly sustainable location, similar to Godmanchester being close to Huntingdon and is capable of accommodating more development than other key service centres. It can take more required merely to sustain local services and facilities.	It is not considered appropriate to include specific detail about individual Key Service Centres, however more detail may be included about the character and nature of the district outside of the 4 market towns. Yaxley has been identified as a Key Service Centre and as a suitable location for large scale development. This is considered to be the most appropriate approach given the services and facilities available in the village and the accessibility of services and facilities in Peterborough.	None needed.
Mr Tim Fryer	Brampton PC	5.5	315	C	Typo in 5th line.	This will be corrected for the submission version.	Submission plan revised to correct spelling error.
Mrs Lynn Targett	n/a	5.7	22	C	The village of Bury has not merged with Ramsey and deserves as much recognition as any of the other villages in Huntingdonshire, and its current treatment is in fact against the Spatial Vision and the Objectives of the Core Strategy.	Bury has been regarded as part of the market town of Ramsey since the adoption of the Local Plan Alteration due to its functional dependence and proximity to Ramsey. It is not considered necessary to change this approach. Consideration will be given to how best to recognise the close proximity of Bury and Ramsey.	None needed.
Strawsons Devt t/a Omnivale	Strawsons Devt t/a Omnivale	5.7	548	O	Delete all after sentence 3 in 5.7, replace with "Although Ramsey is relatively remote and lies off the primary road network, it has functioned	Suggestion not accepted. Although the first part is considered appropriate, the second part should not be included in the Spatial Portrait as it goes beyond the descriptive role of the portrait.	None needed.



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
					<p>historically as a service and employment centre for this part of Huntingdonshire and the Fens. However, its service and employment role has been eroded in recent years and the Town is somewhat run down and in need of regeneration.. It continues to be the focus of a number of regeneration initiatives and is developing its heritage assets. However, these initiatives will not in themselves be sufficient to arrest the trend of decline. There is an opportunity for development on a moderate scale (in strategic terms) in the future to stimulate and facilitate economic, social and physical regeneration, by creating new jobs, by broadening the range and type of housing and by providing new or improved community infrastructure and services; in order to create and maintain a balanced and sustainable community, to restore and consolidate the town's traditional role in the settlement hierarchy</p>		

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Gareth Ridewood	CPRE	5.11	72	S	Should recognise the importance of the Ouse Valley, its flood meadows and associated biodiversity.	There is already a clear reference to the Ouse Valley in paragraph 8.8 and this will be included in the submission version.	None needed.
Ms Diane Millis	Woodland Trust	5.11	60	S	The Woodland Trust supports the reference to its sites. However, the Regional Woodland Strategy for the East of England - 'Woodland for Life' (EERA/ Forestry Commission 2003) should be acknowledged and supported.	The Council aspires to meet the targets set out in the strategy however, the Core Strategy is intended to be a high level strategic document in which such specific targets are inappropriate. The document Woodlands for Life will be considered in more detail when preparing the Development Control Policies DPD.	The Woodland Strategy will be considered when preparing the Development Control Policies DPD.
Chief Engineer	Middle Level Commissioners	5.12	371	C	Reference should be made to the Middle Level Commissioners' system which controls the support link route connecting the EA's River Nene and Great Ouse.	Additional reference is appropriate.	Submission plan revised to include reference to the network of waterways in paragraph 3.15
Rose Freeman	The Theatres Trust	5.12	364	C	Note that Tourism and leisure are important contributors to the local economy	The important contribution that tourism makes to the local economy will be referenced.	Submission plan revised to include reference to tourism and the local economy in paragraph 3.15 and objective 5.
Ms Diane Millis	Woodland Trust	5.13	71	S	Green infrastructure is more than just a series of linear green corridors linking biodiversity areas. It should be defined here as:	Support noted. It is considered appropriate to include green infrastructure in the glossary.	Submission plan revised to include definition of green infrastructure in the glossary (appendix 1).

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Steven Harvey	n/a	5.13	135	S	<p>"a broad network of multifunctional greenspace which helps provide a natural life support system for people benefiting health, recreation, flood amelioration, carbon sequestration and local biodiversity."</p> <p>Support this statement that the creation of balanced sustainable communities requires timely provision of infrastructure and that infrastructure is more than just the physical provision of utility services and highways;</p>	Support noted and this aspiration has been incorporated into a strengthened implementation chapter.	Submission plan revised to incorporate this aspiration into the implementation chapter.
Ian Burns	Cambs PCT	5.16	169	O	<p>Should reflect all health care service requirements. Suggested wording: "Cambridgeshire Primary Care Trust is responsible for the overall commissioning of health care services in Cambridgeshire. National and local health policy is seeking to provide a greater range of healthcare services in accessible locations, closer to patients' homes. Considerable expansion and improvements to the community based Health infrastructure in</p>	Some of the proposed wording is considered acceptable and will be included.	Submission plan revised to include more information on the responsibilities of the PCT in paragraph 3.22. Additional detail has been included on local provision of healthcare. The proposed wording has been included in full in paragraph 5.96.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Geoff Keeble	Highways Agency	5.18	48	C	<p>Huntingdonshire will be required during the period covered by the Core Strategy. The PCT identifies potential sources of capital and revenue funding for health infrastructure, including contributions from new housing developments."</p> <p>Prior to the completion of the A14 Ellington – Fen Ditton improvement scheme, the HA is unlikely to be able to support the provision of any new development likely to impact upon the Trunk Road, as additional new development-related traffic will further exacerbate the strategic highway network congestion. The District should demonstrate cognisance of the recently published Circular 02/2007 (Planning and the Strategic Road Network) and government guidance regarding transport assessments within their LDF documents.</p>	<p>The Council is well aware of the HA's concerns about development and the impact on the strategic highway network. It is however considered to be impractical to have a complete moratorium on developments. The Council and consultants commissioned to carry out the TA have had full regard to Circular 02/2007.</p>	<p>Submission plan revised to significantly strengthen the Infrastructure and Implementation chapter and include information provided by the TA in Appendix 1 of Volume 2.</p>
Ms Diane Millis	Woodland Trust	5.18	73	C	<p>Woodland Trust seeks a statement that any new transport schemes should not directly</p>	<p>While the importance of Ancient Woodland is not disputed and the Council will do everything it can to ensure its protection, it is not possible</p>	<p>None needed, further information on protecting ancient trees and ancient woodland</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Tim Fryer	Brampton PC	5.18	316	C	<p>necessitate the removal of ancient woodland and ancient trees</p> <p>Brampton PC considers that removal of the A14 viaduct may not improve local road access to Huntingdon town centre but will have a detrimental effect on local traffic. Specific attention should be given to improving access to Huntingdon railway station.</p>	<p>to guarantee against adverse impacts from infrastructure development which is out of the control of the Council. The protection of ancient trees and woodlands is an issue that will be dealt with in more detail in the Development Control Policies DPD.</p> <p>It is the Council's opinion that it should be possible to improve access based on studies under taken by Cambridgeshire County Council. Improvements to access for Huntingdonshire railway station should be possible but could be considered as part of the Huntingdon West Area Action Plan.</p>	<p>will be provided in the Development Control Policies DPD.</p> <p>None</p>
Geoff Keeble	Highways Agency	5.19	49	C	<p>The HA notes that there are no proposals for the widening of the A1 A428 between the A1 and Caxton in the the East of England Plan. Without grade-separation, severe congestion is forecast to occur in 2021 at the approaches to the A1/A421/A428</p>	<p>Clarification of the issue raised in the representation should be made.</p>	<p>Submission plan revised to clarify the point made in paragraph 5.84</p>
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc, David Wilson Estates	5.19	433	S	<p>Supports the provision of a High Quality Public Transport Corridor along the A428 between St Neots and Cambridge and improvements to the A428 between Caxton Gibbet and the A1. This would support housing and employment</p>	<p>Support noted. The Infrastructure section will be rewritten to clarify the Council's approach to developer contributions and any standard charges including the GIL</p>	<p>Submission plan revised to strengthen Implementation Chapter which has been informed by the Local Infrastructure Framework. The Chapter clearly sets out the Council's approach to developer</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
					growth, including the growth to the East of St Neots. Developer contributions should be proportionate to the impacts, recognising there is already a sub-regional requirement for such infrastructure.		contributions and CLI (particularly paragraph 5.98).
Ms Diane Millis	Woodland Trust	5.20	74	S	Climate change is the greatest single threat to the long term survival of ancient woodland. The Woodland Trust supports the emphasis on public transport, cycling and walking as more sustainable modes of transport to reduce carbon emissions.	Support noted.	None needed
Ian Burns	Cambs PCT	5.21	172	S	Seeks a commitment to improving access to NHS sites. The Hunts NHS Travel Planning Sub-Group, wish to ensure that patients and staff needing to travel to NHS sites across Hunts are able to do so in ways which both increase accessibility and promote sustainable ways of travelling.	The Core Strategy is intended to be a high level strategic document and it is not appropriate to include such detailed information in it. Where appropriate, issues of access to the Hospital site will be covered by the Huntingdon West AAP.Support noted.	None needed.
Mr Steven Harvey	n/a	5.22	137	O	Objects to the fundamental failure to reflect the Government's emphasis on the	The PPS1 Climate Change supplement was published after the Preferred Options it was therefore impossible to take its content into account or make reference to it. It is acknowledged that the draft of this supplement was	Submission plan revised to include reference to PPS1 Climate Change in Volume 2 in the policy context.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Michael Palmer-Asplin	n/a	5.23	23	C	<p>creation of balanced healthy and sustainable communities.</p> <p>Should make direct reference to PPS1 Climate Change requirements to take account of 'the capacity of existing and potential infrastructure (including for energy supply, waste management, water and sewerage, and community infrastructure such as schools and hospitals) to service the site or area in ways consistent with cutting carbon emissions and successfully adapting to likely changes in the local climate'.</p> <p>Greater clarity and transparency is sought in the derivation of the housing completion and permissions figures in para 5.23, particularly the origin of the 8,500 dwellings completed/permitted since 2001. It should also demonstrate that there has been no double-counting and that demolitions/amalgamations have been taken into account.</p>	<p>available and this has been referenced in Volume 2. However the extent to which the draft could be taken into account was limited as the final version could have change substantially as has been seen with PPS3. The Core Strategy will be amended where necessary to take into account the PPS1 supplement and make more explicit reference to it.</p> <p>It is accepted that more detail as to housing delivery and requirements for the plan period should be given in the Core Strategy. It is considered that this information is best provided in the policy and supporting text of the Strategic Housing Growth policy.</p>	<p>Submission plan revised to include information on housing completions within policy CS2.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Geoff Keeble	Highways Agency	5.23	50	C	The additional 2,750 homes be required between 2021 and 2026 is the same as that put forward in 'Towards a Spatial Strategy for Huntingdonshire'	The housing requirement that the Council is planning for has not changed from Issues and Options as no changes to the housing requirements for Huntingdonshire have been made to the East of England Plan. Comments noted.	None needed.
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc, David Wilson Estates	5.23	436	O	The Core Strategy suggests a residual requirement for 2750 dwellings in the period to 2021 and an extra 2750 homes to allow for a 15 year supply of housing upon. Expresses concern that this appears to assume that 100% of the identified land with planning permission will be implemented/ built out. As the Council cannot exactly determine how many units will be delivered on committed land within the Plan period, a flexibility allowance is essential.	The Strategic Housing Development policy is flexible as, when identifying numbers of dwellings to be built, reference is made throughout to "at least." Additional information on existing commitments will be provided. This policy is supplemented by Policy CS3 which provides for windfall development and is sufficiently flexible.	Submission plan revised to include information on existing commitments in Policy CS2.
Lands Improvement	Lands Improvement	5.23	351	O	There is no detailed breakdown of the housing figures in terms of how many have actually been built or what the figure is for existing planning permissions. It would also seem that there has been no discounting applied to the existing permissions for sites	RSS rate from 2006 to 2021 for Huntingdonshire is 550. The RSS makes it clear that it is this rate that should be used to ensure 15 year supply.	Submission plan revised to include information on existing commitments in Policy CS2.



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	5.23	645	S	that may not be constructed. It is therefore not possible to analyse the Council's housing calculations. Supports the Core Strategy providing for the housing requirement through to 2026	Support noted.	None needed.
Twigden	Twigden Homes	5.23	565	O	Paragraph 5.23 identifies the requirement for 2021-2026 as 2,750 dwellings. This should be 2,800 dwellings in line with the rate set out within the East of England Plan.	The consultee is incorrect. The RSS clearly identifies the yearly delivery requirement for the period from 2006 to 2021 for Huntingdonshire to be 550. It is also clear that this rate should be used in order to plan for the 15 year period required by PPS3.	None needed.
Mr Steven Harvey	n/a	5.24	138	O	Fails to reflect the Government's emphasis on the provision of housing to meet the local needs of rural communities, in terms of sheltered housing for elderly people, special needs housing, 'intermediate' shared equity housing, small 2/3 bed 'starter' homes, adaptable 'lifetime homes' for the ageing population, live/work units and housing designed to encourage people to work from home, together with appropriate childcare, educational, health, community and 'green'.	The paragraph makes no reference to rural housing need. This paragraph will be added to with further detail of the housing need in the District.	Submission plan revised to include additional detail on housing need in paragraph 3.27 and the reasoned justification of policy CS4.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Steven Harvey	n/a	5.25	139	O	<p>infrastructure to support a balanced, healthy and sustainable community.</p> <p>The needs of rural communities will not be satisfied simply by the addition of small clusters of new social rented houses.</p> <p>Fails to acknowledge and respond to the needs of residents outside the four main urban areas (over half the population) to travel less and work nearer home; should provide local solutions to job provision and positive support for employment creation district-wide, not just within urban areas, and support mixed use development as the most sustainable option.</p>	<p>It is proposed to expand the information and detail in the Spatial Portrait about employment and the economy of the district. Paragraph 5.25 deals with the requirements for employment development in the Planning context such as the requirements from the EEP.</p> <p>It is not clear in the representation what the consultee is referring to when referencing PO2 as policy 2 in the Preferred Options deals with strategic housing and not employment.</p>	<p>Submission plan revised to include more information on the economy in paragraphs 3.13 and 3.14. The spatial strategy ensures covers key service centres outside the main urban areas and other policies, such as policy CS5 deals specifically with the housing needs of rural communities.</p>
R W Dew and Son Ltd	R W Dew and Son Ltd	5.26	11	C	<p>There is a need to make allowance for small scale employment development (new development or change of use of existing buildings/sites) in villages - this would be consistent with the emerging Hunts Sustainable Community Strategy.</p>	<p>Small scale development for employment in villages would not take place on a strategic scale. The Development Control Policies DPD will consider appropriate policies on this matter.</p>	None

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Geoff Keeble	Highways Agency	5.27	51	C	The quantum of retail floorspace is the same as that put forward in "Towards a Spatial.	No change has been made to the quantum of retail floorspace, informed by the Retail Assessment, since Issues and Options.	None needed.
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	5.27	245	C	The Retail Assessment Study has a relatively low aspiration in only aiming for a "slight increase" in the proportion of expenditure retained locally as a result of a more attractive retail offer.	Although the Retail Study aspires to a 'slight increase' the amount of retail floorspace development need to achieve this is substantial. It is considered that 20,000sqm of comparison floorspace will not be easy to achieve. It is also considered appropriate to try to achieve incremental improvements as much larger changes will be difficult to maintain and could bring unexpected detrimental side effects.	None needed.
Stanton Group Developments Ltd	Stanton Group Developments Ltd	5.27	428	C	Supports the additional policies proposing further retail development but it should be made clear that the quantitative figures do not represent a ceiling of provision that is not to be exceeded but a general order of provision.	Policy Wording 8 is clear that the 20,000sqm is not considered to be a maximum. This policy will be taken forward into the Submission Core Strategy	None needed.
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	5.28	246	O	Paragraph 5.29 does not deal with convenience goods shopping due to the small quantity of convenience floorspace involved. This is inappropriate as this should be part of the overall retail strategy and must be a strategic consideration.	It is considered that the amount of convenience floorspace that is required is low and because the figure could easily be taken up by relatively minor development it is not necessary to make specific provision in the strategy. This paragraph will be expanded to better clarify the approach to convenience floorspace provision.	Submission plan revised to clarify the Council's approach to convenience floorspace provision in paragraph 3.32 and later in paragraph 5.56 in the reasoned justification for policy CS8 (land for retail development).

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Stanton Group Developments Ltd	Stanton Group Developments Ltd	5.28	434	S	Support the statement that retail convenience floorspace should follow housing development.	Support noted.	None needed.
Strawsons Devt/a Omnivale	Strawsons Devt t/a Omnivale	5.29	549	C	The vision is supported but is considered to be inconsistent with the supporting text. 5.7 is inconsistent with the reasoned justification. Refer to rep on 5.7 for suggested revision.	The consultee does not make it clear in this representation how they consider the Vision and spatial portrait to be inconsistent. The consultee is also unclear what changes they expect to be made to remedy the alleged inconsistencies. The consultee's representation on paragraph 5.7 is not accepted and without any further indication of changes that should be made no change is proposed.	None needed.
Miss Maydo Pitt	GO-East	The Spatial Vision	35	O	GO-East considers that the spatial vision is still not spatially specific and does not explain where growth will be. The vision should provide an indication of where the main growth (retail, housing and employment) will take place and broadly how much. In particular: - the vision could be expanded so that, effectively, a picture is painted of a new scenario at the plan end date that has come about as a result of matters such as new development, environmental improvements, social and economic factors	The issues raised in this representation will be considered, however it should be noted that the Spatial Principles provides much of the information considered necessary.	Submission plan revised to incorporate elements of the spatial principles in the vision to provide the spatial specificity and local distinctiveness required.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Ms Diane Millis	Woodland Trust	The Spatial Vision	75	S	<p>- there could be a greater spatial emphasis in terms of where the focus of change in the district will occur</p> <p>- the needs of specific settlements (e.g. key issues such as employment and housing) could be referred to in the vision statement</p> <p>The Woodland Trust supports the vision for Huntingdonshire, especially its acknowledgement of the need to respect, maintain and enhance 'the special characters of its towns, villages and countryside' and its aim to see residents have improved access to green infrastructure as part of an improved quality of life.</p>	Support noted.	None needed.
Mr Philip Raiswell	Sport England	The Spatial Vision	146	S	<p>Sport England supports the broad content but feel that it could be strengthened by direct reference to a healthier, more active population. Sport has an important role in this.</p>	Reference to healthier and more active lifestyles will be included in the Vision.	<p>Submission plan revised to strengthen and expand the vision.</p> <p>More reference included in the vision to promote healthier and more active lifestyles, especially in relation to recreation and green infrastructure.</p>
Mr Steven Harvey	n/a	The Spatial Vision	140	S	<p>Supports the view that the Core Strategy must achieve the 'vision' of sustainable</p>	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Tom Gilbert-Wooldridge	English Heritage	The Spatial Vision	115	C	development in a predominantly rural area that provides 'an improved quality of life'; Welcomes the overall focus of the revised spatial vision, particularly the reference to the maintaining and enhancing the district's distinct identity and character. However, seeks explicit reference to the natural, historic and built environment within the vision. By replacing "towns, villages and countryside" in the 4th and 5th lines with "natural, historic and built environments".	The vision will be strengthened to include explicit reference to the historic environment.	Submission plan revised to strengthen the vision and emphasise the need to protect the character of the natural, historic and built environments in the District.
Mr Justin Tilley	Natural England	The Spatial Vision	310	S	Supports the emphasis on the need to maintain and enhance local character and the recognition of the importance of green infrastructure in contributing to quality of life	Support Noted.	None needed.
Mr David Reavell	O&H Properties Ltd	The Spatial Vision	218	C	The reference to economic vitality in the Spatial Vision is ambiguous as is the term 'in a sustainable manner' and should be redrafted for clarity. Does this statement mean that employment and economic growth will be encouraged	The vision will be strengthened and clarified.	Submission plan has been revised to strengthen the vision. The aspiration to promote economic development in a sustainable manner has been incorporated in other areas of the vision and linked to employment and

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Martin Leyland	Barratt Strategic	The Spatial Vision	219	C	<p>within the District or that benefits will be felt from economic growth outside Huntingdonshire but within the sub-region?</p> <p>The reference to economic vitality in the Spatial Vision is ambiguous as is the term 'in a sustainable manner' and should be redrafted for clarity. Does this statement mean that employment and economic growth will be encouraged within the District or that benefits will be felt from economic growth outside Huntingdonshire but within the sub-region?</p>	<p>The vision will be strengthened and clarified.</p> <p>The aspiration to promote economic development in a sustainable manner has been incorporated in other areas of the vision and linked to employment and sustainable patterns of growth to clarify how it can be achieved.</p>	<p>sustainable patterns of growth to clarify how it can be achieved.</p>
Mrs Madelaine Liddiard	Godmanchester TC	The Spatial Vision	334	S	Supports the Vision.	Support noted.	None needed.
Mr Steven Harvey	n/a	The Spatial Vision	532	O	<p>Objects to the emphasis on 'urban concentration' which fails to recognise the local distinctiveness of the district and disregards the needs of over half the population, including an increasing proportion of elderly people. By severely restricting the supply of housing in rural areas, the policy approach will</p>	<p>The cost of housing in the district is determined by a great number of factors, most of which are external to Huntingdonshire. Regard is had to the Local Economic Strategy in the Core Strategy.</p> <p>It is considered to be unsustainable to plan for substantial development in rural areas. The Core Strategy has a strategic role to play and identifies locations for large scale growth but also makes provision for development in key service centres and other villages of an appropriate scale. To expect these factors to be specifically referenced in the Vision is unrealistic.</p>	<p>Submission plan revised to explicitly support limited development in larger villages.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Gates Hydraulics	Gates Hydraulics	The Spatial Vision	468	S	Supports the contents of the spatial vision, in particular the requirement for development to be undertaken in a sustainable manner which respects, maintains and enhances the special characteristics of the towns, villages and in particular the countryside within Huntingdonshire.	Support noted.	None needed.
Marlborough Developments Ltd	Marlborough Developments Ltd	The Spatial Vision	520	O	The reference to economic vitality in the Spatial Vision is ambiguous as is the term 'in a sustainable manner' and should be redrafted for clarity, particularly the reference to taking "advantage of the economic vitality of the Cambridge Sub Region in a sustainable manner".	Consideration has been given to how best to clarify the identified parts of the vision.	Submission plan revised to clarify the vision and the aspiration of sustainable economic development is made clear.
Mr Steven Harvey	n/a	5.30	141	O	The vision will not be achieved unless it incorporates positive measures to make the smaller settlements more sustainable in terms of employment, mix and type of housing, services and	In order to maintain the strategic nature of the Core Strategy the Preferred Options specifically identify only those locations that are considered to be suitable for large scale development. The Settlement Hierarchy makes provision for appropriate scales of development in key service centres and smaller settlements. It is however not considered appropriate to specifically	None needed.



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
					<p>facilities and environmental quality. It needs to address:</p> <ul style="list-style-type: none"> <li>• rural unemployment;</li> <li>• elderly people in rural areas being unable to afford suitable housing and being forced to move out of their 'home' communities;</li> <li>• young people in rural areas being unable to find local employment and afford suitable housing and being forced to move out of their 'home' communities;</li> <li>• lack of and loss of local services, leisure, recreation and community facilities as residents are forced to commute to find work, shops, services and facilities elsewhere;</li> </ul>	<p>identify small development opportunities. The vision sets out the aspirations for the district and it is not appropriate to include such detailed information in the vision.</p>	
Ms Diane Millis	Woodland Trust	5.32	76	C	<p>The Woodland Trust is concerned that the quality of the environment and biodiversity is not sufficiently represented in this paragraph. The environment appears to be covered only by the latter point: 'to live in an environment that is protected from the effects of climate change' which fails to consider the need to enhance biodiversity for</p>	<p>Consideration will be given to how the issues raised in this representation can best be incorporated in to the vision. The consultee is referring to the vision in the SCS and not the Core Strategy.</p>	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Martin Leyland	Barratt Strategic		230	O	<p>its own sake and the wide range of benefits that a protected and expanded natural environment can contribute to the people and economy.</p> <p>Fails to recognise the contribution can be made to the growth opportunities in the north of the district, relating to and supporting Peterborough's growth.</p> <p>Huntingdonshire is a key part of the Government's Growth Area and there is a need to work jointly with Peterborough City Council to develop a long term growth strategy.</p> <p>Land to the north and north west of Yaxley presents an alternative sustainable location for growth.</p>	<p>The Council recognises the important contribution that the northern part of the District offers for growth and for promoting biodiversity and green infrastructure and PCC is always consulted. However, as set out in the East of England Plan growth should follow the hierarchy in CSR1 which states that, following a preference for growth in and on the periphery of Cambridge and in Northstowe, growth should be accommodated in the market towns of the sub-region. The spatial strategy does recognise the opportunities in Yaxley, but also acknowledges the high levels of growth it has accommodated in recent years. This should be reflected more clearly in the vision.</p>	<p>Submission plan revised to strengthen the vision and include reference to the relationship that the northern part of the District has with Peterborough and the role it plays in being an important green resource for the expected population growth.</p>
Mrs Madelaine Liddiard	Godmanchester TC		335	S	<p>Support with the exception of the reference to the redundant military bases – Upwood, Wyton, Alconbury. These sites should be given preference over Greenfield sites. Particularly, Alconbury has potential as eco</p>	<p>The future of the airbases in the district is an important issue. The future of Alconbury in particular, is an issue the Council has consulted on and the majority of respondents supported awaiting the RSS review. It is considered that Alconbury's future is an issue that needs to be considered within the wider regional arena in order to ensure the most sustainable locations and scale of growth are</p>	<p>Submission plan revised to clarify the Council's approach to re-using redundant airfields in volume 2.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Ewen McLeod for Wrenbridge Land Ltd	Wrenbridge Land Ltd	5.33	262	S	Should also refer to the special opportunities presented by the committed improvements to the strategic road network, particularly the A14 improvements in the vicinity of Huntingdon, to enable B8 uses to be developed that are readily accessible to this network, such as on the site of the former Alconbury Truckstop.	It is not appropriate for the Core Strategy to refer in detail to specific sites and detail potential uses. The submission plan will include more detail in the Implementation chapter which will cover the implications brought by the A14 improvements.	Submission plan revised to strengthen the Infrastructure and Implementation chapter.
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc, David Wilson Estates	5.33	439	S	Supports the Spatial Principles to locate the majority of growth in Huntingdon, St Neots and St Ives as the market towns which are within the Cambridge Sub-Region.  For retail growth, supports the creation of a new district centre to the east of the railway line at St Neots	Support noted.	None needed.
R W Dew and Son Ltd	R W Dew and Son Ltd	Spatial Principles	12	O	Amend Para 5.39/40 to support small scale employment development in key service centres	Small scale employment development in KSC would not be on a strategic scale. The Development Control Policies DPD will consider appropriate policies on this matter.	None
Miss Maydo Pitt	GO-East	Spatial Principles	36	O	GO-East still not fully clear how the spatial principles fit in with the rest of the Core	The spatial principles were intended to give more detail on the spatial elements contained in the vision. However, it is acknowledged by the Council that the	Submission plan revised to incorporate elements of the spatial principles in the vision

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Gareth Ridewood	CPRE	Spatial Principles	77	C	<p>Strategy structure. It is not clear how they relate to the preferred policies, nor why they are needed in addition to a spatial vision, objectives, core policies and the spatial strategy. A more spatially specific vision could incorporate elements of the spatial principles into the vision, thereby giving it a greater spatial focus. The remainder of the spatial principles could then be deleted from the submission document to avoid unnecessary duplication.</p> <p>Para 5.34 - amend to state that new growth is dependent on new infrastructure funding and delivery first and any growth must be within the existing environmental capacity of the District</p> <p>Para 5.35 remove word 'significant' - the area mentioned - would not be able to accommodate significant growth without compromising sustainable growth policies.</p> <p>5.36 reword to ensure that any development does not by its bulk or</p>	<p>relationship between the vision, principles and objectives is not clear. Consideration has been given as to how to make this clearer.</p> <p>This representation raises a number of issues in relation to a number of paragraphs. The support is noted. For the other issues consideration will be given as to how best to incorporate them into the relevant paragraphs. The Core Strategy is a strategic high level document and it is not appropriate to include detailed information such as a list of buildings of local character. This could be an issue that is looked at when preparing the Development Control Policies DPD.</p>	<p>to provide the spatial specificity and local distinctiveness required.</p> <p>Submission plan revised to strengthen the vision. Parts of the spatial principles have been incorporated to provide spatially specific detail. The vision has been significantly strengthened to recognise the important role that heritage has within the District and sets out how this can be enhanced. The vision also recognises the potential opportunities offered by redundant airfields.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Philip Raiswell	Sport England	Spatial Principles	150	C	<p>scale have a detrimental impact on the historical core of our market towns, eroding their character and dominating the visual scene to avoid loss of character</p> <p>Buildings of historical significance such as the Old Barracks in Huntingdon, Arts and Crafts Isolation Wards on Primrose Lane Huntingdon, the George Hall which are currently under threat, should be protected. There needs to be a List of Buildings of Local Character.</p> <p>Para 5.42 is supported</p>	<p>The inclusion of a district wide spatial principle as identified will be considered.</p>	<p>Submission plan revised to strengthen the vision and include reference to the importance of promoting access to recreational facilities.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Miss Ellen O'Grady	Defence Estates	Spatial Principles	83	S	Defence Estates will work closely with HDC and the local community to find an appropriate scheme for the mixed use redevelopment of RAF Brampton if it becomes surplus to government requirements.	Support noted.	None needed.
Mr Steven Harvey	n/a	Spatial Principles	142	O	The 'urban concentration' approach disregards the needs of the majority of the population to live within sustainable communities in the rural areas. Should reflect Government Guidance on the need to secure the future of existing communities by enabling them to provide for their own basic needs, to overcome the need to travel across the district to the larger urban areas.	In order to maintain the strategic nature of the Core Strategy the Preferred Options specifically identify only those locations that are considered to be suitable for large scale development. The Settlement Hierarchy makes provision for appropriate scales of development in key service centres and smaller settlements. It is however not considered appropriate to specifically identify small development opportunities.	None needed.
Mr Steven Harvey	n/a	Spatial Principles	143	O	We object to the Spatial Principle (5.40) that larger towns and their Spatial Planning Areas should be the only locations that should benefit from growth.	In order to maintain the strategic nature of the Core Strategy the Preferred Options specifically identify only those locations that are considered to be suitable for large scale development. The Settlement Hierarchy makes provision for appropriate scales of development in key service centres and smaller settlements. It is however not considered appropriate to specifically identify small development opportunities.	Submission plan revised to clarify how spatial planning areas have been identified in paragraphs 5.3-5.7 (Volume 1) and Volume 2.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Steven Harvey	n/a	Spatial Principles	144	S	We support the SA/SEA where it makes it clear that PO2 should direct development to create a critical mass of services in order to make communities more self sustaining; without new development, the majority of villages in the district will turn into unsustainable 'dormitory' settlements with no local services or facilities for older and younger people.	<p>Further clarification of the reasons for designating spatial planning areas will be included in section 7.</p> <p>The SA has been integral to plan preparation and has informed production of the Core Strategy at each stage. It has helped ensure that the submission policies are sustainable makes recommendations as to how they can be improved where appropriate. The spatial strategy recognises the importance of sustaining local facilities and directs growth to this settlements which are most sustainable and also helps promote the rural economy by directing growth to key service centres. The settlement hierarchy incorporates sufficient flexibility to allow limited development in smaller settlements which will help sustain local facilities.</p> <p>In order to maintain the strategic nature of the Core Strategy the Preferred Options specifically identify only those locations that are considered to be suitable for large scale development. The Settlement Hierarchy makes provision for appropriate scales of development in key service centres and smaller settlements. It is however not considered appropriate to specifically identify small development opportunities.</p> <p>Many villages are already dormitory settlements and this character will not be changed or other villages becoming more dormitory in nature by simply allocating new development. In most cases this would purely be unsustainable development in increasing unsustainable locations.</p>	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Steven Harvey	n/a	Spatial Principles	145	O	Objects to the failure to address the specific issues of redundant military bases; PO2 should provide certainty about the Council's future intentions for redevelopment at these locations.	At the time of writing, the Preferred Options contained as detailed and specific information concerning the former military bases in the district. The MOD has now confirmed that RAF Brampton will close and this adds to the certainty for redevelopment. Wherever possible the Core Strategy will give as clear a picture of the future of military bases as possible.	Submission plan revised to clarify the Council's approach to re-using redundant airfields in the vision and volume 2.
Mr Steven Harvey	n/a	Spatial Principles	149	O	Fails to acknowledge the requirements of PPS25 to prevent development within flood plain areas, to reflect the key objectives of both the emerging East of England Plan and the emerging Huntingdonshire Sustainable Community Strategy Vision, 2007 or to take into account the PPS1 Climate Change supplement.	The Core Strategy Preferred Options were published after the PPS1 climate change supplement. Although the draft was available and was taken into account it was considered prudent to limit the consideration of the draft as the final version could have changed substantially as has been seen with other PPS documents in recent years. The Sustainable Community Strategy was also under preparation at the same time as the Core Strategy Preferred Options. The two documents had regard to each other during preparation. Regard has been had to PPS25 particularly in St Ives where a number of development locations have been ruled out because of flood risk. The representation claims that these documents were not taken into account but fails to identify areas that could be improved or where changes should be made. More explicit reference will be	None needed.



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Tom Gilbert-Wooldridge	English Heritage	Spatial Principles	116	O	<p>English Heritage considers this should include an explicit reference to the historic environment (or the environment generally).</p> <p>Amend Paragraph 5.42 from "the landscape and countryside of Huntingdonshire" to "the natural, historic and built environments of Huntingdonshire".</p> <p>The following sentences in this paragraph then need to refer to the historic and built environment and how this will be conserved and enhanced.</p>	<p>made to all of these documents where appropriate, however without the identification of areas for improvement no changes are proposed.</p> <p>Suggested changes are accepted. Consideration has been given as to how best to incorporate additional wording.</p>	<p>Submission plan revised to strengthen the vision and include additional reference to the historic environment. The suggested wording has been incorporated into the vision.</p>
Tom Gilbert-Wooldridge	English Heritage	Spatial Principles	117	C	<p>English Heritage considers that as military bases become redundant appraisals will be carried out of their historic interest and that the information will be used to shape future development proposals. Upwood and Wyton especially important. Amend para 5.44 to this effect.</p>	<p>It is not appropriate for the Core Strategy to consider site specific issues. This will be dealt with in subsequent DPDs.</p>	<p>None needed.</p>
Miss Rachel Pateman	Wildlife Trust	Spatial Principles	267	C	<p>Para 5.34 should state that growth does not exceed the</p>	<p>The vision covers the need to protect the environment adequately and it is therefore implicit that environmental</p>	

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr David Reavell	O&H Properties	Spatial Principles	217	O	<p>environmental capacity of the district. Seeks the addition of another key enhancement area - the woodland to the south of the district (including Waresley &amp; Gransden Wood, Sand Wood and Weaveley Wood) which form part of a wider "Forest of South Cambridgeshire"</p> <p>Para 5.42 should recognise that transport networks should consider impacts on ecological networks. Paragraph 5.43 should state that redevelopment of military bases will maximise all aspects of sustainable development.</p> <p>Fails to recognise the contribution can be made to the growth opportunities in the north of the district, relating to and supporting Peterborough's growth.</p> <p>Huntingdonshire is a key part of the Government's Growth Area and there is a need to work jointly with Peterborough City Council to develop a long term growth strategy.</p>	<p>capacity with be taken into account. The information contained in para 5.42 is not intended to be an exhaustive list as demonstrated by the prefix "include." Further detail on all those areas identified for enhancement is given in the relevant policy. It is not considered appropriate to include such detail suggested by the consultee regarding transport and ecological networks within the vision. Para 5.43 does not refer to redevelopment of military bases.</p> <p>The Council recognises the important contribution that the northern part of the District offers for growth and for promoting biodiversity and green infrastructure and PCC is always consulted. However, as set out in the East of England Plan growth should follow the hierarchy in CSR1 which states that, following a preference for growth in and on the periphery of Cambridge and in Northstowe, growth should be accommodated in the market towns of the sub-region. The spatial strategy does recognise the opportunities in Yaxley, but also acknowledges the high levels of growth</p>	<p>Submission plan revised to strengthen the vision and include reference to the relationship that the northern part of the District has with Peterborough and the role it plays in being an important green resource for the expected population growth.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	Spatial Principles	263	S	Support - growth should be directed towards the market towns and such an approach is in conformity with the RSS.	Support noted.	None needed.
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	Spatial Principles	257	S	Support overall principle of spatial principles, including a more restricted approach to growth in smaller settlements subject to appropriate flexibility.	Support noted.	Submission plan revised to strengthen the vision by incorporating elements of the principles. The aspiration to restrict growth where appropriate in smaller settlements has been retained and additional flexibility has been added to policy CS3 the Settlement Hierarchy
Ms Diane Millis	Woodland Trust	Spatial Principles	177	C	The Woodland Trust seeks to amend para 5.34 to refer to the need to ensure future growth in the Cambridge sub-region will not be at the expense of areas or features of high biodiversity value, such as ancient woodland and ancient trees. The Spatial Principles should contain a reference to climate change in line with recommendations in the recently published	Reference to climate change has been adequately covered by the addition of an extra objectives relating to climate change and the reasoned justification of CS1.	Submission plan revised to strengthen the vision by incorporating elements of the spatial principles. The protection of areas with high landscape value is made explicit.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Bewick Homes	Bewick Homes	Spatial Principles	254	S	Support overall principle of spatial principles, including a more restricted approach to growth in smaller settlements subject to appropriate flexibility.	Support noted.	None needed.
Mr Tim Fryer	Brampton PC	Spatial Principles	318	C	At para 5.35 Brampton PC suggest listing the 'industrial area west of Huntingdon town centre' before 'RAF Brampton'. (Note that in 7.3 the areas are listed Huntingdon first.)	The vision will be strengthened by incorporating elements of the spatial principles.	Submission plan revised to strengthen vision by incorporating elements of the spatial principles. The vision clearly sets out the Council's approach to the potential re-use of all redundant airfields, not just RAF Brampton.
Mr Tim Fryer	Brampton PC	Spatial Principles	321	C	At para 5.42 Brampton PC suggests including Hinchbrook Country Park especially if the Huntingdon West AAP recommends further development as greenspace.	The vision sets out the Council's aspirations for the future development of the District and will be strengthened by incorporating elements of the spatial principles, including para 5.35. However, this paragraph only lists some of those areas identified for Strategic Greenspace Enhancement, the identification of which, has been informed by the Cambridgeshire Green Infrastructure Strategy. Hinchbrook Country Park is not one of these areas. Further detail on the particular issue highlighted by the consultee will be dealt with in the AAP.	Submission plan revised to strengthen the vision by incorporating elements of the spatial principles.
Mr Tim Fryer	Brampton PC	Spatial Principles	322	O	At para 5.43 Brampton PC has significant concerns that the removal of the A14	The Spatial Vision and Principles are specifically worded to identify aspirational targets that are considered to be achievable. Further information	Submission plan revised to strengthen the implementation and infrastructure chapter to

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Paul Seabrook	Seabrook Farms	Spatial Principles	628	O	<p>viaduct and the proposed changes to the Huntingdon area road network will provide little or no benefit and may well make traffic flow much worse..</p> <p>The objective regarding "growth in key service centres to sustain existing services and facilities" previously in Options &amp; Issues has not been carried forward into the Preferred for reasons which are not explained. This objective is a sensible and appropriate objective in accordance with sustainable principles. Focussing growth in the large towns and "spatial planning areas" will result in the decline of services in key service centres, and in order to sustain such facilities a proportionate amount of growth should be distributed amongst all of these settlements.</p>	<p>on the implications of A14 improvements will be given in the Infrastructure and Implementation chapter.</p> <p>It is not clear which part of the Spatial Principles previously identified in Towards a Spatial Strategy the consultee is referring to as the wording is virtually unchanged.</p>	<p>give more information on the impacts of the A14 improvements.</p> <p>Submission plan revised to strengthen the vision by incorporating elements of the spatial principles. The aspiration to facilitate appropriate levels of growth in key service centres has been retained.</p>
Gates Hydraulics	Gates Hydraulics	Spatial Principles	486	S	<p>Supports para 5.34 that future growth should take place within Huntingdon, St Neots and St Ives where there is access to existing and improving public</p>	<p>Support noted.</p>	<p>Submission plan revised to strengthen the vision by incorporating some of the spatial principles. The aspiration to regenerate certain</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
					transport, new road infrastructure and where the use of amenities and facilities can be maximised as this is sustainable. Also supports para 5.37 which seeks to regenerate run down areas.		areas is recognised and made explicit throughout the document such as in the spatial portrait .
Marlborough Developments Ltd	Marlborough Developments Ltd	Spatial Principles	522	O	<p>Fails to recognise the contribution can be made to the growth opportunities in the north of the district, relating to and supporting Peterborough's growth.</p> <p>Huntingdonshire is a key part of the Government's Growth Area and there is a need to work jointly with Peterborough City Council to develop a long term growth strategy.</p> <p>Land to the north and north west of Yaxley presents an alternative sustainable location for growth.</p>	<p>The Council recognises the important contribution that the northern part of the District offers for growth and for promoting biodiversity and green infrastructure and PCC is always consulted. However, as set out in the East of England Plan growth should follow the hierarchy in CSR1 which states that, following a preference for growth in and on the periphery of Cambridge and in Northstowe, growth should be accommodated in the market towns of the sub-region. The spatial strategy does recognise the opportunities in Yaxley, but also acknowledges the high levels of growth it has accommodated in recent years. This should be reflected more clearly in the vision</p>	<p>Submission plan revised to strengthen the vision and include reference to the relationship that the northern part of the District has with Peterborough and the role it plays in being an important green resource for the expected population growth.</p>
Mr M Hankins	n/a	Spatial Principles	607	S		Support noted.	None needed.
Milton (Peterborough) Estates Ltd	Milton (Peterborough) Estates Ltd	5.34	171	S	Support overall principle of spatial principles, including a more restricted approach to growth in	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	5.34	247	S	Support the identification of Huntingdon as having capacity to accommodate additional growth.	Support noted.	None needed.
Mr Matthew Stock	Redrow Homes	5.34	284	S	The Spatial Principles are supported in principle as it recognises that the most sustainable locations are the three market towns where existing and proposed infrastructure will support further growth.	Support noted.	None needed.
Ewen McLeod for Wrenbridge Land Ltd	Wrenbridge Land Ltd	5.34	265	C	Two additional objectives should be added: <ul style="list-style-type: none"> <li>To make best use of existing infrastructure and committed improvements to existing infrastructure, such as strategic road improvements;</li> <li>To provide for development in business sectors with very specific locational requirements that need to be located within the district, such as storage and distribution related to the strategic road network.</li> </ul>	The objectives will be revised for submission however, the suggestions are considered too detailed for the Core Strategy.	Submission plan revised to include additional objectives including one on prioritise brownfield land. The criteria relating to making best use of existing infrastructure has been expanded in policy CS1.
Lord De Ramsey	Ramsey Estates	5.34	429	O	Ramsey has effectively been overlooked by the spatial principles with	Despite Ramsey's designation as a Market Town it is acknowledged that the transport infrastructure is not	Submission plan revised to clarify why Ramsey is less

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
H Raby & Sons	H Raby & Sons	5.34	377	S	no specific reference to any vision for the growth beyond regeneration and retail objectives despite Ramsey being the District's fourth market town and therefore the next most sustainable location for development. It is also inconsistent with the way other settlements are dealt with in terms of market towns at paragraph 5.34 and key service centres and smaller settlements at paragraph 5.40.	adequate to support significant development. The levels proposed for Ramsey are considered sufficient to help regenerate the area and begin to improve infrastructure provision. The reasons why Ramsey is less sustainable than other market towns will be clarified for submission.	sustainable than other market towns in paragraph 5.7
H Raby & Sons	H Raby & Sons	5.34	377	S	Supports the overall spatial principles, especially in paragraph 5.34 with the majority of growth directed to the market towns of Huntingdon, St Neots and St Ives being the most sustainable and well serviced locations for expansion. This is in accordance with both the emerging Regional Spatial Strategy and the adopted Cambridgeshire and Peterborough Structure Plan 2003.	Support noted.	None needed.
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc, David Wilson Estates	5.34	440	S	We support the spatial objectives, in particular the desire to enable specialist housing needs to be met in appropriate locations.	Support noted.	None needed.



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
D R Juggins	n/a	5.34	387	S	Supports the overall spatial principles, especially in paragraph 5.34 with the majority of growth directed to the market towns of Huntingdon, St Neots and St Ives being the most sustainable and well serviced locations for expansion. This is in accordance with both the emerging Regional Spatial Strategy and the adopted Cambridgeshire and Peterborough Structure Plan 2003.	Support noted.	None needed.
Lenton Trustees (L019)	Lenton Trustees	5.34	405	S	Supports the overall spatial principles, especially in paragraph 5.34 with the majority of growth directed to the market towns of Huntingdon, St Neots and St Ives being the most sustainable and well serviced locations for expansion. This is in accordance with both the emerging Regional Spatial Strategy and the adopted Cambridgeshire and Peterborough Structure Plan 2003.	Support noted.	None needed.
Bank Trustees	Bank Trustees	5.34	462	S	Supports the overall spatial principles, especially in paragraph 5.34 with the majority of growth directed to the market towns of Huntingdon, St Neots	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr T Smith	n/a	5.34	368	S	and St Ives being the most sustainable and well serviced locations for expansion. This is in accordance with both the emerging Regional Spatial Strategy and the adopted Cambridgeshire and Peterborough Structure Plan 2003. Supports the overall spatial principles, especially in paragraph 5.34 with the majority of growth directed to the market towns of Huntingdon, St Neots and St Ives being the most sustainable and well serviced locations for expansion. This is in accordance with both the emerging Regional Spatial Strategy and the adopted Cambridgeshire and Peterborough Structure Plan 2003.	Support noted.	None needed.
William Evans	WharfLand Investments	5.34	386	O	Wharf objects to the dispersed growth pattern and the market town expansion suggested at St Neots, St Ives and Ramsey and the level of development proposed at the key service centres, namely, Godmanchester (within the Huntingdon area), Fenstanton and Sawtry.	Objection is raised to most of the large scale locations identified, largely on the basis that there is insufficient existing infrastructure but suggests a new settlement as the solution, where there is no infrastructure, which is acknowledged in the representation. Also Eco Towns are separate from district housing requirements so would not replace delivery in the Core Strategy. A significant factor in the discounting of new settlement options previously considered by the Council was two fold;	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Strawsons Devt t/a Omnivale	Strawsons Devt t/a Omnivale	5.34	550	C	<p>Proposes the market town growth strategy is replaced with strategic development at a new Spatial Planning Area known as Conington Spatial Planning Area which would accommodate a sustainable mix of residential and commercial uses in the form of a new community or a new settlement, possibly in the form of a new EcoTown.</p> <p>This could be in the form of a "linked settlement" growth pattern between Peterborough, Conington (a brownfield and or mixed brownfield and greenfield strategic development area) and Huntingdon. It would logically link to development growth already identified to the west of Huntingdon.</p> <p>At para 5.34 add <i>'Some growth but on a smaller scale than the other three market towns will take place at Ramsey and Bury in order to facilitate regeneration.'</i> At para 5.44 add <i>'The former RAF Upwood also offers the opportunity for mixed use development on an</i></p>	<p>firstly the lead in time would be considerable with the implementation of significant new infrastructure and could not be accurately predicted; secondly the requirements from PPS3 for a 5 year land supply could not be reliably maintained due to uncertainty of the lead in time and few sites coming forward for delivery in the medium term because of the lack of additional locations.</p> <p>The Council will clarify its approach to Ramsey and Bury and redundant airfields.</p>	<p>Submission plan revised to clarify development strategy for Ramsey and Bury in para 5.7 and explanation of the council's approach to redundant airfields in the vision.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Adam Ireland	Environment Agency	5.34	534	S	Support the spatial principle of the location of the majority of future development in and around the existing larger towns of Huntingdon, St Ives and St Neots	Support noted.	None needed.
Edwards	n/a	5.34	490	O	Supports the majority of development being directed to the market towns of Huntingdon, St Neots and St Ives as the most sustainable and well serviced locations for expansion. However, considers that Ramsey has effectively been overlooked by the spatial principles, despite being the District's fourth market town and the next most sustainable location..	Ramsey has fewer facilities and is in a less sustainable location than the other market towns and therefore is considered that the scale of growth proposed is appropriately lower	Submission plan revised to strengthen vision and incorporate elements of the spatial principles. The role that Ramsey and Bury has in accommodating growth (and its constraints) is made clear in the spatial portrait and policy CS2.
Huntingdon Water Tower Ltd	Huntingdon Water Tower Ltd	5.34	615	S	Huntingdon Water Tower Ltd support the proposals to focus employment development in the market towns. It also supports proposals to secure high quality employment sites of strategic importance in sustainable locations.	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr T Smith	n/a	5.34	649	S	Particular support is given to proposals for the Huntingdon West Action Area and Western Gateway to the town. This should be a location for buildings of innovative design at this important entrance both to the town centre and Hinchbrook. Supports the overall spatial principles, especially in paragraph 5.34 with the majority of growth directed to the market towns of Huntingdon, St Neots and St Ives being the most sustainable and well serviced locations for expansion. This is in accordance with both the emerging Regional Spatial Strategy and the adopted Cambridgeshire and Peterborough Structure Plan 2003.	Support noted.	None needed
Lenton Trustees (L019)	Lenton Trustees	5.35	406	S	Supports the redevelopment of previously developed land including RAF Brampton and the industrial area to the west of Huntingdon. This is consistent with PPS3, the emerging Regional Spatial Strategy and the adopted	Support noted.	None needed

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Chief Engineer	Middle Level Commissioners	5.37	372	C	The Middle Level Commissioners suggest that the provision of a turning bay for narrow boats as part of the Ramsey Gateway development may assist in increasing tourism in the area and thus aiding the local economy.	While tourism and economic regeneration are considered to be particularly important for the district and for Ramsey the detail proposed is considered to be too specific for the Core Strategy.	None.
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	5.38	248	O	Challenge the proposal to provide additional retail development to the west of Huntingdon Town Centre. There is no proven need for such expansion and whilst spare capacity in the centre remains this should be the focus for development.	The Core Strategy covers a long plan period and in order to plan effectively for at least 9000sqm of comparison floorspace in Huntingdon a long term view must be taken. Additional text should be added to 5.38 to clarify the town centre first approach, however to achieve the development it is considered that land outside of the town centre will be required this is made clear in the Retail Assessment Study which provides robust evidence base underpinning the policy. The Council will make clear the priority attached to development sites within town centres	Submission plan revised to make clear the sequential approach the Council has taken to retail development and emphasise the priority attached to town centre sites in the reasoned justification for retail development.
Sainsburys Supermarkets Ltd	Sainsburys Supermarkets Ltd	5.38	421	S	Supports for the provision of retail growth within the Huntingdon town centre and complementary development to the west of the town centre through the Huntingdon West Area Action Plan, on the basis that growth is focussed in the George Street/Ermine Street area. Also	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Stanton Group Developments Ltd	Stanton Group Developments Ltd	5.38	437	S	support the principle of further growth within St Neots and St Ives. Supports the large proportion of future retail growth which to be accommodated in Huntingdon town centre, particularly the area covered by the Huntingdon West AAP, which are the areas identified within the current Retail Study as being most suitable to accommodate the projected floorspace requirements.	Support noted.	None needed.
Mr C Behagg	n/a	5.39	435	O	Objects to employment development being mostly located in the most sustainable market towns. Increased provision should be made in and adjacent to the Key Service Centres beyond the Spatial Planning Areas in order that the rural economy is supported and diversified	Small scale development for employment in KSC and villages would not be on a strategic scale. The Development Control Policies DPD will consider appropriate policies for this matter.	None needed.
H Raby & Sons	H Raby & Sons	5.39	378	S	Supports employment development being mostly located in the most sustainable market towns, commensurate with the housing growth to enable balanced communities to result. Expanding local employment will reduce	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Bank Trustees	Bank Trustees	5.39	463	S	<p>levels of out commuting to London, Peterborough and Cambridge and ensure the continued success of the local economy. This is in line with PPG13 and the emerging Regional Spatial Strategy and the Cambridgeshire and Peterborough Structure Plan 2003.</p> <p>Supports employment development being mostly located in the most sustainable market towns, commensurate with the housing growth to enable balanced communities to result. Expanding local employment will reduce levels of out commuting to London, Peterborough and Cambridge and ensure the continued success of the local economy. This is in line with PPG13 and the emerging Regional Spatial Strategy and the Cambridgeshire and Peterborough Structure Plan 2003.</p>	Support noted.	None needed.
Mr T Smith	n/a	5.39	370	S	<p>Supports employment development being mostly located in the most sustainable market towns, commensurate with the</p>	Support noted.	None needed.



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Huntingdon Water Tower Ltd	Huntingdon Water Tower Ltd	5.39	614	S	<p>housing growth to enable balanced communities to result. Expanding local employment will reduce levels of out commuting to London, Peterborough and Cambridge and ensure the continued success of the local economy. This is in line with PPG13 and the emerging Regional Spatial Strategy and the Cambridgeshire and Peterborough Structure Plan 2003.</p>	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
FLP	FLP (agent)	5.40	275	O	Our client objects to the notion that development in the Key Service Centres should be restricted.	While it is considered important to maintain the strategic nature of the Core Strategy such that it is considered to be inappropriate to make specific reference to small scale development opportunities that will characterise the Key Service Centres. The Settlement Hierarchy allows appropriate scales of development in KSC. It would not be sustainable to locate major growth in these locations. The aspiration to promoted limited development in appropriate key service centres in order to sustain the local economy and facilities will be made clear in the vision and spatial strategy.	Submission plan revised to clarify the Council's approach to development in Key Service Centres in the vision and spatial strategy.
Mr C Dodson	n/a	5.40	411	O	Objects to the growth proposals for Key Service Centres outside of the Spatial Planning Areas as this is unduly restrictive towards well performing housing sites. Whilst growth at Key Service Centres may be less sustainable than at the market towns, a modest level of growth is considered appropriate in order that the rural economy may be underpinned and existing services and facilities supported. This would be consistent with PPS 7 and is especially relevant where Key Service Centres possess a sufficiently wide range of day to day services and	It is considered important to maintain the strategic nature of the Core Strategy such that it is considered to be inappropriate to make specific reference to small scale development opportunities that will characterise the Key Service Centres. The aspiration to promote limited development in appropriate key service centres in order to sustain the local economy and facilities will be made clear in the vision and spatial strategy.	Submission plan revised to clarify the Council's approach to development in Key Service Centres in the vision and spatial strategy.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mrs Warnes	n/a	5.40	419	O	<p>facilities to minimise the need to travel as at Somersham.</p> <p>Objects to the growth proposals for Key Service Centres outside of the Spatial Planning Areas as this is unduly restrictive towards well performing housing sites. Whilst growth at Key Service Centres may be less sustainable than at the market towns, a modest level of growth is considered appropriate in order that the rural economy may be underpinned and existing services and facilities supported. This is especially relevant where Key Service Centres possess a sufficiently wide range of day to day services and facilities to minimise the need to travel as at Yaxley.</p>	<p>It is considered important to maintain the strategic nature of the Core Strategy such that it is considered to be inappropriate to make specific reference to small scale development opportunities that will characterise the Key Service Centres. The aspiration to promote limited development in appropriate key service centres in order to sustain the local economy and facilities will be made clear in the vision and spatial strategy.</p>	<p>Submission plan revised to clarify the Council's approach to development in Key Service Centres in the vision and spatial strategy.</p>
Mr J Stokes	n/a	5.40	451	O	<p>Objects to the growth proposals for Key Service Centres outside of the Spatial Planning Areas as this is unduly restrictive towards well performing housing sites. Whilst growth at Key Service Centres may be less sustainable than at the market towns, a modest</p>	<p>It is considered important to maintain the strategic nature of the Core Strategy such that it is considered to be inappropriate to make specific reference to small scale development opportunities that will characterise the Key Service Centres. The aspiration to promote limited development in appropriate key service centres in order to sustain the local economy and facilities will be made clear in the vision and spatial strategy.</p>	<p>Submission plan revised to clarify the Council's approach to development in Key Service Centres in the vision and spatial strategy.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mrs J Daniels	n/a	5.40	504	O	<p>level of growth is considered appropriate in order that the rural economy may be underpinned and existing services and facilities supported. This is especially relevant where Key Service Centres possess a sufficiently wide range of day to day services and facilities to minimise the need to travel as at Warboys.</p> <p>Objects to the growth proposals for Key Service Centres outside of the Spatial Planning Areas as this is unduly restrictive towards well performing housing sites. Whilst growth at Key Service Centres may be less sustainable than at the market towns, a modest level of growth is considered appropriate in order that the rural economy may be underpinned and existing services and facilities supported. This is especially relevant where Key Service Centres possess a sufficiently wide range of day to day services and facilities to minimise the need to travel as at Warboys.</p>	<p>The settlement strategy allows for appropriate scales of growth in KSC.</p> <p>It is considered important to maintain the strategic nature of the Core Strategy such that it is considered to be inappropriate to make specific reference to small scale development opportunities that will characterise the Key Service Centres. The aspiration to promoted limited development in appropriate key service centres in order to sustain the local economy and facilities will be made clear in the vision and spatial strategy.</p> <p>The settlement strategy allows for appropriate scales of growth in KSC.</p>	<p>Submission plan revised to clarify the Council's approach to development in Key Service Centres in the vision and spatial strategy.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Persimmon Homes	Persimmon Homes	5.40	544	O	Suggest the last sentence should include "In smaller settlements proposals for future housing will be assessed on the basis of their accessibility to facilities, proximity to towns and extent to which they will meet local housing need."	Suggested wording is acceptable and will be incorporated where appropriate.	Submission plan revised to strengthen the vision. The aspiration behind the suggested wording incorporated into CS3.
Mr Burgess	n/a	5.40	513	O	Objects to the growth proposals for Key Service Centres outside of the Spatial Planning Areas as this is unduly restrictive towards well performing housing sites. Whilst growth at Key Service Centres may be less sustainable than at the market towns, a modest level of growth is considered appropriate in order that the rural economy may be underpinned and existing services and facilities supported. This is especially relevant where Key Service Centres possess a sufficiently wide range of day to day services and facilities to minimise the need to travel as at Yaxley.	It is considered important to maintain the strategic nature of the Core Strategy such that it is considered to be inappropriate to make specific reference to small scale development opportunities that will characterise the Key Service Centres. The aspiration to promote limited development in appropriate key service centres in order to sustain the local economy and facilities will be made clear in the vision and spatial strategy.  The settlement strategy allows for appropriate scales of growth in KSC.	Submission plan revised to clarify the Council's approach to development in Key Service Centres in the vision and spatial strategy.
Property & Procurement	Cambs CC Property & Procurement	5.40	519	O	Objects to the growth proposals for Key Service Centres outside	It is considered important to maintain the strategic nature of the Core Strategy such that it is considered to	Submission plan revised to clarify the Council's approach to

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr S Ross	n/a	5.41	100	C	<p>of the Spatial Planning Areas as this is unduly restrictive towards well performing housing sites. Whilst growth at Key Service Centres may be less sustainable than at the market towns, a modest level of growth is considered appropriate in order that the rural economy may be underpinned and existing services and facilities supported. This is especially relevant where Key Service Centres possess a sufficiently wide range of day to day services and facilities to minimise the need to travel as at Yaxley.</p> <p>It should be recognised that Yaxley benefits from its close physical and functional relationship with Peterborough the Hamptons and that further development can be readily accommodated to the south west of Yaxley without jeopardising its separate identity.</p>	<p>be inappropriate to make specific reference to small scale development opportunities that will characterise the Key Service Centres. The aspiration to promoted limited development in appropriate key service centres in order to sustain the local economy and facilities will be made clear in the vision and spatial strategy.</p> <p>The settlement strategy allows for appropriate scales of growth in KSC.</p>	<p>development in Key Service Centres in the vision and spatial strategy.</p> <p>Submission plan revised to strengthen the vision by incorporating elements of the spatial principles. The vision now reflects the relationship between the north of the District and Peterborough.</p>
Mr Justin Tilley	Natural England	5.41	311	S	<p>Support and welcome the recognition of the important role greenspace provision and function should</p>	<p>Support noted.</p>	<p>None needed.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Justin Tilley	Natural England	5.42	312	S	Support the intention to protect and enhance the countryside but consider that the protection and enhancement of biodiversity should also be specifically mentioned as a principle.	Support noted. The protection and enhancement of biodiversity is adequately covered within the vision and elsewhere in the Core Strategy, namely CS1 and CS9.	None needed.
Chief Engineer	Middle Level Commissioners	5.42	374	C	The Middle Level Commissioners comment that when promoting the district's biodiversity care should be taken to ensure that the non-IDB maintained local land drainage/flood defence systems are not detrimentally affected. There are also issues that need to be addressed in relation to the long-term maintenance of such sites.	Comments noted. To maintain the strategic nature of the Core Strategy it is considered to be overly specific to make specific reference in the Spatial Principles to the land drainage/flood defences as detailed in this representation.	None needed.
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	5.43	644	O	Agree that the A14 improvements will create significant opportunities for development and growth in the Huntingdon area.	While it is acknowledged that a number of elements of the strategy will be dependent to some degree on the implementation of a small number of major infrastructure projects including the improvements to the A14 it is considered that there will be sufficient flexibility in the Strategy for delivery to be maintained if infrastructure provision is delayed.	Submission plan revised to strengthen the Implementation and Infrastructure chapter.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
					<p>However, concerned whether there is understanding of the extent to which development could proceed in advance of, or in absence of, the strategic highway infrastructure. Local Development Frameworks: Lessons Learnt Examining Development Plan Documents - Planning Inspectorate 2007 stresses that :</p> <ul style="list-style-type: none"> <li>- DPDs should be firmly focused on delivery and thus the implementation and monitoring sections are of equal importance as the policies themselves</li> <li>Implementation and delivery targets must be clear and related to policy.</li> <li>- Flexibility is also about considering "what if" scenarios, eg if the strategy is heavily reliant on a specific type of infrastructure or a major site.</li> <li>-The plan should address the issues that could arise if the chosen option cannot be delivered when required.'</li> </ul>	<p>Reference will be made to the implications of infrastructure delivery on delivery of the Core Strategy in the Infrastructure and Implementation chapter.</p>	



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Huntingdon Water Tower Ltd	Huntingdon Water Tower Ltd	5.43	612	S	<p>The preferred options do not appear to be founded upon any rational or objective assessment of the timing of infrastructure delivery so it cannot set out alternative options if the major infrastructure works do not finally proceed, or are delayed further in their implementation. The Core Strategy needs to be founded on a clear documented understanding of infrastructure provision (PSS12 Annex B3-B5) and contingencies are needed to deal with the circumstances of delay in order to meet test ix.</p>	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mrs Lorraine Russell	Ramsey TC	5.44	105	C	<p>This should be a location for buildings of innovative design at this important entrance both to the town centre and Hinchbrook.</p> <p>Should include reference to a mixed use development on the redundant RAF Upwood site which would help justify the inclusion of Ramsey and Bury as a Market Town.</p>	<p>The vision will be revised for submission to clarify the Council's approach to all redundant airfields. The Core Strategy is not intended to identify specific sites only broad directions for growth which are clearly identified in the key diagram. The designation of Ramsey as a market town does not need to be justified as it is a saved policy from the Local Plan Alteration 2002.</p>	None needed.
Mr Chris Blackman	Cambs CC	5.44	471	C	<p>Support the view that the future of Alconbury and Wyton Airfields and other strategic development options will be a matter for consideration as part of the next review of the Regional Spatial Strategy due to start shortly. Alconbury is designated as a strategic employment site in the Saved Policies of the Structure Plan.</p>	<p>Comments and support noted.</p>	None needed.
Mr Roy Reeves	Warboys PC	5.44	634	O	<p>The Parish Council does not support the residential development of RAF Wyton; the land should be returned to agricultural use once the airfield is no longer used for military purposes.</p>	<p>The future redevelopment of redundant airfields such as Wyton is an issue of regional importance which will await the RSS review.</p>	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Marlborough Developments Ltd	Marlborough Developments Ltd		524	C	The purpose of the Objectives and their relationship to the Spatial Principles is not made clear in the Core Strategy. Logically, the objectives should be the first part of translating the vision into policy, prior to the setting out of Spatial Principles, which should then indicate how these will achieve the Core Strategy objectives.	The purpose of the Principles and the Objectives is clearly explained in paragraphs 5.33 and 5.45 respectively. Elements of the spatial principles will be incorporated into the vision in order to add clarification.	Submission plan revised to strengthen the vision.
Mr David Reavell	O&H Properties	5.45	201	C	The purpose of the Objectives and their relationship to the Spatial Principles is not made clear in the Core Strategy. Logically, the objectives should be the first part of translating the vision into policy, prior to the setting out of Spatial Principles, which should then indicate how these will achieve the Core Strategy objectives.	Clarification of the role of the Spatial Principles and the Objectives will be made by incorporating elements of the spatial principles into the vision.	Submission plan revised to strengthen the vision and incorporate elements of the spatial principles.
Martin Leyland	Barratt Strategic	5.45	221	C	The purpose of the Objectives and their relationship to the Spatial Principles is not made clear in the Core Strategy. Logically, the objectives should be the first part of translating the vision into policy, prior to the setting out of Spatial	Clarification of the role of the Spatial Principles and the Objectives will be made by incorporating elements of the spatial principles into the vision.	Submission plan revised to strengthen the vision and incorporate elements of the spatial principles.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Geoff Keeble	Environment Agency	Objectives	56	S	The spatial objectives relevant to the HA are the same as those put forward in HDC's 'Towards a Spatial Strategy for Huntingdonshire' options paper reviewed on behalf of the HA in September 2007, and should support development to proceed in a sustainable manner.	Support noted.	None needed.
Mr Gareth Ridewood	CPRE	Objectives	78	S	Support but at 2. add 'significant' before proportion.	Suggestion is not accepted. It is considered that 'significant' would suggest more than the 40% sought in policy CS4.	None needed.
Mr Philip Raiswell	Sport England	Objectives	154	S	Welcome objective 14.	Support noted.	None needed
Mr Steven Harvey	n/a	Objectives	153	S	Support the reference at 6 to a 'scale which helps to provide local jobs and limit commuting'. The Core Strategy should be made consistent with this objective and the phrase 'limited' elsewhere in PO2 should be omitted to encourage new development that supports the rural	Support noted. References to limited development in rural areas elsewhere in the Core Strategy are considered to be appropriate. Objective 7 is implicit in applying to the whole district, therefore no change is required.	None needed

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Mr Steven Harvey	n/a	Objectives	151	O	<p>economy and makes provision for community needs. We support Objective 7 provided that it also refers specifically to rural areas;</p> <p>Objects to Objective 1, as the urban concentration policies will not allow local needs to be addressed within the rural areas; Objects to Objective 3 as specialist housing needs should be addressed where the need arises, that is within the rural settlements that generate those needs; Objects to Objective 13 as it does not place sufficient emphasis on the need for sequential testing in line with PPS25 to prevent development in flood risk areas. Objects to Objective 15 as it does not place sufficient emphasis on the need for sequential testing in line with PPS25 to prevent development in flood risk areas.</p>	<p>Objective 1 does not rule out appropriate development in rural areas. Objective 3 is considered appropriate because it will not always be appropriate or desirable to meet specialist housing needs where they arise. Objective 13 covers a number of elements connected with risks to health. It is not considered appropriate to cover one element in specific detail. Objective 15 covers the provision of land and infrastructure. It is not considered appropriate to cover one element in specific detail. Flood risk and reference to PPS25 will be clarified elsewhere.</p>	None needed
Tom Gilbert-Wooldridge	English Heritage	Objectives	118	O	<p>As with the spatial vision and principles, the objectives lack specific reference to the conservation and enhancement of the</p>	<p>Suggestion not accepted. Objective 8 clearly sets out to maintain, enhance and conserve the landscape and historic built environment.</p>	None needed.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Tom Gilbert-Wooldridge	English Heritage	Objectives	119	S	Supports Objective 11 on design, but suggest that the wording "is of high quality" is inserted between "development" and "integrates" to strengthen it.	Suggestion accepted.	Submission plan revised to alter objective 11 as suggested.
Mr Justin Tilley	Natural England	Objectives	313	S	Support especially objectives 8,9, 12 & 14	Support noted.	None needed.
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	Objectives	249	S	Support, particularly objectives 1 and 5.	Support noted.	None needed.
Miss Rachel Pateman	The Theatres Trust	Objectives	268	S	Supports the inclusion of objectives relating to habitat conservation and enhancement; provision of accessible greenspace for residents; and reduction of greenhouse gas emissions (points 8, 9, 12 and 14).	Support noted.	None needed.
Mr Matthew Stock	Redrow Homes (South Midlands) Ltd	Objectives	283	O	Reference should be made to making best use of existing infrastructure	Suggestion will be incorporated where appropriate in the submission version.	Submission plan revised to incorporate suggestion into objective 15 and policy CS1
Ian Burns	Cambs PCT	Objectives	174	S	Support Objectives 2 & 3 and that objective include the need to ensure that the types of dwellings built are suited to the requirements of the local population, as well	Support noted. The Core Strategy has been developed in close consultation with the Cambridgeshire PCT and the submission version responds to a number of issues raised (see subsequent representations). Any requirements for additional facilities will be taken into account. The Joint	Further work with the PCT will be required for subsequent DPDs.

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Ian Burns	Cambs PCT	Objectives	175	C	<p>as enable specialist housing needs of particular groups to be met in appropriate locations. Cambs PCT will publish Joint Strategic Needs Assessments for Older People and Children and Young People. Both these key assessments identify housing need for existing and new populations and should be used to inform future plans. Future JSNAs will focus on people with physical disabilities, people with learning disabilities and mental health; these also should be used to inform future plans.</p> <p>At Objective 14 welcome inclusion of 'increased opportunities for pursuing a healthy lifestyle, by maintaining and enhancing recreation opportunities and encouraging walking and cycling'. However, to both reduce levels of physical inactivity and promote safety, there should be a firmer commitment to increasing safer routes for both walking and cycling expressed in the spatial principles section.</p>	<p>Strategic Needs Assessment was not available during preparation of the Core Strategy Submission Report and the Overarching Needs Assessment does not provide sufficient information on the number of facilities needed to be able to inform the Core Strategy.</p> <p>Consideration will be given to how best to incorporate the suggestion.</p>	<p>Submission plan revised to strengthen vision and include reference to increasing access to recreational facilities.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Ms Diane Millis	Woodland Trust	Objectives	199	C	The Woodland Trust recommends including an objective on climate change which addresses both how Huntingdonshire can contribute to reducing greenhouse gases and how the area will adapt to the impacts of climate change particularly with reference to biodiversity in order to prevent loss of the area's characteristic habitats and species.	Suggestion accepted. Consideration given to the inclusion of an objective on climate change incorporating both adaptation and mitigation.	Submission plan revised to strengthen objectives and include an additional objective on climate change.
Mr Chris Blackman	Cambs CC	Objectives	473	O	Objective 1 - Re-word to say, . . . which minimise the need to travel and maximise use of sustainable transport modes, while . . .	Suggestion accepted. The wording will be included in the Objectives.	Submission plan revised to strengthen objectives and incorporate suggestion into objective 1.
Mr Chris Blackman	Cambs CC	Objectives	474	O	Objective 2 - Re-word to say,"are suited to the requirements of local people, are resilient to projected impacts of climate change, and that an appropriate...."	Suggestion accepted.	Submission plan revised to strengthen objectives and incorporate suggestion into objective 2.
Daniel Heenan	n/a	Objectives	360	O	Amend Bullet point 6 to read: "to enable business development in rural areas, in locations and on a scale which helps to provide local jobs, limits commuting and minimises or mitigates adverse environmental impacts."	The suggested wording or similar will be incorporated. It is considered that objective 4 adequately covers tourism.	Submission plan revised to strengthen objectives and incorporate the suggestion made into objective 6.



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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Rose Freeman	The Theatres Trust	Objectives	365	C	<p>There is no reference in the objectives to tourism, which is important for the regional and local economy and is supported elsewhere in the document.</p> <p>One of the Objectives is to strengthen the vitality and viability of town centres as places for shopping and leisure. Yet there are no policies to cover the protection of existing and promotion of new developments for tourism, leisure and cultural opportunities. Should include a statement that the loss of an existing facility should be resisted unless it can be demonstrated that it is no longer required or will be rebuilt elsewhere.</p>	The issues raised by the consultee are not covered by the Core Strategy which is a strategic document. Policies on tourist facilities and the retention of local services will be included in the Development Control Policies DPD.	None needed.
Mrs Madelaine Liddiard	Godmanchester TC	Objectives	336	S	Support.	Support noted.	None needed.
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	Objectives	642	C	<p>Supports the 15 objectives, but Objective 4 should acknowledge the continuing role of Huntingdon in attracting business related to Cambridge particularly where it can provide employment for people</p>	<p>It is considered that the suggested detail is more appropriate to the Spatial Principles. Consideration of how best to incorporate this into the revised vision will be given.</p>	<p>Submission plan revised to strengthen the vision and include information on how to reduce out commuting.</p>

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Name	Organisation	Para/ Policy	Id	Type	Summary	Officers' Response	Action Taken
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	Objectives	643	C	<p>resident within the district who would otherwise commute to Cambridge.</p> <p>Support the 15 objectives, but Objective 2 should support a wider range of housing sites and opportunities to secure delivery. Over concentration on urban redevelopment sites and housing at higher densities will not meet the full range of market demand which includes family and 'executive' type homes necessary to support economic growth.</p> <p>Needs to emphasise:</p> <ul style="list-style-type: none"> <li>- the deliverability of land to sustain the delivery of a five year supply in the medium and longer terms</li> <li>- sites which are not subject to major infrastructure constraints</li> <li>- which can add to the range and choice of housing available</li> <li>- that are in sustainable locations within the spatial planning areas of the principal towns.</li> </ul>	<p>While it is acknowledged that the deliverability of housing is an important part of the strategy objective 2 is considered to be appropriate as it is essential that housing meets the requirements of local people considering the increasing proportion of older single person households. The importance of maintaining delivery will be adequately covered elsewhere in the Core Strategy and so no change to the objectives is considered necessary.</p>	None needed.

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Table 14 Representations received to chapter 4 Sustainable Development

Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Ian Burns	Cambs PCT	6.2	178	C	<p>Include the following recommendations:</p> <p>Ensure the concept of social and community development is considered alongside developments; Ensure community facilities are available from the start; Build infrastructure for social cohesion and social capital into the framework; Require development partners to agree measures of social cohesion and build these into routine monitoring indicators; Require regular review and evaluation of indicators with the local community as partners; Ensure sustainability (resource, management and delivery);</p> <p>For existing developments: Require developers and planners to review existing provision of the infrastructure for social cohesion; Require developers and planners to remedy deficiencies during the later phases of the build; Involve existing communities in the planning of the new/ next phase of development. (Source – Dr Goh's impact of social environment on mental health &amp; lessons learned from the New Towns.)</p>	<p>The source will be reviewed and consideration will be given to the incorporation of appropriate elements bearing in mind the strategic nature of the Core Strategy.</p>	<p>Submission plan revised to strengthen the chapter on sustainable development and include criteria on some of the issues raised by the consultee such as community empowerment and involvement and promoting health and wellbeing.</p>
Strawsons Devt t/a Omnivale	Strawsons Devt	6.2	553	S	<p>Although the principle of policy wording 1 is supported the approach taken to Ramsey and Bury elsewhere in the Core Strategy is not consistent with policy wording 1.</p>	<p>Support noted.</p>	<p>None needed.</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Gary Parsons	Anglian Water	Policy Wording 1	8	C	A Water Cycle Study would ensure the development is implemented in a sustainable way and reduce adverse impact to environment	A Water Cycle Study is being completed for the Core Strategy.	Submission plan revised to strengthen Implementation and Infrastructure chapter and includes information provided by the Water Cycle Study.
Geoff Keeble	Highways Agency	Policy Wording 1	57	S	The criteria relevant to the Highways Agency should achieve more sustainable outcomes through the planning process.	Support noted.	None needed.
Gareth Ridewood	CPRE	Policy Wording 1	79	S	Support all points	Support noted.	None needed.
Mr Philip Raiswell	Sport England	Policy Wording 1	157	C	Strengthen the policy by adding: <ul style="list-style-type: none"> <li>Ensuring the provision of a quality green environment and new (and improved) sports and recreation facilities and greenspace within communities to a recognized standard and quality.</li> <li>Promoting active lifestyles through the spatial arrangement and design of development.</li> </ul>	Agree this issue needs to be included.	Submission plan revised to strengthen policy on sustainable development and include a criteria on promoting healthy and active lifestyles by protecting and enhancing greenspace and recreational facilities.
Alison Melnyczuk	St. Ives TC	Policy Wording 1	147	S	Support	Support noted.	None needed.
Tom Gilbert-Woodbridge	English Heritage	Policy Wording 1	120	S	Add "preserving and enhancing" to the beginning of the sixth criteria and "and their setting" to the end	Suggestions accepted.	Submission plan revised to strengthen sustainable development policy and incorporate changes as suggested.
Mr Justin Tilley	Natural England	Policy Wording 1	314	S	Support – especially the emphasis on enhancement for habitats and species	Support noted.	None needed.
Miss Rachel Pateman	Wildlife Trust	Policy Wording 1	270	S	Expand the objective for "maintaining and enhancing the range and vitality of characteristic habitats and species" to include "and creating viable ecological networks".	Inclusion of the suggestion is accepted.	Submission plan revised to strengthen sustainable development policy and incorporate changes as suggested.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Matthew Stock	Redrow Homes (South Midlands) Ltd	Policy Wording 1	291	O	Fourth criteria is not consistent with Spatial Objectives. Instead of reference to "curtailing," which is unrealistic, it should read "minimising"	Clarification accepted, although reduction of greenhouse gases in order to tackle climate change is essential.	Submission plan revised to strengthen sustainable development policy and incorporate changes as suggested.
Mr Steven Harvey	n/a	Policy Wording 1	189	C	The SA/SEA comments that several essential elements are not specifically mentioned in Policy P1 Sustainable Development. These social and economic objectives should not be omitted.	Changes proposed through the SA/SEA process will be incorporated.	Submission plan revised to strengthen sustainable development policy and incorporate changes as suggested. The policy now includes additional criteria relating to the social and economic dimensions of sustainable development.
Mr Steven Harvey	n/a	Policy Wording 1	186	O	Object to criteria 3 this does not reference PPS25 and 8 which is too general. Policy wording 1 therefore disregards national guidance in PPS25 Flood Risk and PPS1 Climate Change. This is a fundamental omission that would cause the Core Strategy to be found 'unsound' for failing to reflect current Government Guidance.	The climate change supplement to PPS1 was published after the Core Strategy Preferred Options it is therefore unreasonable to expect its contents to be fully reflected in the document. More specific reference to PPS25 is accepted as necessary. Consideration will be given to how best this can be incorporated while unnecessary repetition of national policy.	Submission plan revised to strengthen sustainable development policy and include a more specific criteria relating to water consumption and flood risk in accordance with PPS25
Mr Steven Harvey	n/a	Policy Wording 1	184	O	Object to the inconsistent approach between Core Strategy and SA. Core Strategy P1 should refer to the SA objectives as essential elements of sustainable development. It is clear that the 'urban concentration' theme of the Core Strategy cannot adequately address these sustainable development principles.	It is important to recognise that the SA has been integral to plan preparation at each stage of development and it is therefore considered unnecessary to explicitly state the SA objectives for this policy and every other policy in the Core Strategy. The interdependence between the SA and Core Strategy is sufficiently clear and set out in Volume 2 and the SA. The SA has assessed each policy in detail and found them all to be sustainable, including the spatial strategy. It is	Submission plan revised to strengthen the supporting text and reasoned justification for the sustainable development policy. Volume 2 considers the relationship between the two in greater detail and sets out how the SA has influenced plan preparation.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr David Reavell	O&H Properties	Policy Wording 1	205	O	Sustainable Development should be achieved primarily through the selection of the direction, type and level of growth rather than relying solely on individual developments to deliver specific sustainability initiatives. Policy wording 1 is not specific to Huntingdonshire and does not add to the requirements of PPS1 Climate Change.	It should be noted that the Climate Change Supplement to PPS1 was published after the Preferred Options. Care has and will be taken to minimise repetition of national and regional policy. It is considered that the policy is essential in addition to through the selection of the direction, type and levels of growth sought, to ensure that development is sustainable. It is considered that development will not necessarily be sustainable even if the selection of the direction, type and levels of growth sought is considered to be sustainable.	Submission plan revised to strengthen the supporting text and reasoned justification for the policy on sustainable development which now includes reference to climate change and PPS1 Climate Change. volume 2 also now references PPS1 Climate Change in the policy context boxes.
Ms Diane Millis	Woodland Trust	Policy Wording 1	229	C	Policy gives insufficient emphasis to the need to adapt to climate change and concentrates too heavily upon habitats protected under existing conservation designations (eg SSSIs). Change criteria 7 to: 'maintaining and enhancing the range and vitality of all priority habitats and species under the UK BAP including native woodland, within Huntingdonshire, while also implementing measures to ensure they can adapt to climate change'	It is not considered necessary to include the suggestions as the monitoring proposals incorporate targets relating to UK BAP targets. The policy is intended to be wide ranging to cover all habitats and species.	Submission plan revised to strengthen the policy on sustainable development.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Martin Leyland	Barratt Strategic	Policy Wording 1	223	O	Sustainable Development should be achieved primarily through the selection of the direction, type and level of growth rather than relying solely on individual developments to deliver specific sustainability initiatives. Policy wording 1 is not specific to Huntingdonshire and does not add to the requirements of PPS1 Climate Change.	It should be noted that the Climate Change Supplement to PPS1 was published after the Preferred Options. Care has and will be taken to minimise repetition of national and regional policy. It is considered that the policy is essential in addition to through the selection of the direction, type and levels of growth sought, to ensure that development is sustainable. It is considered that development will not necessarily be sustainable even if the selection of the direction, type and levels of growth sought is considered to be sustainable.	Submission plan revised to strengthen the supporting text and reasoned justification for the policy on sustainable development which now includes reference to climate change and PPS1 Climate Change. volume 2 also now references PPS1 Climate Change in the policy context boxes.
Chris Blackman	Cambs CC	Policy Wording 1	484	O	Re-word the latter half of the 6 <sup>th</sup> criterion to say, "... including the conservation and management of buildings, sites and areas of architectural, historic or archaeological importance".	Suggested accepted.	Submission plan revised to strengthen sustainable development policy and incorporate change as suggested into criterion 6.
Mr C Behagg	n/a	Policy Wording 1	438	S	Support	Support noted.	None needed.
Bank Trustees	Bank Trustees	Policy Wording 1	464	S	Support	Support noted.	None needed.
Mr T Smith	n/a	Policy Wording 1	373	S	Support	Support noted.	None needed.
Mr John Scott	Stamford Homes	Policy Wording 1	399	O	Stamford Homes objects to the inclusion of detailed criteria which are more appropriately included within the Development Control DPD or are a matter for the building regulations. The ability of the site at Field Road, Ramsey to accord with the criteria in Policy Wording 1 has been summarised.	In order to demonstrate the intentions of the Council that development in the district should be as sustainable as possible it is considered appropriate to make appropriate strategic level requirements. The criteria have and will be considered carefully to maintain the strategic nature of the Core Strategy.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 1	337	S	Support	Support noted.	None needed.
Lands Improvement	Lands Improvement	Policy Wording 1	352	O	Amend to: "An assessment will be required to accompany any proposal for major development to demonstrate how the criteria have been met where appropriate."	Major development was considered to be a universally understood definition referring to 10 or more dwellings or 1000sqm of business floorspace. This will be clarified. It is not considered appropriate to include "where appropriate" as it is considered that prospective developers should demonstrate that they have considered all the criteria even if the conclusion is that the particular criterion is not applicable to the development in question.	Submission plan revised to clarify the meaning of major development in a footnote to policy CS1.
William Evans	WharfLand Investments	Policy Wording 1	385	C	Add to criteria 1 "re-use of brownfield land and mixed brownfield and greenfield opportunities"	It is considered to be implicit that in making the best use of land that brownfield redevelopment opportunities used appropriately along with mixed brownfield and greenfield areas. No change is considered to be necessary in the policy wording, however the supporting text should be expanded to include suitable wording as suggested.	Submission plan revised to strengthen reasoned justification for policy CS1 and include reference to maximising brownfield opportunities in sustainable locations.
Mr J Stokes	n/a	Policy Wording 1	453	S	Support	Support noted.	None needed.
Mrs J Daniels	n/a	Policy Wording 1	506	S	Support	Support noted.	None needed.
Adam Ireland	Environment Agency	Policy Wording 1	535	S	Include reference to requirements for Energy Efficiency measures within new development.	Agree. The policy will be revised to include reference to energy efficiency.	Submission plan revised to include reference to energy efficiency in CS1, criterion 2.
Gates Hydraulics	Gates Hydraulics	Policy Wording 1	488	S	Support	Support noted.	None needed.



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Marlborough Developments Ltd	Marlborough Developments Ltd	Policy Wording 1	525	O	Sustainable Development should be achieved primarily through the selection of the direction, type and level of growth rather than relying solely on individual developments to deliver specific sustainability initiatives. Policy wording 1 is not specific to Huntingdonshire and does not add to the requirements of PPS1 Climate Change.	It should be noted that the Climate Change Supplement to PPS1 was published after the Preferred Options. Care has and will be taken to minimise repetition of national and regional policy. It is considered that the policy is essential in addition to through the selection of the direction, type and levels of growth sought, to ensure that development is sustainable. It is considered that development will not necessarily be sustainable even if the selection of the direction, type and levels of growth sought is considered to be sustainable.	Submission plan revised to strengthen the supporting text and reasoned justification for the policy on sustainable development which now includes reference to climate change and PPS1 Climate Change. volume 2 also now references PPS1 Climate Change in the policy context boxes.
Mr Steven Harvey	n/a	6.3	156	S	We support the statement 'Sustainable Development is at the heart of planning and is essential to address the issue of climate change'. We support the SA/SEA conclusions that 'in line with PPS25 the PO2 policies should protect high flood risk areas from development and require sustainable drainage systems to be incorporated into all new developments.	Support noted.	None needed.
Chris Blackman	Cambs CC	6.3	475	O	Add an explanatory reference to SUDS and others as appropriate.	SUDs is adequately covered within the Development Control Policies DPD and it is not considered necessary to go into such detail in the Core Strategy which is intended to be strategic in nature.	None needed.

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Table 15 Representations received on policy wording 2 Strategic Housing Growth

Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Paul Cronk	Home Builders Federation	7	97	O	No reference is made to the production of a Strategic Housing Land Availability Assessment as required by PPS3. The housing requirement can therefore not be known until this has been completed. Reference to the HLAA is now considered irrelevant.	As the Consultee is aware the Council has produced a Housing Land Availability Study. The Study was nearing completion when the Government issued SHLAA guidance. The Council decided to complete the HLAS in line with the draft guidance and then to undertake any work necessary to produce a SHLAA. The additional work is underway and will inform the Submission version.	SHLAA to be submitted alongside the Plan.
Clients of Barker Storey Matthews	Barker Storey Matthews (Agent)	7	459	S	The overall settlement strategy and hierarchy is supported. However, in rural areas specific account should be taken of the potential availability of brownfield sites in villages. Where such sites occur and are capable of development and their development could deliver significant community benefit in response to an expressed need this should be accounted as a material consideration and the scope for an exception considered.	It is considered that appropriate provision for development in key service centres and smaller settlements is made in the Settlement Hierarchy.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	7	641	S	Support the approach taken to spatial planning areas. However, find it confusing that Brampton, Godmanchester and Little Paxton are then also defined as Key Service Centres.	Support noted. The hierarchy as set out is considered appropriate as it clearly identifies Brampton, Godmanchester and Lt Paxton as settlements that have a significant level of services and individual character that would not be recognised if they were treated as 'just' part of the spatial planning areas. The treatment as suggested does not recognise this individual character and the separate settlements are treated as if they were just another part of the towns that they are in close proximity to.	None.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Geoff Keeble	Highways Agency	7.1	55	C	Improvements to the transport network will influence the delivery of housing and employment growth in more sustainable locations.	It is useful to know which areas of the transport network the Highways Agency consider to be particularly important for the delivery of development.	A strengthened section on Infrastructure and Implementation has been included in the Plan.
Mr Steven Harvey	n/a	7.2	192	O	We object to the section (paras 7.2 to 7.6) relating to the concept of Spatial Planning Areas; we believe that the process of spatial planning is intended to strengthen the social, economic and environmental linkages between all the settlements within the district in order to make the district as a whole more sustainable.	There is scope to expand the explanation of spatial planning areas. This should be addressed for submission.	The supporting text for Spatial Planning Areas has been given more detail as to how the settlements within them relate to each other. They are considered to be the most sustainable locations for major growth, while the approach to be taken for all other settlements is set out in the settlement hierarchy.
Mr Gareth Ridewood	CPRE	7.3	80	C	Suggests adding 'whilst maintaining different characters, and being clearly separated by green spaces and water courses which will be maintained' to the end of the first sentence.	Whilst the wording suggested is rather specific, it is acknowledged that an important part of the character of the area is the green/natural separation. A reference to the spatial portrait should be considered where this point can be expanded.	The supporting text has been amended by including this point.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Tim Fryer	Brampton PC	7.3	324	C	Huntingdon, Brampton and Godmanchester should remain physically separate and retain separate identities.	It is acknowledged that the green/natural separation between the settlements in the Huntingdon Spatial Planning Area is an important part of the character of this area. This can be expanded upon in the Spatial Portrait.	The supporting text has been amended by including this point
Lenton Trustees (L019)	Lenton Trustees	7.3	407	S	Our client agrees with the notion of the Huntingdon Spatial Planning Area, and considers the close physical and functional relationship of Huntingdon, Brampton and Godmanchester should lead to the settlements being considered jointly in terms of the most appropriate locations for strategic housing growth.	Support noted.	None needed.
Russell Saywell	n/a	7.4	33	S	Little Paxton is clearly linked to St Neots in terms of location and function and it is therefore correctly included as part of the St Neots Spatial Planning Area.	Support noted. With reference to Planning Area a reference to the Spatial Portrait should be considered with additional information about the relationship of the settlements.	The supporting text for Spatial Planning Areas has been given more detail as to how the settlements within them relate to each other.
Mr Gareth Ridewood	CPRE	7.4	81	C	Would reword the policy after River Great Ouse to add.....' this identity and clear separation will be maintained.' Also concerned that the wording too strongly links Little Paxton with St Neots regarding development opportunities. Little Paxton is not an area that should be considered for growth of this nature.	A reference to the Spatial Portrait should be considered with additional information about the relationship of the settlements.	The supporting text for Spatial Planning Areas has been given more detail as to how the settlements within them relate to each other
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	7.4	264	S	Support the St Neots Spatial Planning Area. However, consider there are other additional smaller scale development opportunities in this area which should be looked upon favourably.	It is not considered necessary to make explicit reference to locations for moderate or minor development. The settlement hierarchy makes provision for particular scales of development in settlements. Clarification of the role of the strategy and opportunities for moderate and minor scale development	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc, David Wilson Estates	7.4	444	O	We do not object to the concept of a St Neots Spatial Planning Area, rather we are unclear as to the implications for Little Paxton based upon the findings of the HLAA. There needs to be greater clarity.	including links between the distribution of strategic housing locations and the settlement hierarchy should be considered.	larger scale where site specific circumstances demonstrate that this would secure the most sustainable option
Bank Trustees	Bank Trustees	7.4	465	S	Our client agrees with the notion of the St Neots Spatial Planning Area, but considers due to the presence of appropriate development land to the east/south east of St Neots, Little Paxton should be considered as a secondary location for housing growth in line with its 'Key Service Centre' status.	It is acknowledged that clarification of the role for Little Paxton in the strategy is necessary. Elsewhere in the policy development in KSC is handled differently so there is potential for confusion. Support noted, although it is now clarified that Little Paxton is not identified as a strategic location for housing. Therefore the approach in the settlement hierarchy sets the housing development policy for the village as a KSC.	The reference to Little Paxton has been removed from Policy CS2. The reference to Little Paxton has been removed from Policy CS2.
Mr Michael Palmer-Asplin	n/a	7.5	26	O	Considers it appropriate for a nearby village with a close physical and functional relationship with its 'host' Market Town to be included in the corresponding Spatial Planning Area. The St Ives Spatial Planning Area should include (a) the important employment locations in Holywell-cum-Needlingworth parish at Compass Point and Parson's Green and (b) Needlingworth village, given the close physical and functional relationship with St Ives market town.	While it is acknowledged that some clarification of the St Ives Spatial Planning Area is required regarding the employment areas east of the town it is not considered appropriate to include Needlingworth.	None
Alison Melnyczuk	St. Ives TC	7.5	148	C	In addition to the flooding constraint to the south of St Ives there is also an inherent problem with 'surface water flooding' to the west and north of the town and this will be exacerbated with additional development unless extensive surface water attenuation schemes are incorporated.	The main flood risk to St Ives lies to the south in the floodplain of the Great Ouse. Development to the west of the town will need to bring forward appropriate surface water attenuation but	None

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Matthew Stock	Redrow Homes (South Midlands) Ltd	7.5	286	O	Text to be amended to recognise the positive advantages offered by the guided busway and A14 improvements in terms of sustainable growth and to acknowledge that there is scope for development to the north of the town.	consultation with the Environment Agency has indicated development is feasible in this area.  It is considered that sufficient reference to the benefits of the Guided Busway and the A14 are contained in the Spatial Portrait and Planning Context. It is considered that land to the north of St Ives is constrained in landscape terms. This area is also some distance away from the town centre and so is less sustainable than the preferred option of land to the west/south west.	None needed.
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	7.5	258	S	Support the notion of St Ives Spatial Planning Area. The issue of flooding is identified to the south which suggests it is not a constraint in other directions.	Support noted. It is considered that reference is made to the Spatial Strategy where more detail about flood risk can be included.	None needed.
Strawsons Devt/a Omnivale	Strawsons Devt t/a Omnivale	7.6	556	O	Paragraph 7.6 should be amended as follows: delete significantly from the last sentence; and add the following sentences: 'For these reasons development has been limited in recent years compared with the other Spatial Planning Areas, but this has eroded the role and function of the town in the settlement hierarchy. Some growth, but on a lesser scale than in the Huntingdon and St Neots Spatial Planning Areas, is justified now to aid regeneration, to redress community imbalances and to enhance sustainability. The Main opportunity for development is on the previously developed land comprising the former RAF Upwood.	The identification of locations for 300 homes in the Ramsey Spatial Planning Area is considered to be the most appropriate scale of development for the area. Structure Plan policy 10/3 is still saved and as such 300 is considered to be the upper limit of what can be considered 'limited and small scale'. The exact location of sites to accommodate development will be a matter for the Planning proposals DPD	None needed.
Edwards	n/a	7.6	493	S	Support the notion of the Ramsey Spatial Planning Area. The close physical and functional relationship of Ramsey, Bury and part of RAF Upwood should lead to the settlements being considered jointly in terms of the most appropriate locations for housing growth.	Support noted. The exact location of sites to accommodate development will be a matter for the Planning Proposals DPD.	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Gary Parsons	Anglian Water	Policy Wording 2	9	C	Provision of wastewater services must ensure existing capacity of the sewerage system is not compromised.	It is useful to have some detail about where AWS see constraint issues. It is acknowledged that a water cycle study is necessary. Such a study should highlight constraints.	A strengthened section on Infrastructure and Implementation has been included in the Plan. Further information is being sought through the Local Investment Framework.
Church Commissioners	Church Commissioners	Policy Wording 2	14	O	Support the inclusion of south-east/east Godmanchester as a location for mixed-use development; 2. the relationship with the Huntingdon West AAP needs to be further clarified. We also feel that all of the areas referred to in the AAP should be given further consideration; 3. aspects of the policy that relate to its operation and need further details 4. identifiable non-strategic sites and suggest should be given further consideration.  It is unclear how the scale of development outlined in the Settlement Hierarchy will operate in relation to the Strategic Housing Growth policy.	Support noted. The relationship between the Core Strategy and the Huntingdon West Area Action Plan should be clarified by stating that significant redevelopment will take place west of the town centre. It is already clear that small and moderate scale sites do not form part of the strategic housing development locations identified. The opportunity for small and moderate scale development in appropriate settlements is identified and provision is made in the settlement hierarchy.	None needed
Mr Michael Palmer-Asplin	n/a	Policy Wording 2	25	O	The allocation to Ramsey is too large, given its poor workforce:jobs ratio and its remote location. A modest allocation of, say, 250-300 dwellings should be allocated to miscellaneous rural sites, with the advantages of being more attractive to local builders, providing for affordable housing in rural areas and reducing the effect of any delays to large sites. This	Provision for small sites to come forward is made in the settlement hierarchy. It is not considered that the level of Strategic Housing Development identified would put this at risk	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Russell Saywell	n/a	Policy Wording 2	34	O	<p>element of the supply would be found from a reduction in the allocation to Ramsey and other locations.</p> <p>An allowance should be made for non implementation of some commitments/future allocations. A 10% rate would suggest that the Council should plan to provide at least 6,000 additional homes.</p>	<p>The level in Preferred Options is consistent with the EoE Plan. The requirement is recognised as a minimum. This is addressed by clearly stating in the Strategic Housing Growth policy that 'at least' 5450 homes will be delivered. The plan period has been specifically extended to 2026 to ensure that there is at least a 15 year provision. Monitoring indicates that maintaining a 5 year land supply will only become a problem in 3 to 4 years time. It is acknowledged that further consideration of delivery is needed. There is no clear justification for an additional 10% allowance for non implementation.</p> <p>Additional housing delivery will come from small and moderate scale sites through the settlement hierarchy in addition to specific locations identified in the Strategic Housing Growth policy.</p>	None needed.
Geoff Keeble	Highways Agency	Policy Wording 2	52	S	<p>Development should be supported in areas where it can facilitate improvements to the benefit of new and existing residents</p>	<p>Support noted.</p>	None needed.
Geoff Keeble	Highways Agency	Policy Wording 2	63	C	<p>Development on the scale proposed for the Huntingdon area would be heavily reliant upon the Ellington to Fen Ditton TPI scheme coming forward since it would enable improved road access to Huntingdon town centre and railway station, together with the additional highway capacity to accommodate trips generated by further development in the A14 corridor.</p>	<p>Comments noted. Phasing and implementation will be considered further to ensure infrastructure delivery does not adversely affect housing development.</p>	<p>A strengthened section on Infrastructure and Implementation chapter has been included in the Plan. Further information is being sought through the Local Investment Framework.</p>



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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr. Paul Ryan	The Stukeleys PC	Policy Wording 2	32	S	The Parish Council supports the approach taken in that in the Huntingdon Spatial Planning Area strategic housing growth is to be located on primarily brownfield sites and only a limited take of greenfield land at Godmanchester. The Parish Council would oppose any proposal to extend further major housing development within its boundaries. The Council supports the development of a significant urban extension to the St Neots, which although it requires greenfield land, does not impact on any neighbouring communities.	Support noted.	None needed.
Mr Paul Cronk	Home Builders Federation	Policy Wording 2	95	C	HDC will need to realistically ensure that a range of both brownfield and greenfield sites are available.	Comments noted. It is considered that there should be sufficient deliverable sites both greenfield and brownfield available through the implementation of this strategy.	None needed.
Mr Paul Cronk	Home Builders Federation	Policy Wording 2	99	C	The housing requirement figure is a minimum in terms of housing delivery. Housing provision will need to be made for 15 years from date of plan adoption.	Comments noted. The requirement is recognised as a minimum. This is addressed by clearly stating in the Strategic Housing Growth policy that 'at least' 5450 homes will be delivered. The plan period has been specifically extended to 2026 to ensure that there is a least a 15 year provision.	None needed.
Mrs Lorraine Russell	Ramsey TC	Policy Wording 2	101	S	Unless Ramsey and Bury's designation as a Market Town can be justified by reference to the need to upgrade infrastructure provision, development should be limited to infill only.	It is considered that opportunities exist in the Ramsey Spatial Planning Area to affect improvements in transport infrastructure, services, facilities and to address local employment issues including out-commuting. To do so will require a holistic package of measures making use of opportunities that are available.	A strengthened section on Infrastructure and Implementation chapter has been included in the Plan. Further information is being sought through the Local Investment Framework.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr John Chase	Buckden PC	Policy Wording 2	130	C	The Council believes that it would sensible to devise alternatives for the Core Strategy in case the Brampton Road Viaduct and the thus the Huntingdon/Godmanchester bypass is retained. It further believes that the bulk of the Huntingdon West Area Plan could be completed even if the bypass was retained.	Studies for the Cambridgeshire Local Transport Plan have shown that the changes to the A14 should not cause additional congestion and pollution in the Huntingdon West area and should enable improved access to Huntingdon town centre. The Council has recognised that changes to the A14 will be critical to plans for the Huntingdon West area and so has committed to producing the HWAAP.	None needed.
Alison Melnyczuk	St. Ives TC	Policy Wording 2	152	C	Although accepting that some additional development will need to be accommodated within St Ives further allocations should avoid ribbon development between St Ives and Houghton.	Site specific details will be considered as part of the Planning Proposals DPD so it is considered that there is sufficient detail in terms of identification of locations for development in the Core Strategy.	None needed.
Tom Gilbert-Wooldridge	English Heritage	Policy Wording 2	121	O	The Policy Wording 2 on pages 19-20 is detailed in terms of where new homes will be provided, but the supporting text does not explain how these locations have been identified. Furthermore, the policy and supporting text lacks any reference to the potential environmental impacts that such development would bring. Seeks consideration of impact of housing locations on the historic environment.	The SHLAA provides the main evidence base as to the reasons for identifying housing locations.  The Development Control Policies DPD will consider appropriate policies to protect the historic environment.	None
Mrs Vanessa Lavender	n/a	Policy Wording 2	82	O	The preferred approach on Key Service Centres has the potential to contradict the Spatial Vision. Concern expressed about the loss of village character in Sawtry if further development occurs.	The level of development identified for Sawtry is considered to be appropriate for the village to help maintain services and support the local economy. While fears about harm to the character of the village are understandable it is considered that this level of development will have a limited impact. Concerns can be addressed through the allocations process for the Planning Proposals DPD.	None

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Mr S Ross	n/a	Policy Wording 2	104	O	The Key Service Centres have capacity to accommodate a greater quantum of additional housing development than proposed. It is considered that at Yaxley, the policy should be worded in such a way so as to allow a modest greenfield urban extension to the southwest in addition to development on previously-developed land within the existing built-up area.	It is not considered appropriate to make provision in the Strategic Housing Growth Policy for locations that will not deliver larger scale housing. It is however considered to be inappropriate to make provision for a strategic greenfield housing development south of Yaxley as it does not have a range of facilities comparable with those in the identified spatial planning areas.	None needed.
Mrs Laura West	n/a	Policy Wording 2	108	O	This approach on Key Service Centres has the potential to contradict the Spatial Vision. Concern expressed about the loss of village character in Sawtry if further development occurs.	The level of development identified for Sawtry is considered to be appropriate for the village to help maintain services and support the local economy. While fears about harm to the character of the village are understandable it is considered that this level of development will have a limited impact. Concerns can be addressed through the allocations process for the Planning Proposals DPD.	None.
Mr David Youles	Yaxley PC	Policy Wording 2	132	S	Support expansion for Huntingdon, St Neots and St Ives. Concern expressed over expansion in Yaxley.	Support noted. Diagram 5.7 was included along with the issue, options and questions that formed part of consultation at earlier stages. These were intended to show the range of options considered previously and were not part of what was being considered at this stage.	None needed.
Lesley Burdett	Shelter	Policy Wording 2	136	S	The portion of socially rented housing should be at least 65%.	It is acknowledged that of the affordable housing delivered through the strategy a large proportion will need to be social rented. Consideration will be given to inclusion of a specified proportion in the affordable housing policy.	Submission plan amended including amendments to policy CS4.
Milton (Peterborough) Estates Ltd	Milton (Peterborough) Estates Ltd	Policy Wording 2	176	O	Provides limited scope for development beyond Market Towns. Scope should also be included for moderate development at Key Service Centres and to a limited extent in sustainable villages.	It is not considered appropriate to specifically identify smaller scale development locations in the strategic housing growth policy. The settlement hierarchy makes provision for appropriate scale development in settlements. Clarification of the role of	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Gareth Ridewood	CPRE	Policy Wording 2	308	C	<p>Brownfield - PDL target should be increased to meet national targets. Windfall Allowance - this should be included in the figures or it will lead to over allocation of greenfield land.</p> <p>Locations - we need to take seriously the environmental capacity of the district to take the growth required by the Government. Development should be phased with sustainable economic development. Existing greenspace between villages, and market town settlements should be maintained to preserve the character of the area and avoid coalescence. Significant investment in strategic greenspace enhancement, greenspace within new developments, and green corridors must be core to any development proposals.</p>	<p>the strategic housing growth policy and the settlement hierarchy should be considered.</p> <p>While it may be possible to increase the proportion of previously developed land used for housing it is not possible to achieve the national target in Huntingdonshire due to the rural character of much of the district and the agricultural rather than industrial heritage which means there are limited large scale previously developed sites in sustainable locations. It is very difficult to get clear evidence to support an allowance for windfall development because by its very nature, windfall development cannot be predicted. The Council will keep housing delivery under review through annual monitoring and will adjust allocation as required. It is considered to be unnecessarily repetitious to state that there is a brownfield first policy when this is explicit in national guidance. It is acknowledged that the policy could be clearer in terms of what will be expected, especially in terms of infrastructure, as part or along side development. Consideration should be given to how this can best be achieved within the strategic nature of the strategy and the other policies in the DPD.</p>	None needed
Miss Rachel Pateman	Wildlife Trust	Policy Wording 2	273	C	<p>We question whether the location of major new developments in St Ives, Brampton and Godmanchester are in the right location for the creation of sustainable communities. Residents in the new development to the east of St Neots must have access to natural greenspace that does not rely on unsustainable modes of transport.</p>	<p>While it is acknowledged that green transport links are a very important part of ensuring development is as sustainable as possible, there are many other important aspects that must be considered. It is considered that the locations identified give the best opportunity for new development to be as sustainable as possible.</p>	None needed

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Matthew Stock	Redrow Homes (South Midlands) Ltd	Policy Wording 2	287	O	We object to the Council's preferred development strategy of concentrating the majority of growth in the Huntingdon and St Neots Spatial Planning Areas. We also strongly object to the proposal to provide only 500 homes in the St Ives Spatial Planning Area. Inadequate account is taken of the significant investment in transport infrastructure taking place and due to take place in the Huntingdon-Cambridge transport corridor. Policy Wording 2 should be amended to recognise that there is scope for additional sustainable housing development at St Ives and the number of homes proposed to be provided at St Ives should be increased by at least 200 to contribute to meeting sub-regional needs.	Land east of St Ives, as indicated in this representation is at significant risk of flooding (HDC SFRA 2004). Following detailed discussions with the Environment Agency it is considered that although there is some land that could be considered to be at no or minimal risk of flooding that large scale development in this location would not be easily achieved and should not be part of the Preferred Option.	None needed.
National Grid Property Ltd	National Grid Property Ltd	Policy Wording 2	285	C	Policy Wording 2 is supported on the basis that identified future growth should rightly be directed to the most sustainable locations of Huntingdon and St Neots Spatial Planning Areas. Similarly the emphasis on the use of previously developed land is supported. The Policy would benefit, however, from clarification as to the appropriate locations for redevelopment of previously developed land and should make specific reference to land which is close to and well related to the built up area of Huntingdon.	Support noted. The suggested wording is welcomed but is considered to be surplus to requirements because by stating that the redevelopment of previously developed land is within the built up area of Huntingdon, development will be well related to existing facilities. There are also virtually no previously developed sites that could be defined as being in close proximity to the built up area of the town but not actually part of the built up area, which is what is suggested by the suggested wording.	None needed.
Mr Steven Harvey	n/a	Policy Wording 2	195	O	We object to Policy P2 and the proportion of development that is proposed to be concentrated within the Spatial Planning Areas.	The Spatial Policy Areas are by far the most sustainable locations and it is therefore appropriate that most growth is directed to these areas.  It is not considered appropriate to identify smaller scale development locations in the strategic housing growth policy. The settlement hierarchy makes provision for moderate and small scale development in appropriate settlements. Clarification of the role of the strategic housing	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr David Reavell	O&H Properties Ltd	Policy Wording 2	207	O	We object to the lack of recognition of the growth potential in and around Yaxley on the basis that it does not take advantage of Yaxley's relationship with Peterborough and the potential to deliver sustainable growth on a larger scale. For clarity 'about' 250 homes should be replaced with 'at least'.	growth policy and the settlement hierarchy should be considered.  The wording of 'about' and 'at least' were used specifically to convey development that could be a small amount above or below this level and development that was definitely not below this level respectively. It is considered that despite some sustainable characteristics Yaxley is not a suitable location for larger scales of growth.	None needed.
FLP	FLP (Agent)	Policy Wording 2	279	S	Our client considers that the policy should provide for the provision of a minimum of 10,414 dwellings in the plan period 2007-2026 of which, 6,492 dwellings will need to be identified on new sites.  A more balanced distribution of new housing development between the spatial planning areas and the key service centres should be provided. Supports additional development in Sawtry.	The calculation in this comment is wrong. The total requirement for 2001 to 2026 is correct. The completions are higher at 3554. Commitments from permissions should be higher at 4375. 10% for non completion is arguably too high, but would be 437. This gives a total to identify of 6458. Part is from Local Plan allocations without permissions 1240, leaving 5218. By this calculation the Core Strategy is over providing by 232. It is not considered appropriate to identify locations for development of small or moderate scale. The settlement hierarchy makes provision for these scales of development in appropriate settlements. Where considered necessary, following continued monitoring of delivery moderate scale allocations may be made in the Planning proposals DPD in line with this hierarchy.	None needed.
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	Policy Wording 2	271	O	Our client considers that the policy should provide for the provision of at least 10,414 dwellings in the plan period 2007-2026 of which 6,492 dwellings will need to be identified on new sites.	The calculation in this comment is wrong. The total requirement for 2001 to 2026 is correct. The completions are higher at 3554. Commitments from permissions should be higher at 4375. 10% for non completion is arguably too high, but would be 437. This gives a total to identify of 6458. Part is from Local Plan	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	Policy Wording 2	260	O	It is considered that the Policy should provide for the provision of at least 10,414 dwellings in the plan period 2007-2026 of which, 6,492 dwellings will need to be identified on new sites. Promotes a greater quantity of housing development in St Ives.	allocations without permissions 1240, leaving 5218. By this calculation the Core Strategy is over providing by 232.  The calculation in this comment is wrong. The total requirement for 2001 to 2026 is correct. The completions are higher at 3554. Commitments from permissions should be higher at 4375. 10% for non completion is arguably too high, but would be 437. This gives a total to identify of 6458. Part is from Local Plan allocations without permissions 1240, leaving 5218. By this calculation the Core Strategy is over providing by 232. St Ives is constraint to a significant extent by flood risk and by landscape, the latter of which is particularly the case to the north of the town. Land to the north is also significantly further from the town centre than less constrained land to the west that has been identified. It is therefore considered that 500 is the most appropriate scale of housing development for St Ives.	None needed.
St John'sCollege, Cambridge	St John'sCollege, Cambridge	Policy Wording 2	307	S	We support an approach which directs a significant proportion of growth for Huntingdon to Huntingdonshire to Huntingdon.  Policy Wording 2 should refer to at least 1800 homes being provided in the Huntingdonshire Spatial Planning Area to ensure for conformity with the emerging Regional Spatial Strategy for the East of England.	Support noted. Comments about the 1800 for Huntingdon SPA are wrong. The wording states "at least 1800" and so does not require amendment.	None needed.
Mrs Joanne Taylor	n/a	Policy Wording 2	233	O	The preferred approach on key service Centre contradicts the Spatial Vision. Concern expressed about the negative impact on Sawtry of further growth.	The level of development identified for Sawtry is considered to be appropriate for the village to help maintain services and support the local economy. While fears about harm to the character of the village are understandable it is considered that this level of development	The policy has been amended to clarify that the actual level of development on sites at Sawtry will be determined

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Martin Leyland	Barratt Strategic	Policy Wording 2	224	O	We object to the lack of recognition of the growth potential in and around Yaxley on the basis that it does not take advantage of Yaxley's relationship with Peterborough and the potential to deliver sustainable growth on a larger scale. The policy is unclear and should be reworded for clarity.	The wording of 'about' and 'at least' were used specifically to convey development that could be a small amount above or below this level and development that was definitely not below this level respectively. Further consideration will be given to the appropriate location and level of development in each KSC in the Planning proposals DPD. It is considered that despite some sustainable characteristics Yaxley is not a suitable location for larger scales of growth.	The policy has been amended to clarify that the actual level of development on sites at KSCs will be determined through the Planning Proposals DPD.
Bewick Homes	Bewick Homes	Policy Wording 2	255	O	Our client objects to the overall disposition of housing requirements set out in this policy, as this provides extremely limited scope for development beyond the District's market towns.	It is not considered appropriate to identify smaller scale development locations in the strategic housing growth policy. The settlement hierarchy makes provision for moderate and small scale development in appropriate settlements. Clarification of the role of the strategic housing growth policy and the settlement hierarchy should be considered.	None needed.
B Gray Esq	n/a	Policy Wording 2	294	S	We support the provision of 5450 homes in Policy Wording 2 and in particular the expansion of the Key Service Centre at Fenstanton and the general direction for its growth.	Support noted.	None needed.
Messrs Bakesef & Mailler	n/a	Policy Wording 2	297	S	We support the Spatial Planning Area for Huntingdon and the growth envisaged at Godmanchester and its general direction.	Support noted.	None needed.
Bedfordia Developments	Bedfordia Developments	Policy Wording 2	300	S	We support the intention to concentrate the majority of growth in the Huntingdon and St Neots Spatial Planning Areas and we consider St Neots in particular well placed to cater for large scale development.	Support noted.	None needed.



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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Scotfield Ltd	Scotfield Ltd	Policy Wording 2	292	C	<p>We support an approach which directs a significant proportion of growth to the Huntingdonshire Spatial Planning Area. The inclusion of Brampton within the Huntingdonshire Spatial Planning Area is particularly welcomed.</p> <p>Policy Wording 2 should refer to at least 1800 homes being provided in the Huntingdonshire Spatial Planning Area to ensure for conformity with the emerging Regional Spatial Strategy for the East of England.</p> <p>Policy wording 2 should also refer to development at Brampton on land on the edge of the settlement as well as on previously developed land.</p> <p>Reference to development at Godmanchester should be removed from Policy Wording 2.</p> <p>Our client's land at Brampton, as shown on the plan attached to this form should be allocated for housing development.</p>	<p>The 1800 homes figure for the Huntingdon SPA is prefixed by 'at least'. No change is therefore required. With reference to the AMR 2007 it is clear that there is well in excess of the required 5 year land supply, such that complying with this requirement will not be a problem for several years. There is therefore no need for additional housing development in the short term. In the medium term there will be a requirement for further housing delivery however the requirements for housing supply apply to the whole district and so it would not be necessary for housing development specifically in Brampton to be delivered. It is also considered that the Spatial Strategy should remain strategic in nature and as such should not seek to identify all locations where housing development, particularly of small and moderate scale development, will be allocated or considered acceptable. In the Planning Proposals DPD allocations will be made in accordance with the strategy as set out in the Core Strategy, however there will be the potential to allocate further sites depending on requirements, in line with the settlement hierarchy and sustainable development principles.</p>	None needed.
Mr S Biart for Fairfield/Luminus	Fairfield/Luminus	Policy Wording 2	304	O	<p>The inclusion of the land under Policy Wording 2 for future development to the south east/east of Godmanchester within the 'Preferred Approach' is both welcomed and supported. Having however undertaken detailed investigations and traffic surveys, it is not the representors view that there is a justifiable reason why the development of this land should be dependent on the completion of the A14 road improvements. The representors therefore object to the inclusion of this</p>	<p>The current situation with the location severed by the A1198 is not conducive to the development of an integrated community.</p> <p>Further consideration of phasing and infrastructure requirements will be given in the Infrastructure &amp; Implementation Chapter.</p>	<p>The Infrastructure &amp; Implementation Chapter has been significantly strengthened</p>

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Mr S Biart for Fairfield/Luminus	Fairfield/Luminus	Policy Wording 2	305	S	The inclusion of the land to the south east/ east of Godmanchester within Policy Wording 2, the Council's Preferred Approach to Housing, is welcomed and supported. Like the Council, the representatives also consider that this is an excellent site to accommodate a high quality urban extension to Godmanchester that will be able to address the housing needs of Godmanchester and "Greater Huntingdon".	Support noted.	None needed.
Mr S Biart for Fairfield/Luminus	Fairfield/Luminus	Policy Wording 2	301	C	While the inclusion of the land to the south east/ east of Godmanchester within the 'Preferred Approach' for Housing, Policy Wording 2, is both welcomed and supported, the reference to the development of the site being part of a mixed use development is not clear. The inclusion of the site within Policy Wording 7, the Preferred Approach for Employment, does not provide any further clarification. Having had numerous discussions with the Council it is, and always has been, the representatives firm opinion that any development on this land is to be residential led. The wording of the Preferred Approach to both Housing and Employment does not clearly identify this as being the case, and should therefore be amended.	The strategy is intended to be strategic and therefore should not be site specific or overly prescriptive about mix of uses.	None needed.
Mr Tim Fryer	Brampton PC	Policy Wording 2	328	C	Brampton is included in current Huntingdon West AAP – thus Brampton featuring in two of the three Huntingdon development areas listed. Building development in Brampton should be limited to RAF Brampton - Huntingdon West AAP development area should be limited to Huntingdon - ie excluding Brampton Parish.	The Core Strategy is a strategic document and it is right that it identifies Brampton as part of the Huntingdon Spatial Planning Area.  The HW AAP will sit within the framework established by the Core Strategy. It is not considered that this implies that there is an overlap which	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
The Diocese of Ely	The Diocese of Ely	Policy Wording 2	347	S	Support	would result in a greater level of development. Support Noted.	None needed.
Lord De Ramsey	Ramsey Estates	Policy Wording 2	430	O	Our client objects to the overall disposition of housing requirements set out in this policy, particularly in respect of the low level of housing growth directed to Ramsey (300 units) when compared to the other 'most sustainable locations' (as defined by paragraph 5.34 of the Core Strategy) of Huntingdon (1800 units), St Neots (2600 units) and St Ives (500 units). It is suggested that this be increased to 400 homes and that this includes provision for growth at the north east of the town.	Ramsey is more sustainable and offers a wider range of services and facilities than Key Service Centres, and its allocation in the preferred option is significantly higher than that for the KSCs, which in total is less than that for Ramsey. However, it has a lower level of services and is in a less sustainable location than the other Market Towns and therefore it is appropriate that a smaller level of development is proposed than in those more sustainable locations	None needed.
The Diocese of Ely	The Diocese of Ely	Policy Wording 2	441	S	We strongly support the identification of land to the east of St Neots for a strategic scale urban extension. The site is clearly deliverable and can contribute significantly to the targets for housing, employment and retailing development over the Plan period.	Support noted. Further detail about deliverability of development east of St Neots is essential and should be sought.	The Infrastructure & Implementation Chapter has been significantly strengthened.
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc, David Wilson Estates	Policy Wording 2	442	O	There needs to be greater clarity of the amount of development directed to Little Paxton. A "small number of homes" is open to misinterpretation in the light of the contents of the Housing Land Availability Study 2007	The wording for Lt Paxton is acknowledged to be potentially misleading and inconsistent with wording for other settlements. Clarification is needed.	The reference to Little Paxton has been deleted from the policy.
D R Juggins	n/a	Policy Wording 2	389	O	Our client objects to the overall disposition of housing requirements set out in this policy, as this provides extremely limited scope for development beyond the District's market towns.	The settlement hierarchy provides scope for limited development in rural settlements. It is considered that scope within the settlement hierarchy is sufficient and that the strategic housing growth policy should identify only those locations that are capable of delivering large scale development. In this way the policy will remain strategic in nature.	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Lenton Trustees (L019)	Lenton Trustees	Policy Wording 2	408	O	Our client objects to the overall disposition of housing requirements set out in this policy, and considers that a more balanced distribution between the Huntingdon Spatial Planning Area and the St Neots Spatial Planning Area would be appropriate. In addition, it is considered that Greenfield housing land to the west of Brampton should be identified for development.	While some of the points put forward support the argument that the Huntingdon Spatial Planning Area is more sustainable than St Neots the measures of sustainability as recognised by the representation are multifaceted. As it is, the site put forward is less sustainable than the locations identified in the preferred option and is constrained by noise from the A1, which is likely to be added to by the A14 changes.	None needed.
Bank Trustees	Bank Trustees	Policy Wording 2	466	O	Our client supports the overall disposition of housing requirements set out in this policy, and in particular the dominance of the St Neots Spatial Planning Area. However, the Policy is opposed in terms of the preferred locations of development which does not promote for the development of land at the south-east of the settlement.	The Core Strategy deals with strategic locations for development. The site boundaries will be determined through the Planning Proposals DPD.	None needed.
Mr C Dodson	n/a	Policy Wording 2	412	O	Objects to the overall disposition of housing requirements set out in this policy, and consider that a greater level of development should be directed to Key Service Centres outside of the Spatial Planning Areas. In addition it is considered that this policy should include provision for the small scale development of land west of King Street, Somersham. The level of increase suggested is an additional 50 homes which represents a modest addition which does not undermine the wider spatial strategy and its core objective of concentrating development at the most sustainable market towns of Huntingdon and St Neots.	It would not be sustainable to identify strategic levels of growth in locations beyond the Spatial Planning areas  The Core Strategy is strategic in nature and should therefore not be concerned with the identification of sites or locations that fall significantly below this level. Provision for this type of development is provided in the settlement hierarchy.	None needed.
Mrs Warnes	n/a	Policy Wording 2	420	O	Objects to the overall disposition of housing requirements set out in this policy, and consider that a greater level of development should be directed to Key Service Centres outside of the Spatial Planning Areas. In addition it is considered that this policy should include provision for	It would not be sustainable to identify strategic levels of growth in locations beyond the Spatial Planning areas.  The settlement hierarchy makes provision for moderate scale development in Key Service Centres and	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Sainsburys Supermarkets Ltd	Sainsburys Supermarkets Ltd	Policy Wording 2	422	C	<p>We support the broad distribution of growth between Huntingdon, St Neots and St Ives as proposed by Policy 2, subject to our further comments below. We object to the lack of clear guidance on the strategy for addressing retail requirements and improving the town centre in Huntingdon in Policies 2 and 8.</p>	<p>this is considered to be sufficient to allow for development that will address local needs and support local services and employment. The Strategic Housing Growth policy identifies locations that are considered suitable for large scale development. The wording of identifying development locations for KSCs should be considered with flexibility in mind.</p> <p>Support noted. Although clarification of the retail elements of mixed use development identified for Huntingdon should be considered, identification of key aspects of the retail strategy for the town centre of Huntingdon should be identified in the appropriate policy and not the Strategic Housing Growth policy</p>	None needed.
Mr John Scott	Stamford Homes	Policy Wording 2	400	O	<p>The amount of housing being provided will not be sufficient to meet the district's housing requirement within the plan period. Additional greenfield sites with a minimum capacity of 620 dwellings need to be identified. In view of the scale of growth already proposed for some of the Spatial Planning Areas and Key Service Centres, the shortfall in housing provision should be made good by increases of approximately 150 dwellings in the Ramsey Spatial Planning Area and in those Key Service Centres where no new provision has been identified.</p>	<p>The calculation in this comment is wrong. The alleged under provision of 620 dwellings is actually an over supply (The Council's allocation of 5450 is greater than the requirement, calculated in this representation, of 4375 by approx. 620)</p>	None needed.
Ely Diocese	Ely Diocese	Policy Wording 2	320	O	<p>The analysis of the housing land supply situation indicates that more homes will be needed on greenfield land to ensure sufficient supply as the identified capacity on previously developed land will be less than the Council anticipate due to site constraints, phasing and other commercial constraints. The additional homes on greenfield land will ensure the critical rate of 550 dwellings per year are delivered.</p>	<p>Without detailed information to back up this representation it is difficult to address this specifically. Through the HLAS and continuing work on a district SHLAA the Council has taken a pragmatic, but cautious approach to site capacity. Although it is likely that some sites will not deliver the amount attributed to them it is as likely that other sites will deliver more. It is therefore</p>	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Ely Diocese	Ely Diocese	Policy Wording 2	348	O	Development to east of the railway at St Neots is strongly supported as it is the best location in the District for additional development, without constraint. More homes will be needed on greenfield land to ensure sufficient supply. The additional homes on greenfield land will ensure the critical rate of 550 homes per year are delivered.	considered that there is no need to identify additional greenfield development. Without detailed information to back up this representation it is difficult to address this specifically. Through the HLAS and continuing work on a district HLAA the Council has taken a pragmatic, but cautious approach to site capacity. Although it is likely that some sites will not deliver the amount attributed to them it is as likely that other sites will deliver more. It is therefore considered that there is no need to identify additional greenfield development.	None needed.
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 2	338	C	Broadly support the spatial planning approach but oppose the proposals for Godmanchester. Land should not be designated for mixed use to the south east/east.	It is considered that the location is one of the most sustainable within the Huntingdon Spatial Planning Area.	None needed.
Lands Improvement	Lands Improvement	Policy Wording 2	354	O	This policy wording sets out the preferred directions of growth in the four spatial planning area yet fails to assess the alternative directions and explain why they were discounted. There is also no clear justification as to how the housing numbers have been divided between these spatial planning areas. Promotes land to the west of Little Paxton.	The reasoning behind the strategy will be clarified.	Submission plan amended including amendments to policy CS2.
Mrs Susan England	n/a	Policy Wording 2	353	O	Preferred approach objectives contradicted by policy wording as additional housing in Sawtry will lead to more commuting.	As detailed in the Settlement Hierarchy Background Paper as there are a range of local services, facilities and local employment opportunities Sawtry is considered to be suitable for some housing growth. It is therefore identified as a Key Service Centre and a share of 250 homes over the plan period.	None needed.
Mr N Hollis	Altodale Ltd	Policy Wording 2	355	O	Whilst supporting further significant development in St Neots, objection is lodged in respect of the reliance on	It is considered reasonable that housing delivery will be achievable at the levels identified. Lt Paxton would not	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
William Evans	WharfLand Investments	Policy Wording 2	380	C	<p>delivering 2450 homes on one greenfield site to the east of the town during the next 18 years. To address this provision should be made for alternative/additional more deliverable options and land at Little Paxton should be considered.</p> <ul style="list-style-type: none"> <li>Huntingdon is acknowledged as a key market town for growth by virtue of its status, existing retail provision, services and existing transportation infrastructure.</li> <li>Wharf objects to the dispersed growth pattern and the market town expansion suggested at St Neots, St Ives and Ramsey and the level of development proposed at Godmanchester, Fenstanton and Sawtry.</li> <li>Wharf proposes that the Council's market town growth strategy is replaced with strategic development at a new Spatial Planning Area known as Conington Spatial Planning Area. This location would accommodate a sustainable mix of residential and commercial uses in the form of a new community or a new settlement, possibly in the form of a new EcoTown.</li> <li>Wharf proposes development that relates to a "linked settlement" growth pattern between Peterborough, Conington and Huntingdon.</li> <li>The Conington Spatial Planning Area would link to growth already identified to the west of Huntingdon.</li> </ul>	<p>necessarily be a suitable alternative choice. Sites will be determined in the Planning Proposals DPD.</p> <p>A new settlement would require significant investment in infrastructure and would delay housing delivery. A significant factor in the discounting of new settlement options previously considered by the Council was two fold; firstly the lead in time would be considerable with the implementation of significant new infrastructure and could not be accurately predicted; secondly the requirements from PPS3 for a 5 year land supply could not be reliably maintained due to uncertainty of the lead in time and few sites coming forward for delivery in the medium term because of the lack of additional locations.</p>	None needed.
Caton Trust	Caton Trust	Policy Wording 2	415	C	<p>Support identification of Bury alongside Ramsey as a Market Town. Support wording that recognises that some housing growth will be necessary on greenfield land. Urge the Council not to be too prescriptive in identifying exact locations of greenfield growth in the Core Strategy as it would pre-empt proper consideration of suitability of sites which should be part of a later site specific DPD.</p>	<p>Support noted. The Council considers the detail contained to be appropriate. The site put forward in this representation is considered to be unlikely to comply with the description for development to the west of the town.</p>	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Stanton Group Developments Ltd	Stanton Group Developments Ltd	Policy Wording 2	452	S	Support the concept of mixed use development in Huntingdon and in the Huntingdon West Area Action Plan area.	Support noted.	None needed.
Mr J Stokes	n/a	Policy Wording 2	456	O	Our client objects to the overall disposition of housing requirements set out in this policy, and considers that a greater level of development should be directed to Key Service Centres outside of the Spatial Planning Areas. In addition it is considered that this policy should include provision for the development of land to the south of Warboys.	It is considered that the Core Strategy should be concerned with the strategic identification of housing development. Therefore the modest level of development considered appropriate for Warboys was not specifically identified in the Strategic Housing Growth policy. Provision is made in the Settlement Hierarchy for this level of development. Clarification of the Strategic nature of the Core Strategy and the Strategic Housing Policy will be made.	Submission plan amended including amendments to policy CS2.
Mr Chris Blackman	Cambs CC	Policy Wording 2	497	C	Support the approach of the policy which represents a good balance for education provision albeit with objections to some wording details.	Support noted.	None needed.
Mr Chris Blackman	Cambs CC	Policy Wording 2	499	O	Add, at the end of the first paragraph in Policy Wording 2, "whilst observing environmental designations and constraints throughout the District."	Suggestion accepted.	Submission plan amended including amendments to policy CS2.
Mr Roy Reeves	Warboys PC	Policy Wording 2	635	S	Support	Support noted.	None needed.
Mr S Juggins	n/a	Policy Wording 2	592	O	We support major growth in Huntingdon but would ask for the direction of development to be west along Stukeley Road.	The Preferred Options are considered to represent the most appropriate level of development for Huntingdon and St Neots. For Huntingdon this takes into account recent development, existing commitments and allocations and the proposed changes to transport infrastructure including the timing. It also takes into account the likely timing of development and infrastructure provision.	None needed.



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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Hunting Trust	Hunting Trust	Policy Wording 2	588	S	We support the proposed policy wording 2 and the key diagram in respect of the village of Sawtry. We support the key diagram and policy wording 2 in identifying land to the west of Sawtry as suitable for residential development. The figure of 250 houses for Sawtry, Yaxley and Fenstanton should be increased to 500.	Support noted. No reasoning is given for increasing the amount of housing that is identified in KSCs so it is considered that no change should be made.	None needed.
France, Gaulty & Camvill Dev Ltd	France, Gaulty & Camvill Dev Ltd	Policy Wording 2	605	O	We support the identification of Godmanchester for further residential growth. We support in particular the identification of land south west of Godmanchester both policy wording and figure 7.1 key diagram. We object however to identification south east of Godmanchester of mixed development on land east of the A1198. Even with the A14 diversion in place, that site is too remote from the town for residential development. Key diagram and policy wording 2 should therefore be amended to indicate that direction of growth is only suitable for employment. The scale of development being proposed in this representation is more appropriate for Godmanchester.	Although it is acknowledged that the A1198 currently presents a significant barrier to integration of the development location east of Godmanchester the changes to the A14 should allow successful integration.	None needed.
Lafarge Aggregates	Lafarge Aggregates	Policy Wording 2	604	O	St Neots area should be recognised as a key area of growth and we support the inclusion of Little Paxton as part of this growth.	The identification of Lt Paxton in the policy will be clarified. The Council does not intend Lt Paxton to be the location for large scale housing development. Lt Paxton has seen substantial development in recent years and has substantial commitments remaining.	Submission plan amended including amendments to policy CS2.
BBSRC	BBSRC	Policy Wording 2	526	S	The preferred approach for 400 additional houses to be provided west of St Ives is supported as this is consistent with the sequential approach to concentrate future development within and adjoining market towns in the Cambridge sub-region.	Support noted.	None needed.
Mrs J Daniels	n/a	Policy Wording 2	507	O	Our client objects to the overall disposition of housing requirements set out in this policy, and considers that a greater level	It is not considered necessary to identify small scale development locations and as such it is considered that the	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Persimmon Homes	Persimmon Homes	Policy Wording 2	542	O	<p>of development should be directed to Key Service Centres outside of the Spatial Planning Areas. In addition it is considered that this policy should include provision for the development of land to the west of Warboys.</p> <p>We consider that Hemingford Grey would meet the criteria for Key Service Centres in RSS14 and it is a comparatively sustainable location for further development given its facilities, proximity to St Ives and the range of facilities available there and its bus services. Recommend that Hemingford Grey is included within the policy and wording to the paragraph on St Ives and put forward our client's site (site 14 in St Ives of the HLAS 2007).</p>	<p>settlement hierarchy provides sufficient provision for smaller sites in appropriate settlements.</p> <p>With reference to the Settlement Strategy Background Paper it is considered that Hemingford Grey does not have sufficient range of services and facilities and does not meet the criteria in the EEP and as such is not designated as a Key Service Centre</p>	<p>None needed.</p>
Gallagher Estates	Gallagher Estates	Policy Wording 2	543	S	<p>Gallagher Estates suggest the following additional paragraph is inserted between paragraph 7.4 and 7.5 to read: "there are two important features of a sustainable urban extension to the east of St Neots that distinguish it from other potential areas for growth in the District and in combination allow for a more sustainable form of development to be advanced in this area: - It can be integrated with an existing allocation to the east of the railway line (known as Loves Farm) and is well related to existing and proposed facilities within this existing allocation. This integration with existing development will enable the creation of a segment of the town that will contribute positively to its character and to its community life and enable the integration of land use and transport in accordance with objectives for sustainable development. - It benefits from proximity to St Neots railway station, where there are fast and frequent services to Huntingdon, Peterborough, Bedfordshire towns and</p>	<p>Support noted.</p>	<p>None needed.</p>

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Strawsons Devt t/a Omnivale	Strawsons Devt t/a Omnivale	Policy Wording 2	557	O	<p>London. Residents within any development within this area would be within easy walking/cycling distance of the station."</p> <p>Policy wording 2 should be amended as follows: 'In the Ramsey Spatial Planning Area where at least 750 homes will be provided. Of these at least 700 will be on previously developed land, about 50 will be on greenfield land and 250 will be affordable. Provision will be made in the following general locations: In an employment led mixed use redevelopment to the west of the town, including the former RAF Upwood, to the north of the town and as development of land within the built-up area of the town.'</p>	<p>The distribution and scale of development identified is considered appropriate. 300 is considered to be the most appropriate scale of development for Ramsey. The Structure Plan considers that the emphasis should be on improving economic performance in Ramsey. To this end the Strategy identifies employment led mixed use development to the west of the town. The identification of RAF Upwood is too site specific for the Core Strategy which should only be locationally specific.</p>	None needed.
Persimmon Homes (East Midlands) Ltd	Persimmon Homes (East Midlands) Ltd	Policy Wording 2	561	O	<p>The spatial strategy fails test iv of tests of soundness outlined in paragraph 4 of Volume two of the Preferred Options Consultation Document, as the strategy fails to consider the advice written in Paragraph 24 of the addendum report to PPS1: Planning and Climate Change (December 2007), PPG13: Transport and Paragraph 5.69 of the EEP panel Report. Spatial strategy should focus growth into the Huntingdon area.</p>	<p>The supplement to PPS1 on Climate Change could not be taken into account as it was published after the Preferred Options. It will be taken into account for the Submission Version. The Core Strategy has to be in conformity with the EEP not the panel report.</p>	Submission plan amended including amendments to policy CS1.
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	Policy Wording 2	639	O	<p>It would be more appropriate given the uncertainty regarding key infrastructure delivery, if the Core Strategy were to determine the broad distribution of development between spatial planning areas. Greenfield allocations in Ramsey and St Ives should be reduced, none made at Fenstanton and the allocation at St Neots reduced to a level that can be properly justified by a rigorous and robust analysis of infrastructure capacity.</p> <p>The allocations within the Huntingdon spatial planning area should be increased as it is the employment and communications hub of the district and to</p>	<p>Infrastructure is identified as a significant factor across the district in determining the location of growth. A Local Investment Framework is being prepared which will further inform the phasing of development and the priorities for infrastructure delivery. National guidance does not require Strategic Environmental Assessment and Sustainability Appraisal of individual sites at this stage and these are considered unnecessary in establishing the locational strategy.</p>	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Sywell Land Ltd	Sywell Land Ltd	Policy Wording 2	609	O	<p>reflect available capacity for growth within existing infrastructure thresholds. Development also needs to be robustly justified with respect to the timing of infrastructure, specifically the A14 works, and to the development of community infrastructure provisions.</p> <p>Whilst giving general indications about the direction of growth, the Key Diagram(s) should clearly indicate that the delivery of such growth would be focused on locations rather than specific sites and will involve a mixture of greenfield and previously developed land and that sites would be identified on the basis of the criteria set out at Policy 1.</p>	<p>The basis for the suggested increase is not explained in full so it is considered that not change should be made. The main concern of the representation is the inclusion of existing allocations without planning permission. The Council considers these allocations to be sound, however clarification of the existing allocations will be made.</p> <p>With regard to the proposals for Yaxley, as the full range of services and facilities are not available in the village it is wrong to suggest that Yaxley has the characteristics of a market town. The availability of services and facilities in Yaxley is recognised and it is identified as a Key Service Centre and a location for moderate scale housing development. This is considered to be the most appropriate approach for the village.</p>	None needed.
Mr Burgess	n/a	Policy Wording 2	514	O	<p>Objects to the overall disposition of housing requirements set out in this policy, and consider that a greater level of development should be directed to Key</p>	<p>It is intended that the policy identifies locations that are suitable for large scale development and that locations that are suitable for smaller scales of</p>	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Jockey Club Racecourses	Jockey Club Racecourses	Policy Wording 2	624	O	Service Centres outside of the Spatial Planning Areas. In addition it is considered that this policy should include provision for the development of land on the periphery of Yaxley. The level of increase suggested is at least an additional 50 homes which represents a modest addition which does not undermine the wider spatial strategy and its core objective of concentrating development at the most sustainable market towns of Huntingdon and St Neots.  We object to policy wording 2 that states that St Neots should get most of the housing growth in the District and consider that St Neots should have more limited housing growth until it has a more sustainable balance between jobs and employees. Brampton and Godmanchester should receive a percentage of growth for the Huntingdon area as they are sustainable locations for development.	development are not specifically identified, instead relying on the guidance in the settlement hierarchy.	None needed.
Edwards	n/a	Policy Wording 2	496	O	Objects to the overall disposition of housing requirements set out in this policy, particularly in respect of the low level of housing growth directed to Ramsey (300 units) when compared to the other 'most sustainable locations' (as defined by paragraph 5.34 of the Core Strategy) of Huntingdon (1800 units), St Neots (2600 units) and St Ives (500 units).	While it is acknowledged that Ramsey is more sustainable and offers a wider range of services and facilities than Key Service Centres, the scale of development in the preferred option is significantly higher than that for the KSCs.	None needed.
Paul Seabrook	Seabrook Farms	Policy Wording 2	629	O	Object to the emphasis on providing 5450 and then basing distribution on this figure. More flexible targets should include allowance of 10% for sites that do not come forward which should then be reflected in the distribution and location of these allocations.  All the options considered included some growth at Kimbolton and the preferred option should do so too. Kimbolton should receive a small allocation of new housing to support the vitality and viability of the town centre.	Ensuring provision and delivery of housing development will be undertaken through monitoring and the Planning Proposals DPD. At this stage it is considered appropriate to plan for 'at least' 5450 homes, which is slightly more than actual requirements, based on recent monitoring.  It was considered that the policy should identify only those locations that are suitable for large scale housing	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Tully	n/a	Policy Wording 2	579	S	Suggest rewording policy wording 2 to include our clients land in Brampton.	The identification of previously developed land in Brampton as a location for housing development is considered to be the most appropriate for this area.	None needed.
Gates Hydraulics	Gates Hydraulics	Policy Wording 2	492	O	We disagree with the Council's preferred location for housing development. This policy states that 71% of housing within Huntingdonshire should be provided on greenfield land. This proportion increases for St Neots and the Core Strategy recommends that 94% of housing in St Neots should be developed on greenfield land. This does not accord with national planning policy and that a far greater proportion of homes should be built on previously developed brownfield land.	Huntingdonshire does not have a good supply of well located brownfield sites. The proportion of greenfield land identified is considered to be a maximum. Many previously developed sites are small and as such would not be appropriate for identification in the policy. The EEP recognises that the 60% target will not be achievable in all districts. While every effort will be made to achieve as high a level of previously developed land re-use as possible it should be acknowledged that it will be impossible to achieve the national target in Huntingdonshire.	The Submission plan has been amended including amendments to the Spatial Vision and the Spatial Objectives.
Marlborough Developments Ltd	Marlborough Developments Ltd	Policy Wording 2	527	O	We object to the lack of recognition of the growth potential in and around Yaxley on the basis that it does not take advantage of Yaxley's relationship with Peterborough and the potential to deliver sustainable growth on a larger scale. The policy is unclear and 'about 250' should be reworded to 'at least 250'.	The sustainability of Yaxley has been recognised with the designation of the village as a Key Service Centre and a location for strategic growth. The wording in the policy, either "about" or "at least" has been carefully chosen, with "about" meaning a number slightly above or below and "at least" meaning a number more than that specified.	None needed.
Burgess Burgess and Cooper	Burgess Burgess and Cooper	Policy Wording 2	551	S	We support the identification of Fenstanton as a key service centre subject to the increase in the amount of housing that should be accommodated in Fenstanton at this key location.	The designation of Fenstanton as a Key Service Centre and the identification of the village as a suitable location for strategic housing development are considered to be appropriate given the availability of services and facilities, access to higher order settlements, the availability of employment and environmental constraints	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Twigden	Twigden Homes	Policy Wording 2	566	O	<p>Policy Wording 2 does not set out the overall housing requirement within the Policy. It plans for a residual of 5,450 dwellings to be provided by 2026. It is considered that a residual requirement of 6,878 dwellings should be planned for.</p> <p>It does not substantiate the limitation of housing growth at Ramsey to 300 dwellings. Ramsey is the Key Market Town in the north of the District and can and should accommodate a higher level of growth.</p> <p>Policy Wording 2 directs development to the north of Ramsey, which will require the use of Greenfield land. More appropriately located, brownfield land is available at the former operational area of RAF Upwood Airfield to the west Ramsey, and at the RAF base itself.</p> <p>Major development is identified on Greenfield sites within the Key Service Centres. This is inconsistent with Policy Wording 3 which permits only moderate levels of development in Key Service Centres.</p>	<p>The policy will be revised to clearly take account of completions, commitments and existing allocations.</p> <p>The EEP is clear that the annual rate from 2006 to 2021 should be used for calculating requirements to fulfil the 15 year supply. The EEP clearly states this as 550 for the District. Therefore the housing requirement for 2021 to 2026 is 2750 homes not 2800 as advocated in this representation. In calculating housing requirements this representation applies a 10% discount to completions between 2001 and 2007. It does not take account of the 1240 homes from existing allocations that do not have planning permission. Both should be included.</p> <p>While it is acknowledged that a substantial amount of previously developed land is available at RAF Upwood, it is consider appropriate for regeneration and sustainability reasons that other locations in the town should be identified including some greenfield development as land to the north of the town has for a long time been part of the regeneration strategy. The perceived inconsistency between policy wording 2 and 3 is intentional. While it is considered appropriate to identify a number of locations that would be suitable for large scale development in Key Service Centres it is considered appropriate to limit most housing development from windfall development to moderate scale.</p>	None needed.
Twigden	Twigden Homes	Policy Wording 2	567	S	<p>Policy Wording 2 is supported in so far as it expresses the overall numbers of homes to be delivered and annual building rates as minima.</p> <p>Policy Wording 2 is supported in so far as it directs development to the west of Ramsey.</p>	<p>Support noted.</p>	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
UK Land Investments	UK Land Investments	Policy Wording 2	585	O	Whilst the Client welcomes the recognition of Buckden as a 'Key Service Centre' in the settlement hierarchy in Policy Wording 3 there is concern at its omission as a location for residential development in the final paragraph to Policy Wording 2. Buckden should be included within the final paragraph as follows: 'Outside the Spatial Planning Areas, in the Key Service Centres of Buckden, Fenstanton, Sawtry and Yaxley, about 250 homes will be provided.'	It was considered appropriate to identify locations that are suitable for large scale housing development. Smaller scale sites can be considered and may be allocated through the Planning Proposals DPD in line with the settlement hierarchy and sustainability objectives, depending on requirements.	None needed.
St Ives GC and D Wilson Est.	St Ives GC and D Wilson Est.	Policy Wording 2	606	S	We support the residential growth of St Ives for a further 500 dwellings, of which 400 will be on a greenfield site to the west of St Ives. This site should be in the most sustainable location which is on the balance of the golf course/The How and immediately adjoins residential development and St Ivo School on the west side of town.	Support noted. It should be noted that the Core Strategy is only locationally specific. Site specific allocations will be dealt with in the Planning Proposals DPD.	None needed.
Mr M Hankins	n/a	Policy Wording 2	608	S	Promotes a site at Whytefield Road in Ramsey as a suitable opportunity for sustainable development within central Ramsey.	Support noted. It should be noted that the Core Strategy is only locationally specific. Site specific allocations will be dealt with in the Planning Proposals DPD.	None needed.
Anderson	n/a	Policy Wording 2	621	C	We support the identification of St Ives as a major area of growth but feel that some of the growth should be to the north west as well as to the west of the town.	The SHLAA considered sites to the north west and north of St Ives and concluded that they were either difficult to integrate with the rest of the town or unsuitable because of their distance from the town centre.	None needed.
Mr T Smith	n/a	Policy Wording 2	650	O	Our client objects to the overall disposition of housing requirements set out in this policy, particularly in respect of the relatively low level of housing growth directed to St Ives (500 units) when compared to the other 'most sustainable locations' (as defined by paragraph 5.34 of the Core Strategy) of Huntingdon (1800 units) and St Neots (2600 units). At the Issues and Options consultation stage objection had been raised by our client in	Flood risk is a significant constraint to the south and east of St Ives which all but rules out growth in these directions. With the town centre in the south east of the town integration and accessibility for any development to the west and north will be particular issues. Additionally the separation of St Ives and Houghton has been identified as important and will be maintained. While development to the west of St Ives does not remove the	None needed.



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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr David Stowell	Spaldwick and Stow Longa PCs	7.7	2	C	<p>respect of the apparent 'downgrading' of St Ives to be considered separately from Huntingdon and St Neots. This implicitly gave St Ives a similar status to the remaining market town of Ramsey which is beyond the Cambridge Sub-Region and where a 'lesser scale of development' has been strategically established.</p> <p>The number of houses already built between 2001 and 2006 should be stated. Account should be taken of possible housing loss due to demolition.</p>	<p>separation it does reduce it. It was therefore considered appropriate to identify a limited level of growth in this direction. To the north west the issues of integration and accessibility to the town centre are considered to be significant enough to rule out this direction as being suitable for growth. The Preferred Options are considered to be the most practical solution to the constraints in St Ives.</p> <p>In is acknowledged that the specific sources of housing are not detailed. Consideration should be given to clarifying housing delivery during the whole plan period.</p>	<p>Policy CS2 amended to include figures of existing commitments. A housing trajectory is included in the Monitoring chapter to illustrate housing delivery from 2001 – 2026 which also includes detailed figures of existing commitments for 2007.</p>
Mr Michael Palmer-Asplin	n/a	7.7	27	C	<p>Greater clarity and transparency is sought in the derivation of the housing completion and permissions figures in para 7.7, particularly the origin of the 8,500 dwellings completed/permitted since 2001.</p>	<p>It is acknowledged that the specific sources of housing are not detailed. Consideration should be given to clarifying housing delivery during the whole plan period.</p>	<p>Policy CS2 amended to include figures of existing commitments. A housing trajectory is included in the Monitoring chapter to illustrate housing</p>

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Peter Glazebrook	HallamLand Management	7.7	397	O	The amount of housing being provided will not be sufficient to meet the district's housing requirement within the plan period. Additional greenfield sites with a minimum capacity of 620 dwellings need to be identified. In view of the scale of growth already proposed for some of the Spatial Planning Areas and Key Service Centres, the shortfall in housing provision should be made good by increases in provision in the Ramsey Spatial Planning Area and in those Key Service Centres where no new provision has been identified; the most sustainable of which is Kimbolton where the greatest proportion, say 50 dwellings, should be identified.	By the calculation in this representation we are over providing by about 620 not under providing. Delivery would be detrimentally impact is a number of the allocations that do not currently have planning permission do not come forward. Consideration should be given to clarifying the sources of housing provision including explicit mention of sites that are allocated but do not currently have planning permission.	Policy CS2 amended to include figures of existing commitments. A housing trajectory is included in the Monitoring chapter to illustrate housing delivery from 2001 – 2026 which also includes detailed figures of existing commitments for 2007.
Mr Chris Blackman	Cambes CC	7.8	478	O	Add to the last sentence but one of the paragraph "whilst also providing sustainable links across the railway to existing facilities in the town".	It is acknowledged that the railway could present integration issues for development east of St Neots. Solutions to this issue will be a key part of master planning for the area. Consideration should be given to the inclusion of text as suggested or similar.	None needed.
Mr Steven Harvey	n/a	7.10	197	O	RESPONSE 14: Strategic Housing Growth - Reasoned Justification We object to Paragraph 7.10 as it fails to make specific reference to national policy in PPS25.	It is not considered necessary for the Core Strategy to make reference to PPS25 in paragraph 7.10.	None needed.

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Name	Organisation	Para/ policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Chris Blackman	Cambs CC	7.10	476	O	There should be more explanation of the planning approach to bring forward the St Neots greenfield development	Further detail as to the specific phasing and other requirements of the various locations of growth should be considered in order to clarify delivery.	The Infrastructure and Implementation chapter has been significantly strengthened to include infrastructure requirements and phasing for strategic directions of growth.
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	7.11	266	S	There should be an approach to facilitate opportunities for housing sites located adjacent to the built up area of towns to come forward.	It is not considered necessary to make the changes suggested as the Strategic Housing Growth policy identifies sufficient locations to deliver the 5450 homes required. Delivery above this should only be on sites within the built up area of the identified settlements in the settlement hierarchy.	None needed.
Mr Peter Glazebrook	HallamLand Management	7.11	395	O	Paragraph 7.11 follows on from paragraph 7.10 and in so doing is too restrictive as it will not enable the requisite number of dwellings to be completed during the plan period.	Previous comments do not prove an under provision.	None needed.

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Table 16 Representations received on the settlement hierarchy

Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Alison Melnyczuk	St. Ives TC	7.13	155	C	An additional 500 dwellings mainly to the west of the town will have a detrimental impact on current infrastructure. All additional development should provide sufficient infrastructure to avoid overloading current facilities.	Contributions to the maintenance and provision of facilities will be expected from all strategic locations identified.	None needed.
Church Commissioners	Church Commissioners	Policy Wording 3	15	S	Support	Support noted.	None needed.
Michael Palmer-Asplin	n/a	Policy Wording 3	28	O	Subdivide 'Smaller settlements' to permit Minor-scale development in appropriate cases. Add another criterion - the extent to which a settlement has a close physical and functional relationship with a host market-town. Criticise entries for access to secondary schools and employment for Needingworth in the Settlement Hierarchy Background paper.	It is considered that local needs and the maintenance of services and facilities for smaller settlement can be adequately provided for by the combination of the provisions in the settlement hierarchy and affordable housing exceptions sites policies. Issues raised with regards to the settlement hierarchy background paper are acknowledged, however although the Compass Point employment area is within the Needingworth parish it is considered to relate more closely to St Ives as it is within the built up area of the town.	None needed.
Maydo Pitt	GO-East	Policy Wording 3	38	O	Policy wording should not refer to prescriptive limits but give an indication of likely acceptable scale of development. Proposals will also be judged on individual merits eg design led approach and efficient use of land. Submission policy should include indicative figures only.	It is acknowledged that development proposals will need to respond to local circumstances to make the best use of land. The policy should be amended to refer to an indication of scale	The policy has been amended to refer to the scale of development being indicative.
Russell Saywell	n/a	Policy Wording 3	45	O	Inconsistent and confusing to separate Brampton and Godmanchester from Huntingdon and Little Paxton from St Neots. Add "(including Brampton and	Disagree. The distinction made between the housing growth policy and the settlement hierarchy for Brampton, Godmanchester and Lt Paxton is considered to be	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					Godmanchester" after Huntingdon and "(including Little Paxton)" after St Neots	appropriate. These settlements do not have the same range of services and facilities as the market towns, while they do have good accessibility to these service and facilities in the towns close by this should not be considered to be the same as having these services in the settlements. These key service centres are considered to be suitable for moderate scale development and the locations for development identified in the strategic housing growth policy should be considered as exceptions to this. The locations identified are specific opportunities for housing development that have been considered at this strategic level collectively with other strategic considerations. This will not be possible with windfall sites and it is considered that it will not be possible to effectively plan for large scale developments that might present themselves during the plan period in these settlements.	
Geoff Keeble	Highways Agency	Policy Wording 3	61	S	Support	Support noted.	None needed.
Mrs Lorraine Russell	Ramsey TC	Policy Wording 3	103	S	Should specify how improvements to Ramsey and Bury's infrastructure and employment opportunities will be brought about. Including Ramsey and Bury as a Market Town is misleading; it is currently only comparable to that of a key service centre in terms of facilities and services.	Ramsey is clearly identified as a market town in the saved Structure Plan policy 10/3. The Strategy makes reference to some of the issues to be tackled by development in Ramsey.	None needed.
P Bryant	Somersham PC	Policy Wording 3	91	O	Contradiction in the designation of Somersham as a KSC. The provision of 35 houses does not take into account the area or infrastructure. It fails to consider Somersham's sphere of influence which includes Colne and Bluntisham.	The 35 homes were proposed in the Towards a Spatial Strategy document. For the Preferred Options it was considered that this level of development was not strategic and would not be identified in the housing growth policy. The settlement hierarchy makes	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Tom Gilbert-Wooldrige	English Heritage	Policy Wording 3	122	C	Need to consider character and form of each settlement as well as access to services and facilities. Include a caveat that development sites will only be appropriate subject to proper environmental assessment.	provision for up to moderate scale development in Key Service Centres such as Somersham, specifically within the built up area. Consideration should be given to clarification of the definition of built up area in relation to the settlement hierarchy. The representation seems to suggest that Somersham should not be a KSC. It is unclear what change should be made as surrounding villages that look to Somersham for local services are referenced when this would support the KSC designation.	None needed.
Mr S Ross	n/a	Policy Wording 3	106	O	Key Service Centres should contain an internal hierarchy with those centres with the greatest capacity to accommodate additional development in a sustainable manner prioritised.	It is considered that the determination of the suggestion of environmental assessment should be considered as part of the development control DPD and is not a strategic issue to be addressed in the Core Strategy.  No prioritisation is considered necessary as development that comes forward will be dependant on opportunities that arise within the settlements. The larger settlements will be more likely to have more opportunities, whereas smaller settlements will have fewer opportunities. It is considered that the limitation of moderate scale development in addition to the availability of development opportunities will be sufficient to allow for appropriate development for the settlements identified as KSCs	None needed.
Mr David England	n/a	Policy Wording 3	110	S	Support inclusion of Warboys as a Key Service Centre	Support noted.	None needed.
Mr and Mrs Eayrs	n/a	Policy Wording 3	133	O	Consideration is not given to the proximity of services provided by other settlements and accessibility via public transport. Change wording	It is not considered appropriate to take this approach in policy. Exceptions will need to be considered if specific proposals come forward as planning	The policy has been amended to state that the scales are indicative which allows a degree of flexibility.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	Policy Wording 3	250	S	Support	Support noted.	None needed.
Milton (Peterborough) Estates Ltd	Milton (Peterborough) Estates Ltd	Policy Wording 3	193	O	Additional flexibility needed. Categories of development are arbitrary. Indicating minor (9 or less) and major development (10 or more) is more appropriate. Object to removal of settlement boundaries as indicated in Settlement Background Paper as this will not provide any certainty or clarity.	It is acknowledged that additional flexibility should be incorporated as the policy as worded is too rigid. It is however considered that the different scales identified represent an important starting point for defining what development should be considered acceptable in the different settlements. With regard to the removal of settlement boundaries it is not intended that the Core Strategy should include either settlement boundaries or criteria based policies as this is a development control and site specific issue. It is acknowledged that clarification of how the Council intends to define where development can take place should be made.	The policy has been amended to state that the scales are indicative which allows a degree of flexibility. The policy allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Gareth Ridewood	CPRE	Policy Wording 3	238	S	Reference should be made to the promotion of brownfield land and sustainable urban extensions above Greenfield development.	Support noted. Clarification of the application of the scales of development should be incorporated in the text.	The priority for the use of brownfield over Greenfield is set out in Policy CS1 and its supporting text. CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Matthew Stock	Redrow Homes (South Midlands) Ltd	Policy Wording 3	290	S	Support although further growth for North of St Ives should be provided for to the north of the town.	Support noted. As detailed in the Settlement Hierarchy Background Paper it is the Council's intention to remove settlement boundaries and to use a definition of the built up area to determine where development proposals are acceptable. The issue of the direction of growth for St Ives is a matter set out in CS2	None needed.
Mr John Chase	Buckden PC	Policy Wording 3	194	O	Object to classification of Buckden as Key Service Centre. It does not have good public transport links or adequate infrastructure and is outside the Cambridge Sub Region. Reclassify as a smaller settlement.	With reference to the background paper on the Settlement Hierarchy Buckden is one of the more marginal villages but is considered to be appropriate as a KSC due to its range of shops. In recognition of the more limited range of services in comparison with other KSCs Buckden has not been identified as a location suitable for large scale growth.	None needed.
Mr Steven Harvey	n/a	Policy Wording 3	208	O	Object to the HLA and the Rural Exceptions document in their present form and their use as base evidence to inform the Core Strategy as it fails to provide a proper appraisal of either the needs of the individual communities or the sustainability of the identified sites.	The Exception Sites Study is not listed as a source for the settlement hierarchy and while the Council was aware of its contents the study was not considered to be a source that was significant in the drafting of this policy. The HLAS was under final stages of completion when the Government's revised guidance for SHLAAs was published. At that time it was considered prudent to complete the work on the Study and publish it as such, identifying that it was not a full SHLAA, although fulfilling much of the role of one. Work is now underway to complete a SHLAA for the district, which will be completed to enable it to be fully taken into account in preparation of the submission version	None. The SHLAA will be submitted as a supporting document.



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Steven Harvey	n/a	Policy Wording 3	198	O	Bluntisham should be included as a key service centre as it is a more sustainable location for growth than Somersham and should be either in place of or as well as Somersham.	Disagree. Bluntisham has fewer facilities than Somersham and therefore less suitable as a KSC.	None needed
Mr Steven Harvey	n/a	Policy Wording 3	202	O	Object to blanket restriction of residential infilling for smaller settlements. Accessibility and sustainability of each settlement needs to be taken into account and some are appropriate for moderate development to sustain village viability.	The development in Smaller Settlements is limited to residential infilling but Policy CS3 should be amended to make it clear that larger scale development may be acceptable where it is the most sustainable option.	Policy CS3 has been amended to allow for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Mr David Reavell	O&H Properties Ltd	Policy Wording 3	209	O	Yaxley should be allocated as a fifth 'spatial planning area' to reflect its close links with Hampton and Peterborough, which have facilities comparable to a market town.	Yaxley has experienced significant development in recent years and has significant existing commitments. While Yaxley does have a good range of services and facilities and good accessibility to higher order services and facilities in Peterborough it does not have the same range of services as a market town. With these issues in mind it is not considered appropriate to designate Yaxley as part of an additional spatial planning area or identify further development locations for the village.	None needed.
FLP	FLP (Agent)	Policy Wording 3	281	O	No justification for moderate scale of development given – this appears to be arbitrary and is restrictive. Thresholds need to be flexible and should be changed to minor development (up to 9 dwellings) and major development (10 or more). KSCs should be given more flexibility for growth. Sawtry is suitable for major development.	The Policy can be amended to make it more flexible. Sawtry does not have the range of services comparable with a market town and is therefore considered appropriately placed in the KSC category.	Policy CS3 has been amended to allow for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	Policy Wording 3	272	S	A flexible approach is needed to maximise development opportunities and undeveloped land on the edge	Support noted. Clarification of where the development scales apply should be incorporated.	CS3 has been amended to state that the scales are

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	Policy Wording 3	261	S	Support	Support noted.	indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option. None needed.
Paul Ryan	Stukeleys PC	Policy Wording 3	240	S	Support designation of Great & Little Stukeley as smaller settlements although there may be cases where development of more than 3 dwellings is appropriate to make efficient use of land and provide more affordable housing for local people.	Support noted. It is considered that clarification of the circumstances were flexibility in the scale of development considered acceptable should be incorporated.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Paul Ryan	Stukeleys PC	Policy Wording 3	241	O	Object to removal of settlement boundaries.	This is not considered to be a strategic issue and is therefore more appropriately dealt with in the Development Control Policies DPD.	None in the Core Strategy.
Martin Leyland	Barratt Strategic	Policy Wording 3	225	O	Yaxley should be allocated as a fifth 'spatial planning area' to reflect its close links with Hampton and Peterborough, which have facilities comparable to a market town.	Yaxley has experienced significant development in recent years and has significant existing commitments. While Yaxley does have a good range of services and facilities and good accessibility to higher order services and facilities in Peterborough it does not have the same range of services as a market town. With these issues in mind it is not considered appropriate to designate Yaxley as part of an additional spatial planning area or identify further development locations for the village.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Bewick Homes	Bewick Homes	Policy Wording 3	256	O	Policy is inflexible and restrictive particularly with regards to smaller settlements. Appropriate scale of development should be taken on a site by site basis. Thresholds for moderate scale are arbitrary. Object to deletion of settlement boundaries. Using a criteria based policy will not provide certainty or clarity to new development potential.	While it is acknowledged that further flexibility to take into account site specific circumstances should be incorporated into the policy, it is considered that the scales of development set important guidelines as to the level of development the Council considers is suitable for different types of settlement. The matter of settlement boundaries is not considered to be a strategic issue and is therefore more appropriately dealt with in the Development Control Policies DPD.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
J Ayres Esq	n/a	Policy Wording 3	293	O	Holme should be designated a KSC due to its range of services and proximity to Yaxley and Peterborough.	Referring to the Settlement Hierarchy Background Paper Holme does have some services and facilities but has only a basic public transport service and cannot be considered to serve a wider local area in the same way as other Key Service Centres.	None
B Gray Esq	n/a	Policy Wording 3	295	S	Support designation of Fenstanton a KSC	Support noted.	None needed.
Mrs C Bradbury	n/a	Policy Wording 3	296	S	Support Little Paxton as KSC	Support noted.	None needed.
Messrs Bakesef & Mailler	n/a	Policy Wording 3	298	S	Support	Support noted.	None needed.
Merrill & Chignell	n/a	Policy Wording 3	299	O	Great Gransden should be included as a KSC as it has good services and is close to Cambridge.	The Settlement Hierarchy background paper identifies the fact that Great Gransden has only a basic range of services and employment opportunities. However it has only a basic public transport service and its proximity to Cambridge would mean that any housing development would add to car based commuting.	None needed.
Scottfield Ltd	Scottfield Ltd	Policy Wording 3	306	S	Support identification of Brampton as Key Service Centre.	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Ely Diocese	Ely Diocese	Policy Wording 3	325	O	Prioritise St Neots for development eg add "with a priority towards St Neots". Policy in current form is inflexible and restrictive. Change last sentence to "secures the best use of the site."	St Neots is recognised in the Strategic Housing Growth policy as the main centre for housing development in the district. It is considered that no further distinction is required in the settlement hierarchy. It is considered that additional flexibility should be incorporated into the policy so that the best use of land can be made when sites are developed. Different levels of settlement, including more categories, have been explored through consultation on the Core Strategy so far but the preferred option was considered to be the best option.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option
Mr Peter Glazebrook	HallamLand Management	Policy Wording 3	392	S	Support.	Support noted.	None needed.
Mr C Behagg	n/a	Policy Wording 3	443	S	Support in respect of Fenstanton. This is consistent with RSS & Structure Plan.	Support noted.	None needed.
Lord De Ramsey	Ramsey Estates	Policy Wording 3	431	O	Supportive of the overall settlement hierarchy in respect of market towns as it places Ramsey and Bury alongside Huntingdon, St Neots and St Ives as 'market towns'. Object to restrictive and inflexible nature of the policy, particularly for smaller settlements. To support limited rural growth suggest amendments to allow development of up to 6 dwellings in smaller settlements. Support proposed deletion of settlement boundaries.	It is considered that clarification of the circumstances under which exceptions to the development scales would be acceptable and factors that will be taken into account when considering sites should be incorporated into the policy. As the Strategic Housing Growth policy identifies locations to accommodate all of the housing requirement for the district during the plan period there is no requirement for the settlement hierarchy policy to enable any housing, however it is recognised that limited housing development in suitable settlements is appropriate considering the range of services and facilities available.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Andrew Middleditch	Henry H Bletsoe & Son	Policy Wording 3	418	O	Concerned this policy relegates vast majority of villages to 'smaller settlements' status allowing very few opportunities for development. An additional category of 'group	The approach to settlements taken in the hierarchy is considered to address the identified problems of a continued policy of infill. The differences between infill and small scale development will not make	CS3 has been amended to state that the scales are indicative, but also allows for

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					settlements' should be identified where basic facilities exist, such as Stilton, Holme, Catworth, Farcet, Gt. Gidding and Alconbury Weston.	sufficient difference to maintain the viability of services and facilities, particularly in the absence of employment opportunities as residents will continue to commute and use services and facilities that are available near to where they work. It is considered that clarification of the circumstances under which exceptions to the development scales would be acceptable and factors that will be taken into account when considering sites should be incorporated into the policy.	development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option
D R Juggins	n/a	Policy Wording 3	390	O	Objects to restrictive and inflexible nature of the policy, particularly for smaller settlements. To support limited rural growth suggests amendments to allow development of up to 6 dwellings in smaller settlements. Support proposed deletion of settlement boundaries.	It is considered that clarification of the circumstances under which exceptions to the development scales would be acceptable and factors that will be taken into account when considering sites should be incorporated into the policy. This is considered to be sufficient to ensure that the best use of land is made and that higher densities are used as advocated in PPS3.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Lenton Trustees (L019)	Lenton Trustees	Policy Wording 3	409	O	Support in respect of Brampton as consistent with RSS and Structure Plan although clarification is needed of where exceptions to development scales may occur.	Support noted. It is considered that clarification of the circumstances under which exceptions to the development scales would be acceptable and factors that will be taken into account when considering sites should be incorporated into the policy.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Bank Trustees	Bank Trustees	Policy Wording 3	469	S	Support	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr C Dodson	n/a	Policy Wording 3	413	O	Support settlement hierarchy as proposed in Policy Wording 3 in respect of unallocated sites with particular reference to Somersham but opposed to deletion of settlement boundaries. Use of criteria based policy will not provide certainty or clarity for potential new development.	Although the approach to settlement boundaries may lead to less clarity there should be more flexibility and more opportunity for development that responds to local requirements. The matter of settlement boundaries is not considered to be a strategic issue and is therefore more appropriately dealt with in the Development Control Policies DPD	None needed.
Mrs Warnes	n/a	Policy Wording 3	426	S	Support.	Support noted.	None needed
Mr John Scott	n/a	Policy Wording 3	401	S	Support.	Support noted.	None needed
Ely Diocese	Ely Diocese	Policy Wording 3	349	O	The Hierarchy should separate out St Neots as the number one priority for development to 2026, eg add "with a priority towards St Neots". Policy in current form is inflexible and restrictive. Change last sentence to "secures the best use of the site."	St Neots is recognised in the Strategic Housing Growth policy as the main centre for housing development in the district. It is considered that no further distinction is required in the settlement hierarchy. It is considered that additional flexibility should be incorporated into the policy so that the best use of land can be made when sites are developed. Different levels of settlement, including more categories, have been explored through consultation on the Core Strategy so far but the preferred option was considered to be the best option.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Mr I R Quince	n/a	Policy Wording 3	331	S	Support particularly Toseland identified as a smaller settlement.	Support noted.	None needed.
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 3	339	C	Reluctantly support Godmanchester's designation as a key service centre. However object to substantial developments in Godmanchester (particularly to the south east/east) as this location has serious disadvantages and the town	The Settlement Hierarchy makes provision for windfall development and so limits development in Godmanchester to moderate scale and below. The Strategic Housing Growth Policy makes provision for location where allocations should be made and therefore identifies 'to the south east/east of	None needed,

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Lands Improvement	Lands Improvement	Policy Wording 3	356	O	Object to arbitrary thresholds for development as they will not make efficient use of land in particular locations. Little Paxton should be allowed to accommodate more than 60 dwellings given its proximity to facilities in St Neots.	The Settlement Hierarchy deals with windfall development and as such it is considered that moderate scale is appropriate for Lt Paxton. It does not have the full range of services and facilities that are available in St Neots and although it has a good range of services and facilities and has good access to St Neots this does not mean that it can be considered suitable for all scales of development.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
William Evans	WharfLand Investments	Policy Wording 3	383	O	The market towns are unable to sustain the level of development without infrastructure in place. This level of development will be detrimental to character and form of these settlements. Suggest amendments:  Huntingdon, St-Neots; "moderate scale may be appropriate to the west of Huntingdon and at RAF Brampton" St Ives and Ramsey and Bury as 'Market Towns' in which development schemes of large, moderate and minor scale "within urban areas" will be appropriate  Add "within urban areas" at the end of the second paragraph.	Most housing development in the towns and key services centres will come from allocations made in the Planning Proposals DPD. The scale and location of these allocations is set out in the Strategic Housing Growth policy. Further housing development will be possible but only on windfall sites within the built up area of the settlements that become available during the plan period and could not be allocated. It is considered that clarification of the issues to be considered when determining the suitability of development should be incorporated. It is considered that this determination of suitability along with the limited nature of sites capable of large scale development becoming available will mean that there is no significant risk of service, facility or infrastructure delivery failure.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr J Stokes	n/a	Policy Wording 3	458	O	Object to inflexible nature of housing development categories which do not take into account making the best use of land on a site by site basis. This may preclude development on a larger scale in KSC. Additional flexibility is needed.	It is considered that clarification of the circumstances under which exceptions to the development scales would be acceptable and factors that will be taken into account when considering sites should be incorporated into the policy.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option
Martin Page	D.H. Barford (Agent)	Policy Wording 3	575	O	Reference to residential infilling is inflexible and restrictive. It should be replaced with 'small scale development of up to 3 dwellings.'	Clarification of appropriate scales of development will be provided.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Martin Page	D.H. Barford (Agent)	Policy Wording 3	593	O	Policy fails to acknowledge the varying size and range of facilities that are available within the 'smaller settlements' and makes no allowance that some smaller settlements have a role or a focus in serving smaller and poorer served settlements.	With reference to the Settlement Hierarchy Background Paper Gt Greensden is identified as having only a basic range of services and public transport. It is recognised that the village has more employment opportunities than many other villages however it is not considered to fulfil the criteria sufficiently to be considered and designated as a Key Service Centre. Gt Greensden is well placed to fulfil criteria and be considered suitable for minor scale development, whereas Toseland is unlikely to be considered suitable for minor development. It is considered important to have this distinction and tests for development proposals within	None needed.



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Martin Page	D.H. Barford (Agent)	Policy Wording 3	594	O	No justification for the limit of 9 dwellings for minor scale development. This is restrictive and may preclude sustainable solutions. Change minor to larger to enable a flexible approach to be taken	Clarification of the flexibility for exceptions to the scales identified should be made.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Martin Page	D.H. Barford (Agent)	Policy Wording 3	595	O	Object to term residential infilling. To make best use of land greater flexibility should be incorporated. Change to "small scale development of up to 3 dwellings."	Clarification of the flexibility for exceptions to the scales identified should be made.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Martin Page	D.H. Barford (Agent)	Policy Wording 3	596	O	Great Gransden should be reclassified from Smaller Settlement to a Key Service Centre.	The Settlement Hierarchy background paper identifies the fact that Great Gransden has only a basic range of services and employment opportunities. However it has only a basic public transport service and its proximity to Cambridge would mean that any housing development would add to car based commuting.	None
Chris Blackman	Cambs CC	Policy Wording 3	503	C	In combination with the environmental factors, sustainability should still be a major factor in considering countryside	Development in the countryside should be limited to uses appropriate in such locations. Where development does take place in the countryside, it is accepted	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					development as accessibility to jobs, education, and various other services is extremely important, especially if the development is of significant size.	that such factors should be taken into account and this is reflected in Policy CS1.	
Wm Morrison Supermarkets	Wm Morrison Supermarkets	Policy Wording 3	538	S	Support	Support noted.	None needed
Mr Roy Reeves	Warboys PC	Policy Wording 3	636	S	Support	Support noted.	None needed
Camvil Developments Ltd	Camvil Developments Ltd	Policy Wording 3	590	S	Support settlement hierarchy but Warboys should be notated in the key diagram with a direction of growth to the west.	Support noted. The Strategic Housing Growth policy identifies locations considered to be suitable for large scale housing development and these locations are then identified on the Key Diagram. As identified in this representation there are sites in Warboys that may be suitable for moderate scale development. Such sites are considered to be too specific to identify in the Core Strategy but may be allocated through the Planning Proposals DPD depending on housing delivery and local requirements.	None needed
Mrs J Daniels	n/a	Policy Wording 3	511	S	Object to inflexible nature of housing development categories which do not take into account making the best use of land on a site by site basis. This may preclude development on a larger scale in KSC with particular regard to Warboys. Additional flexibility is needed.	It is considered that clarification of the circumstances under which exceptions to the development scales would be acceptable and factors that will be taken into account when considering sites should be incorporated into the policy.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mrs J Loe	n/a	Policy Wording 3	578	S	<p>Distinction between settlements with primary schools and other facilities to support limited growth needed. Amend to:</p> <ol style="list-style-type: none"> <li>1. Key service centres – large scale developments of 60 or more developments (Fenstanton, Sawtry and Yaxley)</li> <li>2. Key service centres – moderate scale development 10-59 dwellings (Buckden, Warboys, Kimbolton and Somersham)*</li> <li>3. Minor scale development (up to 9 dwellings) All villages with a primary school**</li> <li>4. Limited development (up to 3 dwellings), all other villages</li> </ol> <p>* Brampton, Godmanchester and Little Paxton are included in the urban proposals under policy wording 2. The plan should support limited growth at the villages of Great Paxton, Great Staughton, Great Gransden, Somersham/Colne, Holme, Folksworth, Earith, Great Gidding, Offords, Spaldwick, Needingworth and Brington</p>	<p>Support noted. The suggested hierarchy and development scales are not considered to be appropriate due to likely future population changes (See SHMA) including a significant fall in school aged children. This would mean that allowing minor development in all villages with (only) a primary school would be unlikely to serve the needs of people who are likely to live there.</p>	<p>None, although CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.</p>
Persimmon Homes (East Midlands) Ltd	Persimmon Homes (East Midlands) Ltd	Policy Wording 3	574	O	<p>The strategy fails to consider the advice PPS1: Planning and Climate Change, PPG13: Transport and paragraph 5.69 of the EEP Panel Report.</p> <p>It is more sustainable to locate development on Greenfield sites that would be well served by the guided busway, rather than locating development on brownfield sites that will inevitably encourage lengthy journeys made by the private car. Major growth proposed for St Neots is not in conformity with the draft RSS. It is unsustainable and</p>	<p>This is not a matter for CS3 and has been adequately considered in the development of CS2 on Strategic Housing Development.</p> <p>The Preferred Options did not take into account the supplement to PPS1 on Climate Change as this had not then been published.</p> <p>Huntingdon and St Neots are in the Cambridge Sub Region and the whole district is in the London to Peterborough Growth Area. Neither of the towns is identified in the EEP as Key Centres for Development and Change or in any other way is any distinction made between the two.</p>	<p>None needed in respect of this Policy.</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr & Mrs Massicks	n/a	Policy Wording 3	572	S	<p>unviable to rely upon the A14 road improvements in order to deliver new housing and employment growth, as is the case in Godmanchester. The future designation of RAF Brampton for housing, employment or mixed use should not be included in the Core Strategy until the lifespan of the base is confirmed. Overall a greater focus for growth should be around the Huntingdon Urban Area.</p> <p>Distinction between settlements with primary schools and other facilities to support limited growth needed. Amend to:</p> <ol style="list-style-type: none"> <li>1. Key service centres – large scale developments of 60 or more developments (Fenstanton, Sawtry and Yaxley)</li> <li>2. Key service centres – moderate scale development 10-59 dwellings (Buckden, Warboys, Kimbolton and Somersham)*</li> <li>3. Minor scale development (up to 9 dwellings) All villages with a primary school**</li> <li>4. Limited development (up to 3 dwellings), all other villages</li> </ol> <p>* Brampton, Godmanchester and Little Paxton are included in the urban proposals under policy wording 2. The plan should support limited growth at the villages of Great Paxton, Great Staughton, Great Gransden, Somersham/Colne, Holme, Folksworth, Earith, Great Gidding, Offords, Spaldwick, Needingworth and Brington</p>	<p>Godmanchester is in broad terms as sustainable as many parts of Huntingdon by virtue of the distance and accessibility to services in Huntingdon town centre. Much of the Strategy is dependant upon delivery of major infrastructure projects such as the A14 improvements.</p> <p>The MoD has confirmed its intention to close RAF Brampton.</p> <p>Support noted. The suggested hierarchy is similar to an option for the settlement hierarchy considered through consultation in preparation of the Core Strategy. The option did not receive much support and the preferred option was considered to be more appropriate.</p>	<p>None, although CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.</p>
Taylor Woodrow Developments Ltd	Taylor Woodrow Developments Ltd	Policy Wording 3	640	O	<p>Fenstanton, Buckden and Warboys should not be designated KSC. They are not in sustainable locations</p>	<p>Only those locations of growth that could accommodate large scale development were considered appropriate to identify in policy wording 2. This does not mean</p>	<p>None needed.</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					compared to nearby alternatives where significant development should be encouraged.	that no allocations of moderate scale will be made. It is considered that these villages have a reasonable range of services and also perform a service function for smaller nearby settlements. It is not considered that there are more appropriate settlements for designation as KSCs.	
Adam Ireland	Environment Agency	Policy Wording 3	536	S	Support.	Support noted.	None needed.
Mr Burgess	n/a	Policy Wording 3	515	S	Support	Support noted.	None needed.
Edwards	n/a	Policy Wording 3	498	O	Support settlement hierarchy but oppose deletion of settlement boundaries. Use of criteria based policy will not provide certainty or clarity for potential new development.	Although the approach to settlement boundaries may lead to less clarity there should be more flexibility and more opportunity for development that responds to local requirements.  The matter of settlement boundaries is not considered to be a strategic issue and is therefore more appropriately dealt with in the Development Control Policies DPD  It is considered that clarification of the circumstances under which exceptions to the development scales would be acceptable and factors that will be taken into account when considering sites should be incorporated into the policy.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Paul Seabrook	Seabrook Farms	Policy Wording 3	630	O	Object to narrow approach of using the hierarchy for only non allocated sites – brownfield or windfall sites. It should instead guide development across the District.	The Settlement Hierarchy will be used in conjunction with the Strategic Housing Growth policy to determine the allocation of sites in the Planning Proposals DPD.	None needed.

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Name	Organisation	Para/Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Blackman	n/a	Policy Wording 3	576	S	<p>Distinction between settlements with primary schools and other facilities to support limited growth needed. Amend to:</p> <ol style="list-style-type: none"> <li>1. Key service centres – large scale developments of 60 or more developments (Fenstanton, Sawtry and Yaxley)</li> <li>2. Key service centres – moderate scale development 10-59 dwellings (Buckden, Warboys, Kimbolton and Somersham)*</li> <li>3. Minor scale development (up to 9 dwellings) All villages with a primary school**</li> <li>4. Limited development (up to 3 dwellings), all other villages</li> </ol> <p>* Brampton, Godmanchester and Little Paxton are included in the urban proposals under policy wording 2. The plan should support limited growth at the villages of Great Paxton, Great Staughton, Great Gransden, Somersham/Colne, Holme, Folksworth, Earith, Great Gidding, Offords, Spaldwick, Needingworth and Brington</p>	<p>Support noted. The suggested hierarchy and development scales are not considered to be appropriate due to likely future population changes (See SHMA) including a significant fall in school aged children. This would mean that allowing minor development in all villages with (only) a primary school would be unlikely to serve the needs of people who are likely to live there.</p>	<p>CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Day	n/a	Policy Wording 3	573	S	Distinction between settlements with primary schools and other facilities to support limited growth needed. Amend to: 1. Key service centres – large scale developments of 60 or more developments (Fenstanton, Sawtry and Yaxley) 2. Key service centres – moderate scale development 10-59 dwellings (Buckden, Warboys, Kimbolton and Somersham)* 3. Minor scale development (up to 9 dwellings) All villages with a primary school** 4. Limited development (up to 3 dwellings), all other villages * Brampton, Godmanchester and Little Paxton are included in the urban proposals under policy wording 2. The plan should support limited growth at the villages of Great Paxton, Great Staughton, Great Gransden, Somersham/Colne, Holme, Folksworth, Earith, Great Gidding, Offords, Spaldwick, Needingworth and Brington	Support noted. The suggested hierarchy is similar to an option for the settlement hierarchy considered through consultation in preparation of the Core Strategy. The option did not receive much support and the preferred option was considered to be more appropriate.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option
Gates Hydraulics	Gates Hydraulics	Policy Wording 3	501	S	Support.	Support noted.	None needed.
Marlborough Developments Ltd	Marlborough Developments Ltd	Policy Wording 3	528	O	Yaxley should be allocated as a fifth 'spatial planning area' to reflect its close links with Hampton and Peterborough, which have facilities comparable to a market town.	Yaxley has experienced significant development in recent years and has significant existing commitments. While Yaxley does have a good range of services and facilities and good accessibility to higher order services and facilities in Peterborough it does not have the same range of services as a market town. With these issues in mind it is not considered appropriate to designate Yaxley as part of an additional spatial planning area or identify further development locations for the village.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Wadsworth Scott and Burgess	n/a	Policy Wording 3	562	S	We support the identification of Needingworth for limited development	Support noted.	None needed.
Twigden	Twigden Homes	Policy Wording 3	568	S	The identification of Ramsey as a Market Town in Policy Wording 3 is supported.	Support noted.	None needed.
N Lunniss	n/a	Policy Wording 3	563	S	Distinction between settlements with primary schools and other facilities to support limited growth needed. Amend to: 1. Key service centres – large scale developments of 60 or more developments (Fenstanton, Sawtry and Yaxley) 2. Key service centres – moderate scale development 10-59 dwellings (Buckden, Warboys, Kimbolton and Somersham)* 3. Minor scale development (up to 9 dwellings) All villages with a primary school** 4. Limited development (up to 3 dwellings), all other villages * Brampton, Godmanchester and Little Paxton are included in the urban proposals under policy wording 2. The plan should support limited growth at the villages of Great Paxton, Great Staughton, Great Gransden, Somersham/Colne, Holme, Folksworth, Earith, Great Gidding, Offords, Spaldwick, Needingworth and Brington	Support noted. The suggested hierarchy is similar to an option for the settlement hierarchy considered through consultation in preparation of the Core Strategy. The option did not receive much support and the preferred option was considered to be more appropriate.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
De'ath & Flack	n/a	Policy Wording 3	571	S	Distinction between settlements with primary schools and other facilities to support limited growth needed. Amend to: 1. Key service centres – large scale developments of 60 or more developments (Fenstanton, Sawtry and Yaxley) 2. Key service centres – moderate scale development 10-59 dwellings (Buckden, Warboys, Kimbolton and Somersham)* 3. Minor scale development (up to 9 dwellings) All villages with a primary school** 4. Limited development (up to 3 dwellings), all other villages * Brampton, Godmanchester and Little Paxton are included in the urban proposals under policy wording 2. The plan should support limited growth at the villages of Great Paxton, Great Staughton, Great Gransden, Somersham/Colne, Holme, Folksworth, Earith, Great Gidding, Offords, Spaldwick, Needingworth and Brington	Support noted. The suggested hierarchy is similar to an option for the settlement hierarchy considered through consultation in preparation of the Core Strategy. The option did not receive much support and the preferred option was considered to be more appropriate.	CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option.
Camvil Developments Ltd	Camvil Developments Ltd	Policy Wording 3	622	O	The key diagram should be amended to include development potential at London Road, St Ives. St Ives is capable of accommodating more than 500 dwellings. Object to policy wording 3.	Flood risk is a significant issue to the south and east of St Ives and this precludes it being identified as a strategic location for growth. Sites that are suitable for moderate development may be allocated through the Planning Proposals DPD in line with the settlement hierarchy.	None needed.
Mr T Smith	n/a	Policy Wording 3	651	S	Support.	Support noted.	None needed.
Mr S Ross	n/a	7.15	102	S	Key service centres with the greatest potential should be recognised and allocated a greater quantum of development.	A greater level of growth in the Strategic Housing Growth policy would not be consistent with the approach of locating major development in sustainable locations. Further sites, on a more	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Peter Glazebrook	HallamLand Management	7.15	396	S	Although the classification of Kimbolton as a Key Service Centre is supported, the background evidence indicates that it is a significantly more sustainable settlement than other Key Service Centres with a comparable score and should be recognised as such.	<p>modest scale may be allocated through the Planning Proposals DPD and determined by the settlement hierarchy but also will be dependant on whether there are deliverable or developable sites.</p> <p>Although Kimbolton may be more sustainable than some Key Service Centres it should be recognised that the Strategic Housing Growth policy identifies locations considered to be suitable for large scale development. Further sites that may be allocated through the Planning Proposals DPD will be determined by the settlement hierarchy but also will be dependant on whether there are deliverable or developable sites.</p>	None needed.
Persimmon Homes	Persimmon Homes	7.15	545	O	Recommend that Hemingford Grey is included as a key service centre on the basis of its good public transport links and access to a range of facilities within the village and nearby St Ives.	<p>With reference to the settlement hierarchy background paper Hemingford Grey is identified as having a basic range of services and only a basic public transport service. It is therefore not considered appropriate to designate Hemingford Grey as a Key Service Centre.</p>	None needed.
Mr Steven Harvey	n/a	7.16	200	O	Object to Policy P3 and to the tight restrictions placed by the settlement hierarchy on new development in the smaller rural settlements.	<p>The development in Smaller Settlements is limited to residential infilling but Policy CS3 should be amended to make it clear that larger scale development may be acceptable where it is the most sustainable option.</p>	<p>CS3 has been amended to state that the scales are indicative, but also allows for development proposals of a larger scale where site specific circumstances demonstrate that this would secure the most sustainable option</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Ian Burns	Cambs PCT	7.19	179	C	<p>Agree with comments from Hinchingbrooke HCT. All NHS employers in the Hunts area should be notified of relevant housing schemes for which key worker staff might be eligible etc.</p> <p>Affordable homes should not be sited on less valuable land to reduce financial impact on the Developer.</p>	How sites are developed is determined through the development control process. The distribution of affordable housing in a site is not a strategic issue to be covered by the Core Strategy.	None needed
Church Commissioners	Church Commissioners	Policy Wording 4	16	O	The threshold of 3 in the smaller settlements is too low. Further evidence is required to support the imposition of this.	Reference to evidence backing up the use of 3 as the threshold for smaller settlements should be included.	The reasoned justification for this policy has been strengthened.
Mr Michael Palmer-Asplin	n/a	Policy Wording 4	29	O	There is an inconsistency between Policies 4 and 10 for factors to be determining the level of affordable housing on a site. Policy 4 should expressly state that infrastructure requirements and other developer contributions will be taken into account when determining the level of affordable housing to be provided or of contributions sought in lieu, in order to maintain reasonable site viability.	The Infrastructure Requirements policy will be revised. Wording of both policies will be considered carefully in order to remove inconsistencies.	The policy has been amended to take these factors into account.

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Name	Organisation	Para/Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Maydo Pitt	GO-East	Policy Wording 4	39	O	Should include a policy(s) which reflects all, or at least some of the following requirements of PPS3, and (if not all) a commitment in the policy that the rest of the requirements will be set out in an LDD: - set separate targets for social-rented and intermediate affordable housing where appropriate; - specify the size and type of affordable housing; - set out the approach to seeking developer contributions to facilitate the provision of affordable housing.  Should provide an indication of the criteria (or at least where they will be set out) for conditions or other material considerations which may affect the amount of affordable housing.	Comments noted. Additional detail will be included in the revised policy.	The policy has been amended to take these factors into account.
Gareth Ridewood	CPRE	Policy Wording 4	84	S	Support - need to provide the maximum number of affordable units that is possible.	Support noted.	None needed.
Mr S Ross	n/a	Policy Wording 4	107	O	PPS 3 sets out the minimum threshold for the provision of affordable housing as 15 dwellings. LPAs can set lower levels but this has to have regard to viability and practicability considerations. The draft provides no evidence to substantiate the use of a lower threshold which must be fully justified.	Reference to evidence supporting the use of thresholds lower than 15 homes should be included.	The reasoned justification for this policy has been strengthened.
Mr David England	n/a	Policy Wording 4	112	O	The level of affordable housing required for all housing development should be reduced to 35% in accordance with the emerging East of England Plan.	It is clearly unviable to seek lower/no thresholds as 3 dwellings is effectively no threshold but reducing thresholds in urban areas would not overly increase the amount of affordable housing achieved. The 40% target is supported by assessments of need, references to which will be made more explicit in the submission Core Strategy. Clarification of the application of threshold should be given in updated SPD.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Gareth Ridewood	CPRE	Policy Wording 4	235	S	Where ever possible Affordable Housing should be sought on site to promote inclusive communities. Exceptions sites should only include affordable housing which remains so in perpetuity.	Support noted.	None needed.
National Grid Property Ltd	National Grid Property Ltd	Policy Wording 4	288	S	The inclusion of site specific considerations to be taken into account in determining the appropriate level of housing provision is supported, and should be retained.	Support noted.	None needed.
Mr Steven Harvey	n/a	Policy Wording 4	203	O	There is no clear definition of 'affordable housing'. No evidence of a growing gap between average earnings and housing costs, a limited supply of new affordable properties and the loss of existing social housing through 'right to buy' / 'right to acquire' provisions . No evidence that RSS targets (35%) are too low and no justification for using 40%. No evidence that it is viable and practical to set a significantly lower threshold (3 dwellings) for affordable housing in rural areas. Why is this lower threshold not viable and practical throughout the district?	The PPS3 definition of affordable housing is considered sufficiently clear for the purposes of this DPD. There is no local variation required.	The supporting text has been amended to make it clear that the definition of affordable housing is that set out in PPS3.  The reasoned justification for this policy has been strengthened.
Mr David Reavell	O&H Properties	Policy Wording 4	212	O	The affordable housing requirement is inappropriate in that it requires larger schemes to compensate for developments which do not reach the affordable housing provision threshold.	The RSS says "At the regional level, delivery should be monitored against the expectation that some 35% of housing coming forward as a result of planning permissions granted after the adoption of the RSS are affordable." It says nothing about small sites. It is therefore reasonable to assume that this refers to all sites and that higher thresholds are expected if thresholds mean that some sites do not contribute. The percentage sought is more than justified by assessed housing need.	None.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Paul Ryan	Stukeleys PC	Policy Wording 4	242	S	The Parish Council supports requirement that 40% of all housing developments should be affordable.	Support noted.	None.
Paul Ryan	Stukeleys PC	Policy Wording 4	243	O	The Parish Council objects to the proposal that this should apply to 3 or more dwellings in all <i>parishes</i> with less than 3,000 population. Many villages have a small population but are in combined parishes. Future reforms will see more villages combined in this way which could take the combined population over 3,000. The policy should therefore refer to <i>villages</i> not <i>parishes</i> , consistent with Policy Wording 5 which refers to "settlements" as a "small rural community".	<b>It is more appropriate to consider the size of the settlement. The policy can therefore be amended to refer to all smaller settlements as defined by the settlement hierarchy.</b>	The policy has been amended to refer to smaller settlements as defined by the settlement hierarchy.
Martin Leyland	Barratt Strategic	Policy Wording 4	226	O	The affordable housing requirement is inappropriate in that it requires larger schemes to compensate for developments which do not reach the affordable housing provision threshold.	The RSS says "At the regional level, delivery should be monitored against the expectation that some 35% of housing coming forward as a result of planning permissions granted after the adoption of the RSS are affordable." It says nothing about small sites. It is therefore reasonable to assume that this refers to all sites and that higher percentages are expected if thresholds mean that some sites do not contribute. The percentage sought is more than justified by assessed housing need.	None.
Mr Peter Glazebrook	HallamLand Management	Policy Wording 4	393	O	Inadequate justification for setting a target of 40% for affordable housing. It is not acceptable to state that 35% is the average for the region, as set out in the East of England Plan, and therefore to achieve this figure a higher percentage must be sought because this approach has no regard to any local assessment of affordable housing A Strategic HMA is currently being undertaken and will inform the latter stages of the Core Strategy's preparation and it is not acceptable to fix a target of 40% ahead of its evidence.	It is acknowledged that the Preferred Options did not make direct reference to the full range of evidence supporting the 40% target for affordable housing in the policy or supporting text however the evidence was referenced in Volume 2. Clarification of the supporting evidence should be made in the supporting text. Clarification of the policy to include detail about priorities and form contributions should take.	The reasoned justification has been strengthened, in particular to include reference to the SHMA.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					There must be adequate scope for negotiation on economic viability taking into account other infrastructure requirements. Object to the statement that criteria "will set out the priorities for achieving affordable housing" and "be set for the form the contribution should take and the circumstances in which these may be varied." These should be specified in the policy.		
Mr John Scott	Stamford Homes Ltd	Policy Wording 4	402	O	Inadequate justification for setting a target of 40% for affordable housing. It is not acceptable to state that 35% is the average for the region, as set out in the East of England Plan, and therefore to achieve this figure a higher percentage must be sought because this approach has no regard to any local assessment of affordable housing A Strategic HMA is currently being undertaken and will inform the latter stages of the Core Strategy's preparation and it is not acceptable to fix a target of 40% ahead of its evidence.  There must be adequate scope for negotiation on economic viability taking into account other infrastructure requirements. Object to the statement that criteria "will set out the priorities for achieving affordable housing" and "be set for the form the contribution should take and the circumstances in which these may be varied." These should be specified in the policy.	It is acknowledged that the Preferred Options did not make direct reference to the full range of evidence supporting the 40% target for affordable housing in the policy or supporting text however the evidence was referenced in Volume 2. Clarification of the supporting evidence should be made in the supporting text. Clarification of the policy to include detail about priorities and form contributions should take.	The reasoned justification has been strengthened, in particular to include reference to the SHMA.  The policy includes clear reference to other LDDS which will provide more detail on priorities and the form of contributions.
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 4	340	S	Support	Support noted.	None needed.
Lands Improvement	Lands Improvement	Policy Wording 4	357	S	Support the target of 40% affordable housing the allowance for contamination costs which may affect the provision of affordable housing. It is important for delivery that schemes are viable and a policy should be flexible.	Support noted.	None needed.

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Name	Organisation	Para/Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
William Evans	WharfLand Investments	Policy Wording 4	382	C	The suggested wording of policy 4 is supported on the basis that the draft policy generally complies with Government's policy direction towards providing an increased level of affordable housing as part of mixed use developments. Wharf generally supports the thresholds cited within the draft policy. The Council's overall approach appears consistent with PPS3 and Circular 01/08 and therefore consistent with PPS12 tests of soundness (iv).	Support noted.	
Martin Page	D. H. Barford (Agent)	Policy Wording 4	611	O	The increase from 29% in 'saved' policy AH4 of the Local Plan Alteration 2002 to 40% is not justified when the Housing Needs Survey identifies the quantum of affordable need has reduced substantially since 2002. It will compound the shortfall in the supply of private market units, which in turn will fuel an increase in property values and exacerbate the affordability difficulties. There will not be adequate funding to deliver 40% affordable housing units. The affordable housing requirement should be retained at 29%. The threshold for affordable housing on smaller developments should be increased to schemes of 6 or more units.	In identifying that the affordable housing requirement has reduced from the 2002 survey to the 2006 update the consultee also identifies that fact that the yearly requirement is still more than the total housing requirement from the EEP for all housing. It is therefore reasonable to set the target as high as possible, taking into account relevant information about viability etc. The Council's waiting list has reduced in recent years, however at the current rate of reduction of about 180 per year it will take over 11 years to clear this waiting list. The Structure Plan policy P9/1 established the 40% target a number of years ago. The Structure Plan Policy was supported by the Cambridge Sub-regional Housing Needs Survey 2003. Additionally the SHMA supports this approach. It is therefore considered that a target of 40% is supported by robust evidence. Additionally the arguments put forward for a lower target in Huntingdonshire than the rest of the Cambridge sub-region could justify a consistent approach.	None.



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Persimmon Homes	Persimmon Homes	Policy Wording 4	547	O	There will need to be flexibility in the consideration of individual sites especially in settlements with less than 3000 and 40% should not be seen as a target. The affordable housing threshold of 3 or more homes will discourage small scale housebuilders from utilising sites in settlements of less than 3000 population and will be detrimental to their vitality. This threshold should be amended. We recommend the following wording for less than 3000 population parishes: "on proposals of 5 or more homes or 0.16ha, in all parishes with less than 3000 homes."	It is not clear how the consultee considers the settlement hierarchy to be relevant to this policy. Although it is acknowledged that the threshold for rural areas may impact upon the number of small sites coming forward the housing trajectory will not be affected by this threshold. There will be no impact because housing requirements from the EEP will be accommodated in locations identified in the strategic housing growth policy and will not be dependant on delivery from other locations.	None.
Persimmon Homes (East Midlands) Ltd	Persimmon Homes (East Midlands) Ltd	Policy Wording 4	580	S	We agree with the provision of affordable housing identified by Policy Wording 4 but the level of affordable housing required has been based on an up to date, robust strategic housing market assessment and other surveys that assess the local need. If the HDC fail to do to complete these surveys, the affordable housing requirement may be found unsound as the evidence base	Support noted. It is acknowledged that the Preferred Options did not make direct reference to the full range of evidence supporting the 40% target for affordable housing in the policy or supporting text. Of which the SHMA is only in draft form. However the evidence was referenced in Volume 2. Clarification of the supporting evidence should be made in the supporting text.	None needed.
Gates Hydraulics	Gates Hydraulics	Policy Wording 4	502	O	We generally support the principle that affordable housing should be provided in new developments. However, the 40% target for the provision of affordable housing is too high as:  - it is not in conformity with the RSS which sets a target of 35% across the East of England  - it could dampen demand from housebuilders and reduce supply thus worsening affordability problems  - could adversely affect quality or other infrastructure requirements	It is acknowledged that the Preferred Options did not make direct reference to the full range of evidence supporting the 40% target for affordable housing in the policy or supporting text however the evidence was referenced in Volume 2. It is considered that the evidence supports a 40% target. The Council has sought 40% in the Cambridge sub-region for sometime now and so arguments about viability due to land costs are only valid outside of the sub-region, whoever the Council should not have to accommodate developers who have paid too much	The reasoned justification has been strengthened, in particular to include reference to the SHMA

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Marlborough Developments Ltd	Marlborough Developments Ltd	Policy Wording 4	529	O	<p>The affordable housing requirement is inappropriate in that it requires larger schemes to compensate for developments which do not reach the affordable housing provision threshold.</p>	<p>The RSS says "At the regional level, delivery should be monitored against the expectation that some 35% of housing coming forward as a result of planning permissions granted after the adoption of the RSS are affordable." It says nothing about small sites. It is therefore reasonable to assume that this refers to all sites and that higher thresholds are expected if thresholds mean that some sites do not contribute. Percentage sought is more than justified by assessed housing need.</p>	None needed.
Twigden	Twigden Homes	Policy Wording 4	569	O	<p>Policy Wording 4 which identifies a 40% affordable housing requirement without sufficient evidence.</p>	<p>It is acknowledged that the Preferred Options did not make direct reference to the full range of evidence supporting the 40% target for affordable housing in the policy or supporting text however the evidence was referenced in Volume 2. Clarification of the supporting evidence should be made in the supporting text.</p>	<p>The reasoned justification has been strengthened, in particular to include reference to the SHMA</p>
Martin Page	D.H. Barford (Agent)	7.22	616	O	<p>Huntingdonshire has the third lowest house price to income ratio in the East of England region, which indicates housing in Huntingdonshire is more affordable than most of the region. Given the RSS Panel's recommendation for an overall average 35% affordable provision across the region and the expectation provision will be higher in areas of greater need, it is reasonable that the</p>	<p>Information attached shows that Huntingdon has the 3rd lowest income to property price ratio in Cambridgeshire, not the East of England. This therefore is not as significant as the consultee implies. Without information about standard deviation it is impossible to tell whether the relatively high average income in the district is due to a small number of high earners or genuinely higher pay.</p>	<p>The reasoned justification has been strengthened, in particular to include reference to the SHMA</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Steven Harvey	n/a	7.24	206	O	<p>affordable housing provision in Huntingdonshire is less than 35% and close to 30%.</p> <p>The proposal to increase the level of affordable housing provision from 29% in 'saved' policy AH4 of the Local Plan Alteration 2002 to 40% is not justified when the Housing Needs Survey identifies the quantum of affordable need has reduced substantially since 2002.</p> <p>The proposed strategy will compound the shortfall in the supply of market units, which in turn will fuel an increase in property values and exacerbate the affordability difficulties.</p> <p>The affordable housing requirement should be retained at 29%.</p>	<p>In identifying that the affordable housing requirement has reduced from the 2002 survey to the 2006 update the consultee also identifies that fact that the yearly requirement is still more than the total housing requirement from the EEP for all housing. It is therefore reasonable to set the target as high as possible, taking into account relevant information about viability etc.</p> <p>The Council's waiting list has reduced in recent years, however at the current rate of reduction of about 180 per year it will take over 11 years to clear this waiting list.</p> <p>The Structure Plan policy P9/1 established the 40% target a number of years ago. The Structure Plan Policy was supported by the Cambridge Sub-regional Housing Needs Survey 2003.</p> <p>Additionally the SHMA supports this approach. It is therefore considered that a target of 40% is supported by robust evidence. Additionally the arguments put forward for a lower target in Huntingdonshire than the rest of the Cambridge sub-region could justify a consistent approach.</p>	<p>The reasoned justification has been strengthened, in particular to include reference to the SHMA</p>
					<p>- not substantiated by evidence of need:</p> <ul style="list-style-type: none"> <li>- no mechanism as mentioned in para 7.24</li> <li>- how will the Core Strategy ensure that sufficient land is brought forward to meet the RSS targets?</li> </ul> <p>Para 7.24 suggests that 'the exceptions process is well established' without evidence that it actually works and can be relied on to deliver the high level of affordable housing required</p>	<p>Evidence of affordable housing need is identified in Volume 2.</p> <p>The mechanism is provided by the higher than agricultural land value associated with affordable housing.</p> <p>The policy deals with rural exceptions. Other policies identify sufficient locations to meet the EEP housing requirements.</p>	

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Church Commissioners	Church Commissioners	Policy Wording 5	17	S	<p>- Support the policy allowing for rural exception sites for affordable housing, but suggest they could contain an element of market housing, even if minimal, in order to cross-subsidise the affordable housing to create a greater incentive for the landowner and produce sites where the affordable housing is built and can just be 'passed over' to the RSL.</p> <p>- Should allocate specific rural exception sites as well as encouraging them through the Core Strategy for unallocated sites</p>	<p>The Council does not believe that it is appropriate to allocate specific sites for affordable housing and that it is more appropriate to respond to local housing need in rural areas in a more flexible manner.</p> <p>It is not considered appropriate to allow some proportion of exceptions sites to be standard market housing.</p>	None needed.
Maydo Pitt	GO-East	Policy Wording 5	40	O	<p>Wording simply repeats PPS3, paragraph 30. Should be amended to make it locally specific. Alternatively, a statement that the Authority intends to rely on PPS3, paragraph 30, in relation to this matter would suffice.</p>	<p>Comments noted. The policy needs to be specific to the area.</p>	<p>The policy has been amended so that it now refers to the settlement hierarchy specific to Huntingdonshire</p>
Tom Gilbert-Wooldrige	English Heritage	Policy Wording 5	123	C	<p>Add criterion that affordable housing development will only be acceptable if the impact on the historic, built and natural environment is acceptable.</p>	<p>Impact on the historic, built and natural environment will be covered by policies in the Development Control DPD.</p>	None needed.
Mr S Ross	n/a	Policy Wording 5	109	O	<p>The use of the word 'within' in the first sentence of the policy is unnecessary because if a site is located within an existing built up area there should be no objection in principle to its development or redevelopment.</p>	<p>Disagree. A proposal for affordable housing within the built-up area may be of a larger scale than would be permitted for market housing</p>	None needed.
Milton (Peterborough) Estates Ltd	Milton (Peterborough) Estates Ltd	Policy Wording 5	190	S	<p>Support the provision of affordable housing on sites within or adjacent to the built up area of smaller settlements and the criteria. Affordable family housing should be limited to villages which have at least a food shop and primary school. Other types of affordable housing should be supported wherever a need can be substantiated. This is consistent with PPS3 paragraph 30 which seeks to ensure that sustainable rural communities are supported.</p>	<p>Support noted.</p>	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Gareth Ridewood	CPRE	Policy Wording 5	236	S	Where ever possible Affordable Housing will be sought on site to promote inclusive communities. Exceptions sites should only include affordable housing which remains so in perpetuity.	Support noted.	None needed.
D R Juggins	n/a	Policy Wording 5	391	S	Support the provision of affordable housing on sites within or adjacent to the built up area of smaller settlements and the criteria. Affordable family housing should be limited to villages which have at least a food shop and primary school. Other types of affordable housing should be supported wherever a need can be substantiated. This is consistent with PPS3 paragraph 30 which seeks to ensure that sustainable rural communities are supported.	Support noted. It is considered appropriate to require a basic range of services appropriate to the type of housing in order to ensure that some level of sustainability.	None needed.
Paul Seabrook	Seabrook Farms	Policy Wording 5	631	O	- Support the policy; exception sites should be identified in the Planning Proposals DPD. However a number of Key Service Centres and small settlements suffer from a shortage of affordable housing and under the settlement hierarchy they will not receive any new development to trigger affordable housing provision to meet the need. - An up to date Housing Needs Assessment is needed to identify the shortages. In Kimbolton the previous assessment, supported by the Parish, showed a need for affordable housing, but infill and the lack of allocations meant that this need was not met. - Retirement Housing is not now identified as a key objective but it is becoming more important with the ageing population. Retired people downsizing can release family housing but often cannot find suitable accommodation	It is not considered appropriate to allocate affordable housing sites through the Planning Proposals DPD. There are numerous problems with this approach, not least of all that land owners may seek standard market housing. It is considered that the plan should respond to local housing need in rural areas in a flexible manner permitting suitable sites as and when necessary based on local housing need.	None needed.
Miss Katie Ruff	Somersham in Action	7.26	19	C	As a result of considering a Gypsy & Traveller planning application at Somersham the Group welcome opportunity of taking part in this consultation process criteria, as they can contribute to the policies, which in turn will help the council, travellers and local residents.	Noted	Note for preparation of Gypsy & Traveller Sites DPD.

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Name	Organisation	Para/Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Maydo Pitt	GO-East	7.26	70	C	Reference to Circular 01/06 needs to be updated to refer to 'Planning for Travelling Showpeople' Circular 04/07.	The reference will be updated.	The reference to Circular 04/07 has been included.
Ian Burns	Cambs PCT	7.26	180	S	Welcome commitment to developing further accommodation for the Gypsy and Traveller communities in line with Government policy as they experience some of the poorest health outcomes in the local population and appropriate accommodation is a major contributor to ensuring good health and wellbeing.	Support noted.	None needed.
Miss Katie Ruff	Somersham in Action	7.29	20	S	Agree that 15 – 25 additional pitches is reasonable and that HDC is required to find sites to accommodate them. However, there is a need to adopt more specific criteria in consultation with stakeholders.  Temporary planning permissions should not be granted in unsuitable locations as it is not a long term solution to the problems of site provision (see report by independent task group headed up by Sir Brian Briscoe, looking at site provision and enforcement for gypsies and travellers.)	Support noted. The development of more detailed criteria to assist in the identification of sites is also a matter for the specific DPD. However, additional criteria can be set out in the Core Strategy policy as suggested in response to objections. When considering granting temporary planning permission, the Council would not grant permission where the site was clearly inappropriate.	The policy has been amended to include additional criteria
Miss Katie Ruff	Somersham in Action	Policy Wording 6	21	C	There should be a set of specific and secondary criteria for gypsy and traveller sites to enable all parties to be clear of the boundaries of establishing a traveller site. It would also be a fairer process to use a consultation process to select possible sites and give alternative options. Temporary permissions should not be given where they do not meet the set criteria and are not suitable for long term provision. Have suggested additional criteria for the policy:  - should not impact materially on the amenities of any residential property	The criteria set out in the Core Strategy will be at an appropriate level. The site specific DPD on Gypsy & Traveller sites may develop more detailed criteria to identify sites. This would be the subject of a more focused consultation with stakeholders and this will also include exploring different site options.  Agree that some additional criteria should be included to cover the need to take account of the settlement hierarchy and the needs of Gypsies, Travellers and Travelling.	The policy has been amended to include additional criteria.

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Name	Organisation	Para/Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					<ul style="list-style-type: none"> <li>- no part of a site should abut a residential property</li> <li>- should be no impact on neighbouring businesses</li> <li>- movement of vehicles to and from site should not cause disturbance to neighbouring properties / operations</li> <li>- take account of impact on landscape</li> <li>- should be within reasonable distance of education and health services and shops</li> <li>- should allow plenty of space for the caravans on chosen sites and take into account parking and suitable access roads, ensuring essential highway safety for vehicles. Have tested the possible criteria on a potential site in the Huntingdon area.</li> </ul>	<p>However, it is considered that the existing criteria cover the impact on nearby dwellings and businesses. In any criteria there will be a judgement that will have to be made. It is agreed that all criteria should look to the needs of both the Travelling and Settled communities.</p> <p>All planning applications are visited by planning officers in order to make a judgement before a decision is reached.</p>	
Maydo Pitt	GO-East	Policy Wording 6	41	O	<p>Welcomes the inclusion of a policy wording relating to gypsy and traveller sites but consider wording does not fully reflect the requirements of Circular 01/2006, paragraph 31, which requires policies to set out the criteria for the location of gypsy and traveller sites which will be used to guide the allocation of sites. The current policy has an emphasis around amenity impacts on the surroundings rather than wider locational considerations. For instance, there is no consideration of location relative to the settlement hierarchy which reflects the sustainability of settlements on the basis of facilities and services provided and which would need to be accessed by the travelling community as well as the settled community.</p>	<p>Agree that some additional criteria should be included to cover the need to take account of the settlement hierarchy and the needs of Gypsies, Travellers and Travelling Showpeople.</p>	<p>The policy has been amended to include additional criteria, including reference to the settlement hierarchy.</p>
P Bryant	Somersham PC	Policy Wording 6	92	O	<p>The Parish Council supports the representation made by residents on Gypsies and Travellers as the current criteria is not precise enough.</p>	<p>Agree that some additional criteria should be included to cover the need to take account of the settlement hierarchy.</p>	<p>The policy has been amended to include additional criteria.</p>

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Name	Organisation	Para/Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Tom Gilbert-Wooldrige	English Heritage	Policy Wording 6	124	C	An additional criterion could be included to state that the provision of a site will only be acceptable if the impact on the historic, built and natural environment is acceptable.	hierarchy and the needs of Gypsies, Travellers and Travelling Showpeople.  This would be covered by policies in the Development Control DPD and is also set out in Government guidance both of which apply to all development.	criteria, including reference to the settlement hierarchy  None needed.
Ian Burns	Cambs PCT	Policy Wording 6	181	S	Endorses the importance of sites being within walking and cycling distance or having good public transport links to education and health services.	Support noted.	None needed.
Ian Burns	Cambs PCT	Policy Wording 6	182	O	The health and safety aspects of the criteria should include 'wellbeing' and to reflect the wording in the original option to include avoiding areas with an unacceptable noise constraint eg areas adjacent to trunk roads.  Amend the last bullet point of the criteria to read: the health, safety and wellbeing of occupants are not put at risk including through unsafe access to sites, poor air quality and unacceptable noise (as for example close to trunk roads) and unacceptable flood risk the quality of the environment is at the same acceptable standard that would be expected when planning for the settled community	Agree this can be added to refine the criteria	The policy has been amended to include these points.
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 6	341	S	Support.	Support noted.	None needed.



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Table 18 Representations received on policy wording 7 land for employment development.

Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Chris Blackman	Cambs CC	7.33	477	S	The aim of a 'low carbon future' for employment is supported, in accordance with the RES.	Support noted.	None needed.
Strawsons Devt t/a Omnivale	Strawsons Devt t/a Omnivale	7.34	558	O	Amend as follows: at 7.34: "Additional provision is made in the Ramsey Spatial Planning Area to aid regeneration, to reduce local unemployment and under-employment, to reduce out-commuting and to support the creation of a balanced community by complementing the planned growth in homes." In the policy: "In Ramsey Spatial Planning Area where at least 8 hectares of land, of which at least 6 hectares will be on previously developed land, will be provided in the following locations: In a mixed use redevelopment for B1, B2 and complementary uses which also employment to the west and north of Ramsey, notably on former RAF Upwood."	Although it is acknowledged that RAF Upwood is an important redevelopment opportunity in the Ramsey area, it is not considered appropriate to identify specific sites in the Core Strategy. It is the Council's intention to have employment led regeneration in the Ramsey area. For this a balance between jobs and housing is considered necessary. As the Core Strategy identifies the problems of accessibility it is considered appropriate to limit development.	Submission plan amended including amendments to policy CS7 and reasoned justification.
R W Dew and Son Ltd	R W Dew and Son Ltd	Policy Wording 7	13	O	Should include wording to support small scale employment development in villages, especially key service centres	It is not considered appropriate to identify locations for all scales of development in the Core Strategy in order to maintain its strategic nature. The strategy does not preclude small scale economic development in Key Service Centres or smaller settlements. Clarification in the supporting text that small scale economic development will be supported in KSCs should be considered.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Church Commissioners	Church Commissioners	Policy Wording 7	18	O	Supports the inclusion of south-east/east Godmanchester as a location for mixed-use development and promote Rectory Farm in this area. The relationship of the Core Strategy with the Huntingdon West AAP needs to be clarified. All the areas referred to in the AAP should be given further consideration, especially land at Thrapston Road, Brampton. Settlements outside of the	While it is not appropriate to identify specific sites in the Core Strategy the Rectory Farm site was considered as part of the SHLAA. The sites allocation would not be precluded by the identification of major locations for employment development in the Core Strategy, although detailed consideration would be necessary in preparation of the Planning Proposals DPD.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Michael Palmer-Asplin	n/a	Policy Wording 7	30	O	Insufficient employment land has been allocated to the St Ives area, given its not particularly good workforce:jobs ratio. Sites are available in the Compass Point/Gifford's Farm area east of the town unaffected by flood risk.	With reference to the employment sites identified in this representation it was considered that these were clearly part of the built up area of St Ives. Vol 2 reported a summary of consultations and further discussion with the Environment Agency. The SHLAA identified flood risk as a constraint but also identified other constraints that together meant that this site was not considered suitable for housing development.	None needed.
Russell Saywell	n/a	Policy Wording 7	46	O	Little Paxton is included in the St Neots Spatial Planning Area for housing purposes and should also be linked to St Neots for employment potential. A number of brownfield redevelopment opportunities exist in Lt Paxton.	The approach taken with Lt Paxton in the two policies is considered to be inconsistent. The approach taken in the employment policy is considered to be correct as Lt Paxton is not considered to be suitable for large scale development of either employment or housing. With this in mind the reference to Lt Paxton accommodating a small amount of housing in the Strategic Housing Policy will be removed.	Submission plan amended including amendments to policy CS2 and reasoned justification.
Geoff Keeble	Highways Agency	Policy Wording 7	54	S	It is unclear how the Preferred Approach will limit levels of out commuting, however this policy is supported.	Support noted	None needed.
Alison Melnyczuk	St. Ives TC	Policy Wording 7	158	S	The plan to maintain the status quo in St Ives regarding Employment Land is seen as sensible.	Support noted.	None needed.
Tom Gilbert-Wooldrige	English Heritage	Policy Wording 7	125	O	The policy wording is detailed in terms of where employment land will be provided, but the supporting text does not explain how these locations have been identified. The policy and supporting text lack reference to the potential environmental impacts of development. It has not been possible to assess the locations for impact on the historic environment. It is highly likely that	Due to the strategic nature of the Core Strategy only locations for major development are identified. Site specific details of allocations will be decided through the Planning Proposals DPD.	Submission plan revised to to explain how and why locations for major development have been identified in

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					the historic environment will be affected in each location. Site specific assessments should be carried out.		the reasoned justification of CS7. Appendix 1 of Volume 2 also includes an assessment of the potential impacts relating to the strategic highway network.
Mr S Ross	n/a	Policy Wording 7	111	O	The allocation of 2ha of employment land at Yaxley is welcome. Its location should be determined through a Site Allocations DPD not through the core strategy. Land to the southwest of Yaxley could accommodate employment development just as well as land to the northeast.	The Core Strategy does not identify specific sites. Specific sites will be determined through the Planning Proposals DPD.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Gareth Ridewood	CPRE	Policy Wording 7	239	C	Policy needs greater clarification as to where the development is proposed, especially in relation to Huntingdon, North West of the town, Brampton, and Godmanchester. A map would have provided greater clarification. Also no mention of the environmental constraints.	The Core Strategy should not identify specific sites only locations for development. It is considered that the descriptions of the locations in conjunction with the key diagram provide the appropriate level of detail. Specific sites for allocation will be determined in drawing up the Planning Proposals DPD.	None.
Mr Matthew Stock	Redrow Homes (South Midlands) Ltd	Policy Wording 7	289	O	A low carbon future scenario should not be adopted as a basis for planning for employment land provision. It is unrealistic and cannot be relied upon to ensure the delivery of future economic growth and new jobs as envisaged by the RSS. Policy Wording 7 should be amended to increase the amount of employment land to be provided to reflect a more trend based approach of higher provision. The locational distribution is flawed. More land should be identified in St Ives recognising its future sustainable transport links. Land away from the flood plain which would not cause unacceptable local levels of flood risk should	Disagree. The ELR concludes that a low carbon scenario is the most sustainable and that the level of additional land required set out in the Preferred Options is appropriate. The majority of this land should be directed to areas where most housing growth is to take place ie Huntingdon Spatial Planning Area and St Neots Spatial Planning Area.	None.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Ian Burns	Cambs PCT	Policy Wording 7	183	C	<p>be identified. At least 8 hectares of greenfield land should be provided for employment uses in the St Ives Area as part of a north-eastern extension to the town at Gifford's Farm.</p> <p>Employment is important as a pathway to learning and skills development. The Hunts Personal and Community Development Skills Partnership should be consulted to ensure the appropriateness of the proposals.</p>	<p>The suggested consultee will be included for the submission stage of the Core Strategy.</p>	<p>No amendments to the Submission plan needed.</p>
Mr Steven Harvey	n/a	Policy Wording 7	210	O	<p>We object to Policy P7 as it will have a negative impact on the long term survival of existing rural communities and will discourage the regeneration of potentially sustainable communities outside the main urban centres.</p>	<p>The Preferred Option only identifies large scale employment development locations in accordance with the strategic nature of the Core Strategy. Local employment opportunities will be supported. The Development Control policies DPD will detail supportive policies dealing with local employment opportunities, however waste recycling is not considered to be a subject that requires local specification as it is covered by Cambs CC in their Minerals and Waste LDF.</p>	<p>None.</p>
Mr David Reavell	O&H Properties	Policy Wording 7	215	O	<p>The allocation of 2ha of employment for Yaxley is not strategic in scale and should not be considered as part of the Core Strategy. This should come forward as an allocation in the Site Allocations DPD. The scale of growth proposed continues the piecemeal development of Yaxley which offers no wider benefits to the settlement.</p>	<p>The identification of locations for employment development will be clarified; however the overall scale of development for Yaxley is considered to be appropriate.</p>	<p>Submission plan amended including amendments to policy CS7 and reasoned justification.</p>
Paul Ryan	The Stukeleys PC	Policy Wording 7	244	O	<p>The Council objects to the proposal to provide employment land to the north west of Huntingdon due to increased traffic through the villages of Gt &amp; Lt Stukeley, impact on environmental amenity, likelihood of severance and erosion of the green separation between Great Stukeley and Huntingdon. Development of large buildings would be highly visible on the slope destroying this important approach to Huntingdon.</p>	<p>The Alconbury Airfield was considered at the EEP EIP and it was concluded that its future should be decided in the next RSS. As the Core Strategy will be reviewed well before the end date of the current plan period and most likely shortly after the review of the RSS the future of Alconbury will be determined within this plan period. Huntingdon is the main focus</p>	<p>None.</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					<p>The balance of employment land proposed for Huntingdon and St Neots is not appropriate. Huntingdon has more jobs than resident workers. St Neots is more of a dormitory town and needs a rebalancing of its housing/jobs ratio, particularly with the urban extension to the east of the town.</p> <p>No account is taken of the potential for employment growth at Alconbury Airfield. It is unacceptable to allocate greenfield land in the Plan when there is such a reserve of land. Consultation on the Employment Land Review was limited to land-owners, developers and business interests. The Council was not consulted and its views have not been taken into account. If greenfield employment development at Huntingdon is required, this is not the best location. HDC has been influenced by land owning interests in selecting this site, and has not conducted a thorough search of alternatives. North of the town is considered to be a better location: it has less landscape impact; it does not impact on any rural community; it is better related to the strategic road network and services as it is adjacent to the Huntingdon Retail Park and A141; it is better related to labour supply; it could help fund a safe pedestrian/cycle bridge over the A141.</p>	<p>for employment development in the strategy because the town is the main economic centre for the district and is the first choice for employers to locate. If these factors were not recognised and the strategy tried to work against them it would be likely to increase out commuting and impact upon the economic competitiveness of the district. The selection of locations was based on a number of factors including assessments carried out for the Employment Land Review and the SHLAA. In these assessments the area west of the town scored more highly than the area to the north of the town.</p>	
Martin Leyland	Barratt Strategic	Policy Wording 7	227	O	<p>The allocation of 2ha of employment for Yaxley is not strategic in scale and should not be considered as part of the Core Strategy. This should come forward as an allocation in the Site Allocations DPD. The scale of growth proposed continues the piecemeal development of Yaxley which offers no wider benefits to the settlement.</p>	<p>The identification of locations for employment development will be clarified; however the overall scale of development for Yaxley is considered to be appropriate.</p>	<p>Submission plan amended including amendments to policy CS7 and reasoned justification.</p>
Ewen McLeod	Wrenbridge Land Ltd	Policy Wording 7	269	O	<p>Policy Wording 7 should be amended to provide a higher level of employment land in the District, better reflecting recent trends. It should be amended to recognise the locational advantages offered by the District</p>	<p>The Employment Land Review recommends the Low Carbon Future approach. The Core Strategy recognises that this approach will be challenging and makes appropriate allowances. It is</p>	<p>None.</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr S Biart	Fairfield/Luminus	Policy Wording 7	303	C	<p>for new B8 uses, in particular the existing strategic road infrastructure and the committed improvements to the A14 Huntingdon/Cambridge section. In recognition of its locational advantages and site characteristics the former Alconbury Truckstop site should be identified as a suitable location for new B8 uses.</p> <p>The inclusion of the land to the south east/east of Godmanchester is supported. The reference to the development of the site being part of a mixed use development is not clear. The wording of this policy does not provide sufficient clarity. It is the representors opinion that development on this land is to be residential led. The wording of both Housing and Employment policies does not clearly identify this as being the case, and should be amended.</p>	<p>considered that sufficient land is planned for. Delivery will be monitored and phasing will enable sufficient land supply.</p> <p>The reference to significant mixed use development is considered to be sufficiently clear. It is considered implicit that development in this location will be residential led. The only location where this is different is for Ramsey and this is clearly stated as being employment led.</p>	<p>Submission plan amended including amendments to policy CS7 and reasoned justification.</p>
Mr C Behagg	n/a	Policy Wording 7	446	O	<p>Object to the overall levels of employment land proposed for the District over the plan period as the 82 hectares identified may prove to be insufficient to meet the jobs required by the RSS. Oppose the very low level of provision in the Key Service Centres beyond the Spatial Planning Areas.</p>	<p>The link between jobs growth and employment land provision is indirect. The ELR identified a trend to higher job densities, particularly in the higher skill sectors that the Council is seeking to promote. It recommends the Low Carbon future as increasingly likely. It is acknowledged that it will be challenging. Given the strategic nature of the Core Strategy it is unreasonable to expect small scale opportunities in Key Service Centres to be identified. These small scale opportunities will continue to play an important part in maintaining and enhancing the sustainability of KSCs and smaller settlements.</p>	<p>None.</p>
H Raby & Sons	H Raby & Sons	Policy Wording 7	379	O	<p>Object to the overall levels of employment land proposed for the District over the plan period as the 82 hectares identified may prove to be insufficient to meet the jobs required by the RSS. Oppose the very low level of provision in the Key Service Centres beyond the Spatial Planning Areas.</p>	<p>The link between jobs growth and employment land provision is indirect. The ELR identified a trend to higher job densities, particularly in the higher skill sectors that the Council is seeking to promote. It recommends the Low Carbon future as increasingly likely. It is acknowledged that it will be challenging.</p>	<p>None.</p>

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc	Policy Wording 7	445	S	We support the identification of a significant mixed use urban extension to include 25 ha of land for B1, B2 and B8 uses to the east of St Neots.	Given the strategic nature of the Core Strategy it is unreasonable to expect small scale opportunities in Key Service Centres to be identified. These small scale opportunities will continue to play an important part in maintaining and enhancing the sustainability of KSCs and smaller settlements.  Support noted. It should be noted that the 25ha identified is for the whole of the St Neots Spatial Planning Area and not just the urban extension.	None needed.
Bank Trustees	Bank Trustees	Policy Wording 7	470	O	Object to the overall levels of employment land proposed for the District over the plan period as the 82 hectares identified may prove to be insufficient to meet the jobs required by the RSS. Oppose the level of provision in the St Neots Spatial Planning Area.	The link between jobs growth and employment land provision is indirect. The ELR identified a trend to higher job densities, particularly in the higher skill sectors that the Council is seeking to promote. It recommends the Low Carbon future as increasingly likely. It is acknowledged that it will be challenging. Given the strategic nature of the Core Strategy it is unreasonable to expect small scale opportunities in Key Service Centres to be identified. These small scale opportunities will continue to play an important part in maintaining and enhancing the sustainability of KSCs and smaller settlements.	None.
Mr T Smith	n/a	Policy Wording 7	376	O	Object to the overall levels of employment land proposed for the District over the plan period as the 82 hectares identified may prove to be insufficient to meet the jobs required by the RSS. Oppose the very low level of provision in the Key Service Centres beyond the Spatial Planning Areas.	The link between jobs growth and employment land provision is indirect. The ELR identified a trend to higher job densities, particularly in the higher skill sectors that the Council is seeking to promote. It recommends the Low Carbon future as increasingly likely. It is acknowledged that it will be challenging. Given the strategic nature of the Core Strategy it is unreasonable to expect small scale opportunities in Key Service Centres to be identified. These small scale opportunities will continue to play	None.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Tim Fryer	n/a	Policy Wording 7	329	C	The first two sub-paragraphs of Policy Wording 2 are misleading as Brampton is covered twice. Development in the AAP area should be confined to Huntingdon.	It is considered that further clarification of locations for development in the HWAAP area would not be justified in the Core Strategy as this would pre-empt the AAP. Clarification of the locations will be made.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Ely Diocese	Ely Diocese	Policy Wording 7	327	O	Growth east of St Neots is supported. It is necessary to master plan this growth to integrate employment land opportunities. The imbalance between Huntingdon and St Neots is inappropriate and the Plan would be unsound going forward in this way. From research carried out at the time of the last Local Plan Alteration in collaboration with Dr Moore of the Department of Land Economy, University of Cambridge, St Neots will play a significant role over the Plan period in meeting the employment needs of the Cambridge sub region. Work produced reveals a pattern of innovation based in Cambridge and then the more space extensive activities moving out to the localities nearby but without the constraints of Cambridge in terms of conservation and limited space.	The Employment Land review identifies Huntingdon as the main economic centre for the district and the first choice for employers to locate. As the strategy seeks to implement a significant scale urban extension in St Neots the amount of land identified for the town has been increased from that advocated in the Employment Land Review. Clarification of this will be included.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Ely Diocese	Ely Diocese	Policy Wording 7	350	O	Growth east of St Neots is supported. It is necessary to integrate sufficient employment land opportunities. The figure for St Neots is inappropriate and the policy is unsound as a result. Support should be expressed in principle for redevelopment of poorly performing existing industrial and employment generating land uses for employment uses.	The Employment Land review identifies Huntingdon as the main economic centre for the district and the first choice for employers to locate. As the strategy seeks to implement a significant scale urban extension in St Neots the amount of land identified for the town has been increased from that advocated in the Employment Land Review. Clarification of this will be included..	Submission plan amended including amendments to policy CS7 and reasoned justification.



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 7	342	O	We broadly support the approach to employment but oppose the proposals for Godmanchester. We do not consider land should be designated for mixed use to the south east/east.	Support noted. It is implicit that residential led and in conjunction with the Council's Local Economy Strategy employment as part of the mix of uses will not be dominated by warehousing. .	None needed.
William Evans	WharfLand Investments	Policy Wording 7	381	O	Huntingdon is acknowledged as a key market town for growth by virtue of its status, retail provision, services and transportation infrastructure. We object to the dispersed growth pattern and the expansion at St Neots, St Ives and Ramsey and the level of development proposed at the key service centres of Godmanchester, Fenstanton and Sawtry. We propose a new Spatial Planning Area for Conington. It is proposed that strategic development here would accommodate a sustainable mix of residential and commercial uses in the form of a new community or a new settlement possibly in the form of a new eco-town. We propose development that relates to a "inked settlement" growth pattern between Peterborough, Conington and Huntingdon.	A new settlement would require substantial infrastructure and forward planning. There is a need for additional employment land in a shorter time frame than is likely to be possible from a new settlement. The Council considered a new settlement at Alconbury or Wyton (both having substantial brownfield areas) earlier in the process but discounted both. Clarification of the locations identified will be made.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Property & Procurement	Camb CC Property & Procurement	Policy Wording 7	417	O	Land on the northern edge of Brampton should be identified for employment as it is suitable for development including that for high quality employment and/or hotel.	The Core Strategy does not identify sites, only locations for development. Additionally it is considered that the Core Strategy should not identify locations that are only suitable for small or moderate scale development. With this in mind it is unreasonable to expect the Core Strategy to identify directions of growth where single or small numbers of sites, if allocated would lead to only moderate scale development.	None.
Stanton Group Developments Ltd	Stanton Group Developments Ltd	Policy Wording 7	454	S	We support mixed use development in Huntingdon and in the Huntingdon West Area Action Plan area.	Support noted.	None needed.
Martin Page	D.H. Barford	Policy Wording 7	618	O	The provision of 82ha for employment land over the plan period will be inadequate. To ensure the job growth target can be met and there is an adequate range of sites, as well	It is unrealistic to base future requirements on limited information about past performance without taking into account trends and policies that will affect	None.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Chris Blackman	Cambs CC	Policy Wording 7	505	C	<p>as addressing the aim of reducing out commuting, the amount of employment land within the district needs to be significantly increased.</p> <p>The scale of employment growth is supported as being broadly in accord with the RES. There is considerable unease about these forecasts so this shouldn't be a major factor in judging the adequacy of the forecasts. Much of the growth will not be in B1, B2 or B8 type facilities.</p>	<p>future requirements. The Employment Land Review considers these trends and policies and recommends that the Low Carbon future should be followed. Given that there is such an indirect link between jobs and land provision and the variation in the amount of land considered to be required, delivery and supply will be monitored closely.</p> <p>Comments noted. The importance of Huntingdon in terms of its economic function for the district and the preference shown by employers for locating there supports the identification of the town as the focus for economic development during the plan period.</p>	None needed.
Cambridge Project Management	Cambridge Project Management	Policy Wording 7	546	O	<p>The policy wording in respect of employment development on the remaining phase 2 land at St Ives Business Park, Harrison Way, St Ives is ambiguous and clarification is required through changes to the text. Further employment land in St Ives should be brought forward and the phase 2 land should be acknowledged as available.</p>	<p>Where land is either allocated or has extant planning permission it is considered to be included by reference to existing commitments.</p>	None needed.
Strawsons Devt/a Omnivale	Strawsons Devt t/a Omnivale	Policy Wording 7	559	O	<p>Wording is supported. It should be amended- At 7.34 add "Additional provision is made in the Ramsey Spatial Planning Area to aid regeneration, to reduce local unemployment and under-employment, to reduce out-commuting and to support the creation of a balanced community by complementing the planned growth in homes."  In Policy Wording 7 "in Ramsey Spatial Planning Area where at least '8ha of land, of which at least '6ha... for B1, B2 'and complimentary uses which also provide employment' to the west and north of Ramsey, 'notably on the former RAF Upwood'."</p>	<p>The future development of the Ramsey area has been limited due to Cambridgeshire and Peterborough Structure Plan policy 10/3 which seeks to limit economic development in Ramsey to small to medium scale development. Additionally Ramsey is isolated with poor transport links and a high level of car based out-commuting. With these factors in mind the 4ha identified for economic uses in Ramsey is considered to be appropriate. Clarification of locations identified will be made</p>	Submission plan amended including amendments to policy CS7 and reasoned justification.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Persimmon Homes (East Midlands) Ltd	Persimmon Homes (East Midlands) Ltd	Policy Wording 7	577	O	The Plan fails test iv of the tests of soundness, as the strategy fails to consider the advice in Paragraph 24 of the PPS1: Planning and Climate Change supplement, PPG13: Transport and paragraph 5.69 of the EEP Panel Report.	It is acknowledged that the Preferred Options fail to consider advice in the PPS1 supplement due to it being published after the Preferred Options. The EEP Panel report does identify Huntingdon as a key centre for growth however this has not been taken on in the RSS, where Huntingdon is not identified as a Key Centre for Development and Change.	Submission plan amended including amendments to policy CS7 and reasoned justification.
John Blackburn	Little Paxton PC	Policy Wording 7	597	C	Land to the south of Lt Paxton has been designated for employment for several years but this is insufficient. An initiative to encourage employers to utilise this land is needed.	In order to maintain the strategic nature of the Core Strategy the employment policy identifies only those locations that are considered to be suitable for new large scale economic development. It is not considered appropriate to identify more local opportunities or existing commitments, however these will be supported, especially in Key Service Centres. Clarification of this approach will be made.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Jockey Club Racecourses	Jockey Club Racecourses	Policy Wording 7	625	O	Clear support for existing rural businesses should be included in the Core Strategy. Policy Wording 7 should be amended to include support for business development in rural areas if it is on a scale which will help to provide local jobs, supports local businesses, and avoid adverse environmental impacts.	In order to maintain the strategic nature of the Core Strategy the employment policy identifies only those locations that are considered to be suitable for new large scale economic development. It is not considered appropriate to identify more local opportunities, however these will be supported, especially in sustainable locations such as Key Service Centres. Clarification of this approach will be made.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Paul Seabrook	Seabrook Farms	Policy Wording 7	632	O	Object to the failure to fully consider growth in the smaller employment areas that provide employment opportunities throughout the district's rural hinterland and contributes to sustainability through local employment provision. The policy is inflexible, as it does not allow reasonable scope for the expansion of existing sites outside settlements. For these sites to remain feasible there must be scope to renew and redevelop existing premises and make new land available. Scope for the	In order to maintain the strategic nature of the Core Strategy the employment policy identifies only those locations that are considered to be suitable for large scale economic development. It is not considered appropriate to identify more local opportunities, however these will be supported, especially in sustainable locations such as Key Service Centres. Clarification of the policy about this approach will be made. Policies detailing the Council's approach to local	None.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Property & Procurement	Camb CC Property & Procurement	Policy Wording 7	521	O	expansion of employment sites with good transport links and sustainable working practices, where expansion can be incorporated on adjacent or closely related sites without detriment to the local environment should be included. The figures for Kimbolton raise concern, and how they impact upon its status in the Settlement Hierarchy. The supporting publication gives a skewed view on employment in Kimbolton. Kimbolton is an Historic Market Town, and there is a significant opportunity to improve sustainability through balanced provision of housing and employment.	The locations identified in the Employment Land policy are considered to be appropriate. Clarification of the locations identified will be made.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Gates Hydraulics	Gates Hydraulics	Policy Wording 7	509	O	Policy wording 7 makes a prediction of the employment land required before 2026 but provides no guidance for those proposing employment generating development; or for those proposing alternative types of development on sites presently in employment use. The policy should have regard to draft PPS4.	The detail sought by the consultee is considered to be more appropriate for the Development Control DPD. Draft PPS4 was published after the Preferred Options and so could not be taken into account.	None needed.
Marlborough Developments Ltd	Marlborough Developments Ltd	Policy Wording 7	530	C	The allocation of 2ha of employment for Yaxley is not strategic in scale and should not be considered as part of the Core Strategy. This should come forward as an allocation in the Site Allocations DPD. The scale of growth proposed continues the piecemeal development of Yaxley which offers no wider benefits to the settlement.	The Core Strategy does not identify sites only locations of development. Clarification of identified locations will be made.	Submission plan amended including amendments to policy CS7 and reasoned justification.
Twigden Homes	Twigden Homes	Policy Wording 7	570	O	The provision of 10ha is a more appropriate level for Ramsey. Policy Wording 7 assumes that half of the employment land provision in Ramsey will be on Greenfield land. However, sufficient brownfield land is	The future development of the Ramsey area has been limited due to Cambridgeshire and Peterborough Structure Plan policy 10/3 which seeks to limit economic development in Ramsey	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					available at RAF Upwood in conjunction with appropriately designed housing provision within the former limits of the airfield.	to small to medium scale development. Additionally Ramsey is isolated with poor transport links and a high level of car based out-commuting. With these factors in mind the scale of development identified for employment in Ramsey is considered to be appropriate.	
UK Land Investments	UK Land Investments	Policy Wording 7	586	O	There should be specific policy wording dealing with tourism which includes references to the provision of facilities in or adjacent to the four market towns and 'Key Service Centres'.	It is acknowledged that the policy does not make reference to tourism and its importance to the local economy. Tourism has been identified as an important employment sector for Huntingdonshire. Policies supporting tourism development will be included in the Development Control Policies DPD.	None.
UK Land Investments	UK Land Investments	Policy Wording 7	591	O	Should allow for employment related development in the Key Service Centres, to encourage locally based facilities, in addition to Huntingdon and St Neots. Buckden should be included within either the Huntingdon or St Neots Spatial Planning Areas as an appropriate location for employment development or as a modest residential/employmenta mixed use development.	In order to maintain the strategic nature of the Core Strategy the employment policy identifies only those locations that are considered to be suitable for large scale economic development. It is not considered appropriate to identify more local opportunities however these will be supported, especially in Key Service Centres. Clarification of the policy about this approach will be made.	None.
Huntingdon Water Tower Ltd	Huntingdon Water Tower Ltd	Policy Wording 7	613	S	The proposals to focus employment development in the market towns are supported. Proposals to secure high quality employment sites of strategic importance in sustainable locations are also supported. Support is given to proposals for the Huntingdon West Action Area and Western Gateway to the town and improvements to the A14. This should be a location for buildings of innovative design at this important entrance to the town centre and Hinchingsbrooke.	Support noted.	None.
Marshalls	Marshalls	Policy Wording 7	617	O	Concerned that development is to be limited to existing committed sites within the built up area of St Ives. This does not allow for the expansion needs of existing industry outside these areas.	Where sites have extant planning permissions or are currently allocated they are considered to be covered by the reference to existing commitments.	None.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Christine Beavon	Rectory Properties Ltd	Policy Wording 7	627	O	An additional area for employment land should be identified in Policy Wording 7 at Brampton Hut.	Expansion of existing employment uses will be covered in the Development Control Policies DPD.  The locations identified in the Employment Land policy are considered to be appropriate. Brampton Hut is not an appropriate location for a strategic Employment area as it is not well related to the main centres of population in the Spatial Planning Areas.	None needed.
Geoff Keeble	Highways Agency	Policy Wording 7	648	C	It is unclear which growth model would be put forward. For both models the required development would be mostly concentrated in the central employment market area around Huntingdon, although housing growth at St Neots will give rise to the need for significant additional new employment opportunities to create a sustainable community.	Comment noted. The locations identified in the Employment Land policy are considered to be appropriate.	None needed.
Mr John Scott	Stamford Homes	7.36	403	C	Supports policies which increase job opportunities within the town although these should not be restricted to B1, B2 and B8 uses as this could be achieved through enhanced services and facilities including those provided in retail and leisure. Restricting new residential development will not facilitate the development of new and existing employment allocations or provide the additional jobs in the service sector which Ramsey needs. If existing employment allocations are not suitable, they should be removed and other sites allocated, such as that at RAF Upwood, which may be more attractive to the market and meet the needs of employers	The employment policy identifies only the strategic locations suitable for large scale economic development in the standard 'B' uses. It is fully acknowledged that employment over the course of the plan period will come from many other sources. The Employment Land Review assesses the existing Local Plan allocations for employment uses and recommends retention of some. Unlike residential allocation employment allocation sometimes take a number of years to come to fruition. Economic development will be monitored and should it become evident that existing allocations will not come forward they will be de-allocated as part of future reviews.	None needed.

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Table 19 Representation received on policy wording 8 Retail Development.

Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	7.38	252	O	The dispersal of retail development equally between Huntingdon & St Neots and again within St Neots between the town centre and the eastern expansion will not have the intended effect of retaining retail expenditure. No evidence to support a proven need for out of centre retail development in St Neots or that PPS6 tests have been applied. Instead retail development should be focussed on brownfield land in the town centres, and particularly in Huntingdon	CS8 focuses retail development in all available brownfield and town centre locations thereby demonstrating that PPS6 sequential tests have been applied. As the SHLAA and Scoping Report identifies brownfield opportunities, in sustainable locations are limited. This policy makes best use of brownfield land, particularly in Huntingdon with development proposed close to the town centre in a sustainable brownfield site. The Council considers the Retail Assessment Study (2005 & 2007) provide robust evidence to underpin this policy. It would not be appropriate to deliver the scale of housing development proposed in St Neots without providing associated retail services and facilities. Providing appropriate infrastructure with housing development is crucial in order to promote sustainable communities.	Submission plan revised to strengthen the reasoned justification for policy CS8 and provide further detail on the role of the different settlements in the retail hierarchy and to include stronger reference to the priority that the Chequers Court development takes.
Stanton Group Developments Ltd	Stanton Group Developments Ltd	7.38	447	S	We agree with the additional comparison and convenience floorspace proposed targets.	Support noted.	None needed.
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	7.39	251	C	The evidence provided in Vol 2 shows a weaker market demand in St Neots so it is surprising that the Preferred Option promotes St Neots area focused growth. Huntingdon has greater potential for qualitative improvements in shopping and thus more likely to increase the amount spent locally.	The Council considers the Retail Assessment Study to provide robust evidence to underpin the policy. The policy proposes a distribution of retail development that, on the one hand, recognises the role of Huntingdon as principal centre and seeks to build on its strengths to increase the proportion of retail expenditure locally but, on the other hand, acknowledges the need to boost the local economy of St Neots and provide retail services with the strategic urban extension.	None needed.

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Name	Organisation	Para/Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Sainsburys Supermarkets Ltd	Sainsburys Supermarkets Ltd	7.39	424	C	The priority for convenience floorspace should be to ensure that the Chequers Court scheme comes forward and Sainsbury's can be relocated to facilitate that. The Council should address the capacity for a discount foodstore only after Sainsbury's relocation.	Comments noted. The Council is progressing the Huntingdon West Area Action Plan that will tackle the retail development in that area which should facilitate further projects in the town centre.	Submission plan revised to emphasise the priority that Chequers Court Phase II takes in paragraph 5.58. Other potential options arising from redevelopment in the Huntingdon West area are being dealt with separately in the AAP.
Stanton Group Developments Ltd	Stanton Group Developments Ltd	7.39	449	S	Agree with the statement suggesting that there may be further opportunities to increase convenience floorspace. This provides greater opportunities for retail expansion on sites close to the town centre, particularly within the Huntingdon West Area Action Plan area.	Support noted.	None needed.
Wm Morrison Supermarkets	Wm Morrison Supermarkets	7.39	540	S	Support the targets for retail floorspace.	Support noted.	None needed.
Geoff Keeble	Highways Agency	Policy Wording 8	53	S	The Preferred Approach for retail growth should be encouraged since maximising retail growth within the market towns could reduce the amount of car travel.	Support noted.	None needed.
Gareth Ridewood	CPRE	Policy Wording 8	85	C	Need to ensure any development does not threaten the viability of the existing towns' retail outlets. Oppose expansion of out of town retail. Need to encourage independent retailers that add character to our towns.	The Council recognises the important role that independent retailers have in promoting the local economy and helping to preserving settlement character. The need for additional retail development outside of town centres to complement existing retail outlets will be emphasised. Further information on maintaining the attractiveness of town centres by defining primary shopping areas and frontages will be set out in the Development Control Policies DPD.	Submission plan revised to strengthen the reasoned justification for policy CS8 and, in paragraph 5.59, include reference for the proposed district centre in St Neots to complement existing retail development.



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Name	Organisation	Para/Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Alison Melnyczuk	St. Ives TC	Policy Wording 8	160	S	Support retail development in St Ives.	Support noted.	None needed.
Tom Gilbert-Woodbridge	English Heritage	Policy Wording 8	126	O	The supporting text does not explain how locations have been identified. The policy and supporting text lacks reference to potential environmental impacts. The historic environment is likely to be affected in every location. Reference to English Heritage guidance. Assessment of sites should be done before allocation.	The representation is not clear what it is about the policy that is opposed or what requires changing. The supporting text will be clarified to include more specific reference to evidence that supports the policy. It is not particularly clear which guidance produced by English Heritage the consultee is referring to. It is not appropriate for the Core Strategy to assess sites as it is a high level strategic document.	Submission plan revised to strengthen the supporting text and reasoned justification for policy CS8. Assessment of individual sites will be carried out in the Planning Proposals DPD.
Churchmanor Estates Company Plc	Churchmanor Estates Company Plc	Policy Wording 8	253	O	The majority of retail growth should be in Huntingdon where there is adequate capacity with St Neots and other local centres taking only some modest growth. There is no evidence of the sequential test being applied and no proven need for out of town retail development in St Neots.	The Retail Assessment Study provides a robust evidence base has taken PPS6 and the need for sequential tests into account. The distribution of growth is such that Huntingdon's position as principal retail centre can be strengthened, therefore increasing the proportion of local expenditure whilst boosting the retail economy in St Neots. It is essential to provide sufficient retail development to meet day to day needs within development of such a large scale.	None.
Somerfield Stores Ltd	Somerfield Stores Ltd	Policy Wording 8	231	C	It should be made clear that the convenience floorspace figure is for the whole district and should not necessarily be provided for in one development. It should reflect guidance in PPS6, particularly the sequential test.	It is considered that the policy is sufficiently clear regarding the location of the convenience floorspace, however the supporting text will be added to, with detail as suggested.	Submission plan revised to strengthen supporting text and reasoned justification for policy CS8.
Connolly Homes Plc, David Wilson Es	Connolly Homes Plc, David Wilson Es	Policy Wording 8	448	S	Supports some of the 9000m2 comparison floorspace being accommodated in a new district centre as part of the mixed use extension to the east of St Neots.	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Sainsburys Supermarkets Ltd	Sainsburys Supermarkets Ltd	Policy Wording 8	423	C	Support the concentration of retail growth within Huntingdon and St Neots. However we object to the lack of clear guidance on the strategy for addressing retail requirements and The need to relocate the existing Sainsbury's to facilitate the Chequers Court scheme in Policies 2 and 8.	To maintain the strategic nature of the Core Strategy it is not considered appropriate to include detail as suggested in this representation. Supporting text can be added to in order to emphasise the importance of development and redevelopment for the town centres of the district particularly Huntingdon.	Submission plan revised to strengthen supporting text and reasoned justification.
Mr John Scott	Stamford Homes	Policy Wording 8	404	O	Objects that no provision is made for additional retail floorspace in Ramsey to maintain its important role as a market town and secure its regeneration.	The Retail Study concluded that Ramsey is unlikely to require significant comparison floorspace and that the district wide requirements for convenience floorspace is limited and dispersed across the whole district. Retail development is not ruled out for Ramsey but it is considered to be unsuitable for identification of significant retail development in addition to that already permitted.	Submission plan revised to acknowledge the role that retail plays in regeneration in paragraphs 3.31 and 3.32 as well as information on existing retail commitments in Ramsey provided in paragraph 5.61.
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 8	343	S	Support the revitalisation of Huntingdon town centre which will need improved access and parking.	Support noted.	None needed.
Resolution Asset Management	Resolution Asset Management	Policy Wording 8	358	S	The policy is considered to be consistent with both national and local planning policy. The quantum of floorspace identified is supported.	Support noted.	None needed.
Cambridgeshire County Council	Cambs CC	Policy Wording 8	361	S	Supports the Retail policy particularly the floorspace identified for each centre. It is the most appropriate option having regard to the established retail hierarchy of the District	Support noted.	None needed.
Stanton Group Developments Ltd	Stanton Group Developments Ltd	Policy Wording 8	455	O	Disagree with the equal distribution of comparison floorspace between Huntingdon and St Neots as Huntingdon is identified in 7.39 as 'the higher order centre where pressure for further development is the greatest'. The most appropriate strategy would be to accommodate an increased level of floorspace in Huntingdon.	The distribution of growth is such that Huntingdon's position as principal retail centre can be strengthened, therefore increasing the proportion of local expenditure whilst boosting the retail economy in St Neots. It is essential to provide sufficient retail development to meet day to day needs within development of such a large scale.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
DH Barford (Agent) - Martin Page	DH Barford	Policy Wording 8	619	S	The policy is too restrictive in terms of potential locations for further retail development. The Retail Study identifies the need for a discount food store in Huntingdon and the policy identifies convenience floor space being provided within the town centres. The only scope for significant further retail development is in Huntingdon - options for town centre development in the other towns are limited. The policy refers to potential development in the Huntingdon West area and also within the mixed use urban extension to the east of St Neots; however these will not be in the town centre. To reflect this the policy text should refer to future retail development being "in or in close to town centres, or locations where the development will serve existing or proposed urban extensions"	It is considered appropriate that the preference for the location of retail development is in the town centres. It is however acknowledged that this may not always be possible. The Retail Assessment Study has taken account of national guidance in PPS6 and sequential tests and this has therefore informed the development of this policy. It would not be appropriate to repeat government guidance in the Core Strategy.	None.
Persimmon Homes (East Midlands) Ltd	Persimmon Homes (East Midlands) Ltd	Policy Wording 8	582	O	The policy should conform with the EEP Panel Report that identified Huntingdon as a key centre for growth followed by St Neots and then St Ives..	The EEP Panel Report listed Huntingdon as one of a number of possible locations for future growth, but this does not form part of the East of England Plan.	None needed.

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Table 20 Representations received on the Key Diagram and policy wording 9.

Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Chris Blackman	Cambs CC	7.42	482	C	An "Accession" assessment of the locational and accessibility aspects of the Key Diagram, shows principally: The Huntingdon Spatial Planning Area scored highest overall largely because the town of Huntingdon has 15 of the 16 key services located within its environs. The St Ives Spatial Planning Area scored well largely because the majority of the key services are located within the town of St Ives. The St Neots Spatial Planning Area has very similar characteristics to the St Ives Spatial Planning Area. The majority of the key services are located within the town of St Neots. Sites within the Ramsey Spatial Planning Area scored lower than the other market town spatial planning areas because it has less key services located within its environs. Like Ramsey, the Key Service Centres of Fenstanton, Sawtry and Yaxley scored lower than the larger market towns because they have a lower number of key services located within or close to their environs.	Comments noted. The data provided will be included in the submission version.	Submission plan revised to include data provided by the consultee in appendix 1 of Volume 2.
Sywell Land Ltd	Sywell Land Ltd	7.42	610	O	Land to the west of Yaxley merits designation as a Direction of Growth for residential development. Yaxley is an appropriate sustainable location for further development and the westerly direction is the most appropriate.	The sustainable nature of Yaxley is recognised with its designation as a Key Service Centre and as a location suitable for large scale development. This is considered to be the most appropriate level of development for Yaxley as unlike Godmanchester it does not have the same range of facilities within such close proximity. It is acknowledged that Peterborough offers a greater range of services than Huntingdon, however despite reasonable public transport services, because Yaxley is further away many more trips are going to be made by car, which is clearly not sustainable.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr David Stowell	Spaldwick and Stow Longa PCs	Figure 7.1	1	C	"Market towns are Key Service Centres" should read "Market towns and Key Service Centres". Add "retail" in St Ives Spatial Planning Area description.	Typo will be corrected.	Key Diagram key amended.
Mr Michael Palmer-Asplin	n/a	Figure 7.1	31	O	Add employment arrow east of St Ives, outside of the floodplain.	It is considered that no change to the key diagram is necessary as this is not a new development location.	None.
Maydo Pitt	GO-East	Figure 7.1	37	O	Include an indication of growth within the built up area	The key diagram includes development details and identifies location for development within the built up area.	None.
Mr David Reavell	O&H Properties	Figure 7.1	196	O	The urban area of Peterborough should be redrawn correctly to include Hampton which extends to the district boundary. The red arrow east of Yaxley should be removed as this is not a strategic allocation and a separate notation should be made for Yaxley reflecting the need to work with PCC to ensure the long term sustainable planning for growth in this location.	The diagram by its very nature should not be expected to be an accurate representation of the district or its surroundings. The representation of Peterborough on the key diagram is considered to sufficiently represent the built up area of the city. The red employment arrow will be removed following clarification of the employment development policy. It is not considered necessary to identify Yaxley in any special way as suggested. The Spatial Planning Areas are not denoted on the map and it is considered that the suggestion is a similar designation. The designation of a spatial area for Yaxley or some similar designation has been dealt with in the response to other representations.	Key diagram amended.
FLP	FLP	Figure 7.1	278	S	Support in respect of Sawtry	Support noted.	None needed.
Stamford Homes (Midlands) Ltd	Stamford Homes (Midlands) Ltd	Figure 7.1	259	O	Object to the preferred direction for development in St Ives as being to the west. The considerable unconstrained opportunities to the north should be identified.	The locations of growth for St Ives are considered to be appropriate. Please refer to responses to representations on Policy 2 for more detail.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Martin Leyland	Barratt Strategic	Figure 7.1	220	O	The urban area of Peterborough should be redrawn correctly to include Hampton which extends to the district boundary. The red arrow east of Yaxley should be removed as this is not a strategic allocation and a separate notation should be made for Yaxley reflecting the need to work with PCC to ensure the long term sustainable planning for growth in this location.	The diagram by its very nature should not be expected to be an accurate representation of the district or its surroundings. The representation of Peterborough on the key diagram is considered to sufficiently represent the built up area of the city. The red employment arrow will be removed following clarification of the employment development policy. It is not considered necessary to identify Yaxley in any special way as suggested. The Spatial Planning Areas are not denoted on the map and it is considered that the suggestion is a similar designation. The designation of a spatial area for Yaxley or some similar designation has been dealt with in the response to other representations.	Key diagram amended.
Mr C Behagg	n/a	Figure 7.1	450	O	Diagram should indicate employment development for Fenstanton as the location east of London Road can offer up to 12 ha	In line with the strategic nature of the Core Strategy the key diagram only identifies those locations of growth identified in policies in the Core Strategy as being suitable for large scale growth. The key diagram identifies Fenstanton as a Key Service Centre and the locations within the village and to the east and south, however as no further locations have been identified as suitable for large scale growth in the policies there are no further designations applied on the Key Diagram. For further detail please refer to the responses to representations on policy 7.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Lord De Ramsey	Abbots Ripton Estates	Figure 7.1	432	O	Object. Ramsey spatial planning area should receive more growth, particularly to the north east of the town.	In line with the strategic nature of the Core Strategy the key diagram only identifies those locations of growth as being suitable for large scale growth. For detail as to why locations to the north east of Ramsey are not identified please refer to responses to representations on policy 2.	None needed.
H Raby & Sons	H Raby & Sons	Figure 7.1	384	O	Object. Diagram should indicate employment growth of up to 31.5 ha at Brookfield Farm, Great Stukeley.	It is not considered necessary to identify the land suggested as a location for employment development. Please see the response to representations on policy 7 for more details.	None needed.
Lenton Trustees (L019)	Lenton Trustees	Figure 7.1	410	O	Object as diagram indicates that Huntingdon spatial planning area could receive less growth than St Neots spatial planning area which is not as sustainable. Land west of Brampton should be identified.	In line with the strategic nature of the Core Strategy the key diagram only identifies those locations of growth as being suitable for large scale growth. For detail as to why locations are not identified please refer to responses to representations on policy 2.	None needed.
Bank Trustees	Bank Trustees	Figure 7.1	472	O	Diagram should indicate growth east/south-east rather than east of St Neots, which is more appropriate than that identified for St Neots. Land at Potton Road is appropriate for sustainable, mixed development.	It is not the intention to rule out sites that fit the description given in the policy, however it has proved difficult to clearly identify this location on the diagram.	None needed.
Mr C Dodson	n/a	Figure 7.1	414	O	Object as Somersham is not identified to accommodate growth.	In line with the strategic nature of the Core Strategy the key diagram only identifies those locations of growth as being suitable for large scale growth. The key diagram identifies Somersham as a Key Service Centre but as it has not been identified as suitable for large scale growth in the policies there are no further designations applied on the Key Diagram.	None needed.
Mrs Warnes	n/a	Figure 7.1	427	O	Object as diagram does not identify Yaxley to accommodate peripheral growth - sites south of The Drove and	In line with the strategic nature of the Core Strategy the key diagram only identifies those locations of growth identified in policies in the Core Strategy	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
					west of The Wykes represent available and suitable land which can facilitate a sustainable extension.	as being suitable for large scale growth. The key diagram identifies Yaxley as a Key Service Centre and the development locations within the village and to the east but as no further locations have been identified in the policies there are no further designations applied on the Key Diagram. For further detail please see responses to representations on policy 2.	
Property & Procurement	Cams CC Property & Procurement	Figure 7.1	416	O	Object. Diagram should indicate potential for limited peripheral employment development at Brampton, particularly to the north of the village	In line with the strategic nature of the Core Strategy the key diagram only identifies those locations of growth as being suitable for large scale growth. The key diagram identifies Brampton as a Key Service Centre and the large scale mixed use development location in the village but as other locations have not been identified as suitable for large scale growth in the policies there are no further designations applied on the Key Diagram.	None needed.
Mr J Stokes	n/a	Figure 7.1	460	O	Object. Diagram should indicate housing growth at Warboys, particularly south of Farriers Way.	In line with the strategic housing growth policy the key diagram identifies the locations that the Council considers to be suitable for large scale housing development. For further detail please refer to responses to representations on policy 2.	None needed.
Wagstaffe & Abblitt	Wagstaffe & Abblitt	Figure 7.1	584	O	Support the principle of development to the north of Ramsey but would like the key diagram to include an area of mixed development (of about 15ha) along Stocking Fen as this is more sustainable than development along St Mary's Road.	The general location to the north/north west of Ramsey has been identified for mixed use development. This is considered to be appropriate for Ramsey	None needed.



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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mrs J Daniels	n/a	Figure 7.1	512	O	Object. Diagram should indicate growth at Warboys, particularly a location west of Ramsey Road on a partly brownfield site.	In line with the strategic housing growth policy the key diagram identifies the locations that the Council considers to be suitable for large scale housing development. For further detail please refer to responses to representations on policy 2.	None needed.
Persimmon Homes	Persimmon Homes	Figure 7.1	541	O	Other options should be explored as directions of growth for St Ives. Key diagram should include an option for development on the eastern side of Hemingford Grey - a comparatively sustainable location, given its facilities, proximity to a substantial range of facilities in St Ives and bus services	In line with the strategic housing growth policy the key diagram identifies the locations that the Council considers to be suitable for large scale housing development. For further detail please refer to responses to representations on policy 2. Please also refer to the Settlement Hierarchy Background Paper.	None needed.
Adam Ireland	Environment Agency	Figure 7.1	537	S	We can confirm that the directions for proposed strategic development as delineated on the key diagram conform to the sequential test in PPS25 and are therefore sound as informed by suitable evidence base.	Support noted.	None needed.
Mr Burgess	n/a	Figure 7.1	518	O	Object. Diagram should indicate peripheral growth at Yaxley – land south of The Drove and west of The Wykes is available and suitable for a sustainable extension to Yaxley.	In line with the strategic housing growth policy the key diagram identifies the locations that the Council considers to be suitable for large scale housing development. For further detail please refer to responses to representations on policy 2.	None needed.
Edwards	n/a	Figure 7.1	500	O	Object, more growth should be shown for Ramsey Spatial Planning Area given its status as market town. Diagram does not allow for non strategic greenfield development east of Bury Road, Ramsey.	For more information concerning the scale of development identified for Ramsey please see the responses to representations to policy 2. In line with the strategic nature of the Core Strategy the key diagram identifies those locations that have been identified through the policies as suitable for large scale development. The Core Strategy will not identify smaller scale development opportunities. Where such opportunities	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Property & Procurement	Cams CC Property & Procurement	Figure 7.1	523	O	Object. Employment development south east of Yaxley should be shown.	comply with the settlement hierarchy they may be allocated through the Planning Proposals DPD.  In line with the employment policy the key diagram identifies the locations that the Council considers to be suitable for large scale employment development. For further detail please refer to responses to representations on policy 7.	None needed.
Marlborough Developments Ltd	Marlborough Developments Ltd	Figure 7.1	531	C	The urban area of Peterborough should be redrawn correctly to include Hampton which extends to the district boundary. The red arrow east of Yaxley should be removed as this is not a strategic allocation and a separate notation should be made for Yaxley reflecting the need to work with PCC to ensure the long term sustainable planning for growth in this location.	The diagram by its very nature should not be expected to be an accurate representation of the district or its surroundings. The representation of Peterborough on the key diagram is considered to sufficiently represent the built up area of the city. The red employment arrow will be removed following clarification of the employment development policy. It is not considered necessary to identify Yaxley in any special way as suggested. The Spatial Planning Areas are not denoted on the map and it is considered that the suggestion is a similar designation. The designation of a spatial area for Yaxley or some similar designation has been dealt with in the response to other representations.	The employment arrow at Yaxley has been removed.
Burgess Burgess and Cooper	n/a	Figure 7.1	560	S	Support for location south of Fenstanton	Support noted.	None needed.
Twigden Homes	Twigden Homes	Figure 7.1	564	O	Does not reflect policy wording 2 and is too specific. Growth west of Ramsey should be indicated as this is more sustainable and accessible than that to the south (RAF Upwood).	The identification of development locations for the west of Ramsey is considered to be appropriate.	None needed.
Mr R Bruce	n/a	Figure 7.1	581	S	Support but growth at Buckden should be included in diagram  The scale appropriate at Buckden should be in the range of 10-59 dwellings.	Support noted. Buckden is identified on the key diagram as a key service centre.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
UK Land Investments	UK Land Investments	Figure 7.1	587	O	Include arrow for tourist and or residential/mixed development adjacent to the west of Buckden.	In line with the policies the key diagram identifies the locations that the Council considers to be suitable for large scale development. For further detail please refer to responses to representations on policy 2 and 7.	None needed.
Mr T Smith	n/a	Figure 7.1	652	O	Object. More growth should be indicated within St Ives Spatial Planning area given its location in Cambridge sub region. Arrow should point to the north/north west of St Ives, not just the west.	In line with the strategic housing growth policy the key diagram identifies the locations that the Council considers to be suitable for large scale housing development. For further detail please refer to responses to representations on policy 2.	None needed.
Mr Philip Raiswell	Sport England		162	C	Include reference to Open Space, Sport and Recreation Needs Assessment and Audit (2006) within Strategic Greenspace Enhancement policy.	Reference to the supporting evidence will be made.	Submission plan amended including identification of the evidence base in appendix 2.
Thornhill Estates	Thornhill Estates		461	S	Support. Promotes Little Paxton Quarry as suitable for appropriate leisure/tourism based activities.	Support noted.	None needed.
Gareth Ridewood	CPRE	8.1	86	S	Include reference to biodiversity.	Reference to biodiversity will be incorporated.	Submission plan amended including amended policy CS9 and reasoned justification.
Geoff Keeble	Highways Agency	Policy Wording 9	64	S	Support as Greenspace enhancement areas can encourage sustainable travel such as walking and cycling.	Support noted.	None needed.
Gareth Ridewood	CPRE	Policy Wording 9	87	S	Emphasise importance of local green spaces integrated within all development.	Support noted.	None needed.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Alison Melnyczuk	St. Ives TC	Policy Wording 9	166	C	Important to ensure separateness and distinctiveness of settlements through areas of strategic greenspace. Particularly important for west of St Ives.	The maintenance of separation between settlements is considered to be of particular importance and strategic green infrastructure and open space can help protect separation.	None needed.
Tom Gilbert-Wooldridge	English Heritage	Policy Wording 9	127	O	No reference made to historic environment. Add: "conserve and enhance relevant historic and cultural assets." Reference historic environment in supporting text.	The importance of the historic environment to green infrastructure is acknowledged. The suggested text is considered to be too vague, however consideration to appropriate wording will be given.	Submission plan amended including amended policy CS9 and reasoned justification.
Mr Michel Kerrou	River Nene Regional Park	Policy Wording 9	93	C	Green Infrastructure map and/or policy fail to acknowledge adjoining initiatives such as the Nene Valley Strategy. Reference should be made to optimise opportunity for linkages to be made.	Links with the wider green infrastructure network outside the district are important. Reference to the importance of these links will be included.	Submission plan amended including amended policy CS9 and reasoned justification.
Mr Justin Tilley	Natural England	Policy Wording 9	317	S	Support.	Support noted.	None needed.
Mr Justin Tilley	Natural England	Policy Wording 9	319	S	Supports strategic initiative for greenspace enhancement, but add reference in supporting text on the treatment of landscape and wildlife conservation and countryside access to areas not covered by this policy.	Consideration will be given to how best to incorporate the importance of landscape and wildlife conservation throughout the district while maintaining the strategic nature of this policy.	Submission plan amended including amended policy CS9 and reasoned justification.
Miss Rachel Pateman	Wildlife Trust	Policy Wording 9	274	S	Support but include objective to "safeguard sites of existing nature conservation value" and an additional enhancement area woodland south of Hunts (part of Forest of S. Cambs project).	The policy will be amended to include reference to existing sites of nature conservation value. Consideration will be given to inclusion on the diagram of additional areas for strategic greenspace enhancement.	Submission plan amended including amended policy CS9 and reasoned justification.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Ms Diane Millis	Woodland Trust	Policy Wording 9	234	C	Insufficient consideration given to adaptation to climate change – developing resilient natural systems able to respond to and absorb change. Incorporate Woodland Access Standard as a monitoring indicator.	Reference to the importance of adaptation to climate change will be incorporated.	Submission plan amended including amended policies CS1 & CS9 and the supporting text.
Bedfordia Developments	Bedfordia Developments	Policy Wording 9	302	S	We support in principle the Area of Strategic Greenspace Enhancement along with green corridors connecting them and consider the residential development of Bedfordia Fields linked to the provision of a large parkland area will provide visual and biodiversity enhancement, together with increased public access.	Support noted.	None needed.
Daniel Heenan	n/a	Policy Wording 9	359	O	Regardless of investment priorities all strategically important green infrastructure should be identified in the Development Plan included the River Nene Regional Park Initiative.	Consideration will be given to how best to include strategically important green infrastructure that is outside district boundary. While the importance of the River Nene Regional Park is acknowledged the importance to the district of the Great Fen Project for example is more significant..	Submission plan amended including amended policy CS9 and reasoned justification.
Mr Tim Fryer	n/a	Policy Wording 9	330	C	Include more on protection and maintenance of existing greenspace include in 1 <sup>st</sup> criteria: "safeguard existing and potential." Include reference to Country Park in para 5.42	Policy and supporting text will be amended to identify the importance of existing sites of nature conservation value.	Submission plan amended including amended policy CS9 and reasoned justification.
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 9	344	S	Support but would like to see greater facilities provided across the District to allow easier access to the countryside, new footpaths and walks.	In line with the strategic nature of the Core Strategy it is considered appropriate to concentrate on those green corridors of particular importance for the district. The importance of improving access to the countryside at a more local level is acknowledged and consideration will be given to including suitable references.	Submission plan amended including amended policy CS9 and reasoned justification.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Chris Blackman	Cambs CC	Policy Wording 9	508	C	Support inclusion of Strategic Greenspace and reference to Green Infrastructure Strategy. Areas of enhancement should reference to this Strategy and the areas identified in Structure Plan and Biodiversity Partnership 50 Year Wildlife Vision. Potential connections between Camboorne and Cambridge need to be considered as well as the continuing importance of existing Ouse Valley Corridor. Delete "reinstate" suggest add "create" green infrastructure and a network of corridors connecting the key areas across Cambridgeshire.	Reference to the documents will be included. Consideration will be given to how best to include strategically important green infrastructure that is outside district boundary.	Submission plan amended including amended policy CS9 and reasoned justification.
Anglian Water Property Ltd	Anglian Water Property Ltd	Policy Wording 9	552	S	Support the Council's proposal to identify Grafham Water as an area of Strategic Greenspace Enhancement. Whilst supporting the need to enhance the environmental assets of the District, wish to support the continued growth of Grafham Water as a centre for tourism and recreation. Amend 3 <sup>rd</sup> bullet to: "contribute to diversification of the local economy and tourist development through provision of new facilities".	Support noted. Suggested wording is considered suitable and will be included.	Submission plan amended including amended policy CS9 and reasoned justification.
Ian Burns	Cambs PCT	8.3	185	C	Support but include reference to health benefits in reasoned justification for enhancement of green space.	Comments noted. The inclusion of an appropriate reference will be included.	Submission plan amended including amended policy CS9 and reasoned justification.
Gareth Ridewood	CPRE	8.4	88	S	Support	Support noted.	None needed.
Chris Blackman	Cambs CC	8.4	479	O	Para 8.4 change to: "The Cambridgeshire Horizons Green Infrastructure Strategy (Cambridgeshire Green Vision)..."	Suggested change is accepted and will be incorporated.	Submission plan amended including amended policy

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Gareth Ridewood	CPRE	8.6	232	S	Support, particularly Great Fen Project.	Support noted.	None needed.
Chief Engineer	Middle Level Commissioners	8.6	375	C	Care should be taken to ensure that the non-IDB maintained local land drainage/flood defence systems are not detrimentally affected. Consideration for long term maintenance needs to be had.	Comments noted.	None needed.
Mr Tim Fryer	n/a	8.7	332	C	Include Hinchingsbrooke Country Park in the Strategic Green Infrastructure.	Reference to Hinchingsbrooke Country Park will be included.	Submission plan amended including amended policy CS9 and reasoned justification.
Anglian Water Property Ltd	Anglian Water Property Ltd	8.7	555	S	Para 8.7 include: Grafham Water offers opportunities for water and land based recreation.... A major focus of initiatives in this area will be the provision of improved links to green space for people and wildlife through green corridors incorporating sustainable access routes"	Support noted. Consideration of suggested changes will be given.	Submission plan amended including amended policy CS9 and reasoned justification.
Gareth Ridewood	CPRE	8.8	89	S	support	Support noted.	None needed.
Mr David Stowell	Spaldwick and Stow Longa PCs	Figure 8.1	3	C	Change to colour of market towns and key service centres to clarify map.	While it is considered that the diagram is sufficiently clear changing the colour of the towns and key service centres is likely to aid clarity so will be incorporated.	Submission plan amended including amended diagram for policy CS9.
Russell Saywell	n/a	Figure 8.1	47	S	Support – as land previously proposed for residential development north of Little Paxton now excluded.	Support noted.	None needed.
Chris Blackman	Cambs CC	Figure 8.1	483	O	Add the pre-existing green corridor of the Ouse Valley and the cross-border green corridor towards Cambourne and Cambridge.	The Ouse Valley is clearly shown on the diagram. Consideration will be given to the inclusion of further green corridors and areas of strategic greenspace.	Submission plan amended including amended diagram for policy CS9.

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Name	Organisation	Para/ Policy	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Tim Fryer	n/a	Figure 8.1	333	S	Strongly supported particularly the 'Brampton towards Grafham cycleway / bridleway'.	Support noted.	None needed.
Anglian Water Property Ltd	Anglian Water Property Ltd	Figure 8.1	554	S	Supports the inclusion of Grafham Water as Strategic Green Infrastructure.	Support noted.	None needed.
UK Land Investments	UK Land Investments	Figure 8.1	589	O	Include specific reference to tourism related development.	The consultee is not clear how tourism related development should be identified on the diagram. Consideration will be given to additional supporting text highlighting the importance of tourism in relation to green infrastructure.	Submission plan amended including amended policy CS9 and reasoned justification.



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Table 21 Representations on policy wording 10 infrastructure requirements.

Full Name	Organisation	Rep On	Rep Id	Type	Summary	Officers' Response	Action Taken
Chief Engineer	Middle Level Commissioners	8.9	369	C	There is a need to appreciate that any contribution required by the Council for Drainage/Flood prevention will be in addition to those received by the Middle Level Commissioners under the Land Drainage Act 1991 and associated byelaws.	Comments noted.	None needed.
Gary Parsons	Anglian Water	Policy Wording 10	10	C	Water and sewerage services are outside the scope for S106 or planning gain. As a private company, Anglian Water Services is obliged to provide adequate services under its licence. Funding is sought through charges to its customers. The provision of infrastructure will be constrained by environmental, planning and financial considerations. A Water Cycle Strategy would provide a framework for planning and infrastructure provision.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements. A Water Cycle Study is being undertaken.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections.
Maydo Pitt	GO-East	Policy Wording 10	42	O	We consider that the submission policy should provide more certainty for developers about what, how and when infrastructure requirements and financial contributions will be sought, including prioritisation of infrastructure items listed, indication of any specific strategic infrastructure items requiring developer contributions, and trigger points for when contributions would be expected. We broadly support, the proposed SPDs, however the policy is not clear or certain enough to enable SPDs to cover the important matters of infrastructure and developer contributions. The SPDs should cover the detailed elements, building upon a clear strategic policy. Test 7	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify the areas identified in this representation.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections.
Geoff Keeble	Highways Agency	Policy Wording 10	65	O	No reference is made to improvements in sustainable transport infrastructure to support proposed development. It is	Following consideration of comments substantial rewriting of the Infrastructure section is	Submission plan amended including amendments to the

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Full Name	Organisation	Rep On	Rep Id	Type	Summary	Officers' Response	Action Taken
Mr Philip Raiswell	Sport England	Policy Wording 10	168	S	recommended that a hierarchy is established whereby sustainable travel measures are put forward ahead of contributions to highways or car parks. Welcome the specific identification of open space and recreation as the target of planning contributions.	considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority. Support noted.	Infrastructure and Implementation and Monitoring Sections. None needed.
Alison Melnychuk	St. Ives TC	Policy Wording 10	170	C	Infrastructure contributions should be viewed in terms of the impact the development will have on communities nearby as well as where the development is. Surface water flooding in St Ives will be exacerbated with new development unless extensive attenuation schemes are incorporated. These schemes should be incorporated on all developments within its hinterland to ensure there is no transfer of problem.	Comments noted. While the importance of flood attenuation is acknowledged, particularly for St Ives, it is not considered to be an issue that requires additional prescription in the Core Strategy.	None needed.
Tom Gilbert-Wooldrige	English Heritage	Policy Wording 10	128	C	Reference should be made to improvements to the historic environment, to maximise opportunities for enhancements.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections.
Mr S Ross	Swan Hill Homes	Policy Wording 10	113	O	Reference to contributions for maintenance conflicts with advice at paragraph B19 of Circular 05/2005.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections. None needed.
Mr Justin Tilley	Natural England	Policy Wording 10	323	S	We support open space and recreation, strategic green infrastructure, footpaths, bridleways, cycleways and environmental improvements in the list for development contributions.	Support noted.	None needed.
Miss Rachel Pateman	Wildlife Trust	Policy Wording 10	276	S	We support the inclusion of strategic green infrastructure here.	Support noted.	None needed.

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Full Name	Organisation	Rep On	Rep Id	Type	Summary	Officers' Response	Action Taken
National Grid Property Ltd	National Grid Property Ltd	Policy Wording 10	282	O	The policy should state that when determining the level of contributions sought, site specific considerations will be taken into account.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including Infrastructure and Implementation and Monitoring Sections.
Ian Burns	Cambs PCT	Policy Wording 10	187	S	We support contributions towards health and social care infrastructure and, where appropriate for management and maintenance of services and facilities.	Support noted.	None needed.
Ian Burns	Cambs PCT	Policy Wording 10	188	C	Community development provision to facilitate the development of social infrastructure should be included. This follows the recommendations in Cambridgeshire PCT's report on the effect of the Social Environment on Mental health (S.Goh 2007).	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements. To include requirements for contributions evidence of what is required and why will be required.	Submission plan amended including Infrastructure and Implementation and Monitoring Sections.
Mr Steven Harvey	n/a	Policy Wording 10	211	O	We object and suggest that requirements are tempered, so there is confidence that a fair contribution that is directly related to local community needs is negotiated and that the viability of the proposed scheme, including the developer's profit, will be taken into account.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements.	Submission plan amended including Infrastructure and Implementation and Monitoring Sections.
Chris Blackman	Cambs CC	Policy Wording 10	485	O	Where definite, site-specific, infrastructure requirements arise from development proposals, they should be included in the Submitted version of the Core Strategy	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority including specific infrastructure requirements where known.	Submission plan amended including Infrastructure and Implementation and Monitoring Sections.
Chris Blackman	Cambs CC	Policy Wording 10	487	C	We welcome travel planning in the list. This should include residential travel plans. Environmental improvements for	Comments noted. Where appropriate specific requirements will be detailed	Submission plan amended including amendments to the

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Full Name	Organisation	Rep On	Rep Id	Type	Summary	Officers' Response	Action Taken
					biodiversity should include provision of mitigation/compensatory habitat, enhancement of existing habitats including management, the linking of fragmented habitats and buffering of habitat and creating new habitat, including wildlife corridors to connect development with surrounding landscape.	along with more detail as to the scope of contributions that may be required.	Infrastructure and Implementation and Monitoring Sections.
Mr Peter Glazebrook	HallamLand Management	Policy Wording 10	394	C	We accept contributions to infrastructure and community benefits which are necessary in conjunction with development. However, any negotiations must take account of site specifics including viability which could be affected by affordable housing requirements.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections.
Sainsburys Supermarkets Ltd	Sainsburys Supermarkets Ltd	Policy Wording 10	425	C	The policy should include reference to the policy guidance set out under Circular 05/05.	Reference to the circular will be included.	Submission plan amended including amendments to the Infrastructure and Implementation and Policy CS10.
Rose Freeman	The Theatres Trust	Policy Wording 10	366	S	The policy is supported and we are pleased that a SPD will be prepared setting out the details of planning obligations.	Support noted.	None needed.
Mr John Scott	Stamford Homes	Policy Wording 10	398	C	We accept contributions to, infrastructure and community benefits which are necessary in conjunction with development. However, any negotiations must take account of site specifics including viability which could be affected by affordable housing requirements.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections.
Mrs Madelaine Liddiard	Godmanchester TC	Policy Wording 10	345	S	Support but would expect to be included in discussions over necessary contributions if development is to occur in Godmanchester.	Support noted.	None needed.
Lands Improvement	Lands Improvement	Policy Wording 10	346	S	We support the approach for planning obligations related to the form of the development and its potential impact. The	Support noted. Following consideration of comments substantial rewriting of the	Submission plan amended including amendments to the

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Full Name	Organisation	Rep On	Rep Id	Type	Summary	Officers' Response	Action Taken
Stanton Group Developments Ltd	Stanton Group Developments Ltd	Policy Wording 10	457	S	Community Infrastructure Levy may change the approach to developer contributions depending on the final content of the Government's proposals.	Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority, as well as more detail about the Council's approach regarding CIL.	Infrastructure and Implementation and Monitoring Sections.
Martin Page	DH Barford (agent)	Policy Wording 10	620	O	DCLG document 'Planning Obligations: Practice Guidance' (2006) should be used. Whilst identifying the range of infrastructure facilities and services for which contributions are likely to be sought, the policy does not identify the types of contribution that will be sought. These details should not be in SPDs.	Support noted.	None needed.
Chris Blackman	Cambs CC	Policy Wording 10	489	C	County Council requirements for children & young persons for each part of the District are sent as a separate paper. Principal requirements will be a primary school at Brampton, an additional form of entry for secondary education at Huntingdon, an additional secondary school at St Neots and three forms of entry for primary education, including an extension to the Love's farm school and a new 2FE primary school. At St Ives and Ramsey, there is educational capacity. There is also adequate capacity at Sawtry and Yaxley, but any growth at Fenstanton would require contribution to additional primary capacity.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections.
Chris Blackman	Cambs CC	Policy Wording 10	491	C	There will be a need for additional early years/childcare/nursery provision associated with the major growth areas. In other areas, it does not necessarily follow that there is capacity in the early years and childcare sectors. There may	Comments noted. This information is essential and is being utilised in the preparation of the LIF.	Submission plan amended including amendments to the Infrastructure and Implementation and Monitoring Sections.

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Full Name	Organisation	Rep On	Rep Id	Type	Summary	Officers' Response	Action Taken
Chris Blackman	Cambs CC	Policy Wording 10	494	O	Footpaths and bridleways should be included. This will enable improvements to the network to provide for healthy, sustainable transport for the new community.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including the Infrastructure and Implementation and Monitoring Sections.
Chris Blackman	Cambs CC	Policy Wording 10	495	O	Archaeology should be included.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including amendments to the Infrastructure and Implementation and policy CS10.
Persimmon Homes (East Midlands) Ltd	Persimmon Homes (East Midlands) Ltd	Policy Wording 10	583	S	We support the provision of a standardised charging system, however, in order to comply with the advice in Circular 05/05 Planning Obligations; Contributions will be fairly and reasonably related to the scale and nature of the proposed development, directly related to that development and relevant to planning.	Support noted. Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority including the Council's approach to the CIL.	Submission plan amended including amendments to the Infrastructure and Implementation and policy CS10.
Adam Ireland	Environment Agency	Policy Wording 10	539	S	We continue to support the requirement for developer contributions.	Support noted.	None needed.
John Blackburn	Little Paxton PC	Policy Wording 10	598	C	There is insufficient emphasis on these improvements to be made before or by the time the need arises. There is likely to be an immediate need for education and health care arising from new developments. The aging population raises the need for care of the elderly within the community and leisure facilities for the elderly. There has been significant development recently in Lt Paxton but no additional provision for primary education. More has permission but there is no indication of planned growth to the school.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority including the timing of provision.	Submission plan amended including amendments to the Infrastructure and Implementation and policy CS10.

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Full Name	Organisation	Rep On	Rep Id	Type	Summary	Officers' Response	Action Taken
Paul Seabrook	Seabrook Farms	Policy Wording 10	633	O	Contributions and infrastructure improvements should be considered in parallel with the Spatial Strategy. Several Key Service Centres are seeking infrastructure improvements but are unable to carry them out without contributions from development.	It is recognised that infrastructure improvements may only be possible in KSC with the aid of developer contributions. It will be important to ensure contributions can be secured from development. Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including amendments to the Infrastructure and Implementation and policy CS10.
Gates Hydraulics	Gates Hydraulics	Policy Wording 10	510	O	We have concerns with whether the policy wording accurately reflects the Government's approach to planning obligations, as set out in Circular 05/2005.	Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. This will provide the opportunity to clarify contribution requirements and their priority.	Submission plan amended including amendments to the Infrastructure and Implementation and policy CS10.

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Table 22 Representations on Implementation, Monitoring and the Glossary

Name	Organisation	Para/ Policy	Rep ID	Type	Summary	Officers' Response	Action Taken
Maydo Pitt	Go East	9	44	O	The monitoring and implementation framework needs to be more specific setting out by whom, how and when the vision, objectives and core policies will be delivered. Possible contingency measures should also be included as well as infrastructure requirements of other partners' policies and programmes. A strategic housing trajectory setting out anticipated delivery of housing and broad sources (i.e. existing commitment, urban capacity sites, brownfield allocations, Greenfield sites/urban extensions) is required.	The deficiencies in the infrastructure and implementation sections and the links between them are acknowledged. Work is underway to produce a Local Investment Framework (LIF). The preliminary work for the LIF will inform the Submission Core Strategy and enable greater clarity in the Infrastructure and Implementation sections.	Submission plan amended including the Infrastructure and Implementation and the Monitoring sections.
William Evans	Wharf Land Investments	9.1	388	S	Monitoring and review of the various components of the Local Development Framework will be fundamental in order to reflect the changing circumstances both in terms of the Government's future housing targets, eco town programme and overall housing allocation and distribution at a regional and sub regional level.	Support noted. Monitoring and review are essential components of the LDF.	None needed.
Paul Cronk	HBF	9.3	94	C	HDC will need to demonstrate that its housing trajectory is realistic and sites identified are readily available for development.	Comments noted. The housing trajectory will be supported by evidence of the realistic availability of sites.	Submission plan amended including the Monitoring Section.
Ian Burns	Camb's PCT	9.4	191	C	Recommend an indicator is included in to capture a measure of social cohesion. For example the new national indicator NI 2: % of people who feel they belong to their neighbourhood.	Inclusion of the suggested indicator will be considered.	None needed.
Mr David Stowell	Spaldwick and Stow Longa PCs	Table 9.1	4	C	Clarify where the "related spatial objectives" originate or include SA objectives draft Final SA report. Targets should be more specific.	It is considered to be clear that the spatial objectives refer to those in the Core Strategy and that the Related SA Objectives refer to those in the Draft Final SA Report.	None needed.



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Name	Organisation	Para/ Policy	Rep ID	Type	Summary	Officers' Response	Action Taken
Mr David Stowell	Spaldwick and Stow Longa PCs	Table 9.1	5	C	Reconsider the indicator "Amount of new residential development within 30 mins public transport time of GP, hospital, primary and secondary schools, areas of employment and a major retail centre" to take into account whether public transport is available for return journeys at appropriate times. No recommendation as to how the indicator should be reworded.	Data on this indicator is collected by Cambs CC. Return journey information would be a valuable inclusion. Changing this indicator should be investigated.	Investigation of amendments will be undertaken however the Submission plan is unchanged.
Tom Gilbert-Woolbridge	English Heritage	Table 9.1	129	O	Building for Life standard indicator is too narrow focusing only on large scale housing development. Include an indicator for measuring the number of permissions granted that adversely affect historic environment.	An indicator as suggested would be very difficult to administer as most development could be considered to adversely affect the historic environment to some extent. Establishing whether an impact is significant would be required and is likely to require detailed professional consideration and survey work.	None needed.
Mr Justin Tilley	Natural England	Table 9.1	326	C	There is no provision for tracking landscape change or recreation and access to greenspace. It should be made clear what the relationship is between the AMR and SA monitoring process.	The areas for monitoring suggested will be considered however it will be difficult to identify appropriate and measurable indicators. Both the AMR and the SA report identify the relationship between the two documents.	Investigation of amendments will be undertaken however the Submission plan is unchanged.
Miss Rachel Pateman	Wildlife Trust	Table 9.1	277	C	More monitoring related to climate change needed eg indicators for amount energy which comes from renewable sources; and the number of new homes that achieve the EcoHomes Excellent rating.	The indicators suggested will be considered in light of the Code for Sustainable Homes becoming mandatory and the programmed changes in Building Regulations to achieve zero carbon homes by 2016. Renewable Energy generation capacity will be included as an indicator in the Development Control Policies DPD.	None needed.

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Name	Organisation	Para/ Policy	Rep ID	Type	Summary	Officers' Response	Action Taken
Miss Rachel Pateman	Wildlife Trust	Table 9.1	280	C	Only Natural England and HDC have a statutory duty relating to biodiversity although support and advice can be given by other agencies eg RSPB	Comments noted.	None needed.
Mr Philip Raiswell	Sport England	Table 9.1	173	C	Include additional indicator measuring: additional open space, sport and recreation facilities secured through development and other means	Inclusion of the suggested indicator will be considered in the Development Control Policies DPD.	None needed.
Ms Diane Millis	Woodland Trust	Table 9.1	237	C	Include Woodland Access Standard as a performance indicator. This recommends: -that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size -that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes.	Adoption of the standard will be considered for the Development Control Policies DPD.	None needed.
Chris Blackman	Cambs CC	Table 9.1	480	O	Include the following indicators: - Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality. Objectives 2, 13. (Core output indicator). - Renewable energy capacity installed by type. Objective 12, 13. (Core output indicator) - Per capita CO2 emissions in the LA area. Objective 12, 13. (National Indicator 186). - Trends in travel in the Market Towns of Huntingdon, St Ives and St Neots. Objective 12, 13. (Local output, significant effects). - Area of accessible, informal open space per 1000 people for public use. Objective 9. (Local output, significant effects).	Indicators identified will be included in either the Core Strategy or other DPDs.	Submission plan amended to include number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality included as an indicator in the Monitoring Section.
Chris Blackman	Cambs CC	Table 9.1	481	O	Amend household waste indicator to "% household waste recycled and composted"	Indicator will be amended.	Submission plan amended including the Monitoring Section.

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Name	Organisation	Para/ Policy	Rep ID	Type	Summary	Officers' Response	Action Taken
Rose Freeman	The Theatres Trust	10	367	S	Simplify explanation of Community Infrastructure to "community facilities provide for the health, welfare, social, educational, leisure and cultural needs of the community."	Support noted. Suggestion accepted.	Submission plan amended including amendments to the Glossary Section.

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Table 23 Representations on Volume Two

Name	Organisation	Para Policy	Rep ID	Type	Summary	Officers' Recommendation	Action Taken
Taylor Woodrow Developments Ltd			21	O	There has been no comparative or logical assessment which determines the preference for one option over another in Vol 2 which informs the development of the Preferred Option. For this reason, the Preferred Option has not taken into account infrastructure delivery expectations and is not sound.	It is acknowledged that the assessment of alternatives was not been made particularly detailed. It is, however, important to recognise that the draft Final SA does assess the alternative approaches identified at the Issues and Options stage and the Final SA assesses those alternatives identified from Preferred Options consultation. This needs to be read in conjunction with the both volumes of the Core Strategy. Further detailson the assessment of alternatives will be incorporated in Volume 2 and the chapter on implementation and infrastructure will be strengthened in volume 1	Submission plan revised to clarify and further explain the assessment of alternatives in volume 2.
Gates Hydraulics	Gates Hydraulics		16	S	Agree with the contents of the spatial vision, in particular the requirement for development to be undertaken in a sustainable manner which respects, maintains and enhances the special characteristics of the towns, villages and countryside of Huntingdonshire. Greenfield land should therefore be avoided.	Support noted.	None needed.
Persimmon Homes (East Midlands) Ltd		5	17	O	The Core Strategy is unsound as it fails to consider Paragraph 24 of the addendum report to PPS1: Planning and Climate Change (December 2007), PPG13: Transport and paragraph 5.69 of the EEP Panel Report which all require the consideration for access by sustainable travel modes and make use of existing infrastructure. Furthermore, the EEP Panel Report makes no reference to major development at St Neots and the level currently proposed for the town does not conform to the draft RSS. Growth should be focused around the Huntingdon Urban Area, thus making the most effective use of the Guided Busway and East Coast Main Line, and other planned public transport improvements arising from existing planned development. Growth in Godmanchester on the scale proposed is unsustainable and unviable as it relies on A14 road improvements and does not make good use of existing transport	The supplement to PPS1 was published after the Preferred Options and therefore will be reviewed and taken into account for Submission. Work is underway to ensure that the submission strategy is the most sustainable and that implementation of required infrastructure is both sufficiently funded and delivered when necessary. It should be noted however that whatever the EEP panel report states (or not) the District has to take into account the EEP as it is currently drafted and so long as conformity is maintained, is free to determine the best strategy for the plan period.	Submission plan revised to strengthen Implementation and Infrastructure chapter.

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Name	Organisation	Para Policy	Rep ID	Type	Summary	Officers' Recommendation	Action Taken
Taylor Woodrow Developments Ltd		5	20	0	<p>infrastructure. The designation of mixed development at Brampton should not be included in the Core Strategy until the lifespan of the base is decided. The SA and evidence base needs to prove Ramsey is a suitable location for mixed use development. It would be more sustainable to locate development on Greenfield sites that would be well served by the guided busway, rather than locating development on brownfield sites that will inevitably encourage lengthy journeys made by the private car.</p> <p>The Preferred Options does not set out any clear framework for the testing of the plan, for its monitoring and to deal with what PINS describes as the 'what if' scenario. It appears to be reliant on a number of factors for which no clear information is as yet available that would guarantee that the plan can be implemented. The inclusion of housing and infrastructure trajectories would clarify the choice of location and broad phasing of development proposed. The issues that are likely to be pertinent to delivering the strategy include:</p> <ul style="list-style-type: none"> <li>- The A14 southern bypass, its timing, the provision of junctions and the extent to which development can be commenced or completed in advance of its provision</li> <li>- The delivery of A428 improvements between St Neots and Caxton Gibbet</li> <li>- The release of RAF Brampton following closure</li> <li>- Flood risk assessment</li> <li>- Community infrastructure provision, particularly secondary education provision, and the mechanisms for its funding and delivery.</li> </ul> <p>Infrastructure assessment should have regard to services and community provision such as schools and should set out what will be necessary to provide and how they are to be delivered.</p>	<p>This raises a number of pertinent issues that will need to be resolved before the strategy can be finalised. Following consideration of comments substantial rewriting of the Infrastructure section is considered to be necessary. The need for inclusion of a housing trajectory is accepted. Following receipt of initial work towards the LIF further details on infrastructure requirements can be incorporated into the submission document.</p>	<p>Submission plan revised to strengthen the Implementation and Infrastructure chapter and include a housing trajectory in the Monitoring Chapter.</p>

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Name	Organisation	Para Policy	Rep ID	Type	Summary	Officers' Recommendation	Action Taken
Mr S Ross	Swan Hill Homes Ltd		9	S	Option 15 is Supported. Development in the Key Service centres should be tailored to respond to the circumstances of each of the centres. Yaxley is particularly well related to Peterborough and therefore is a more sustainable location to accommodate growth than other KSC that do not have a close relationship with higher order centres.	Option 15 was included along with the issues, options and questions that formed part of consultation at earlier stages. These were intended to show the range of options considered previously and were not part of what was being considered at this stage. Although option 15 has been taken forward to some extent, the Council considers that a greater consideration for the Core Strategy is maintaining a strategy that is strategic and does not prescribe smaller scale allocations. The Key Service Centres are considered suitable for moderate scale development. Sites capable of moderate scale development will be considered following continued monitoring of delivery, and where appropriate will be allocated in the Planning Proposals DPD.	None needed.
Mr S Ross	Swan Hill Homes Ltd		14	S	Map 5.7 is Supported. Development in Direction AA could be sustainable and would not risk the coalescence of the settlement with The Hamptons or Peterborough.	Map 5.7 was included along with the issues, options and questions that formed part of consultation at earlier stages. These were intended to show the range of options considered previously but was not part of what was being considered at this stage. The Council considers that an important consideration for the Core Strategy is maintaining a strategy that is strategic and does not prescribe smaller scale allocations. The Key Service Centres are considered suitable for moderate scale development. Sites capable of moderate scale development will be considered and where appropriate allocated in the Planning Proposals DPD.	None needed
Mr S Ross	Swan Hill Homes Ltd	5.3	3	S	Support. It is a cornerstone of sustainability to ensure that development is located where services and facilities are available and where development could contribute to reducing the need to travel. Eg Yaxley benefits from a close physical and functional relationship with Peterborough and the Hamptons and benefits from good public transport services.	Support noted. Yaxley does have attributes that mean it is sustainable to some extent, which is recognised by its designation as a Key Service Centre.	None needed

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Name	Organisation	Para Policy	Rep ID	Type	Summary	Officers' Recommendation	Action Taken
Mr S Ross	Swan Hill Homes Ltd	5.7	4	S	Further development in the Key service centres will contribute to improving their internal sustainability and local services and facilities.	Support noted.	None needed
Mr S Ross	Swan Hill Homes Ltd	Table 5.5	13	O	Whilst a truly dispersed strategy might conflict with sustainable development. A strategy which provides for modest development in the Key Service Centres in addition to the majority at locations such as Huntingdon, would provide a more 'balanced' strategy than the levels of development currently set out in the draft Core Strategy. A higher level of development is considered appropriate for Yaxley because of its relationship with Peterborough and the Hamptons. An allocation of 500 dwellings is more appropriate including 1 or more peripheral Greenfield sites.	The preferred strategy allows for modest development in Key Service Centres. Given the amount of housing development for the district it is considered that 500 would be inappropriate for Yaxley, especially if this meant significant use of greenfield sites.	None needed
Mr S Ross	Swan Hill Homes Ltd	5.14	5	O	Whilst a truly dispersed strategy might conflict with sustainable development. A strategy which provides for modest additional development in the Key Service Centres in addition to the majority of development at locations such as Huntingdon, would provide a more 'balanced' strategy than currently set out in the draft. A higher level of development is considered appropriate for Yaxley because of its physical and functional relationship with Peterborough and the Hamptons. An allocation in the region of 500 dwellings would be more appropriate, including 1 or more peripheral greenfield sites.	The preferred strategy allows for modest development in Key Service Centres. Given the amount of housing development for the district it is considered that 500 would be inappropriate for Yaxley, especially if this meant significant use of greenfield sites.	None needed
Paul Seabrook	Seabrook Farms		19	O	Vol. 2 - Option 29 In response to question 34, we strongly request that all Key Service Centres are allocated some form of growth. The allocation of new development to these Key Service Centres, (employment or housing), is essential in strengthening settlement vitality and viability, becoming more self-contained and reducing the need of residents to travel outside of their village in order to access important services and facilities. The level of growth should be in proportion with the size of the settlement, and the level of services and facilities found within. The scale of development should be sufficient	Question 34 was included along with the issues, options and questions that formed part of consultation at earlier stages. These were intended to show the range of options considered previously and were not part of what was being considered at this stage. Although the decision to allow growth in Key Service Centres has been taken forward to a great extent, it is considered that a greater consideration for the Core Strategy is maintaining a strategy that is strategic and does not prescribe smaller scale allocations. The Key Service Centres are considered suitable for moderate scale	None needed

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Name	Organisation	Para Policy	Rep ID	Type	Summary	Officers' Recommendation	Action Taken
Mr S Ross	Swan Hill Homes Ltd	5.19	6	O	to sustain and improve the local economy. It is this balance that is essential if truly sustainable settlements are to be created. This should be Supported as a key principle behind the Core Strategy.	development. Sites capable of moderate scale development will be considered following continued monitoring of delivery, and where appropriate will be allocated in the Planning Proposals DPD but will not be identified in any more detail in the Core Strategy.	None needed
Mr S Ross	Swan Hill Homes Ltd	5.35	7	C	The 'alternative' of including a distinction between 2 categories of Key Service Centres, based on their capacity to accommodate development and sustainability considerations, would be Supported.	It is not considered appropriate to make such a distinction between Key Service Centres, however some housing development has been identified as suitable in key service centres where this accords with the overall strategy to concentrate growth in the Huntingdon and St Neots Spatial Planning Areas and the Cambridge Sub Region.  Although this alternative was considered reasonable the Council has decided that a single category of Key Service Centre is the best approach. Further details on the assessment of alternatives will be incorporated into Volume 2.	Submission plan revised to strengthen and clarify the Council's assessments of alternatives in volume 2.
Mr S Ross	Swan Hill Homes Ltd	5.43	8	O	Including a distinction between 2 categories of Key Service Centres would be Supported. The fact that the East of England plan does not specifically include this does not preclude the council from considering this option. Even without the inclusion of a 2 category system it is still possible to allocate a different quantum of development to each of the Key Service Centres, taking into account their location, local needs and sustainability merits.	Although this alternative was considered reasonable the Council has decided that a single category of Key Service Centre is the best approach. Further details on the assessment of alternatives will be incorporated into Volume 2.	Submission plan revised to strengthen and clarify the Council's assessments of alternatives in volume 2.
Persimmon Homes (East Midlands) Ltd			18	S	Agree with the provision of affordable housing identified by Policy Wording 4 of the Core Strategy Preferred Options. However, the level of affordable housing required should be based on an up to date, robust strategic housing market assessment and other surveys that assess the local need.	Support noted. The SHMA is currently in draft form and will be completed prior to Submission of the Core Strategy. The level of affordable housing sought will be based on the SHMA, previous needs assessment and the draft EEP.	Submission plan revised to reference completed Cambridge sub region SHMA and



# Schedule of Representations

Huntingdonshire District Council | Core Strategy - Submission Version - Volume Two

Name	Organisation	Para Policy	Rep ID	Type	Summary	Officers' Recommendation	Action Taken
Mr S Ross	Swan Hill Homes Ltd		10	C	The inclusion of an affordable housing target of 40% is not objected to provided robust provenance can be demonstrated to support this.	It is considered that the combination of SHMA, Needs assessment and requirements from the EEP are sufficient to justify seeking 40% affordable housing provision.	Peterborough SHMA where relevant.  The reasoned justification has been strengthened, in particular to include reference to the SHMA
Mr S Ross	Swan Hill Homes Ltd		11	S	Option 31 would be preferred as it properly reflects the advice on thresholds set out at paragraph 29 of PPS 3.	Option 31 was included along with the issues, options and questions that formed part of consultation at earlier stages. These were intended to show the range of options considered previously and were not part of what was being considered at this stage.	None needed.
Mr S Ross	Swan Hill Homes Ltd		12	O	It is considered that thresholds below 15 dwellings should not be included in the core strategy as insufficient justification has been demonstrated to support such an approach. Lower thresholds would discourage development of smaller sites. This would have a negative effect on the ability of the Council to meet its strategic housing requirement.	The District's housing requirements are not dependant on small sites as these are mostly windfall sites and therefore not considered in the housing delivery calculations.	None needed.
Mr Michael Palmer-Asplin			2	C	Volume 2 of the Core Strategy Preferred Options para 5.81 is unduly pessimistic regarding suitable employment land east of St Ives. Some of the potential is indeed in the flood risk area, but land is available on higher ground north of the A1123 (actually in Holywell-cum-Needingworth parish, the western part adjoining existing employment uses).	The Council is not convinced of the need to identify additional land for employment uses in St Ives as identified in the Employment Land Review which provides robust evidence to underpin this policy. However, it is recognised that this may have to be reviewed depending on results of monitoring.	None needed.
Ms Diane Millis	Regional Policy Officer Woodland Trust	Table 6.1	15	C	Additional documents should be used as source material for the Core Strategy. Reference should be made to the Regional Woodland Strategy for the East of England - Woodland for Life (EERA/FC, 2003). The Core Strategy should also take account of Planning Policy Statement: Planning and Climate Change Supplement to Planning Policy Statement 1 (DCLG, 2007).	The Core Strategy is intended to be a high level strategic document in which such specific targets are inappropriate. The document Woodlands for Life will be considered in more detail when preparing the Development Control Policies DPD. The documents referenced will be reviewed for production of the Submission Core Strategy.	The Woodland Strategy will be considered when preparing the Development Control Policies DPD.

# Schedule of Representations

Huntingdonshire District Council | Core Strategy - Submission Version - Volume Two

Name	Organisation	Para Policy	Rep ID	Type	Summary	Officers' Recommendation	Action Taken
Mr Gary Parsons	Planning Liaison Account Manager Anglian Water Services Ltd	7.5	1	O	Without a water cycle study/strategy, the environment's ability to sustain the proposed development is unproven in terms of wastewater discharges.	A water cycle study will be prepared for submission.	Submission plan revised to strengthen Implementation and Infrastructure Chapter and include relevant information from the Water Cycle Study.

CABINET

12TH JUNE 2008

**“PROSPEROUS PLACES: TAKING FORWARD THE SUB NATIONAL  
REVIEW OF ECONOMIC DEVELOPMENT AND REGENERATION”  
CONSULTATION DOCUMENT**

**(Report by Head of Policy and Strategic Services)**

**1. INTRODUCTION**

- 1.1 The purpose of this report is to seek the Cabinets endorsement of a response to the consultation document “Prosperous Places: Taking forward the Sub National Review (SNR) of Economic Development and Regeneration” produced by the Department for Business Enterprise and Regulatory Reform (BERR).

**2. BACKGROUND**

- 2.1 This consultation follows the publication of the results of the Sub National Review of Economic Development and Regeneration in July 2007 and provides details on the implementation of the recommendations raised in that review.

- 2.2 The consultation seeks views on the proposals designed to:

- ◆ streamline the regional tier, introducing integrated strategies and giving regional development agencies lead responsibility for regional planning;
- ◆ strengthen the (first tier) local authority role in economic development, including a new statutory duty to assess local economic conditions; and
- ◆ support collaboration by local authorities across economic areas.

- 2.3 The closing date for the consultation is 20th June 2008. It is possible that Regional Development Agency delegated powers could come into force by Autumn 2009, with the role of regional planning body being transferred by Spring 2010 and the first joint regional strategy being published by Spring 2011.

**3. KEY POINTS IN CONSULTATION PAPER**

**3.1 Preparation of a Single Regional Strategy**

- 3.1.1 A key proposal is a Single Regional Strategy (SRS) to replace the existing Regional Spatial Strategies (RSSs) and Regional Economic Strategies (RESs) with the result of a single strategy for each region.

- 3.1.2 The precise nature of the working arrangements for developing the SRS will be left for each region to determine, though the consultation clearly indicates that the Regional Development Agency will have overall responsibility for the SRS.

- 3.1.3 A new streamlined process is proposed to replace the existing Regional Spatial Strategy process with two stages of examination in public and one formal consultation period. It is suggested that this process would take two years however this sounds ambitious as it is less than half the time it currently takes to complete the current Regional Spatial Strategy which only has one examination in public.

### **3.2 Enhanced Partnership arrangements**

- 3.2.1 The consultation document makes a clear commitment to the establishment of a Local Authority Leader's Forum in each region to work with the Regional Development Agencies (RDAs). No definitive guidance on the relationship between the RDA and the Leader's Forum exists and the document advocates flexibility on the adoption of a structure to best suit each region. However, forums must be:

- ◆ 'Streamlined, manageable...and able to engage effectively with the RDA'
- ◆ representative of local government in the region (including involving both upper and lower tier authorities);
- ◆ comprised of Leaders and have sufficient authority to agree the Single Regional Strategy on behalf of all authorities in the region.

- 3.2.2 The anticipated role for these regional forums includes signing off the Single Regional Strategy and undertaking an economic assessment of their local area.

- 3.2.3 Although the SNR proposals will involve significant changes to the regional structures, RDAs will remain accountable to central government while local authorities are encouraged to develop and strengthen their new scrutiny arrangements of RDAs, although no further detail is provided.

- 3.2.4 Local Authorities and Sub-regions are seen as having an enhanced role in promoting economic development and Multi-Area Agreements (MAAs) will increasingly replace Local Area Agreements (LAAs) with the express purpose of enhancing and promoting sub-regional collaboration.

### **3.3 Duty to undertake an economic assessment**

- 3.3.1 Integral to the SNR proposal is the potential for a statutory economic assessment duty for county and unitary authorities. This would:

- ◆ be carried out in consultation with district authorities, RDAs, and other partners; and
- ◆ contribute to the analysis which underpins local, county/sub-regional and regional strategies.

- 3.3.2 This economic assessment will complement PPS4 on planning for sustainable economic development. Three options for the assessment are set out:

- ◆ legislation to establish the statutory duty with statutory guidance issued by the Secretary of State;
  - ◆ primary legislation setting out the topics to be covered in the assessment but no statutory guidance issued by the Secretary of State; or
  - ◆ no new duty to be introduced.
- 3.3.3 The first economic assessments will need to be prepared in 2010/11, in time to inform the 2011/12 LAA targets and Single Regional Strategy.

#### **4. CONCLUSION**

4.1 There is a strong economic case for concentrating economic decision-making and devolving funding powers to the sub-regional level. It is widely acknowledged that administrative boundaries of towns, cities and districts do not necessarily reflect the reality of economic markets in which businesses trade goods, services and labour. Also regional boundaries reflect local economies even less well as they bring together a number of micro economies. The real level at which economies operate below the national level is the sub-regional level. Therefore it is right that decisions that affect those economies are taken at that level by democratically elected bodies.

4.1 In view of this, it is important that the Sub-National Review:

- ◆ allows district councils to be at the centre of economic development for their areas;
- ◆ gives a statutory economic development duty to district councils;
- ◆ aligns national and local targets for economic development;
- ◆ streamlines current regional strategies so that it prevents overlap and conflicting priorities;
- ◆ enables Councils to work sub-regionally via bottom-up structures; and
- ◆ ensures regional roles are genuinely strategic

4.2 Therefore the introduction of a Single Regional Strategy and a duty to undertake an economic assessment should be welcomed. However, a concerted approach should be made to ensure that the local input at district level is an integral element within the process.

#### **5. RECOMMENDATION**

5.1 Cabinet is requested to approve the response to the consultation on the proposals set out in Appendix 1 on the Sub National Review of Economic Development and Regeneration.

## **BACKGROUND INFORMATION**

Prosperous Places: Taking forward the Sub National Review of Economic Development (March 2008)

Taking Forward the Sub National Review of Economic Development and Regeneration (December 2007)

Sub National Review of Economic Development and Regeneration (July 2007)

LGA Prosperous Communities

**Contact Officer: Corrine Garbett**  
 **01480 388459**

**RESPONSE TO THE CONSULTATION ON THE SUB-NATIONAL REVIEW**

**Q1. How should RDAs satisfy themselves that sufficient capacity exists for programme management and delivery at local or sub-regional level?**

Suggested Response: In the East of England a comprehensive performance management and assessment process has been used by EEDA to monitor programme management and delivery at both the local and sub-regional level. This has identified where both the capacity and capability exists within sub-regional partnerships to deliver and should be used as the basis of reassurance for the RDAs.

**Q2. Do you agree that local authorities should determine how they set up a local authority leaders' forum for their region, and that the Government should only intervene if the required criteria are not met or if it failed to operate effectively? If not, what would you propose instead?**

Suggested Response: Yes, this approach will engage local partners and enable an effective mechanism to accurately reflect the local picture and requirements. It is important that there is flexibility so that the structure and form of the Forum can reflect individual region's needs.

**Q3. Are the proposed regional accountability and scrutiny proposals proportionate and workable?**

Suggested Response: Further clarity will be needed as to possible changes to the existing scrutiny procedures at local level, particularly as the RDA will be assuming greater responsibility with the adoption of a Single Regional Strategy. It is essential that the scrutiny process is clearly distinguished from the local authority role in agreeing and implementing the Single Regional Strategy.

**Q4. Do you agree that the regional strategy needs to cover the elements listed at paragraph 4.13? Are there other matters that should be included in the regional strategy to help in the delivery of key outcomes?**

Suggested Response: Environmental matters should be given due recognition and prominence within the Single Regional Strategy (SRS). The protection and enhancement of the environment therefore should be included in the list of elements to be included in the regional strategy.

Regional Spatial Strategies (RSSs) are required to provide a clear spatial strategy based upon a vision for the Region's future which is illustrated by a key diagram. To enable the strategy to be clearly expressed both a vision and key diagram should form part of the regional strategy.

There is also no reference to the consideration of sub-regional issues other than housing as part of the SRS. It is considered that the regional strategy should address all relevant sub-regional issues.

The existing RSS process emphasised the need for both delivery mechanisms and a clear link between objectives and policies and monitoring. It is therefore considered that both delivery mechanisms and the monitoring of the regional strategy through the preparation of an Annual Monitoring Report should be included in the list of elements.

The existing national planning guidance relating to Regional Planning sets out a detailed topic based list of the relevant material to be taken into account in the preparation of Regional Spatial Strategies. A similar list of appropriate topics for the Single Regional Strategy should be prepared. It is suggested that this list should include the following:

- ◆ Government Policy
- ◆ National Policy Statements required by the Planning Bill
- ◆ Planning Policy Guidance and Planning Policy Statements
- ◆ Advice provided by the National Housing and Planning Advice Unit
- ◆ Local Economic Assessments
- ◆ Local evidence relating to housing need and delivery as set out in PPS 3

**Q5. Do you agree with the way in which we propose to simplify the preparation of the regional strategy, in particular allowing flexibility for regions to determine detailed processes? If not what other steps might we take?**

Suggested Response: There is merit in the proposal to merge RSS and RES into a single regional strategy. However we remain concerned that the consultation document does not provide appropriate safeguards to ensure democratic accountability. For example it is proposed to allow RDAs to submit a draft strategy for determination by Ministers in the event of a failure to agree it with local authorities.

We welcome the recognition that local authorities at all levels should be closely involved in the process of agreeing Regional Strategies and its submission to the Secretary of State. However the suggested process makes no reference to the requirement of Local or Strategic Planning Authorities to provide advice to the Regional Planning Body. It is considered essential that the requirement for Authorities to provide advice to the RPB is retained as part of any changes to primary legislation as a result of this consultation document.

Reference is made to the preparation of policies for specific sub regions and cooperation at the sub regional level on economic development matters. However, no reference is made to the existing role of the Local and Strategic Planning authorities in preparing the initial draft of sub regional strategies within their area as part of the current RSS process. It is considered essential that this role is retained as part of any changes to primary legislation as a result of this consultation document.

Flexibility for RDAs and local authorities to agree the detailed working arrangements for the preparation of the regional strategy are welcomed. However local authorities should be formally consulted on the content of the project plan and proposed working structures.

The Council considers that there is need for a firm commitment from Government to require the RPB to prepare a delivery plan setting out actions and investment priorities as previously set out in the Review of Sub-national



economic development and regeneration. This should be prepared in parallel with the regional strategy.

It is essential that Government Agencies together with local authorities are fully involved with the preparation of the delivery plan and that its content is agreed by the proposed local authorities leader forums. The proposed timescale for the preparation of the Single Regional Strategy may be unrealistic given the recent experience of the emerging East of England Plan.

**Q6. Do you think that the streamlined process would lead to any significant changes in the costs and benefits to the community and other impacts?**

Suggested Response: While the function of the Local Authority Leader's Forum will ensure significant input to the new process, there would appear to be, superficially, a somewhat reduced overall opportunity for partners and the public to comment on the strategy as it develops. This is evidenced by only one formal public consultation and no comeback following any Secretary of State amendment. It is therefore considered that both Local Authorities and the wider public are disadvantaged as a result of the new process given that there are fewer opportunities to comment on the emerging regional strategy.

Currently the RPB is required to prepare a Statement of Public Participation to demonstrate the way in which stakeholders and the wider public will be involved in the preparation of the RSS. This existing requirement should be retained as part on any new legislation.

**Q7. Which of the options for the local authority economic assessment duty (or any other proposals) is most appropriate?**

Suggested Response: Option 2, the Non – statutory guidance would be the most favoured approach as it offers guidance but without being too prescriptive. The 'no new duty option' (3) is not appropriate.

**Q8. What additional information or support do local authorities consider valuable for the purpose of preparing assessments?**

Suggested Response: In the first year, elements of the possible guidance suggested in Option 1 could be utilised as a template for local authorities but without being too prescriptive. Equally, as mentioned in the document, utilising the National Improvement and Efficiency Strategy for capacity building should be welcomed particularly in light of the Audit Commission indicating that assessments would be taken into account as part of future Comprehensive Area Assessments.

**Q9. How should lead local authorities engage partners, including district councils, in the preparation of the assessment?**

Suggested Response: Unitaries and District Authorities have the best knowledge of their area and need to be engaged fully in the new structure and development of the regional strategy.

Lead authorities should utilise existing networks of partners both for data and information in compiling the assessments but also for consultation on drafts.

Most counties operate a forum of economic development agencies and planning officers with regular meetings and this should be used to share tasks and oversee the preparation of the assessment.

**Q10. Which partner bodies should be consulted in the preparation of the assessment?**

Suggested Response: Partners should include all those currently involved in the preparation of existing district, county or sub-regional economic development strategies. This will range from locally based organisations such as business fora and chambers of commerce representing the private sector, through county level agencies to regionally organised bodies such as Business Link and LSC. It will be necessary to ensure that agencies consulted reflect the broad range of areas to be covered in the assessment including (to be confirmed) transport, housing and land and property issues. This would include the potential delivery partners listed in Par 5.20 of the consultation document

**Q11. Should any duty apply in London and, if so, which of the proposed models is most appropriate?**

Suggested Response: *Not applicable to comment.*

**Q12. Do you agree that there is value in creating statutory arrangements for sub-regional collaboration on economic development issues beyond MAAs? What form might any new arrangements take?**

Suggested Response: Until some assessment of the benefits and effectiveness of the dozen pilot MAAs is undertaken, it is considered premature to create statutory arrangements for further sub regional collaboration on economic development issues. If they are proposed at this stage it should be on an informal basis only.

**Q13. What activities would you like a sub-regional partnership to be able to carry out and what are the constraints on them doing this under the current legislation?**

Suggested Response: Given the limited degree of devolved funding and responsibility for sub-regional partnerships in this region, it is premature to consider significant additional devolvement of activities particularly in areas such as transport and planning where there is limited or no experience. In addition existing sub-regional partnerships have limited democratic accountability and this will be important for some areas of devolvement suggested in the consultation document, such as planning and transport.

**Q14. How would a sub-regional economic development authority fit into the local authority performance framework?**

Suggested Response: If significant powers and responsibilities were to be devolved to a sub regional partnership or authority the same performance requirements that apply to local authorities through the LAA should be applied. Indicators and targets relating to the devolved activities should be negotiated and the sub-regional partnership required to report on achievement.

**Q15. Should there be a duty to co-operate at sub-regional level where a statutory partnership exists? To whom should this apply?**

Suggested Response: Yes, the requirement to cooperate should apply to the same range of agencies that applies to the LAA currently, otherwise the potential status and influence of the partnership could be significantly undermined.

**Other Issues**

Suggested Response: There is a strong economic case for concentrating economic decision- making and devolving funding powers to the sub-regional level. It is widely acknowledged that administrative boundaries of towns, cities and districts do not necessarily reflect the reality of economic markets in which businesses trade goods, services and labour. Also regional boundaries reflect local economies even less well as they bring together a number of micro economies. The real level at which economies operate below the national level is the sub-regional level. Therefore it is right that decisions that affect those economies are taken at that level by democratically elected bodies.

In view of this, it is important that the Sub-National Review:

- ◆ allows district councils to be at the centre of economic development for their areas;
- ◆ gives statutory economic development duty to district councils;
- ◆ aligns national and local targets for economic development;
- ◆ streamlines current regional strategies so that it prevents overlap and conflicting priorities;
- ◆ enables Councils to work sub-regionally via bottom-up structures; and
- ◆ ensures regional roles are genuinely strategic

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**CABINET**

**12<sup>TH</sup> JUNE 2008**

**ECO-TOWNS: LIVING A GREENER FUTURE – RESPONSE TO THE  
DEPARTMENT OF COMMUNITIES & LOCAL GOVERNMENT  
CONSULTATION**

**(Report by Head of Planning Services )**

## **1. INTRODUCTION**

- 1.1 In July 2007 the Housing Green Paper announced the Government's intention to deliver 10 new 'eco-towns' as part of its ambitious initiative to build an additional 3 million new homes by 2020. At the same time the Government published the 'Eco-Town Prospectus' setting out specific criteria that would be applied to consideration of these proposals and invited landowners and developers to make appropriate submissions for further consideration. The Government received a total 57 bids in response to this initiative and it has subsequently reduced those down to a current short-list of 15 proposals from which 10 'winning' bids will be selected later this year.
- 1.2 The Government is now consulting in respect of the short-listed proposals and as one of the short-listed sites is within Cambridgeshire, on a Greenfield site at Hanley Grange near Hinxton in South Cambridgeshire, it is important that this Council now considers the strategic planning issues related to the initiative and responds to the consultation on that basis.
- 1.3 Because of the potential implications of the proposals for the adopted planning strategy for Cambridgeshire, and for the delivery of growth within the Cambridgeshire Sub-Region, all of the Cambridgeshire Council's, and Cambridgeshire Horizons, have worked in partnership to prepare a joint response to the consultation.

## **2. BACKGROUND TO THE CONSULTATION**

- 2.1 The Government considers that eco-towns initiative will deliver increased housing numbers in sustainable ways. The specific criteria for eco-towns stated that;
  - They must be new, identifiably separate, settlements that can deliver, in addition to existing plans, at least 5,000 new homes;
  - The overall eco-town development should reach zero-carbon standards and be considered to be an exemplar in at least one aspect of environmental sustainability;
  - 'Affordable' housing should make up at least 30 to 50% of the total range and distribution of new home tenures;

- The development should deliver a good mix of other associated and related uses (including retail, business, leisure and educational facilities); and;
- A dedicated management body should be established to help develop the eco-town and support and co-ordinate the delivery of community based services.

2.2 Overall 57 national 'bids' for new eco-towns were submitted, 20 of which were located in the East of England, 6 were located in Cambridgeshire (including proposed sites at Hanley Grange, Six-Mile Bottom, Mereham and Waterbeach) and 2 were located in Huntingdonshire (in respect of proposed sites at Alconbury Airfield and Connington Airfield). This Council, and in partnership with the other Cambridgeshire Council's and Cambridgeshire Horizons, made representations to the Government regarding the potential unsuitability of all of these 'bids' and those submissions have mostly been successful with only the Hanley Grange proposal being taken forward to the short-listing stage.

2.3 Accordingly, whilst none of the short listed sites are located in Huntingdonshire, it is considered important that this Council continues to be aware of the progress of the eco-town selection process, in case subsequent further or previously rejected 'proposals' should come forward in Huntingdonshire, and to continue to work in partnership with our colleagues within Cambridgeshire in order to effectively respond to this consultation and to take forward the delivery of a more coherent strategy for longer-term sustainable growth within Cambridgeshire.

### **3. ISSUES IN RESPECT OF THE SHORTLISTED PROPOSAL**

3.1 Whilst the proposed site at Hanley Grange is located in South Cambridgeshire it is considered that its potential designation as an 'eco-town' would have related negative implications for Huntingdonshire in terms of the impacts of that upon the planning strategy for Cambridgeshire and growth strategy for the Cambridge Sub-Region.

3.2 It is considered that the designation of Hanley Grange as an eco-town would;

- Unacceptably undermine the basis of the current and emerging regional, sub-regional and local planning processes. Because of the scale and scope of the development pressures facing Cambridgeshire all of the authorities in the area have combined to take forward coherent strategies for assessing and delivering sustainable forms of growth. The proposed by-passing of this 'plan-led' sustainably focussed approach, and in particular the forthcoming review of the Regional Spatial Strategy, would seriously devalue that joint approach and create unacceptable uncertainty about the strategic planning process. It is considered that the upcoming early review of the RSS will be the appropriate vehicle, within which, all of the various competing sub-regional new town and settlement proposals can be realistically evaluated.

- Inappropriately divert scarce public and private resources away from the delivery of the already committed and extremely challenging strategy for delivering sustainable growth within the Cambridge Sub-Region. Whilst significant progress is already being made in terms of meeting the challenges associated with the delivery of the required scale of new growth in Cambridgeshire there are both limited capacities within the local authorities and indeed with the housing market itself. The risk of non-delivery of the already agreed upon/committed growth strategy would obviously have serious knock-on effects, in terms of housing delivery and development viability issues, for all of the local authorities within the area.
- It is considered, that to date, a particular positive feature related to the issues of further large scale growth within Cambridgeshire has been the overall 'public acceptance' of the need for that further growth and a desire to deliver that growth in the most environmentally friendly and sustainable ways. Therefore the potential imposition of unwarranted eco-town developments, against the expressed opinions of the host community, would seriously damage and undermine that consensus.

3.3 All of the Cambridgeshire authorities, strongly supported by Cambridgeshire Horizons, have worked together in preparing a suggested joint response to this consultation (copy to follow).

#### **4. CONCLUSIONS**

4.1 The Government's stated twin policy objectives for the eco-town initiative are to deliver additional housing growth in demonstrably sustainable ways. Having regard to the situation currently pertinent in Cambridgeshire it is considered that this rather hap-hazard response to dealing with issues of delivery would both undermine confidence in the adopted local plan-led approach, negatively impact upon existing delivery programs and therefore actually be unsustainable because of those impacts.

4.2 Whilst Huntingdonshire has, to date, been successful in terms of fighting off inappropriate and unsustainable proposals for 'eco-towns' it is important that this Council continues to positively address all of the pertinent issues because it is considered likely that those unwarranted development proposals may at some point in the future resurface.

4.3 It is important that Huntingdonshire continues to work with its partners in order to present a robust Cambridgeshire wide response to these important strategic planning issues.

#### **5. RECOMMENDATION**

5.1 That the Cabinet notes the current situation in respect of the eco-towns selection process and endorses the suggested joint Cambridgeshire response to this consultation.

## **BACKGROUND INFORMATION**

The Eco-Towns Prospectus – DCLG July 2007

HDC response to DCLG – February 2008

Eco-towns: Living a Greener Future – DCLG April 2008

Proposed Joint Cambridgeshire Response – May 2008

Contact Officer: Steve Ingram, Head of Planning Services  
01480 388400



COMT  
CABINET

27<sup>TH</sup> MAY 2008  
12<sup>TH</sup> JUNE 2008

## **EARITH CONSERVATION AREA: CHARACTER STATEMENT AND BOUNDARY REVIEW**

**(Report by Planning Policy Manager)**

### **1. INTRODUCTION**

- 1.1 The purpose of this report is to advise the Cabinet of the responses to the Earith Character Statement and Boundary Review consultation documents and to consider the Council's response.

### **2. BACKGROUND**

- 2.1 The District Council is committed to the production of Conservation Area Character Statements to provide an analysis of the special interest of all the District's 60 Conservation Areas. These documents will be used to guide decisions on planning matters and other changes to the fabric of Conservation Areas to ensure that the character and appearance of Conservation Areas is not diminished. It is also hoped that the publication of these documents will help to increase the general public's awareness of the special qualities that make the District's Conservation Areas unique.
- 2.2 The existing Earith Conservation Area Character Statement was adopted in March 1979 following a period of public consultation. Under the new Best Value Performance Indicators (BVPIs), all character statements should be reviewed in a five year rolling programme to ensure that the advice being offered is relevant and up-to-date.

### **3. THE BOUNDARY REVIEW**

The original boundary of the Earith Conservation Area was very tightly drawn around building groups and did not reflect a thorough or justified examination of the area's historic merit or development. Best and current practice expects Conservation Area boundaries to be drawn on the basis of thorough research and analysis.

Following the methodology for Boundary Review adopted in 2003, it is proposed that the Conservation Area is enlarged. This would better reflect the historic relationship between the village and the surrounding area. The proposed boundary also includes some of the earlier urban extensions within the village.

The rationale for the proposed boundary changes is explained and illustrated in the attached document, the Earith Conservation Area Boundary Review.

#### **4. THE CHARACTER ASSESSMENT**

4.1 The contents of the Character Statement follow a previously-agreed pattern, which conveys the special architectural and historical interest of the Conservation Area through maps, photographic illustrations and written text. Specific references are made to:-

- The historical development of Earith
- The essential characteristics of the Conservation Area including important views, focal points and landmark buildings
- The green open spaces, trees and gardens in the Conservation Area
- The architectural styles within the village
- The distribution of construction materials
- Examples of traditional local detailing

4.2 This approach conforms with English Heritage's recent publication *Guidance on conservation area appraisals* 2006.

#### **5. THE CONSULTATION RESPONSE**

5.1 13 written responses have been received from the statutory agencies, local organisations and members of the public consulted. The comments received are presented within Appendix 1 and the Council's response to them is also indicated.

5.2 Many comments related to minor issues of fact or detail, or issues beyond the scope of the document.

5.3 On 25<sup>th</sup> February 2008, the Development Control Panel endorsed the Character Assessment and Boundary Review.

#### **6. RECOMMENDATIONS**

6.1 That the Cabinet considers the responses to comments presented in Appendix 1 and agrees to:

1. Adopt the revised Earith Conservation Area Character Assessment and Boundary Review (as previously circulated) with the amendments contained in Appendix 1 of this paper, which will become a material consideration in planning decisions.
2. Authorise the Head of Planning Services to make any minor consequential amendments to the text and illustrations necessary as a result of these changes, after consultation with the Executive Member for Planning Strategy.

## **BACKGROUND INFORMATION**

The Earith Draft Character Assessment and Boundary Review

**Contact Officer: Susan Smith**  
**Assistant Conservation Officer**  
**☎ 01480 388416**

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**EARITH CHARACTER ASSESSMENT & BOUNDARY REVIEW: SUMMARY OF RESPONSES**

**APPENDIX ONE**

- 1 – action taken
- 2 – not within the remit of this document
- 3 – no action taken

	Respondent	Comment	Response	Action
1	Stewart Patience Planning Policy Officer Box ET 1010 Cambridgeshire County Council	(i) It is noted that it is proposed to extend the Conservation Area to include Little Fen and the Bulwark. The Minerals and Waste Site Specific Proposals plan (Preferred Options stage) has this area included in a Minerals Safeguarding area.	(i) <i>Noted</i>	3
2	Eliza Gore Assistant Archaeologist Planning and Countryside Advice Cambridgeshire County Council	(i) The documents propose a welcome extension to the current Conservation Area. It takes into account the importance of Earith's settlement morphology.  (ii) The section on Historic Development is concise in terms of medieval and post-medieval development, but is provides a rather limited summary of a landscape that is very rich in archaeological sites. There are several Roman findspots and prehistoric quarrying.	(ii) <i>Noted</i>  (iii) <i>Noted</i>	3  3
3	Natural England Eastbrook Shaftesbury Road Cambridge	(i) The revised site includes the whole of Berry Fen SSSI and part of the southern section of the Ouse Washes SSSI, SAC, SPA and Ramsar. Natural England will need to be informed if this imposes any obligations on landowners or managers likely to conflict with the interests of nature conservation.	(i) <i>Noted</i>	3
4	Peter Brace Earith Parish Council	(i) Meeting requested with regard Conservation Area. Blanket approach excessive. No problem with including The Bulwark and Black Fen. There are some buildings and sites that could also be included. Number of objections from residents in High Street, Colne Road and Chapel Road.	(i) <i>Meeting attended and boundary redrawn</i>	1

5	Letters from local residents	<p>(i) Chapel Road should not be included as it has a mixture of properties, a lot of which are modern.</p> <p>(ii) The character of Colne Road is best conserved without additional regulations being imposed upon residents.</p> <p>(iii) The New Lode should remain as a car park due to parking restrictions on the High Street.</p> <p>(iv) Request for property in Bridge End not to be included in Conservation Area.</p> <p>(v) Request for property in Whybrows lane not to be included in Conservation Area.</p> <p>(vi) Concern regarding extension of Conservation Area putting greater restrictions on the owners.</p>	<p>(i) <i>Boundary redrawn</i></p> <p>(ii) <i>Boundary redrawn</i></p> <p>(iii) <i>Noted</i></p> <p>(iv) <i>Noted</i></p> <p>(v) <i>Boundary redrawn</i></p> <p>(vi) <i>Noted</i></p>	<p>1</p> <p>1</p> <p>3</p> <p>3</p> <p>1</p> <p>3</p>
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COMT  
CABINET

27<sup>TH</sup> MAY 2008  
12<sup>TH</sup> JUNE 2008

## **THE HEMINGFORDS CONSERVATION AREA: CHARACTER STATEMENT AND BOUNDARY REVIEW**

**(Report by Planning Policy Manager)**

### **1. INTRODUCTION**

- 1.1 The purpose of this report is to advise the Cabinet of the responses to The Hemingfords Character Assessment and Boundary Review consultation documents and to consider the Council's response.

### **2. BACKGROUND**

- 2.1 The District Council is committed to the production of Conservation Area Character Statements to provide an analysis of the special interest of all the District's 60 Conservation Areas. These documents will be used to guide decisions on planning matters and other changes to the fabric of Conservation Areas to ensure that the character and appearance of Conservation Areas is not diminished. It is also hoped that the publication of these documents will help to increase the general public's awareness of the special qualities that make the District's Conservation Areas unique.
- 2.2 The existing Hemingfords Conservation Area Character Statement was adopted in October 1974 following a period of public consultation. Under the new Best Value Performance Indicators (BVPIs), all character statements should be reviewed in a five year rolling programme to ensure that the advice being offered is relevant and up-to-date. It was last reviewed in 1994.

### **3. THE BOUNDARY REVIEW**

The original boundary of The Hemingfords Conservation Area was very tightly drawn around building groups and did not reflect a thorough or justified examination of the area's historic merit or development. Best and current practice expects Conservation Area boundaries to be drawn on the basis of thorough research and analysis.

Following the methodology for Boundary Review adopted in 2003, it is proposed that the Conservation Area is enlarged. This would better reflect the historic relationship between the villages and the surrounding area. The proposed boundary also includes some of the earlier urban extensions within the villages.

The rationale for the proposed boundary changes is explained and illustrated in the attached document, The Hemingfords Conservation Area Boundary Review.

#### **4. THE CHARACTER ASSESSMENT**

4.1 The contents of the Character Assessment follow a previously-agreed pattern, which conveys the special architectural and historical interest of the Conservation Area through maps, photographic illustrations and written text. Specific references are made to:-

- The historical development of Hemingford Abbots and Hemingford Grey
- The essential characteristics of the Conservation Area including important views, focal points and landmark buildings
- The green open spaces, trees and gardens in the Conservation Area
- The architectural styles within the villages
- The distribution of construction materials
- Examples of traditional local detailing

4.2 This approach conforms with English Heritage's recent publication *Guidance on conservation area appraisals* 2006.

#### **5. THE CONSULTATION RESPONSE**

5.1 15 written responses have been received from the statutory agencies, local organisations and members of the public consulted. The comments received are presented within Appendix 1 and the Council's response to them is also indicated. Some comments were received after the final draft was sent to printing. Changes were made to the documents and the relevant pages have been printed separately as an addendum to the Character Assessment.

5.2 Many comments related to minor issues of fact or detail, or issues beyond the scope of the document.

5.3 On 25<sup>th</sup> February 2008, the Development Control Panel endorsed the Character Statement and Boundary Review.

#### **6. RECOMMENDATIONS**

6.1 That the Cabinet considers the responses to comments presented in Appendix 1 and agrees to:

1. Adopt the revised Hemingfords Conservation Area Character Assessment and Boundary Review (as previously circulated) with the amendments contained in Appendix 1 of this paper, which will become a material consideration in planning decisions.



2. Authorise the Head of Planning Services to make any minor consequential amendments to the text and illustrations necessary as a result of these changes, after consultation with the Executive Member for Planning Strategy.

## **BACKGROUND INFORMATION**

The Hemingfords Draft Character Assessment and Boundary Review

**Contact Officer: Susan Smith**  
**Assistant Conservation Officer**  
**☎ 01480 388416**

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**THE HEMINGFORDS CHARACTER ASSESSMENT & BOUNDARY REVIEW: SUMMARY OF RESPONSES**

**APPENDIX ONE**

- 1 – action taken
- 2 – not within the remit of this document
- 3 – no action taken

	Respondent	Comment	Response	Action
1	West Highways Division Box ET 1031 Stanton Way Huntingdon	(i) No Comment	<i>Noted</i>	3
2	Chris Blackman Planning Policy Officer Box ET 1010 Cambridgeshire County Council	(i) In general terms CCC are happy to support the proposed extensions and the further protection and enhancement that should follow the designation. (ii) The Education Property Officer hopes that the inclusion of the Hemingford Grey village school will not frustrate any legitimate education development needs on the site in the future. (iii) The proposed extensions do not conflict with any site-specific proposals for the Preferred Options for the Minerals and Waste Development Plan.	<i>Noted</i>	3

3	Hemingford Abbots Parish Council Clerk to the Council Mrs Pat Chafer 62 Common Lane Hemingford Abbots	<p>(i) Overall the Parish Council are very pleased to see the revision. However there were some suggested corrections and amendments.</p> <p>(ii) Suggested extension of the boundary to include the western area of The Thorpe, Westmeare and Langley Way, and the eastern side of The Thorpe, Manor Road and the whole of Braggs Lane.</p> <p>(iii) A further extension of the boundary should be made to the south of Hemingford Abbots.</p> <p>(iv) Grammar and punctuation corrections.</p> <p>(v) Photographs – corrections and comments.</p> <p>(vi) Corrections on text.</p> <p>(vii) The Thatched Cottage is a rebuild of a listed building and the listing information should be updated.</p> <p>(viii) What criteria do Buildings of Local Interest have? Can other buildings be nominated?</p> <p>(ix) There is very little reference to the river which is essential to the development of the villages</p> <p>(x) Footpaths, bridleways and cycleways should be included in the document.</p> <p>(xi) Godmanchester Eastside Common should be noted as a site of special archaeological interest.</p> <p>(xii) Rideaway Drive should be mentioned as unique in terms of Local Authority Housing due to the thatched roofs.</p> <p>(xiii) Pleased to see that Quiet Waters Caravan Park has been kept within the Conservation Area.</p> <p>(xiv) The Splash should be mentioned.</p> <p>(xv) Does the Conservation Area offer any protection for ridge and furrow? Could the land be turned into arable?</p> <p>(xvi) The area to the rear of Royal Oak Corner should be shown with a significant trees symbol.</p> <p>(xvii) What does minor development works refer to. The Parish Council has been vigilant in working closely with the District Council and County Council to achieve high standards of detail for boundaries, signage, roads and pavements.</p>	<p>(i) Noted</p> <p>(ii) Amendments made</p> <p>(iii) Not thought necessary</p> <p>(iv) Amendments made</p> <p>(v) Amendments made</p> <p>(vi) Amendments made</p> <p>(vii) Noted</p> <p>(viii) Noted</p> <p>(ix) Amendments made</p> <p>(x) Amendments made</p> <p>(xi) Amendments made</p> <p>(xii) Amendments made</p> <p>(xiii) Noted</p> <p>(xiv) Noted</p> <p>(xv) Noted</p> <p>(xvi) Amendments made</p> <p>(xvii) Noted</p>	<p>3</p> <p>1</p> <p>3</p> <p>1</p> <p>1</p> <p>1&amp;3</p> <p>1&amp;3</p> <p>2</p> <p>2</p> <p>1</p> <p>1</p> <p>1</p> <p>1</p> <p>3</p> <p>3</p> <p>3</p> <p>1</p> <p>3</p>
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4	Hemingford Grey Parish Council Clerk to the Council Mrs G Stoehr 30 West Drive Highfields Caldecote	<p>(i) Conservation Area only relating to one side of the street, for example St Ives Road, would the other side be subject to normal planning law?</p> <p>(ii) The west of The Thorpe and its eastern boundary should be included. Plus the whole area north of Manor Road and the southern edge of Vicarage Fields.</p> <p>(iii) Text corrections.</p> <p>(iv) Footpaths should be added.</p> <p>(v) Prefer riverside meadows to be referred to as 'flood meadows' rather than 'water meadows'.</p> <p>(vi) Parish Council would agree that there are problems with the parking especially in the High Street and Church Street. However to state that 'residents and businesses ought to be able to sort out more satisfactory arrangements' is not helpful.</p> <p>(vii) It would be helpful if the map showed the parish boundary for Hemingford Grey.</p> <p>(viii) The ridge and furrow needs to be added to the key.</p> <p>(ix) The Apex should be shown as a corner building and it should be shown that there are glimpse views of St Ives parish church spire across the grassland in Hemingford Road.</p> <p>(x) It should be shown that 'sideways sash windows' are common in the village.</p> <p>(xi) The Parish Council commends the response of the Hemingford Grey Preservation Society to the District Council, especially the importance of the river.</p>	<p>(i) Response in writing</p> <p>(ii) Amendments made</p> <p>(iii) Amendments made</p> <p>(iv) Amendments made</p> <p>(v) Amendments made</p> <p>(vi) Noted</p> <p>(vii) Amendments made</p> <p>(viii) Amendments made</p> <p>(ix) Amendments made</p> <p>(x) Amendments made</p> <p>(xi) Noted</p>	3  1 1 1 1 3  1 1 1  1 3
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5	Hemingford Grey Preservation Society Chair David de Garis 1 Meadow Close Hemingford Grey	<p>(i) Where road forms boundary of Conservation Area, there should be special planning rules to prevent despoiling the area.</p> <p>(ii) It is not clear if Victoria Terrace and Limes Park are in the Conservation Area.</p> <p>(iii) Manor Road and the east side of The Thorpe should be included in the Conservation Area.</p> <p>(iv) With the criticism of the standard of paving, street furniture and signage, perhaps the District Council could enlist the help of the County Council to obtain improvement.</p> <p>(v) There is minimal reference to the river which is a focal point for each village.</p> <p>(vi) Text corrections.</p> <p>(vii) Does Daintree Green as an open space merit a mention?</p>	<p>(i) <i>Noted</i></p> <p>(ii) <i>Noted</i></p> <p>(iii) <i>Amendments made</i></p> <p>(iv) <i>Noted</i></p> <p>(v) <i>Amendments made</i></p> <p>(vi) <i>Amendments made</i></p> <p>(vii) <i>Noted</i></p>	2 3 1 3 1 1 3
6	Comments forms and letters from local residents	<p>(i) The whole of Braggs Lane should be included.</p> <p>(ii) Manor Road should be included</p> <p>(iv) The whole of The Thorpe should be included.</p> <p>(v) The Thorpe should not be included. The buildings of note are covered by Listed Building legislation.</p>	<p>(i) <i>Amendments made</i></p> <p>(ii) <i>Amendments made</i></p> <p>(iii) <i>Amendments made</i></p> <p>(iv) <i>Noted</i></p>	1 1 1 3

## **PERFORMANCE MONITORING** (Report by the Head of Policy and Strategic Services)

### **1. INTRODUCTION**

- 1.1 The purpose of this report is to present to Members performance management information on “Growing Success” – the Council’s Corporate Plan – to Cabinet.

### **2. BACKGROUND INFORMATION**

- 2.2 In January 2007 the Council adopted a revised Corporate Plan “Growing Success”. The plan includes around 50 short, medium and long term objectives to help achieve aims and ambitions for Huntingdonshire’s communities and the Council itself. In addition the Council have identified a small number, 12, objectives which were considered to be a priority for the immediate future.

### **3. Performance Management**

- 3.1 Progress against all 50 or so objectives are reported to Chief Officer Management Team quarterly on a service basis. A progress report from each Division includes performance data in the form of achievement against a target for each of the objectives that those services contributes towards and is supported by narrative on achievements and other issues or risks.
- 3.2 Members of the Overview and Scrutiny Panel have an important role in the Council’s comprehensive Performance Management framework and the process of regular review of performance data has been established. In adopting the updated version of Growing Success, and in particular in prioritising objectives, it was intended that members should concentrate their monitoring on a small number of objectives to enable them to take a strategic approach which in turn would build confidence that the Council priorities are being achieved.
- 3.3 Executive members at the November Cabinet meeting requested that the Overview and Scrutiny Panel’s deliberations were summarised and appended to this report. However, due to the timing of the Overview and Scrutiny Panel’s meeting and the distribution of the Cabinet agenda the Panels comments will now be circulated separately.

### **4 PERFORMANCE MONITORING**

The following performance data is appended for consideration:

**Annex A** - a summary of achievements, issues and risks relating to the objectives identified by the Heads of Service

**Annex B** - Performance data from services which contribute to the Council objectives. For each measure there is a target, actual performance against

target, forecast performance for the next period and a comments field. The data is colour coded as follows:

- green – achieving target or above;
- amber – between target and an “intervention level (the level at which performance is considered to be unacceptable and action is required);
- red – the intervention level or below; and
- grey - data not available

**Annex C** – Council Improvement Plan – a rolling plan of actions identified following internal or external reviews such as the Comprehensive Performance Assessment, Use of Resources Assessment, Direction of Travel Statement and the Annual Governance Statement.

## **5. REVIEW OF GROWING SUCESSS**

In line with the agreed process the annual review of Growing Success (objectives/targets etc) was intended so that an updated version could be presented to members by end of June. However, the preparation of a new Sustainable Community Strategy (SCS) and Local Area Agreement (LAA) for Cambridgeshire presents an opportunity for the Council to examine our organisational objectives and targets so that we can demonstrate our contribution to these broader outcomes for the benefit of Huntingdonshire. The timing of these documents mean the review of Growing Success will take place in late summer and be submitted to the Council in September. It is proposed this will be adopted as the timetable for the review of Growing Success in future years as this provides a better fit with the Councils business planning, budget, MTP and service planning process.

## **6. RECOMMENDATION**

It is recommended that Cabinet consider the results of performance for priority objectives.

## **BACKGROUND INFORMATION**

Performance Management reports produced from the Council’s CPMF software system

Growing Success: Corporate Plan

**Contact Officer:** **Howard Thackray, Policy & Research Manager**  
**☎ 01480 388035**



Objective		Comments from appropriate Head of Service
<b>To lower carbon emissions</b>	Achievements:	<i>Environmental Management :Tackling climate change and Using resources efficiently</i> Planning - LDF Core Strategy being taken forward with the requirement to deliver sustainable development being a cornerstone of that whole policy initiative. All planning decisions being made with positive regard to sustainable development as a material planning consideration
	Issues:	Planning - New Government guidance issued in December 2007 (updated PPS1 – Planning and Climate Change) which has again amended the requirements in terms of ‘local’ policy developments. Draft local policies to be reconsidered in light of this amended guidance.
	Risks:	<i>Environmental Management</i> -Financial forecast included in SEA Revue scenarios reduce enthusiasm for activity intended to reduce carbon emissions. Sensitivity needed in terms on information interpretation Planning - Uncertainty regarding the basis of what can be considered as ‘local’ policy (and the specifics of its content and what evidence base will be needed to support it) needs to be clarified via inputs from Go-East and the Planning Inspectorate
<b>To promote healthy lifestyle choices</b>	Achievements:	<b>Leisure Development</b> overall has experienced a 22% increase in throughput in 2007/08 compared to 2006/07. In particular the Health Walks Scheme, the Cardiac Rehabilitation Phase IV Scheme and the Community Sports Programme (disability and equity related) have had exceptional growth and success. The service has won two new lottery funding awards during the year which will come into effect during 2008/09 – these include a new project for older people – ‘Active at 50’ and the second for adults but specifically the 16-34 year olds, ‘Community Sports Network – Sports Activator’ <b>Health Improvement Service</b> HDC awarded The Food Standards Agency Regional Food Champion Award for the hunts for Good Project. Currently Nominated for National Champion
	Issues:	<b>Arts Service</b> Art attack sessions still proving popular with high customer satisfaction levels although numbers fluctuate according to weather and availability of other local half term activities. New summer school activities planned
	Risks:	<b>Leisure Development</b> Short term funding arrangements for the health and physical activity programmes. The short term temporary nature of some of the staff positions means that the risk of staff turnover is high. The positions are highly specialised in nature and recruiting to a similar standard is difficult and training new staff can be expensive and takes a significant amount of time (at least 6 months) <b>Smoke Free Services</b> DH grant funding for Smoke Free Officer runs out at end of this financial year
<b>To achieve a low level of homelessness</b>	Achievements:	The number of households prevented from becoming homeless was 29 for the quarter, giving a total of 138 households from April 07 to March 08. Despite an increase in the number of households threatened with homelessness in the last quarter of the year compared to the same period last year, the overall number of households becoming homeless in 2007/08 saw a reduction on the previous financial year (146 households in 07/08 compared to 160 in 06/07).

		<p>6 self contained flats were completed at Coneygear Ct. Whilst this will not reduce homelessness it will provide a better quality alternative to the use of B&amp;B.</p> <p>The sub-regional Home-Link Choice Based Lettings scheme went live at the end of February as planned. This transparency of available properties should lessen the sometimes unrealistic expectations of sought after locations by some applicants.</p>
	Issues:	<p>Monitor the impact of the Register's new priority 'banding' system to ensure that it does not have an impact on the prevention of homelessness or restrict homeless households from moving on from temporary accommodation.</p> <p>Currently waiting to see the outcome of the introduction of the Local Housing Allowance to see if this makes settled homes (in the private sector) a more affordable proposition to implement</p> <p>Awaiting outcome of LAA reward grant bids to increase emergency homelessness provision as an alternative to the use of B&amp;B</p>
	Risks:	<p>Major incident resulting in high levels of homelessness.</p> <p>Recent interest rate rises and wider economic factors could increase demand.</p> <p>Failure of LAA reward grant bids.</p>
<b>To enable the provision of affordable housing</b>	Achievements:	<p>Spent £1,390,092 of HDC affordable housing grant</p> <p>Completed village needs survey for Bluntisham and Colne</p> <p>Secured £1,217,038 social housing grant from Housing corporation (08/11).</p> <p>Completed 69 Affordable Homes and 27 HomeBuy (for the year 07/08)</p> <p>Planning - Through the successful application of policy and via suitably robust negotiations we have been able to deliver a higher overall % level of affordable housing</p>
	Issues:	<p>Complete village needs survey for Needingworth (subject to Rural Housing enabler post being filled [not a HDC employee]).</p> <p>Review HDC grant programme and commit funding for Huntingdon Town Centre site.</p> <p>Project manage the delivery of the exemplar high energy efficient scheme on HDC land (Mayfield Road).</p> <p>Receive the results of the New Development Survey research project and arrange a seminar for feedback to Officers/Members</p> <p>Planning - Changes in national planning policy now allows for a greater degree of commercial viability to be considered in respect of S106 negotiations. Therefore we will need to appropriately reinforce our in-house (or retained) skills base in order for us to remain as successful in terms of delivering the required outcomes.</p>
	Risks:	<p>RSLs and developers not performing to timescales.</p> <p>Availability of Housing Corporation funding via the bidding process.</p> <p>Planning - further amendments to the 'balance' of national policy and specifically in respect of the amount of grant potentially available could put pressure on the preferred mix of affordable housing.</p> <p>Reductions in grant could reduce the ability to deliver social rented housing and increase other forms of provision e.g. shared equity. Delays on developments, outside of HDC control, may result in under or overspend of budget.</p>

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Community/Council Aim: A Clean, Green and Attractive place						
Objective: To Lower Carbon Emissions						
Division: Planning						
Divisional Objective: To encourage sustainable forms of development						
Key activity(s) only to deliver service objective	Key Measure	Target :	Actual	Forecast	Comments:	
Include sustainable policies within LDF (to set a sustainable policy framework)	Core Strategy – Adherence to LDF timetable on target	1	1	1	1= on target	QRT
To make appropriate planning decisions (to encourage sustainable forms of development)	Developing a policy in accordance with the Local Development Scheme timetable to encourage improved on-site energy efficiency levels (10% reduction in CO2 emissions) by Sep 2009	1	1	1	On target , however, national policy will supersede this requirement, measure will be deleted from April 08	QRT
To positively encourage sustainable development via UDF's etc (to give targeted guidance)	Developing a policy in accordance with the Local Development Scheme timetable to encourage 10% improvement in on-site renewable energy generation target by Sep 2009	1	1	1	On target , however, national policy will supersede this requirement, measure will be deleted from April 08	QRT
Division: Technical Services						
Divisional Objective: To Lower Carbon Emissions						
Key Activity(s) only to deliver service objective:	Key Measure:	Target :	Actual	Forecast	Comments:	
Encourage implementation by service management of measures intended to reduce overall corporate consumption of energy from non-renewable sources	Achieve 1% annual reduction in the Council's consumption of non-renewable energy	1	1	1	1 = on target. The Council switched to renewable energy Tariff in April 2007 which alone enabled the 1% carbon reduction target to be achieved. Detailed energy use monitoring	QRT

					system to be introduced in 2008 in conjunction with the Carbon Trust. Energy Savings identified through this process will result in future reductions	
Extend Travel Plans to all of the Council's employment sites and promote implementation of their associated action plans.	Annual targets in approved Travel Plans on target	1	1	1	1 = on target. Target for reduction in car use being monitored via the annual travel for work survey. Travel plans introduced for Speke house, Eastfield House and Headquarters.	QRT
Promote energy efficiency and use of renewable energy to householders.	For properties built before 1997 reduce energy consumption to 70% of 1996 consumption by April 2011.	1	1	1	1 = on target. Home Energy Conservation Act HECA report for 2006/07 completed November 2007. 4.18% improvement in 2006/07. Cumulative energy saving from 1995 to 2007(27.57%) so in line for achieving 30% target by 2010/11	QRT
Promote implementation of Environment Strategy's action plan	Annual targets in approved Environment Strategy achieved – 2008/09 and beyond.	1	1	1	1 = on target. Environment strategy year one action plan approved. Full baseline figures and targets for year 1 to be published Sept 2008	QRT
Secure initial adoption of Environment Strategy by March 2008 and subsequent annual review/update to ensure that any necessary MTP annual funding commitment is made by the	Initial Environment Strategy approved in March 2008 for implementation from 2008/09	1	1	1	1 = on target. Environment strategy adopted by Council in April 2008, year one action plan also	QRT

council to deliver on-going carbon dioxide reduction.					approved	
<b>Community/Council Aim: Healthy Living</b>						
<b>Objective: To Promote healthy lifestyle choices</b>						
<b>Division: Administration</b>						
<b>Divisional Objective: To Increase participation in healthy physical activities</b>						
<b>Key Activity(s) only to deliver service objective:</b>	<b>Key Measure:</b>	<b>Target :</b>	<b>Actual</b>	<b>Forecast</b>	<b>Comments:</b>	
Maintain and improve standard of facilities and match facility provision with usage demand.	Number of visits for physical activity to Leisure Centres by March 2008 (1.5 million)	16870 00Up to Q4	1659 38		Actual = cumulative total for Q4. Attendance levels up 1.25% on last year despite St Neots swimming pool being closed for 6 months of the year	QRT
Promotion and marketing of available activities	Number (18400) of active card holders by March 2008	18400 For Q4	1708 9		target of 18400 by March 2008 not achieved , main reason was due to the closure of St Neots swimming pool for 6 months	QRT
<b>Division: Lifestyles</b>						
<b>Divisional Objective: To promote healthy lifestyle choices</b>						
<b>Key Activity(s) only to deliver service objective:</b>	<b>Key Measure:</b>	<b>Target :</b>	<b>Actual</b>	<b>Forecast</b>	<b>Comments:</b>	
Diet: Supporting the Hunts for Good Food Programme in establishing a healthy eating culture	Number of Food projects supported and promoted	4	6			QRT
Offering training for smoking cessation and helping workplaces become smoke-free	Number of businesses participating in smoking cessation programme	5	6	5		QRT
Provide a range of accessible leisure opportunities such as: a Holiday Activity Programme for <17 years	Total throughput of school, outreach and holiday activity Programmes	300	398		Annual result 4,441 = 14% increase on 2006/07	QRT
Provide under-represented groups with the opportunity to participate in sport and active recreation	Total throughput of activity programme for disabled participants and under-represented groups	350	908		Increase due to the success of street sports initiative in Yaxley and Huntingon	QRT

Support Vulnerable People to be more active, Cardiac Rehabilitation programme and Health Walks	Total throughput of the Cardiac Rehabilitation programme and Health walks in Huntingdonshire	1300	2275		Extra Cardiac class introduced and Health walks have been very popular.	QRT
<b>Divisional Objective: To provide a range of accessible arts activities to provide a means of self-expression and support sound mental health</b>						
<b>Key Activity(s) only to deliver service objective:</b>	<b>Key Measure:</b>	<b>Target :</b>	<b>Actual</b>	<b>Forecast</b>	<b>Comments:</b>	
Organise family-friendly Art attack-based events	Number of people (family friendly) participating	30	24		Events take place over the school half term breaks (3 per year).	QRT
Organise participatory arts activities for children in School half-term breaks (Art Attack)	Number of children attending Art Attack sessions (throughput)	120	104			QRT
<b>Community/Council Aim: Housing that meets the local need</b>						
<b>Objective: To achieve a low level of homelessness</b>						
<b>Division: Housing</b>						
<b>Divisional Objective: To achieve a low level of homelessness</b>						
<b>Key Activity(s) only to deliver service objective:</b>	<b>Key Measure:</b>	<b>Target :</b>	<b>Actual</b>	<b>Forecast</b>	<b>Comments:</b>	
By helping to prevent people from becoming homeless by housing homeless people where appropriate	Numbers of households prevented from becoming homeless each year to 2009	135	138	35 for Q1 08/09	Target of 140 for 2008/09	QRT
<b>Objective: To enable the provision of affordable housing</b>						
<b>Division: Housing</b>						
<b>Divisional Objective: To enable the provision of affordable housing</b>						
<b>Key Activity(s) only to deliver service objective:</b>	<b>Key Measure:</b>	<b>Target :</b>	<b>Actual</b>	<b>Forecast</b>	<b>Comments:</b>	
By maximising the land available for new affordable housing. By working in partnership with Housing Associations to bid for external funding. By making a financial contribution to pay for affordable homes to be built	Number of new affordable homes built by 2010	63	96	175 during financial yr 08/09	Annual target for 2008/09 is 175	QRT
<b>Division: Planning</b>						
<b>Divisional Objective: Maximise provision of affordable housing on relevant development sites</b>						
<b>Key Activity(s) only to deliver service objective:</b>	<b>Key Measure:</b>	<b>Target :</b>	<b>Actual</b>	<b>Forecast</b>	<b>Comments:</b>	
Develop Core Strategy and Development Control Policies DPD (to	% of housing completions on qualifying sites that are affordable (in Cambridge Sub Region)	40	46.1	40		YRL

set framework)/Adopt Planning Obligations SPD (to set specific targets and thresholds)/ Negotiate S106 Agreements (to deliver required amounts of affordable housing)			5			
	% if housing completions on qualifying sites that are affordable (out of CSR)	29	46	29		YRL
	% of affordable housing (commitments) on qualifying sites	30	21	30	The figure is low because the major qualifying site is the allocated site east of the Railway St Neots, the area of development decided during the quarter was one with very little planned affordable housing in it. This has the impact of skewing the figures when measured over a relatively short period of time as some phases have no affordable houses planned.	QRT

Objective		
<b>To promote development opportunities in and around the market towns</b>	Achievements:	Draft Local Economy action plan has been developed. Marketing plan for Creative Enterprise Centre developed and service provider group set up to determine programme of training and activities for the Centre. Hosted Town Centre Study tour for neighbouring councils in the East Midlands Development Agency Area to share our best practice
	Issues:	Delivery of Local Economy action plan dependent on external funding. Creative Enterprise Centre activities dependent on partner involvement and funding opportunities
	Risks:	All Partners need to engage if delivery of strategy is to be successful
<b>To enhance public, community and specialist transport into and around the market towns</b>	Achievements:	Sustainable Transport schemes (including the Market Town Transport strategies) are continuing to come to fruition including public transport initiatives being delivered, such as Huntingdon to St. Ives Bus priority measures and an updated car parking strategy and action plan to commence delivery from Summer 2008. Community Transport schemes continue to operate with coverage over the majority of the District
	Issues:	CCC ability to adequately resource MTTs may impact upon the planned delivery of schemes. Community Transport schemes continue to be reliant on volunteer resources to deliver overall objectives
	Risks:	Community Transport highly vulnerable to changes in funding streams and grant availability. Schemes tend to operate financially via a number of different sources. The loss of any one source and the inability to secure alternative funding leaves operational services at high risk of termination
<b>To improve access to Council services</b>	Achievements:	The new customer services team has been established from 1 <sup>st</sup> April and now include customer service centres, call centre, community information centres and tourist information. The new team reports to Julia Barber, who's job title has changed to Head of Customer Services. This new team will start to develop plans to implement the requirements of the recently approved Customer Service Strategy.
	Issues:	
	Risks:	
<b>To make our performance management more effective and transparent</b>	Achievements:	All services entering data into Performance Management system.
	Issues:	Timeliness of data entry necessary to feed into reporting cycle.
	Risks:	Failure to use performance management data could delay development of comprehensive performance management system and affect quality of decision making.
<b>To reduce the number of car journeys to work by employees</b>	Achievements:	Continued involvement in Camshare, promotion of Cycle Scheme and introduction of pool car fleet has assisted in reducing car usage. Eastfield House site specific plan in place
	Issues:	Providing officer time to promote travel plan issues and monitoring targets set within corporate and site specific plans
	Risks:	Considerable officer time required to roll out site specific travel plans and to monitor and update those currently in place within the corporate plan



<b>To build the new operations centre and headquarters</b>	Achievements:	Construction work is on progress with the basic structure of Building C/D nearing completion. Detailed planning for the relocation of staff into the new building is well advanced. A planning consent has been secured for the residential development of the site of the former Building A. A marketing exercise has started and tenders for the purchase of the land are due for return in June 2008.
	Issues:	Planning conditions relating to the external landscaping have not yet been discharged. Negotiations continue with the planners to achieve discharge before the construction programme is delayed.
	Risks:	Utilities have been ordered to reduce the risk of delay due to the companies' failure to provide their services to programme. The national economy is reducing house sales and this may reduce interest in the residential land.
<b>To be an employer people want to work for</b>	Achievements:	The numbers of applications received locally imply that we are well thought of as an employer.
	Issues:	From staff survey June 07 - 71% Stated that "I am satisfied with Council as my employer"
	Risks:	If HDC were not well thought of this would impact on number of application received and an increasing staff turnover
<b>To re-balance saving and spending to ensure resources are available to achieve the Council's priorities</b>	Achievements:	The Budget and MTP was approved by Council on the 20 February 2008. This produced a balanced budget for 2008/9 and reduced the 'gap' identified in future years budgets. We now anticipate achieving a small surplus in the revenue account for 2007/8.
	Issues:	Over the course of the 2008 we will be working on how to address the £500,000 - £2m 'gap' in the revenue budget which is currently apparent for 2009/10 – 2011/2
	Risks:	We are unable to generate sufficient plans to generate new income or reduce expenditure

Community/Council Aim: A strong, diverse economy						
Objective: To promote development opportunities in and around the market towns						
Division: Policy and Strategic Services						
Divisional Objective: To promote development opportunities in and around the market towns						
Key Activity(s) only to deliver service objective:	Key Measure:	Target :	Actual	Forecast	Comments:	
Review the Local Economy strategy & identify priorities	% of LES actions/milestones on track	90	100	100	QR T	
Divisional Objective: To support town centres to be economically viable and vibrant						
Key Activity(s) only to deliver service objective:	Key Measure:	Target :	Actual	Forecast	Comments:	
Support the sustainable development of Town Centre Partnerships	% of town centre projects on track as specified in their annual action plans	90	100	100	QR T	
Community/Council Aim: Access to Services and Transport						
Objective: To enhance public, community and specialist transport into and around the market towns						
Division: Planning						
Divisional objective: To encourage more sustainable forms of transport						
Key Activity(s) only to deliver service objective:	Key Measure:	Target :	Actual	Forecast	Comments:	
Develop car parking strategy	To complete car parking strategy and develop Action plan for post – April 2008 delivery	1	1	1	YR L	
Development of market town transport strategies (to set the policy framework)/Develop targeted proposals and initiatives (to encourage specific provision)	Membership of Nene and Ouse community transport	850	850	850	QR T	
	More than 18.5% modal share for daily bus, cycle and pedestrian trips across all 4 market towns (Ave. Figure)	18.5	19.5	18	YR L	
Objective: To improve access to council services						
Division: IMD						
Divisional Objective: To review how customers can access Council Services and, if necessary, to deliver change projects as part of the customer First Programme.						
Key Activity(s) only to deliver service objective:	Key Measure:	Target :	Actual	Forecast	Comments:	

Deliver elements of the temporary Customer Service Centre project as defined in the PID	Progress towards review of the customer service strategy and implementation of authorised projects on target	1	1	1	1=on target IMD delivered against the project implementation document for the temp customer service centre on time and to budget. The revised customer service strategy was approved by Cabinet in Feb 08. This measure will be removed from IMD scorecard.	QR T
Provide Access to Council Services Via the	Percentage of calls answered with 20 Seconds	80	81	80		QR T
Call Centre and to deliver Phase 2 – Roll-out Services to call Centre (from late Autumn 2007)	Percentage of residents rate access to council services as good/excellent in the Council-wide annual survey	70			Data will be available in due course	YR L
To implement and additional Kiosk in St Neots	Progress towards the implementation of a temporary customer service centre and St Neots kiosk on target	1	1		Implemented	QR T
<b>Division: Revenue and Benefits</b>						
<b>Divisional Objective: To provide a prompt and effective service to customers</b>						
<b>Key Activity(s) only to deliver service objective:</b>	<b>Key Measure:</b>	<b>Target :</b>	<b>Actual</b>	<b>Forecast</b>	<b>Comments:</b>	
Dealing with callers at the CSC	Average waiting time (in minutes)	<5.00	4.2		Average waiting time per customer per day over the qrt	QR T
	Maximum waiting time (in minutes)	<60.00	29		Maximum waiting time any one person had to wait per day over the qrt	QR T
	Number of visitors per quarter	13500	15682			QR T
<b>Division: Personnel</b>						
<b>Divisional Objective: To enable e-recruitment</b>						
<b>Key Activity(s) only to deliver service objective:</b>	<b>Key Measure:</b>	<b>Target :</b>	<b>Actual</b>	<b>Forecast</b>	<b>Comments:</b>	
Advertise posts via Cambs Jobs Portal	Number of hits (opening and looking at post details) per post, per quarter	80	0		Data will be available in due course once the recruitment	QR T

					module in ResourceLink had been operational for 3 months	
Resourcelink – Recruitment Module	Project plan – implementation on track	1	1	1		QR T
<b>Community/Council Aim: To improve our systems and practices</b>						
<b>Objective: To build the new operations centre and headquarters</b>						
<b>Division: Technical Services</b>						
<b>Divisional Objective: Deliver Headquarters and other accommodation project ensuring buildings are completed to specification, on time and to budget</b>						
<b>Key Activity(s) only to deliver service objective:</b>	<b>Key Measure:</b>	<b>Target :</b>	<b>Actu al</b>	<b>Forec ast</b>	<b>Comments:</b>	
Ensure delivery proceeds in accordance with approved programme	Unauthorised delay relative to items on critical path of approved development programme	0	0	0		QR T
Ensure developer complies with the council's requirements	Non-financial/timing disputes referred for expert adjudication	0	0	0		QR T
Ensure that variations are ordered only after additional funding has been approved	Value of unfunded ordered variations	0	0	0		QR T
<b>Objective: To make our performance management more effective and transparent</b>						
<b>Division: Policy and Strategic Services</b>						
<b>Divisional objective: To make our performance management effective and more transparent</b>						
<b>Key Activity(s) only to deliver service objective:</b>	<b>Key Measure:</b>	<b>Target :</b>	<b>Actu al</b>	<b>Forec ast</b>	<b>Comments:</b>	
Link all divisional reports to Council and Community objectives	Reports available for COMT on monthly basis	1	1	1	1=on target reports produced monthly	QR T
Set up, maintain divisional reports/Ensure all appropriate data is entered into the system in time to produce management reports. Generate scheduled reports via Corvu	Reports available for Members on a quarterly basis	1	1	1	1=on target reports produced monthly	QR T
<b>Objective: To reduce the number of car journeys to work by employees</b>						
<b>Division: Technical Services</b>						
<b>Divisional objective: To reduce the number of car journeys to work by employees</b>						
<b>Key Activity(s) only to deliver</b>	<b>Key Measure:</b>	<b>Target</b>	<b>Actu</b>	<b>Forec</b>	<b>Comments:</b>	

<b>service objective:</b>		:	<b>al</b>	<b>ast</b>		
Introduce site specific travel plans at each of the Councils main sites	<b>Reduce</b> the % of employees who drive to work by sole use of car	68	64	64 (06/07 annual survey )	Data taken from the Annual Travel to Work survey published in December 2007.	QR T
<b>Community/Council Aim: To learn and develop</b>						
<b>Objective: To be and Employer People Wish to Work For</b>						
<b>Division: Personnel</b>						
<b>Divisional Objective: To create a culture via policies and procedures that attracts and retains staff</b>						
<b>Key Activity(s) only to deliver service objective:</b>	<b>Key Measure:</b>	<b>Target :</b>	<b>Actual</b>	<b>Forecast</b>	<b>Comments:</b>	
Policies and procedures that keep up to date with modern working patterns	Biennial staff survey - % level of satisfaction	80	71		From staff survey June 07 - 71% Stated that "I am satisfied with Council as my employer. Next survey due in 2009	YR L
Recruitment package	% of posts filled within one round of recruitment	90	94			QR T

## Improvement Plan

## Annex C

(Note: the Council's Improvement Plan is updated and monitored frequently to reflect the development areas adopted through external inspection and compliance with statutory guidance.)

In progress

Completed

Subject	Area of Focus	Reference	Proposed Action	Outcome	Lead Members and Officer	Progress March 2008
Learning & Knowledge	Learning across the Council and making the most of learning opportunities to use research, consultation and knowledge to plan services.	CPA	Adopt systematic approaches to learning and sharing knowledge via the Council's intranet.	Council uses learning and knowledge and research effectively across the organisation to improve the delivery of services and achievement of priorities.	Member: Mike Simpson Officer: Dir Commerce & Technology support Head of IMD	Share Point project on track.
Capacity and Resources	Sustainability of spending plans, employee capacity, staff turnover.	CPA	Delivery of People Strategy	The Council has the right number of employees with the right skills to meet its priorities and objectives.	Member: Andrew Hansard Officer: Dir Central Services Support: Head of Personnel	People Strategy - 35 actions completed and 15 in progress.
Partnership Working	Relationship between partnerships and Council priorities, risks and opportunities of partnerships, the links between the three tiers and the extent of innovative working to improve services.  Review the financial performance (where applicable) and outputs of its	CPA  Use of Resources 2006/07	Monitoring and evaluation of partnership success via the implementation of the Partnership Framework and reviews of significant partnerships.  Development of new Sustainable Community Strategy. Review via Huntingdonshire Strategic Partnership.	Strong and effective partnerships which enhance capacity to delivery priorities. Risks relating to partnerships will be identified and evaluated accordingly.  The Council is satisfied with financial performance and outputs of significant partnership.	Member: Ian Bates Member: Andrew Hansard Officer: Dir of Central Services Support: Policy and Strategic Services	Evaluation of strategic partnerships completed, a Health check approved, procedures established and a review period agreed. A database of all HDC partnerships

Subject	Area of Focus	Reference	Proposed Action	Outcome	Lead Members and Officer	Progress March 2008
	significant partnerships. Risks relating to partnerships are identified and managed.		Contribute to the development and achievement of Local Area Agreements.			is being developed.
						Pilot completed Autumn 07. New LAA will be agreed Spring/Summer 08
Risk Management	Members role in risk management.	Use of Resources 2006/07	An assessment of risk management training requirements for Members will be completed and training delivered accordingly.	Members adequately trained in risk management.	Member: Terry Rogers Officer: Dir Commerce & Technology Support: Financial Services	Training completed March 2008
	How well does the Council plan and manage their Finances.	Use of Resources 2006/07	Periodic consultation to ensure that the Council can demonstrate that it is considering the views of a range of stakeholders, in making its decision whether to continue not too publish an annual report.	The Council plans and manages their finances effectively.	Member: Terry Rogers Officer: Dir Commerce & Technology Support: Financial Services	Not actioned at this time.

Subject	Area of Focus	Reference	Proposed Action	Outcome	Lead Members and Officer	Progress March 2008
Financial Accounts	Working paper requirements should be agreed with the auditor prior to the commencement of the final accounts audit.	Use of Resources 2006/07	Already actioned for 2006/07 final accounts.	The Council plans and manages their finances effectively.	Accountancy Manager	Completed for 2006/07. Will be discussed in March 08 for 2007/08 audit.
	Publication of financial information.	Use of Resources 2006/07	No response to previous invitations to the public to identify any additional financial information they require but invitation will be repeated periodically.	Published financial information which meets the needs of stakeholders.	Member: Terry Rogers Officer Dir Commerce & Technology Support: Financial Services	Opportunity offered in the Autumn District Wide to comment on the 2006/7 accounts. 3 responses.
Financial Reporting	Managing Performance Against budget.	Use of Resources 2006/07	The Council will continue to review and update its budget monitoring processes, ensuring that it is: <ul style="list-style-type: none"> <li>◆ predictive rather than backward looking;</li> <li>◆ focused on large, high risk or volatile budgets;</li> <li>◆ related to operational activity indicators that are lead indicators of spend; and</li> <li>◆ informed by a risk assessment.</li> </ul>	Effective budget monitoring process.	Member: Terry Rogers Officer: Dir Commerce & Technology Support: Financial Services	The budget is monitored by predicting the outturn.  Members are advised of the likelihood of contingency budgets not being spent and savings achieved.
	Planned saving and efficiency	Use of Resources 2006/07	Planned savings are deducted from relevant budgets so that monitoring is incorporated into budgetary control. Efficiency savings have already been identified to cover the 2007/08 target. The system is likely to be fundamentally changed by the Government for 2008/09 onwards.	The Council meets it's efficiency targets and planned savings	Member: Terry Rogers Officer Dir Commerce & Technology Support: Financial Services	Action taken in budget monitoring in 2007/08 but on-going.



Subject	Area of Focus	Reference	Proposed Action	Outcome	Lead Members and Officer	Progress March 2008
	Assurance with systems of internal control.	Use of Resources 2006/07	The Council will develop and implement an assurance framework in conjunction with a revised Code of Corporate Governance.	Adequate framework of assurance in place.	Member: Chris Stevens Officer: Dir of Central Services Support: Policy and Strategic Services	Assurance framework endorsed by Governance Panel 26 March 08
Systems of Internal Control	Compliance with constitution.	Use of Resources 2006/07	The Council will introduce a system of monitoring compliance with standing orders, standing financial instructions and its scheme of delegation. Monitoring of the scheme of delegation will be considered within relevant internal audits.	Assurance of compliance with constitution.	Member: Andrew Hansard Officer: Dir Central Services Support: Head of Administration Head of Legal Head of Policy & Strategic Services Head of Finance	Since Aug 2007, compliance with the scheme of delegation, codes of financial management and procurement reviewed in all appropriate audits.
	Probity and Propriety.	Use of Resources 2006/07	The Council will provide clear evidence of how its Fraud and Corruption Plan has impacted upon any proactive counter fraud and corruption work, including the results of internal audit.  (F&CP risk assessment scores have been used in determining the 2007-08 audit plan. All high risk areas have already been reviewed.)	Successful counter fraud and corruption work.	Member: Terry Rogers Dir Commerce & Technology Support: Financial Services	See comments in brackets.

Subject	Area of Focus	Reference	Proposed Action	Outcome	Lead Members and Officer	Progress March 2008
Internal Control	Probity and Propriety.	Use of Resources 2006/07	A review process will be maintained for appropriate areas and any 'lessons that can be learnt' or any weaknesses in controls will be addressed where frauds have been identified. (A formal process is not required for non-benefit related cases due to the low numbers involved. Benefit fraud procedures already include a "lessons learnt" stage.)	Learning used to improve systems.	Member: Terry Rogers Officer: Dir of Commerce and Technology Support: Revenues and Benefits	See comments in brackets.
	Probity and Propriety.	Use of Resources 2006/07	The Council has improved the monitoring arrangements for the capital programme.	Effective monitoring of the capital programme.	Member: Terry Rogers Officer: Dir of Commerce and Technology Support: Financial Services	Action taken to improve budget monitoring in 2007/08 but on-going improvements sought.
Procurement	Improvement in value for money through procurement.	Use of Resources 2006/07	The Council will demonstrate a best-practice approach to procurement, that it has identified where the greatest benefits can be gained and that there is evidence that it acts on these effectively. Existing joint procurement exercises will be built upon and developed where appropriate to yield further cost savings and improvements to value for money.  (Business case developed for e-Marketplace and Purchase to Pay integration and has been agreed in principle with Director C&T.	Improve value for money resulting from the approach to procurement.	Member: Terry Rogers Officer: Dir of Commerce and Technology Support: Financial Services	See comments in brackets.

Subject	Area of Focus	Reference	Proposed Action	Outcome	Lead Members and Officer	Progress March 2008
			Initiation held pending assessment the impact of Shared Services opportunity (Financial Management Systems) currently being developed. continued progress in the use of collaborative contracts.)			
Financial Management - The Council manages performance against budgets	The Council should continue to develop its budget monitoring processes to ensure that it is appropriate for the Council and it meets the requirements of the UoR criteria which include the need to ensure monitoring is informed by a risk assessment.	Use of Resources 2007/08	Significant progress has been made but a formal risk assessment will be carried out to focus further developments. (by 31 March 08)			
Internal Control - Risk Management	Risk management training should be delivered to appropriate officers and members prior to 31 March 2008.	Use of Resources 2007/08	All Heads of Service have received training. Further Member training provided in December 2007. Any Members who missed both training sessions will be briefed individually. (by 31 March 08)	Raise awareness of risk and risk management		Training completed March 2008
Systems of Internal Control	The Council should develop and implement an assurance framework. Once implemented, processes need to be put in place to ensure that	Use of Resources 2007/08	An assurance framework will be developed and agreed by the Corporate Governance Panel on 26 March 2008. (by 31 March 08)	Agreed systems/process in place to provide assurance that the council undertakes it's functions and responsibilities with integrity, openness and accountability.		

Subject	Area of Focus	Reference	Proposed Action	Outcome	Lead Members and Officer	Progress March 2008
	this a fluid living document that is updated constantly for any changes in objectives, risks and assurances.					
	Internal Audit Managers opinion on the internal control environment.	Governance Assurance framework	Actions identified in the internal audit action plan are implemented as per the agreed audit timetable.	Improve the overall assurance opinion on the system of Internal control.		Monitored via Performance Management Framework and reported Qrt to COMT. As at March 08 performance not improved
Governance	Equalities.	Governance Assurance framework	Implement and monitor Corporate Equality Action Plan.	Facilitate progress in relation to the Local Government Standard for Equalities.		Level 2 of the standard achieved. Progress to level 3 (by 2010) on target
	Consultation.	Governance Assurance framework	Adopt and implement consultation and engagement strategy.	Developing consultation and engagement with local communities.		Strategy to go to Cabinet in Feb 08.
	Complaints System.	Governance Assurance framework	Review existing mechanisms for responding to harassment e.g. Open Out, corporate complaints procedure, grievance procedure and Dignity at Work Policy.	A corporate complaints system that will enable transparent non-discriminatory reporting.		Review of Complaints system and Grievance procedure during 08/09 and Dignity at work in 09/10
	Sustainable Community Strategy.	Governance	Working to develop a Sustainable Community Strategy (SCS).	Delivery of the outcomes identified in the SCS via the		Development of the new

Subject	Area of Focus	Reference	Proposed Action	Outcome	Lead Members and Officer	Progress March 2008
		Assurance framework		Huntingdonshire Strategic Partnership.		SCS on target. Not due to be completed until Summer 08
Data Quality	Data Quality	Use of Resources /VFM	Action identified in the Data Quality action plan are implemented as per the agreed timetable	To provide reliable, accurate and timely performance information with which to manage services, inform users and account for our performance		

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## CABINET

12<sup>TH</sup> June 2008

### **CORPORATE EQUALITY POLICY – Action Plan Progress (Report by the Head of Policy)**

#### **1. INTRODUCTION**

- 1.1 The purpose of this report is to inform the Cabinet of progress with the council's Corporate Equality Policy (CEP) Action Plan.

#### **2. BACKGROUND**

- 2.1 The CEP sets out the Council's aim and objectives for equality and the accompanying action plan sets out the corporate and directorate actions and targets. It is supported by three equality schemes (Race, Disability and Gender). The action plan combines activities which are compatible with the Council's achievement of Level 2 of the Equality Standard and the statutory requirements contained within the three equality schemes.
- 2.2 The CEP and action plan shows how the Council will translate its statutory responsibilities into objectives and actions in respect of equalities; in particular it takes account of:
- Equalities legislation relating to race, disability and gender
  - The achievement of Level 2 of the Equality Standard
- 2.3 Having achieved Level 2 and working towards Level 3 of the Equality Standard, the Council made a commitment to establish a timetable to assess the impact of all services in terms of equality. A three year timetable was adopted, those services with a more 'public facing' role were placed in years 1 and 2.
- 2.4 Training on how to conduct equality impact assessments took place during 2007 and 2008 and results from these assessments are set out in Appendix 3. Equality impact assessments are a statutory requirement and they are the primary method by which the Council can assess whether it is providing equal access to services in terms race, disability and gender. Many of the equality impact assessments have also considered sexuality, religious belief and age.

#### **3. PROGRESS**

- 3.1 The Corporate Equality Policy identified two outcomes and two measures that will tell us how successful we have been in terms of understanding the diverse needs of local people, that our services meet those needs and that they are provided in a fair and accessible way. These outcomes and measures are:

Outcome	Measure	2006/07	Target (2007/8)	Actual 2008/08	Target for
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					<b>2008/09</b>
That our services are provided in ways that meet diverse local needs	% of local people who believe that Council services meet their needs	* baseline not available	*75%	84%	85 %
That the Council is recognised for promoting equality and inclusion in communities	% of local people who believe that the Council promotes equality and inclusion in their community	64%	70%	83%	85%

- 3.2 The appended progress report covers:
- the achievement made against the actions and targets set in March 2007
  - an action plan for 2008/09
  - results from equality impact assessments conducted over the last 12 months.
  - revised timetable for equality impact assessments during 2008/09
- 3.3 The Corporate Equality Policy Action Plan contained 107 actions, of which:
- 76 have been fully completed
  - 26 are on-going
  - 2 have not been completed and will be taken forward into the new action plan
  - 3 actions have been deemed not required
- 3.4 Eight service areas were selected to undertake equality impact assessments during 2007/08 (Administration, Housing, Information Management Division, Environmental Health, Human Resources, Planning, Revenues and Benefits and Technical Services). Two services (Housing and Environmental Health) completed all of their impact assessments; the other 6 services completed some of their impact assessments. Those impact assessments not completed on time have been re-scheduled for completion during 2008/09. A full list of outcomes/actions arising out of completed equality impact assessments is contained in Appendix 3. A revised timetable for equality impact assessments during 2008/09 is set out in Appendix 4.
- 3.5 The Corporate Equality Steering Group (comprising officers from all three directorates plus an employee representative) is responsible for overseeing progress with the equality standard and equality impact



assessments. Actions that come out of equality impact assessments will be delivered through individual services however, the steering group will look at all of the actions and co-ordinate activity to ensure there is no duplication of work. The steering group will also monitor the equality impact assessment timetable. Corporate themes arising out of equality impact assessments during 07/08 include monitoring, training and consultation.

- 3.6 A stage 1 (or initial assessment) equality impact assessment establishes how the policy or service meets different needs according to race, gender, disability, sexual orientation, religious belief or age. It also examines whether there are any obvious barriers and if any improvements can be made. All of the equality impact assessments that have been conducted over the last 12 months needed only a stage 1 assessment, with the exception of Choice Based Lettings, which will proceed to a stage 2 assessment. A stage 2 assessment is required if any major barriers are identified in stage 1; this will entail a more detailed study; so far only 1 equality impact assessment will require a stage 2 assessment.
- 3.7 The Council has a statutory responsibility to report findings from progress made with the race, disability and gender equality schemes as set out in Appendix 1. Findings from equality impact assessments embrace race, disability, gender, sexuality, age and religious belief.

#### **4. CONCLUSIONS**

- 4.1 Cabinet is asked:
- to note progress made with the corporate equality policy action plan (Appendix 1)
  - endorse the new corporate equality action plan (Appendix 2)
  - to note the findings from equality impact assessments conducted during 2007/08 (Appendix 3)
  - endorse the revised equality impact assessment timetable set out in Appendix 4.

#### **Background Papers**

Corporate Equality Policy  
Appendix 1 - Corporate Equality Policy - Action Plan Progress  
Appendix 2 - Corporate Equality Policy – Action Plan 2008/09  
Appendix 3 – findings from equality impact assessment 2007/08  
Appendix 4 – Equality Impact Assessment timetable (08/09)

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## Corporate Equality Policy - Action Plan progress 2007/08

Action	Progress	Further or continuing work
<p>Formulate &amp; adopt a Corporate Equality Policy                      Make a corporate commitment to develop a corporate equality policy (CEP)                      CEP to be completed and signed off and taken through Member approval process by March 07                      Publish corporate equality plan                      Steering group to sign off CEP by March 07</p>	<p>Completed                      Completed</p>	<p>Monitoring</p>
<p>Each Division to commit to engage in consultation on service delivery</p>	<p>Completed</p>	<p>Review CEP March 2010</p>
<p>Ensure draft CEP has been circulated for consultation                      Ensure CEP &amp; corporate equality policy is subject to internal &amp; external consultation</p>	<p>Completed</p>	<p>Corporate support and coordination for this where appropriate</p>
<p>Establish consultation with designated community, stakeholder groups and wider community on all aspects of equality policy                      Establish mechanism for consultation with designated community, stakeholder groups and wider community on all aspects of equality policy</p>	<p>Complete</p>	
<p>Engage in consultation with Members, employee representatives and services on EIA and the CEP                      Corporate Equality Policy to be reported to Members &amp; Employee Panel/ELAG as appropriate for comment.</p>	<p>Consultation &amp; Engagement Strategy now in place</p>	<p>Further work required to deliver actions within the consultation &amp; engagement strategy</p>
<p>Divisional commitment to comprehensive equality policy                      Directorates to commit their services to take appropriate action to</p>	<p>Complete</p>	
	<p>Completed (links to results of EIA's and performance</p>	

**Appendix 1**

<b>Action</b>	<b>Progress</b>	<b>Further or continuing work</b>
comply with corporate equality policy, Race, Disability and Gender Equality Scheme's	management)	
Divisional commitment to setting equality targets Directorates to commit services to linking their service plans to the Corporate Equality Policy	Completed (links to results of EIA's and performance management )	
Divisional commitment to equality action planning Directorates to commit services to setting equality targets in their service plans where gaps identified	Complete (links to results of EIA's and performance management)	
Organise corporate equality training	Completed– training programme in place	Annual review of training
Divisional commitment to allocation of specific resources for improving equality practice	Completed	EIA process now commenced. Services need to consider whether action arising out of EIA's can be met within existing resources
Adopt recruitment procedures which use non-discriminatory practices Any gaps will be included in an over-arching employment policy An equality objective will be built into management competencies and a mechanism for measuring effectiveness will be developed	Recruitment policy adopted and Awarded Positive about Disability (two ticks ✓✓) status	Under review to align with role out of Resource Link.  Competencies being planned for introduction in April 2009

## Appendix 1

<b>Action</b>	<b>Progress</b>	<b>Further or continuing work</b>
Commitment to an employment equality assessment of the Local Labour Market Area (comparative study of pay, terms and conditions)	Completed	This will become an ongoing review
Engage in employment equality assessment of LLMA Investigate if required		On-going
Engage in workforce profiling and an equal pay review Equal pay audits completed annually for internal comparison. Investigate if required to compare against external comparators	Complete – incorporated into an annual report and submitted to Employment Panel, published on Modern.Gov	On-going
Commitment to establish a fair employment and equal pay policy Produce an over-arching employment policy Commitment to developing an equal employment and equal pay element of CEP incorporating the employment related issues from RES and including those assessments of organisation & individual requirements required for compliance with the DDA Produce an over-arching employment policy	Completed  Completed	HR Equality Policy currently being researched
Commitment to adopt procedures to ensure that publicity for vacancies does not unfairly restrict the range of applicant	Completed	EIA on Recruitment Policy on-going
Adopt procedures to ensure that publicity for vacancies do not unfairly restrict the range of applicants Conduct full EIA if required. Policy to be defined in overarching employment policy.	Positive about Disability status achieved	On-going HR Equality Policy currently being researched
Adopt written procedure or document existing procedure Produce a standard range of application forms and job descriptions Already in place but HR to commit to review annually	Complete	
Develop corporate mechanism for assessing development of service	Completed	On-going review to

## Appendix 1

<b>Action</b>	<b>Progress</b>	<b>Further or continuing work</b>
level equality objectives and targets	Monitoring mechanism included within Performance Management system	establish whether further detail within the performance management system is required.
Create structure for overseeing development of information and monitoring systems	On-going (Monitoring research)	
Ensure procedures for responding to harassment on grounds of race, disability and gender are in place Plan/scope how to review existing mechanisms e.g. Open Out, Complaints Policy, Dignity at Work, Grievance & Disciplinary.	Completed	Review of procedures: <ul style="list-style-type: none"> <li>• Complaints policy</li> <li>• Dignity at Work policy</li> <li>• Grievance &amp;</li> <li>• Disciplinary policy</li> <li>• Open Out</li> </ul>
Each directorate to engage in consultation with designated community, staff & stakeholder groups where appropriate  Directorates to consider consultation/engagement with designated community, staff & stakeholder groups  Produce a plan which enables Directorates to plan, co-ordinate, consult and engage with community, staff etc	Complete - Consultation & Engagement Strategy now in place	Further work required to deliver actions within the consultation & engagement strategy  Establish consultation & engagement database and calendar
Each directorate to engage with equality impact assessment, scrutiny and audit on service delivery	Complete	

## Appendix 1

<b>Action</b>	<b>Progress</b>	<b>Further or continuing work</b>
<p>Produce a plan that details the following processes:</p> <ul style="list-style-type: none"> <li>To ensure that Members undertake scrutiny/audit of corporate/strategic equality issues</li> <li>Reporting issues emerging from EIA of services to Members</li> </ul>		<p>Review of Member training First report due May 2008</p>
<p>Engage in department and service area EIA Draft training plan and programme</p>	<p>complete</p>	<p>EIA training commenced and on-going</p>
<p>Engage in development of service level equality objectives and targets Include in performance management framework and work with the service planning process</p>	<p>Complete – EIA process is linked with performance management</p>	
<p>Review of services should include the procurement function and all contracted services &amp; partnership arrangements Consideration of a plan to ensure that any review of services include the procurement function and all contracted services &amp; partnership arrangements</p>	<p>Complete – EIA of Procurement Strategy &amp; Partnership Framework completed</p>	<p>Implement actions arising out of Procurement Strategy EIA</p>
<p>Adopt procedures to ensure that publicity for vacancies do not unfairly restrict the range of applicants Conduct full EIA if required. Policy to be defined in overarching employment policy.</p>	<p>Positive about Disability status achieved</p>	<p>On-going HR Equality Policy currently being researched</p>
<p>Adopt written procedure or document existing procedure Produce a standard range of application forms and job descriptions Already in place but HR to commit to review annually</p>	<p>Complete</p>	

Appendix 1

Action	Progress	Further or continuing work
<b>Race Equality Scheme (RES) - Action Plan 2006 – 2009</b>		
<b>Action</b>	<b>progress</b>	<b>Further or on-going work</b>
Initial listing and assessment of functions/policies for relevance to general duty	Complete	
Consultation of RES	Complete	
Equality Impact assessments to commence	Complete	
Development of guidance for assessment of proposed policies for impact on race and other equality areas	Complete	
Development of guidance for monitoring & assessment of existing policies	Complete	
Development of guidance for consulting on proposed policies	Complete	
Review of systems and procedures in relation to ethnic monitoring		On-going research on corporate monitoring
Report on RES to Cabinet	Complete	Spring 2008
Publication of RES	Complete	Spring 2008
Establish departmental equality working groups	Not required	
Evaluate equality training to date	Complete	Annual review
Development of training plan for employees (linked into equality standard training) e.g. for For equality steering group For managers/general staff Members	Complete	
Publication of results of equality impact assessments	Complete	Spring 2008



Appendix 1

Action	Progress	Further or continuing work
Examination of previous years employment (equality monitoring) data	Complete Incorporated into an annual report submitted to Employment Panel and published via Modern. Gov Complete	On-going Annual activity
Publication of employment monitoring information	Complete Incorporated into an annual report submitted to Employment Panel and published via Modern. Gov	On-going Annual activity
Annual report on progress to date in achieving RES targets	Complete	Spring 2008
Publication of Annual report on website	Complete	Spring 2008
Review of procurement strategy in relation to race	Complete	
Review of complaints procedure in relation to race, gender & disability		On-going EIA of Corporate Complaints Policy now re-scheduled 08/09
<b>Disability Equality Scheme (DES) - Action Plan 2006 – 2009</b>		
Initial listing and assessment of functions/policies for relevance to general duty	Complete	
Consultation on DES	Complete	
Process of impact assessments to begin	Complete	
Development of guidance for equality impact assessment of proposed policies	Complete	
Development of guidance for monitoring & assessment of existing	Complete	

Appendix 1

Action	Progress	Further or continuing work
policies		
Development of guidance for consulting on proposed policies	Complete	
Review of systems and procedures in relation to disability monitoring		On-going research on corporate monitoring
Report on DES to Chief Officers, Overview & Scrutiny & Cabinet	Complete	Spring 2008
Publication of DES	Complete	Spring 2008
Establish departmental equality working groups	Not required	
Evaluate equality training	Complete	Annual review of training
Development of training plan for employees (linked into equality standard training) e.g. for For equality steering group For managers/general staff Members	Complete	
Assessment and publication of results of equality impact assessments		Spring 2008
Examination of previous years employment (equality monitoring) data	Complete - Incorporated into an annual report submitted to Employment Panel and published via Modern.Gov	
Publication of employment monitoring information	Complete - Incorporated into an annual report submitted to Employment Panel and published via Modern.Gov	
Annual report on progress to date in achieving DES targets to Chief Officers, Overview & Scrutiny & Cabinet	Complete	Spring 2008

Appendix 1

Action	Progress	Further or continuing work
Publication of Annual Report on website	Complete	Spring 2008
Review of complaints procedure in relation to race, gender & disability		EIA of Corporate Complaints Procedure re-scheduled for 08/09
Consider findings from DES consultation: <ul style="list-style-type: none"> <li>Each service to consider recommendations and findings of DES consultation and identify actions</li> </ul>	Partial achievement – not all services responded	Consideration to be given by all services
More education and training for employees to raise awareness and change attitudes to disabled people: <ul style="list-style-type: none"> <li>Linked with development of training plan for employees</li> <li>Specific training for frontline staff on disability issues – to be assessed through Personal Development Reviews</li> </ul>	Complete – general training programme on-going.	Specific training (if required) to be identified spring 2008
A dedicated department for disability issues that is accessible and widely publicised as a centre for information and consultation	Impractical to support this however the Policy Division & the Equality Steering Group can partially fulfil this role	On-going
Improve physical access to HDC buildings		On-going
Improved transportation in rural areas with adjustments to access for disabled people on buses:	Completed and referred to Cambs Local Transport Plan and Huntingdonshire Accessibility Action Plan	
Dedicated parking, greater penalties for anti-social parking in disabled (accessible) bays and adjustments to roads and paving	Considered as part of the Car Parking Strategy	On-going

Appendix 1

Action	Progress	Further or continuing work
A transparent complaints procedure, well trained staff with an understanding of the needs of disabled people.		On-going - EIA of Corporate Complaints Procedure due 08/09
Better communication and flow of information on available funding and facilities for disabled people	Complete Information and communication requirements of disabled people were considered as part of the review of the Customer Service Strategy	On-going
More dedicated leisure facilities with improved access and support available: <ul style="list-style-type: none"> <li>• Consider the extent to which suitable facilities and activities can be provided by leisure services and leisure development</li> </ul>	Good progress has been made	On-going
Greater access to IT and Internet for dissemination of information: <ul style="list-style-type: none"> <li>• Each service to consider how to improve access to services and information about their service using the Intranet/Internet</li> </ul>	Complete in terms of IMD	On-going - individual services to continue to consider
Long term involvement with disability support groups and individuals regarding consultation and engagement:	Consultation & Engagement Strategy	On-going action

Appendix 1

Action	Progress	Further or continuing work
<ul style="list-style-type: none"> <li>HDC will commit to consultation and engagement with disability support groups and individuals</li> </ul>	complete	
<p>Consider how to consult with learning disabled in future DES and action plan consultation:</p> <ul style="list-style-type: none"> <li>Further work to ensure that groups/individuals representing the needs of learning disabled are included in any future consultation on disability</li> </ul>	Not complete	On-going
<b>Gender Equality Scheme (GES) 2006-09 – Action Plan</b>		
Initial listing and assessment of functions/policies for relevance to general duty	Complete	
Consultation on GES	Complete	
Process of impact assessments to commence	Complete	
Development of guidance for equality impact assessment of proposed policies	Complete	
Development of guidance for monitoring & assessment of existing policies	Complete	
Development of guidance for consulting on proposed policies	Complete	
Review of systems and procedures in relation to gender monitoring		On-going research on corporate monitoring
Report on GES to Chief Officers, Overview & Scrutiny & Cabinet	Complete	Spring 2008
Publication of GES	Complete	Spring 2008
Establish departmental equality working groups	Not required	

Appendix 1

Action	Progress	Further or continuing work
Development of training plan for employees (linked into equality standard training) e.g. for For equality steering group For managers/general staff Members	Complete	
Assessment and publication of results of equality impact assessments	Complete	Spring 2008
Examination of previous years employment (equality monitoring) data	Complete	Annual report
Publication of employment monitoring information	complete	Annual report
Further to analysis of employment monitoring data (05/06) more research in terms of: <ul style="list-style-type: none"> <li>• Pay gap</li> <li>• Imported discrimination</li> <li>• Encouraging more females into high grades</li> <li>• Encouraging more males into position graded 8 – 13</li> </ul>	Initial comparison made of internal comparisons – an annual analysis will now be incorporated into the report made annually to Employment Panel and published therefore on Modern.Gov	On-going
Analysis of training take up by gender using ResourceLink	Currently awaiting report which will then enable annual review and comparison to employee base	On-going
Annual report on progress to date in achieving GES targets to Chief Officers, Overview & Scrutiny & Cabinet	Complete	Spring 2008
Publication of Annual Report on web site	Complete	Spring 2008
Review of complaints procedure in relation to race, gender & disability		EIA of corporate complaints policy re-

**Appendix 1**

<b>Action</b>	<b>Progress</b>	<b>Further or continuing work</b> scheduled for 08/09
Consult with employees Conduct consultation with ELAG./employees on Gender Equality	Complete	
Review personnel policies Ensure gender equality, equal pay and under-represented are considered as part of review of personnel policies	As part of EIA timetable all HR policies and procedures will be reviewed	On-going
Monitor key employment and workforce profiles by gender, age, ethnic origin, disability, sexual orientation, religion and belief		On-going
Raise general awareness/monitor/evaluate different working patterns and work life balance options available to both male and female employees.		On-going
Develop Consultation & Engagement strategy to support GES	Complete	
Open Out reporting stations across the district have the ability to record Hate crime, including gender related crime	Complete	
Undertake further work to consider why employees do not feel confident reporting gender discrimination		On-going
Undertake further work to explore further the reasons why people feel that they have been discriminated against		On-going
Information relating to flexible working to be considered as part of the review of the Flexible Working Policy	Complete	
Any future employee surveys need to consider the difficulties in obtaining a representative sample from across the whole of the Council	Next employee survey due 2009	On-going

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Appendix 2

**Action Plan 2008/2009**

<b>Action</b>	<b>Responsibility</b>	<b>Target</b>
Annual review of equality related training (including Member training) <ul style="list-style-type: none"> <li>• Evaluate training to date</li> <li>• Consider linking with development of training plan for employees</li> <li>• Specific training for frontline staff on disability issues – to be assessed through Personal Development Reviews</li> </ul>	PSSD & HR	September 08
Services to consider whether actions arising out of Equality Impact Assessments can be met within existing resources – a co-ordinated approach to be adopted where appropriate	All	
Keep Recruitment Policy under review to align with role out of Resource Link. Ensure introduction of competencies	HR	April 2009
Examination of previous years employment (equality monitoring) data Monitoring and analysis of workforce profiles by equality categories for: <ul style="list-style-type: none"> <li>• applicants for employment, training and promotion</li> <li>• those who receive training</li> <li>• those who benefit or suffer detriment as a result of performance assessment procedures</li> <li>• those involved in grievance procedures</li> <li>• those who are the subject of disciplinary procedures</li> <li>• those who leave the council's employment</li> </ul>	HR	October 2008
Ongoing review of employment equality assessment of local labour market assessment (LLMA)	HR/PSSD	October 2008
Complete HR Equality Policy	HR	June 2008
Complete Equality Impact Assessment of Recruitment Policy	HR	June 2008
Further to analysis of employment monitoring data more research in terms of: <ul style="list-style-type: none"> <li>• Pay gap</li> <li>• Imported discrimination</li> </ul>	HR	March 2009

Appendix 2

Action	Responsibility	Target
<ul style="list-style-type: none"> <li>Encouraging more females into high grades</li> <li>Encouraging more males into position graded 8 – 13</li> </ul>	HR	March 2009
Ensure gender equality, equal pay and under-represented are considered as part of review of personnel policies	HR	March 2009
Raise general awareness/monitor/evaluate different working patterns and work life balance options available to both male and female employees.	HR	March 2009
Undertake further work to consider why employees do not feel confident reporting gender discrimination	HR	March 2009
Undertake further work to explore further the reasons why people feel that they have been discriminated against	HR	March 2009
Any future employee surveys need to consider the difficulties in obtaining a representative sample from across the whole of the Council	HR	Next employee survey due 2009 On-going
Review Corporate Equality Policy	PSSD	March 2009
Annual review of action plan		March 2010
Review of Corporate Equality Policy		March 2010
Development of general equality scheme		September 2008
Complete corporate monitoring research	PSSD	
Undertake equality impact assessment of :		
<ul style="list-style-type: none"> <li>Corporate complaints policy and procedures</li> <li>Dignity at Work policy</li> <li>Grievance &amp; Disciplinary policy</li> <li>Open Out</li> </ul>	Administration HR HR Community Initiatives	March 2009 March 2009 March 2009
Further work required to deliver actions within the consultation & engagement strategy	PSSD	March 2009
Report on progress with race/disability/gender equality schemes and Corporate Equality Policy Action Plan targets to Chief Officers, Overview &	PSSD	Spring 2008

Appendix 2

Action	Responsibility	Target
Scrutiny & Cabinet		
Publication of race/disability/gender equality schemes	PSSD	Spring 2008
Assessment and publication of results of equality impact assessments	PSSD	Spring 2008
Consider findings from disability equality scheme consultation: <ul style="list-style-type: none"> <li>• Re-launch consultation findings</li> <li>• Each service to consider recommendations and findings of DES consultation and identify actions</li> </ul>	PSSD All	September 2008
More dedicated leisure facilities with improved access and support available: <ul style="list-style-type: none"> <li>• Consider the extent to which suitable facilities and activities can be provided by leisure centres and leisure development</li> </ul>	Administration Environment & Community Services	March 2009
Greater access to IT and Internet for dissemination of information: <ul style="list-style-type: none"> <li>• Each service to consider how to improve access to services and information about their service using the Intranet/Internet</li> </ul>	Complete in terms of IMD - individual services to continue to consider this.	
Long term involvement with disability support groups and individuals regarding consultation and engagement: <ul style="list-style-type: none"> <li>• commit to consultation and engagement with disability support groups and individuals</li> <li>• Further work to ensure that groups/individuals representing the needs of learning disabled are included in any future consultation on disability</li> </ul>	PSSD	Progress to be made by March 2009
Consider self assessment against requirements of Level 3 of the Equality Standard. Produce action plan for achieving Level 3 (if required)	PSSD	March 2009
On-going review to establish whether further equality detail within the performance management system is required	PSSD	March 2009

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**Equality Impact Assessments conducted 2007/08 – actions or issues arising**

Name of Policy or service area	Actions/issues arising out of assessment	Target/date for completion
<p><b>Young Persons Housing Strategy</b></p>	<p><b>Actions/issues arising out of assessment</b></p> <ul style="list-style-type: none"> <li>• Confirm the percentage of BME population. Aged 16-25</li> <li>• Devise a monitoring system to record the number of housing advice queries from lesbian, gay, bisexual or transgender clients.</li> <li>• Consider the extent to which young people with complex needs are not considered within the scope of this strategy.</li> <li>• Consider whether sexuality and religion should be included on application forms in the future. This is regarded as a corporate issue for the equality steering group to consider.</li> <li>• Review the promotional material available to ensure all religions and sexual orientation is positively promoted.</li> <li>• Consult employees and referral agencies to identify if they believe that disadvantage or unfavourable outcomes could be experienced by certain groups.</li> </ul>	<p>2009</p>
<p><b>Rent Deposit Scheme</b></p>	<ul style="list-style-type: none"> <li>• Referral of EIA results to Landlords' Forum</li> <li>• To check take-up of scheme by clients (for whom English is not their 1<sup>st</sup> language) to ascertain utility of translation of form and guidance into Polish and Portuguese</li> </ul>	<p>2009</p>
<p><b>Homelessness Strategy</b></p>	<p>No immediately identified issues other than to continue to monitor the need for translation of advice literature into different community languages together with any trends in households accessing this service.</p>	<p>N/A</p>
<p><b>Choice Based Lettings</b></p>	<p>Stage 2 assessment required</p> <ul style="list-style-type: none"> <li>• To ascertain whether the aims of the CBL policy and best practice are compatible with the corporate equality targets, as well as CBL equalities best practice recommended by the DCLG and EHRC</li> <li>• To decide whether to translate any of the CBL materials into other languages</li> <li>• To ascertain whether the CBL policy will affect any of the groups assessed using the EIA process</li> <li>• To frame a monitoring process to scrutinise the effects of the shift of policy to CBL, and</li> </ul>	<p>2009</p>

Appendix 3

Name of Policy or service area	Actions/issues arising out of assessment	Target/date for completion
	<p>direct lets</p> <ul style="list-style-type: none"> <li>• To monitor the utilisation of the different media to access the CBL service</li> <li>• Monitoring language take up and the use of other media to access the service</li> <li>• To make any recommendation that will widen access, and to frame a monitoring procedure that will track access by affected groups</li> </ul>	
<p><b>Enabling new development procedures</b></p>	<ul style="list-style-type: none"> <li>• Ask Housing Associations if they have completed any EIA's</li> <li>• Consider whether the development of specialist homes for people with disabilities and for those in need of supported housing are in line with the identified need, pro rata, and monitor the resources that are available to develop such schemes (including shared ownership option)</li> <li>• Consider whether adherence to the Lifetime Home standard should be rolled out further in the district as a policy. This will follow research into local RSL policy, national policy, evaluation and cost analysis.</li> <li>• Consider the role of low cost home ownership in meeting the need of target groups by analysing the income of these groups and discussing the issue with lead commissioners of health and social care</li> <li>• Consider how up to date the data is that is used in the development programme is. Identify any secondary data or prevalence data that could also be used to inform the programme</li> <li>• Consult with Housing Corporation/RSLs/Others</li> <li>• Consider the impact of the <u>County Disability Strategy on local policies and procedures</u></li> </ul>	<p>2009</p>
<p><b>Housing Strategy 2006-2011</b></p>	<ul style="list-style-type: none"> <li>• Consider the need for the production of the strategy translated into community languages or produced in large type or taped.</li> <li>• Reference of this EIA to Sub Regional Housing Groups</li> </ul>	<p>2009</p>

Appendix 3

Name of Policy or service area	Actions/issues arising out of assessment	Target/date for completion
<p><b>Older People Ageing Well Strategy</b></p>	<ul style="list-style-type: none"> <li>• Consider whether sexuality and religion should be included on application forms in the future.</li> <li>• Consider if publicity material positively encourages people from all religions and sexual orientation.</li> <li>• Ask other Councils what they have found when undertaking similar EIAs.</li> <li>• Explore what services supported housing services are available for older people with a learning disability and mental health needs.</li> <li>• Quantify the numbers or prevalence rate of older people with a learning disability and enduring mental ill health.</li> </ul>	<p>2009</p>
<p><b>Disabled Facilities Grants</b></p>	<ul style="list-style-type: none"> <li>• Data analysis of applications, cancellations and time taken to process applications by ethnicity, age and gender to ensure that applications from certain groups do not disadvantage any group.</li> <li>• Consider whether people could 'fall through the net' if they are not literate in English and therefore do not return forms.</li> <li>• Consider whether sexuality and religion should be included on application forms in the future.</li> <li>• Consult staff and Occupational Therapists to identify if they believe that disadvantaged or unfavourable outcomes could be experienced by certain groups.</li> <li>• Ask other Councils what they have found when undertaking similar EIA's</li> </ul>	<p>2009</p>
<p><b>Empty Homes Strategy</b></p>	<ul style="list-style-type: none"> <li>• Referral of EIA to Landlords' Forum</li> <li>• Private Sector Housing Officer to record whether or not any assistance was requested or given to assist in the implementation of the strategy.</li> </ul>	<p>2009</p>
<p><b>Housing Repairs Assistance</b></p>	<ul style="list-style-type: none"> <li>• Data analysis of applications, cancellations and time taken to process applications by ethnicity to ensure that applications from certain groups do not disadvantage any group.</li> <li>• Consider whether people could 'fall through the net' if they are not literate in English and therefore do not return forms</li> </ul>	<p>2009</p>

Appendix 3

Name of Policy or service area	Actions/issues arising out of assessment	Target/date for completion
	<ul style="list-style-type: none"> <li>• Consider whether sexuality and religion should be included on application forms in the future.</li> <li>• Consult staff and Occupational Therapists to identify if they believe that disadvantage or unfavourable outcomes could be experienced by certain groups.</li> <li>• Ask other Councils what they have found when undertaking similar EIAs.</li> </ul>	
<b>Communications &amp; Marketing Strategy</b>	<ul style="list-style-type: none"> <li>• Ensure there are links between the Communications &amp; Marketing Strategy and the Corporate Equality Policy and Consultation &amp; Engagement Strategy</li> <li>• Ensure that the council's identity and logo are considered in terms of equality</li> <li>• Research into how other councils have incorporate equality issues into their Communication &amp; Marketing Strategies</li> </ul>	2009
<b>Consultation &amp; Engagement Strategy</b>	<ul style="list-style-type: none"> <li>• Further work to understand the barriers to consultation in terms of gender, religious belief and sexual orientation</li> <li>• Review outcomes of this EIA after 1 year</li> </ul>	April 2009 April 2009
<b>Partnership Framework</b>	<ul style="list-style-type: none"> <li>• Additional questions added to the Performance and Serving the Public sections in the Partnership Health check (do partners share the same approach to equality as HDC; how do the outcomes of the partnership link in with the needs around race, gender and disability</li> <li>• Review (after 12 months) to establish how successful the 2 additional questions are.</li> </ul>	Complete  April 2009
<b>Attendance management policy (sickness policy)</b>	<ul style="list-style-type: none"> <li>• To ensure that attendance issues are dealt with equitably across the organisation through research and evaluation.</li> <li>• To research and evaluate through identification of current practice across HDC</li> <li>• Evaluation of current practice identifying internal best practice and benchmarking externally as appropriate</li> <li>• To introduce a policy and procedure building on current best practice across the organisation built on:</li> <li>• Identification of current organisational best practice usage</li> <li>• Identification of sector best practice</li> </ul>	April 2009 April 2009



### Appendix 3

Name of Policy or service area	Actions/issues arising out of assessment	Target/date for completion
<p><b>Leisure Development</b></p>	<ul style="list-style-type: none"> <li>• Development of policy and procedure reflecting the culture and aims of the organisation</li> </ul> <p>Following adoption of a policy and procedure to ensure through programme of training/attendance at managers meetings that implementation is applied equitably in all areas</p> <p>Develop staff awareness and knowledge:</p> <ul style="list-style-type: none"> <li>○ Ensure staff awareness is reviewed as part of appraisal process. Ensure new staff members receive appropriate training</li> </ul> <p>Encourage referrals from all sections of community to Exercise Referral by highlighting opportunities to health professionals:</p> <ul style="list-style-type: none"> <li>○ Continue to monitor referrals by equality and if numbers fall below expected ratios positively promote services.</li> <li>○ Ensure that registration agreement with Health Professionals ensures access from point of referral for all the community where their medical condition allows.</li> </ul> <p>Ensure appropriate information and resources for public:</p> <ul style="list-style-type: none"> <li>○ Review current provision of literature.</li> <li>○ Continue to use positive role models in promotions.</li> <li>○ Fully utilise all information channels – web technology, email, hard copy literature, Customer service centre etc.</li> </ul> <p>Increase awareness of clubs and other partners:</p> <ul style="list-style-type: none"> <li>○ Encourage partner clubs and coaches to undertake appropriate training including: A Club for All, Equity in Your Coaching and Coaching Disabled Performers.</li> <li>○ Work towards only working with partner organisations who have a commitment to equality and who have attended appropriate training.</li> <li>○ Promote the availability of training courses in conjunction with Living Sport</li> </ul> <ul style="list-style-type: none"> <li>• Further research and evidence gathering to show the full range of accessible services offered by the leisure centres</li> </ul>	<p>All actions are on-going</p>
<p><b>Leisure Centres Customer Care Policy</b></p>		<p>April 2009</p>

Appendix 3

Name of Policy or service area	Actions/issues arising out of assessment	Target/date for completion
<b>Unauthorised encampment &amp; Travellers Policy</b>	The preliminary evidence shows that all relevant equality and diversity issues involved in relation to all specialist activities with Gypsies and Travellers are under consideration and actions are in place to develop a number of issues. Stage 2 not required and no further objectives created.	N/A
<b>Huntingdonshire Community Safety Partnership</b>	<ul style="list-style-type: none"> <li>• Seek sustainable funding for the Open Out Co-ordinator post (for next 5 years)</li> <li>• Assess effectiveness of linking the Open Out Co-ordinator post more closely to HDC and Cambridgeshire Constabulary's community safety units</li> <li>• Review Open Out</li> </ul>	Complete From April 2008 April 2009
<b>Arts Service</b>	<p>To ensure that people from minority cultures have equal access to information on arts events &amp; activities:</p> <ul style="list-style-type: none"> <li>○ Identify &amp; liaise with "community champions" to act as 2-way conduits of information to groups of people from minority cultures</li> <li>○ Following work with community champions, develop specific projects for target groups, subject to identifiable need, capacity &amp; funding</li> <li>○ Provide relevant print for the projects in targeted languages</li> </ul> <p>To ensure that people with disabilities have equal access to information on arts events &amp; activities:</p> <ul style="list-style-type: none"> <li>○ Encourage local groups &amp; societies to include reference to the accessibility of their venues on their own print &amp; publicity</li> </ul>	<p>March 2009</p> <p>On-going</p> <p>On-going</p> <p>June 2008</p>
<b>Statutory nuisance service</b>	The preliminary evidence shows that all relevant equality and diversity issues involved in relation to the specialist service of Statutory nuisance have been given due consideration however a more detailed consultation exercise is planned	N/A
<b>Health &amp; Safety (external)</b>	<p>To identify whether there are any areas of the service where people feel they have not been able to access the service or been treated unfairly because of Equality issues:</p> <ul style="list-style-type: none"> <li>○ To conduct a Customer and business survey and collate data.</li> </ul>	Jan 2008

Appendix 3

Name of Policy or service area	Actions/issues arising out of assessment	Target/date for completion
407	<ul style="list-style-type: none"> <li>o To identify and liaise with appropriate Community groups</li> </ul> <p>Ensure appropriate information and resources for businesses and consumers:</p> <ul style="list-style-type: none"> <li>o To review current provision of advisory literature.</li> <li>o Further review to be carried out in light of comments from consultation process</li> </ul> <p>Develop Staff awareness and knowledge:</p> <ul style="list-style-type: none"> <li>o Review staff awareness on equality and diversity issues and consider appropriate training or information as part of annual appraisal process and Personal Development Profile (PDP). Consider use of questionnaire to assess staff awareness</li> <li>o EIA as a standing item on team meetings</li> <li>o Consider EIA issues as part of management and peer review processes.</li> <li>o 6 Staff to attend Food Standards Agency (FSA) endorsed food and faith training session</li> <li>o Member Staff to attend Cambridgeshire Islamic awareness day, and feedback to rest of team</li> </ul>	<p>08/09</p> <p>On-going If required</p> <p>On-going</p> <p>Complete/on-going Complete/on-going Course arranged Feb 08 Complete</p>
Food Safety	<p>To identify whether there are any areas of the service where people feel they have not been able to access it or been treated unfairly because of Equality issues:</p> <ul style="list-style-type: none"> <li>o To conduct a Customer and business survey and collate data.</li> <li>o To identify and liaise with appropriate Community groups</li> </ul> <p>Ensure appropriate information and resources for businesses and consumers:</p> <ul style="list-style-type: none"> <li>o To review current provision of advisory literature.</li> <li>o Further review to be carried out in light of comments from consultation process</li> </ul> <p>Develop Staff awareness and knowledge:</p> <ul style="list-style-type: none"> <li>o Review staff awareness on equality and diversity issues and consider appropriate training or information as part of annual appraisal process and PDP. Consider use of questionnaire to assess staff awareness</li> <li>o EIA as standing item on team meeting</li> <li>o Consider EIA issues as part of management and peer review processes.</li> </ul>	<p>Jan 2008 08/09</p> <p>On-going If required</p> <p>On-going</p> <p>Complete/on-going Complete/on-going</p>

Appendix 3

Name of Policy or service area	Actions/issues arising out of assessment	Target/date for completion
	<ul style="list-style-type: none"> <li>o 6 Staff to attend FSA endorsed food and faith training session</li> <li>o Member Staff to attend Cambridgeshire Islamic awareness day, and feedback to rest of team</li> </ul>	<p>Course arranged Feb 08</p> <p>Complete</p>
<p><b>Procurement Strategy</b></p>	<ul style="list-style-type: none"> <li>• Review government best practice and advice in terms of equality and procurement</li> <li>• Amend the draft Procurement Strategy.</li> <li>• Improve Equalities terms in to Councils standard Terms &amp; Conditions.</li> <li>• Develop the Equalities element of procurement training.</li> <li>• Amend 'Expressions of Interest' and 'Pre-Qualification Questionnaire' to include equalities aspects.</li> <li>• Write and publish guidance.</li> <li>• Development assessment techniques to ensure equalities are given appropriate weight in evaluations.</li> <li>• Amend website:</li> <li>• Intranet to link to guidance and documentation.</li> <li>• Internet to explain Council's equalities and procurement policy.</li> <li>• Awareness campaign for all Officers.</li> <li>• Introduce contract monitoring.</li> </ul>	
<p><b>Web &amp; Intranet Strategy</b></p>	<ul style="list-style-type: none"> <li>• Target of AAA accessibility of 98% of pages by 2009 (subject to appropriate funding and resourcing + migration of site to new Microsoft SharePoint Platform)</li> <li>• Monitoring of website and advice to employees to ensure that captions are included in all video files that are placed on the Internet</li> <li>• Continued education of Authors and Editors on Accessibility issues.</li> <li>• Continued adherence (and auditing) of the Web Authoring policy through drop in training sessions and phone advice.</li> <li>• IMD will investigate value of "paid for" automatic translation.</li> </ul>	<p>2009</p> <p>On-going</p> <p>On-going</p> <p>On-going</p> <p>08/09</p>

Appendix 3

Name of Policy or service area	Actions/issues arising out of assessment	Target/date for completion
	<ul style="list-style-type: none"> <li>To continue to advise web authors creating surveys to contact Policy so that they can be checked for Equality and Disability questions.</li> <li>IMD/ Customer Services to survey "hard to reach" groups and others who do not use web services. Website survey to include ethnicity and disability monitoring questions</li> </ul>	<p>On-going</p> <p>April 2009</p>
<b>Recovery Policy</b>	<p>The preliminary evidence shows that all relevant equality and diversity issues have been considered – no actions are required</p>	N/A
<b>Benefits Prosecution Policy</b>	<ul style="list-style-type: none"> <li>Further research and evidence gathering to demonstrate how current procedures are equitable and fair.</li> </ul>	June 2008
<b>Cash payments</b>	<p>The preliminary evidence shows that all relevant equality and diversity issues have been considered – no actions are required</p>	N/A
<b>4 Co Planning – Control (informal discussion with applicants)</b>	<ul style="list-style-type: none"> <li>Add a section on the Planning page (Internet) to promote the preliminary enquiry service (PENQ)</li> <li>Team leaders to review PENQ reply progress as part of their weekly casework reviews</li> <li>Amend Internet pages to clearly indicate that information in alternative formats can be provided</li> </ul>	To be confirmed
<b>Development Planning Policy</b>	<ul style="list-style-type: none"> <li>Use plain English and minimise jargon</li> <li>Gather advice in respect of planning for Gypsies and Travellers</li> <li>Encourage women to respond to consultations</li> <li>Put in place a mechanism to receive comments in different formats</li> <li>Better involve children and young people in relevant issues</li> </ul>	To be confirmed

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Function/policy/procedure	Existing/proposed policies related to function	Priority
<b>Central Services Directorate</b>		
<b>Political Management Structures &amp; Support</b> To manage political management systems and to support effective representation		2008/09
<b>Electoral Services</b> <b>Brought over from 07/08</b>	No policies – will assess the service/function	2008/09
<b>Licensing Services</b> <b>Brought over from 07/08</b>	<ul style="list-style-type: none"> <li>o Statement of Licensing Policy</li> <li>o Statement of Gambling Policy</li> </ul> Other licensing issues (e.g. taxi, street collection etc) can be assessed separately	2008/09
<b>Leisure Centres</b> To offer a wide range of sport, recreational and social activities for all ages and abilities	Individual Leisure Centres' Business Plans. Leisure centre service plans Customer care policy? Impressions marketing plan? Junior activities & crèche policies NOP & EAP Policies New employee recruitment & induction policy	2008/09
<b>HR</b> Responsible for pay & performance, recruitment & selection, good employment & foster a culture of innovation in service delivery	Flexible working hours framework Performance related pay Personal development reviews Disciplinary and capability procedures Grievance procedures Joint consultation (ELAG) Job evaluation scheme Leave arrangements for part time staff Redundancy policy Mobile and home working People Strategy Recruitment strategy Management development Retain IIP Accreditation	2008/09
<b>Estates Service</b> The management of industrial/commercial properties and provision of advice and valuations		2008/09

**Huntingdonshire District Council  
Equality Impact Assessment timetable  
Year 2 timetable 2008/09**

**EIA's brought forward from 07/08 highlighted in red**

<b>Function/policy/procedure</b>	<b>Existing/proposed policies related to function</b>	<b>Priority</b>
<b>Health &amp; Safety</b> To promote a safe and healthy workforce and working environment		2008/09
<b>Economic Development</b> To encourage sustainable growth of local businesses and attract inward investment, including the Local Economy Strategy		2008/09
<b>Communication &amp; Marketing</b>	Code of practice on local government publicity Corporate branding Press release training Informally – event management & scrutiny of press releases	2008/09
<b>Policy</b> Internal support services, performance management, external funding, consultation & research, equality & diversity.		2008/09
<b>Tourism Services</b> To ensure Huntingdonshire offers a good quality visitor experience, including the Tourism Strategy for Huntingdonshire		2008/09
<b>Commerce &amp; Technology</b>		
<b>Customer First</b>	<b>Accessibility issues in specification of new system</b>	2008/09
<b>Customer services including:</b>	<b>Customer service strategy</b> <b>Customer service centre accessibility</b> <b>Call centre training</b>	
<b>Community initiatives</b>	No policies – will assess the 2 community information centres and community services Service Plan	
<b>Revenues slippage from 07/08</b>	<b>Any revenues EIA's brought forward from 07/08 (may include income - debt recovery and staff procedures/guidance notes-- which is now part of financial services)</b>	



**Huntingdonshire District Council  
Equality Impact Assessment timetable  
Year 2 timetable 2008/09**

**EIA's brought forward from 07/08 highlighted in red**

Function/policy/procedure	Existing/proposed policies related to function	Priority
<b>Financial Services</b>	Fraud Code of Conduct Fraud Terms of Reference Fraud Strategy Authorised Officer's Procedures x 2 Record Retention & Destruction Policy Overpayments Policy Benefit's Take-up Strategy Landlord's Policy RIPA & SPOC Guidance Notes Revenues Service Standards Bailiffs Code of Conduct Property Inspectors Manual Guidance on making Special Arrangements Discretionary Relief Hardship Relief Bailiffs Code of Conduct Property Inspectors manual Debt recovery Strategy Staff procedures/guidance notes	
<b>Environmental &amp; Community Services</b>		
<b>Caravan &amp; Camping sites</b> To ensure that sites are suitable for occupation		2008/09
<b>Private Sector Housing</b> Maximise fitness for occupation of dwellings and regulate landlord tenant obligations		2008/09
<b>Energy efficiency</b>	<b>Advice to the public on energy efficiency</b>	2008/09
<b>Professional Design Services</b> To assist in the completion of the Council's Capital Programme		2008/09
<b>Building Control</b>		2008/09

**Huntingdonshire District Council**  
**Equality Impact Assessment timetable**  
**Year 2 timetable 2008/09**  
**EIA's brought forward from 07/08 highlighted in red**

<b>Function/policy/procedure</b>	<b>Existing/proposed policies related to function</b>	<b>Priority</b>
To ensure building work complies with building regulations and planning condition, and to ensure the public are protected in respect of dangerous structures		
<b>Refuse Collection/recycling</b> Provision of domestic refuse collection		2008/09
<b>Charter Markets</b> To ensure the viability of weekly markets		2008/09
<b>Abandoned Vehicles</b> To remove abandoned vehicles from within the district		2008/09
<b>Countryside Services</b> To encourage the public's enjoyment and access to the countryside		2008/09
<b>Parks &amp; Open Spaces</b> To encourage the use of parks and open spaces, to promote a range of activities to encourage wide use and to encourage use by community groups and voluntary organisations		2008/09
<b>Refuse Collection (strategy)</b> Minimise waste and increase awareness of litter and recycling issues		2008/09
<b>Housing</b>	Any housing EIA's brought forward from 07/08	
<b>Heritage and Conservation</b> To promote an understanding of the historic environment and engage the public in order to share the responsibility of stewardship of the historic environment	<ul style="list-style-type: none"> <li>• Conservation Area Character Statements</li> </ul>	2008/09
<b>Development control</b> Determining planning applications and providing planning advice	<ul style="list-style-type: none"> <li>• Determining applications</li> <li>• Consulting on applications</li> <li>• Pre-application advice</li> </ul>	2008/09

**Huntingdonshire District Council  
Equality Impact Assessment timetable  
Year 2 timetable 2008/09**  
EIA's brought forward from 07/08 highlighted in red

<b>Function/policy/procedure</b>	<b>Existing/proposed policies related to function</b>	<b>Priority</b>
<p><b>Development Plans</b> To create policies and guidance to help in the creation of sustainable communities</p>	<ul style="list-style-type: none"> <li>• Local Development Framework</li> <li>• Planning policy</li> <li>• SCI</li> </ul>	2008/09
<p><b>Transport</b> To assist in the completion of the Cambridgeshire Transport Plan, to develop the Cycling Strategy and provide advice to Town Centre initiatives</p>	<ul style="list-style-type: none"> <li>• Market Town Transport Strategies</li> <li>• Accessibility Action Plan</li> <li>• Cycling Strategy</li> <li>• Cambs Transport Plan</li> </ul>	2008/09
<p><b>Planning Enforcement</b></p>	<ul style="list-style-type: none"> <li>• Enforcement of planning regulations</li> </ul>	2008/09
<p><b>Urban Design, Trees and Landscape</b></p>	<ul style="list-style-type: none"> <li>• Urban Design Frameworks</li> </ul>	2008/09

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<b>CABINET</b>	<b>12 JUNE 2008</b>
<b>CORPORATE GOVERNANCE PANEL</b>	<b>24 JUNE 2008</b>

## **BENEFIT FRAUD PROSECUTION POLICY & PROCEDURES (Report by Head of Customer Services)**

### **1. INTRODUCTION**

- 1.1 This report is to formalise the outcome of a review of the existing procedure for the sanction and prosecution of those persons found to be committing benefit fraud. The existing procedures for disposal of these matters are contained in the council's Anti-Fraud and Corruption Strategy.
- 1.2 The Fraud Team undertakes investigation of allegedly fraudulent applications for housing benefit and council tax benefit. This work complies with various legislative requirements as well as providing protection of the public purse.
- 1.3 The Team are part of the Benefit Service and report through the Benefit Manager to the Head of Customer Services.

### **2. SANCTIONS & PROSECUTIONS**

- 2.1 All cases of Benefit Fraud identified following investigation are referred to the Head of Customer Services (HoS) by the Fraud Manager (FM) in accordance with the Prosecution Policy. The FM will make recommendation on disposal of every case based on the public interest and evidential test and the HoS will approve or amend these in line with the existing procedures and the likelihood of securing a conviction.
- 2.2 The council currently brings all prosecutions through the Head of Legal Services. The council's Solicitor either then presents the cases in court or instructs other High Street solicitors to act as agents, or in Crown Court matters instructs counsel through recommended chambers.
- 2.3 All others sanctions, in relation to Benefit Fraud Matters, short of prosecution which are allowed by legislation or Home Office guidance are conducted by the Fraud Manager (FM), once such disposal has been agreed by the Head of Customer Services (HoS).
- 2.4 Where partner organisations are involved (for example, the Department for Work and Pensions) they will sometimes lead on any sanction or prosecution as agreed as part of the partnership working arrangements in place. These actions will include any offences identified by the Fraud Team.

- 2.5 The Fraud Team undertake in excess of 400 investigations into alleged benefit fraud each year. The success rate of these investigations resulted in 109 sanctions and prosecutions 2006/2007 and 120 in 2007/2008, this number continues to increase year on year. Sanctions include Formal Cautions and Administrative Penalties (fines) as well as prosecutions.
- 2.6 The Fraud Team provide a service to the Benefit Section. However, its expertise and specialist knowledge has led to its use by the Local Taxation and Housing Departments. There are no formal arrangements in place to allow such investigations and no funding or internal recharges made for this type of work by the Fraud Team.

### **3. PROPOSAL**

- 3.1. Having undertaken a review of the council's prosecution policy and procedures, and noting the year on year increase in fraud detection and sanction activity, it is proposed that the issuing of lesser sanctions (Formal Cautions & Administrative Penalties) be delegated to the Fraud Manager, and that these changes are reflected in the Prosecution Policy. The number of cases being dealt with in this manner cannot be undertaken by the HoS due to volume and requirement to manage the process throughout.
- 3.2. The volume of cases passed to the councils Legal Services Team has resulted in some delays in cases being brought to court. A pilot scheme was introduced in early 2007 to train and then allow the Fraud Manager to present some matters in court for first, plea and sentencing hearings where the cases are relatively straight forward. This has been found to be very successful and reference to the council's own solicitor, where legal advice was required, has been maintained. It is proposed that this delegation be formally agreed and included in the constitution.
- 3.3. The Fraud Team need to have in place an agreed process for reporting on other types of council fraud and for this activity to be funded by way of recharges to those services.

### **5. RECOMMENDATIONS**

- 5.1 It is

#### **RECOMMENDED**

that the Chief Officers/Panel/Cabinet

- (a) note the content of this report;
- (b) agree and authorise the revised Prosecution Policy attached at Annexe A;
- (c) authorise the amendment of the Delegated Functions within the Council Constitution to allow the Fraud Manager to undertake court hearings and issue appropriate sanctions as detailed in paragraph 3.1;

- (d) amend the same functions to allow the Fraud Team staff to undertake investigations in fraud affecting other District Council services and report to the relevant HoS on the outcomes, findings and recommendations of these investigations.

## **BACKGROUND INFORMATION**

The Social Security Administration Act 1992, as amended.

The Fraud Act 2006

Police and Criminal Evidence Act 1984

Criminal Procedures and Investigations Act 1996

Local Government Acts 1972, as amended

Local Government Finance Act 1992, as amended

Housing Act 1996

HDC- Anti-Fraud and Corruption Strategy

**Contact Officer: Julia Barber – Head of Customer Services**



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## HUNTINGDONSHIRE DISTRICT COUNCIL

### Benefits Prosecution Policy

#### 1. Introduction

- 1.1 Huntingdonshire District Council (the council) is committed to the professional delivery of housing and council tax benefit services to its customers and the contribution that this service can make to the corporate objective of having low levels of poverty in the district. Benefit is for those who are most vulnerable in society and the Council therefore has two main aims:
- To deliver the correct amount to the correct person as soon as possible.
  - To ensure that benefits are taken up by those who are entitled to them.
- 1.2 The Council also has a duty to protect the public funds it administers from abuse and is aware of the risks within the benefits system for fraud, error or other irregularity. In carrying out this duty, the authority may use information provided to it for the purpose of the prevention and detection of fraud. It may also share this information with other bodies administering public funds solely for these purposes.
- 1.3 The Council will, wherever possible incorporate effective internal controls to minimise the risk of fraud occurring. However, despite this fraud can be perpetrated and appropriate procedures need to be in place.
- 1.4 The Council understands that some people will attempt to obtain benefit to which they are not entitled and sometimes this is done deliberately. Where an investigation has revealed this is the case, the Council will consider the individual circumstances of the case and where appropriate will consider criminal prosecution, alternatively an Administrative Financial Penalty or a Formal Caution may be applied.
- 1.5 The Social Security Administration Act 1992, as amended, allows authorities to consider offering offenders a financial penalty or a formal caution as an alternative to prosecution. Such sanctions can only be offered if the case could be brought to court. However, should the offender refuse to accept such sanction then the Council must consider instigating proceedings against the individual concerned.
- 1.6 The Council's policy outlines the procedures to be followed with regard to the prosecution of benefit claimants, landlords, employees and members who have committed benefit fraud. It will serve as a policy statement that is

supported by members of the Council who have endorsed the Fraud and Corruption Strategy, and as an operational guide for Investigating Officers.

- 1.7 The council will always have regard to the circumstances of the individual it is dealing with when considering any case following an investigation into alleged benefit fraud. Every case will be treated on its own merits and know distinction will be made due to gender, sexual orientation, religion or race. The council will, however, have regard to any extenuating and relevant circumstances of the individual including age, disability or language difficulties which may have contributed to apparent offending.
- 1.8 The term Sanction refers to any penalty that can be imposed by the council and allowed by legislation where offending contrary to the Social Security Administration Act 1992, Theft Act 1938, or the Fraud Act 2006 appears in the councils opinion to have occurred.

## **2. The Policy**

- 2.1 The Investigation Officers must adhere, at all times, to the requirements of the Police and Criminal Evidence Act 1984, the Social Security Administration Act 1992 (as amended), the Code of Practice for Crown Prosecutors and the Criminal Procedures and Investigations Act 1996, and any other relevant legislation.
- 2.2 All cases that fall into the criteria outlined in 2.4, regardless of the level of the overpaid benefit, will be passed to the Fraud Manager who will decide, unless there are exceptional circumstances, whether a sanction is appropriate and the type. Where criminal proceedings are to be considered in any case a recommendation will be made to the Head of Customer Service on such disposal for that officers agreement. A monthly list of all non-prosecution matters will be provided by the Fraud Manager to be agreed by the Head of Service.
  - That prosecution is referred to the most appropriate organisation, i.e. where the primary fraud appears to have been perpetrated. This could be the Department for Work & Pensions, the Police, the Councils Legal Department, The councils Fraud Team or any other body deemed appropriate.
  - Imposition of an administrative penalty (this can only be offered where there are sufficient grounds to prosecute but the penalty option is preferred).
  - Imposition of a formal caution (this can only be offered where there are sufficient grounds to prosecute and the offence has been admitted at interview).
  - Closure of the case without sanction, as it would not be in the public interest to pursue the particular case. However, the reasons should be fully documented and authorised by the Head of

## Customer Services.

- 2.3 **The First Test of Public Interest.** To be considered in all cases regardless of the method of sanction chosen.

The public interest factors can increase the need to prosecute or may suggest an alternative course of action. The factors will vary from case to case. Not all the factors will apply to each case and there is no obligation to restrict consideration to the factors listed. In making a decision to prosecute all available information must be carefully considered.

The points outlined in 2.4 and 2.5 should be taken into consideration when determining whether or not to prosecute.

- 2.4 Common Public Interest Factors in Favour of a prosecution

- a) The defendant is alleged to have committed the offence whilst under an order of the court.
- b) The defendant has previous convictions or cautions that are relevant to the present offence.
- c) A conviction is likely to result in a significant sentence.
- d) The defendant is in a position of trust.
- e) There is evidence that the offence was premeditated.
- f) There are grounds to believe that the defendant was motivated solely by personal gain.
- g) There are grounds for believing that the offences were likely to be continued or repeated e.g. by a history of recurring conduct.
- h) The offence is alleged to have occurred over a long period of time involving more than one period of deception.
- i) The offence, although not serious in itself, is widespread in the area where it is committed.
- j) There is evidence that the offence was carried out by more than one person.
- k) The evidence shows that the suspect was a ringleader or an organiser of the offence.
- l) The overpayment of benefit is in excess of £2,000.00 or the fraud spans a period exceeding 52 weeks.
- m) A good prima facie case has been established and clear reports have been compiled at every stage of the investigation.

## 2.5 Common Public Interest Factors Against a prosecution

- a) There has been a long delay between the offence taking place and the date of the trial, unless
  - the offence is serious
  - the delay has been caused in part by the defendant
  - the offence has only recently come to light.
- b) The defendant is elderly or is, or was at the time of the offence, suffering from significant mental or physical ill health, unless the offence is serious or there is a real possibility that it may be repeated.
- c) The offence was committed as a result of a genuine mistake or misunderstanding (these factors must be balanced against the seriousness of the offence).
- d) It is a first offence and the loss or harm can be considered minor (based on each individual case) particularly if it was caused by misjudgement.
- e) The amount of the overpayment is less than £2,000.00 and the period spans less than 52 weeks.
- f) The court is likely to impose a very small or nominal penalty.
- g) The defendant admitted the offence at the first opportunity and made an offer of repayment. Failure to honour such an agreement will result in the continuance of initiated action.
- h) The defendant (whether it is a landlord or tenant) has put right the loss or harm that was caused. However, simply because the defendant can pay compensation does not mean that s/he can avoid prosecution.
- i) Maladministration or delay of the housing/council tax benefit scheme has occurred at some period during the offence.

## 3. Alternatives to Prosecution

- 3.1 Only cases that qualify for court on both the strength of evidence and the public interest factors can be considered for an alternative to prosecution. In essence, this means that the collated evidence must be sufficient to enable criminal proceedings to be initiated. If the evidence is insufficient then no alternative should be offered. In addition to strong independent evidence, there must be an admission of guilt at the interview under caution for a formal caution to be considered. Investigations, which fail to meet the above criteria, must be closed without sanction.

- 3.2 The defendant must give his informed consent to the alternative procedure to prosecution being offered. If the offer is declined the Council must always be in a position to instigate criminal proceedings should it wish to do so. This means that an investigation must have been undertaken as if it was the intention to prosecute if the case is proved. It would be a serious misuse of power to offer an alternative to prosecution in any case where a prosecution would be unlikely to succeed in court.
- 3.3 As a general rule the following cases should not normally be considered for an alternative to prosecution:
- a) The defendant is a council member, employee or an employee of another welfare organisation.
  - b) The defendant has declined to accept or has withdrawn from their agreement to accept an administrative penalty.
  - c) The defendant has declined a formal caution.
  - d) The defendant has already received an administrative penalty or formal caution for a previous offence.
  - e) The defendant is subject to a prosecution by another agency for a similar offence.
  - f) The defendant has previous convictions for similar offences.
  - g) Where there is evidence that the defendant has used alias/es to claim benefit.

#### **4. Formal Caution**

- 4.1 A formal caution is an oral or written warning given, to a person who has committed an offence, as an alternative to prosecution. In any case selected for caution there must be evidence to prove the offence, an admission at an interview under caution and the person being cautioned must give informed consent. A formal caution is a deterrent, and does not affect the recipient except if by re-offending when it may be cited in court on conviction for future offences. Where a caution has been declined the case must then be considered for criminal proceedings.
- 4.2 The Fraud Manager, or other delegated Fraud Team Member in consultation with the Head of Customer Services will offer a formal caution in appropriate cases. These will include:
- a) A first offence that was disclosed by the defendant at the first opportunity.
  - b) A first offence where the overpayment does not exceed £2,000 unless there are exceptional circumstances. In such circumstances

the agreement of the Head Of Service must be sought before such a sanction is offered.

C) Where a genuine mistake or oversight contributed to the offence.

## **5. Administrative Penalty**

5.1 Section 115a of the Social Security Administration Act 1992, as amended by section 15 of the Social Security Administration (Fraud) Act 1997 introduced financial administrative penalties as an alternative to prosecution. A financial penalty amounting to 30% of the gross adjudicated overpayment can be offered in a fraud case if the following conditions are met:

- a) There is a recoverable overpayment of benefit as defined by the Social Security Administration Act 1992
- b) The cause of the overpayment is attributed to an act or omission on the part of the defendant, and
- c) There are grounds for instituting criminal proceedings for an offence relating to the overpayment upon which a penalty is based.
- d) The person to offered such a penalty has the ability to repay it within a reasonable timescale and the imposition of such a penalty will not over-burden them if they have existing priority debts.
- e) Penalties will be only be offered where the overpayment does not exceed £2000 unless there are exceptional circumstances. In such circumstances the agreement of the Head Of Service must be sought before such a penalty is offered.

5.2 If the offender declines the offer of an administrative penalty or the offender withdraws his agreement to pay the penalty the case must be considered for prosecution. Where the person signs the agreement but then defaults on repayment of the Penalty this will also be treated as a withdrawal of the agreement by that person.

5.3 The Fraud Manager or other delegated Fraud Team officer in consultation with the Head of Customer Services will offer an Administrative Penalty in appropriate cases. These will include:

- a) An offence where the overpayment is significant enough to consider that the claimant be prosecuted, but also dependant on the length of time over, which the overpayment arose.
- b) Whether or not there has been an admission at an interview under caution.
- c) What action the Department of Social Security is taking on any part

of the benefit it administers.

## **6. Recording Sanctions and Prosecutions**

- 6.1 For an effective regime of sanctions to be successful it is highly desirable that accurate records of all convictions, administrative penalties and formal cautions are maintained. This will enable the correct decisions to be made taking full account of the defendant's background. Therefore, it is important that an acceptance record of each is maintained.
- 6.2 All sanctions must be recorded by the Council and copies of all documents used to consider and issue the sanction retained. Relevant paperwork must also be sent to the Department for Work and Pensions to update the central database on sanction activity.

## **7. Publicity**

- 7.1 It is the Council's intention to positively promote this policy as well as the outcome of any prosecutions, which will deter others from fraudulent activity.

## **8. Reporting and Review**

- 8.1 Summary information on cases and action taken will be reported to the Head of Customer Services and the Executive Councillor for Finance on a quarterly basis.
- 8.2 This policy will be reviewed annually or when changes in legislation require it.

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**CABINET**

**12TH JUNE 2008**

**REPRESENTATION ON ORGANISATIONS/  
APPOINTMENT OF CHAMPIONS  
(Report by the Head of Administration)**

**1. INTRODUCTION**

- 1.1 The Council's representation on a variety of organisations is reviewed annually. Listed in the attached schedule are those organisations to which the Council has been invited to nominate representatives for 2008/09.
- 1.2 At the same time, Members' attention is drawn to a vacancy as Training Champion (previously former Councillor K Reynolds) and to a request from Councillor L M Simpson to step down as Oxmoor Champion.

**2. RECOMMENDATION**

- 2.1 The Cabinet are therefore invited to make their nominations where required to the organisations referred to in the schedule appended hereto and to appoint new Champions for Oxmoor and for Training.
- 2.2 In the event that changes are required to the District Council's representation during the course of the year the Chief Executive, after consultation with the Deputy Leader and Vice Chairman of the Cabinet, be authorised to nominate alternative representatives as necessary.

**BACKGROUND PAPERS**

File held in the Administration Division of the Central Services Directorate.

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**REPRESENTATION ON ORGANISATIONS 2008/2009**

Organisation	Nominating/ Appointing Panel	Approx No. of Meetings Per Annum	Allowance Payable S – Subsistence T - Travelling	Representative(s) for 2007/2008	Representative(s) for 2008/2009
AICH	Cabinet	6 - Huntingdon	S & T Organisation reimburses travelling	Mrs M Wheeler	Cllr. Mrs M J Thomas
Archives County Advisory Group	Cabinet	3 - Huntingdon, Wisbech, Cambridge	S & T	Cllr J E Garner	Cllr J E Garner
Arts Forum for Cambridgeshire and Peterborough	Cabinet	2	S & T	Cllr Mrs D C Reynolds and Head of Environmental & Community Health (Substitute: Cllr L M Simpson)	Cllr Mrs D C Reynolds and Head of Environmental & Community Health (Substitute: Cllr L M Simpson)
Cambridgeshire Age Concern Liaison Committee	Cabinet	AGM - Cambridge 1 Half yearly meeting - Ely 1 Members meeting/forum – Chatteris 2 Members meeting/forum – Huntingdon 1	S & T	Mrs J Chandler	Mrs J Chandler
Cambridgeshire Chamber of Commerce – Huntingdonshire Area	Cabinet		S & T	Cllr A Hansard	Cllr A Hansard
Cambridgeshire County Council Association – Member Forum on Waste Management	Cabinet	6	S & T	Cllr C R Hyams	Cllr C R Hyams
Cambridgeshire Enterprise Services (Steering Group for Huntingdonshire Enterprise Agency)	Cabinet	2	S & T	Cllr A Hansard	Cllr A Hansard
Cambridgeshire Horizons	Cabinet		S & T	Cllr I C Bates	Cllr I C Bates
Cambridgeshire Museums Advisory Partnership	Cabinet	1 (AGM)	S & T	Cllr J E Garner	Cllr J E Garner
Cambridgeshire Older People's Partnership Board	Cabinet	4	S & T	Cllr R West	Cllr R West
Community Safety Board	Cabinet	3	S & T	Cllr Mrs D C Reynolds	Cllr Mrs D C Reynolds

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Cromwell Museum Management Cttee	Cabinet	2	S & T	Cllrs M G Baker and T D Sanderson	Cllrs M G Baker and T D Sanderson
DIAL Druglink	Cabinet	6	S & T	Mrs M Wheeler	Cllr. Mrs M J Thomas
East of England – Regional Assembly	Cabinet	7/8	S & T	Cllr I C Bates (Substitutes: Cllrs P L E Bucknell and L M Simpson and Cllr G Harper [Leader of Fenland District Council])	Cllr I C Bates (Substitutes: Cllrs P L E Bucknell and L M Simpson and Cllr G Harper [Leader of Fenland District Council])
Enviar Ltd, St Ives Composting Facility – Site Liaison Forum	Cabinet		S & T	Cllr M F Newman	Cllr M F Newman
Great Fen Project Steering Group	Cabinet	12	S & T	Cllr P L E Bucknell	Cllr P L E Bucknell
Greater Cambridge Development Board	Cabinet		S & T	Cllr I C Bates	Cllr I C Bates
Home Improvement Agency – Advisory Committee	Cabinet	4/5	S & T	Cllr Mrs Reynolds	Cllr Mrs Reynolds
Huntingdon Business Against Crime	Cabinet	4	S & T	Cllr J M Sadler	Cllr J M Sadler
Huntingdon Freeman's' Charity	Cabinet	11	S & T	Cllr J D Fell	Cllr J D Fell
Huntingdonshire Citizens' Advice Bureau****	Cabinet	General Meeting – 4 Trustee Board – 12	S & T	Cllr T V Rogers (General Meeting) and Mr T F Hayward (Trustee Board)	Cllr T V Rogers (General Meeting) and Mr T F Hayward (Trustee Board)
Huntingdonshire Federation of Volunteer Bureaux	Cabinet	4	S & T	Cllr J M Sadler	Cllr J M Sadler
Huntingdonshire Flood Forum	Cabinet O&S (P&F)	2 1	S & T S & T	Cllr P L E Bucknell	Cllr P L E Bucknell
Huntingdonshire Local Strategic Partnership – Children and Young People Culture and Leisure Economic Forum Environment Growth & Infrastructure Health, Housing & Social Care Transport and Access	Cabinet	6 4 8 3 4	S & T	Cllr A Hansard Cllr L M Simpson Cllr A Hansard Cllr C R Hyams n/a Cllr Mrs D C Reynolds Cllr P L E Bucknell	Cllr A Hansard Cllr L M Simpson Cllr A Hansard Cllr C R Hyams Cllr P L E Bucknell Cllr Mrs D C Reynolds Cllr P L E Bucknell
Huntingdonshire Personal Community Development Learning	Cabinet	6	S & T	Cllr Mrs D C Reynolds	Cllr Mrs D C Reynolds
Huntingdonshire Regional College Board – until 1/3/09	Cabinet	4	S & T	Cllr J M Sadler	Cllr J M Sadler
Huntingdonshire Society for the Blind	Cabinet	4 - Ambury Road Day Centre, Huntingdon	S & T	Cllr P L E Bucknell	Cllr P L E Bucknell
Huntingdonshire Strategic Partnership Board	Cabinet	4/5 various locations – hosted by main partners	S & T	Cllr I C Bates (Deputy: Cllr L M Simpson)	Cllr I C Bates (Deputy: Cllr L M Simpson)

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Internal Drainage Boards - until 1.6.05 Alconbury and Ellington	Cabinet	2	S & T	Cllrs K M Baker, M G Baker, L M Simpson Messrs C Allen and E K Heads	Cllrs K M Baker, M G Baker, L M Simpson Messrs C Allen and E K Heads
Benwick		2	S & T	Mr I Lack	Mr I Lack
Bluntsfarm		2	S & T	Mr I Lack	Mr I Lack
Conington and Holme		1/2	S & T	Cllrs P G Mitchell and J S Watt together with Mr C Allen	Cllrs P G Mitchell and J S Watt together with Mr C Allen
Ramsey First (Hollow)		2	S & T	Mr I Lack	Mr I Lack
Ramsey Fourth (Middle Moor)		2	S & T	Cllr P A Swales and Mr I Lack	Cllr P A Swales and Mr I Lack
Ramsey, Upwood and Great Raveley		2	S & T	Cllrs J T Bell and P A Swales and Mr C Allen	Cllrs J T Bell and P A Swales and Mr C Allen
Sawtry		1	S & T	Cllrs J E Garner and L W McGuire, Mr C Allen, *** Chairman of Sawtry Parish Council and Mrs J Day	Cllrs J E Garner and L W McGuire, Mr C Allen, *** Chairman of Sawtry Parish Council and Mrs J Day
Sutton and Mepal		2	S & T	Mr I Lack	Mr I Lack
The Ramsey		1	S & T	Cllrs E R Butler, P A Swales and Mr I Lack	Cllrs E R Butler, P A Swales and Mr I Lack
Warboys, Somersham and Pidley		2/3	S & T	Cllrs P M D Godfrey and M F Newman Mr I Lack	Cllrs P M D Godfrey and M F Newman Mr I Lack
Whittlesey		4	S & T	Mr C Allen	Mr C Allen
Woodwalton		1/2	S & T	Cllr J T Bell	Cllr J T Bell
Little Gransden Aerodrome Consultative Committee	Cabinet	2	S & T	Cllr R J West	Cllr R J West
Local Area Agreement Board for Cambridgeshire	Cabinet			Leader of the Council	Leader of the Council
Local Government Association –	Cabinet				
General Assembly					
Rural Commission		2		Leader of the Council	Leader of the Council
Strategic Aviation Special Interest Group		4		Cllr K M Baker	Cllr K M Baker
Luminus Homes Group *	Cabinet	8	S & T	Cllr P L E Bucknell	Cllr P L E Bucknell
Luminus Homes **				Cllrs M G Baker, Mrs M Banerjee, K J Churchill, and Mrs C Godley and Mr J Burniston	Cllrs M G Baker, Mrs M Banerjee, K J Churchill, and P K Urseel and 1 vacancy
Luminus (parent)	Cabinet	5	S & T	Cllr K Baker	Cllr K Baker
Oak Foundation (sheltered/charitable)		3		Cllr R Muir	Cllr R Muir
Middle Level Commissioners – until 1.6.08	Cabinet	2 (and Annual Inspection)	S & T	Mrs J Day	Mrs J Day

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National Sailing Academy Project Committee at Grafton Water Centre	Cabinet	6 at Grafton	S & T	Mr A H Duberly	Mr A H Duberly
Neighbourhood Partnership Panels - Eynesbury	Cabinet	6	S & T	Cllr A Hansard	Cllr A Hansard
North Huntingdon (including the Oxmoor SRB Project Area and additional targeted areas in the North & East Huntingdon)		6	S & T	Cllr L M Simpson	Cllrs L M Simpson and J J Dutton
Ramsey (including Bury and Upwood)		6	S & T	Cllr I R Muir	Cllr. Swales
Neighbourhood Policing Panels (formerly Police Local Consultation Groups) – Eynesbury	Cabinet	3	S & T	Cllr A Hansard	Cllr A Hansard
Huntingdon		3		Cllr L M Simpson	Cllr L M Simpson
Oxmoor		3		Cllr L M Simpson	Cllr L M Simpson
Yaxley		3		Cllr Mrs M Banerjee	vacant
Ramsey		3		Cllr P L E Bucknell	Cllr P L E Bucknell
St Ives		4		Cllr P H Dakers	Cllr Mrs J A Dew
St Neots		3/4		Cllr A Hansard	Cllr A Hansard
Oxmoor Community Action Group (OCAG)	Cabinet		S & T	Cllr L M Simpson	Cllr. J J Dutton
Oxmoor Opportunities Partnership Forum	Cabinet		S & T	Cllr L M Simpson	Cllr. J J Dutton
Pensions Consultative Group	Cabinet	2/3	S & T	Cllr T V Rogers	Cllr T V Rogers
Ramsey Area Partnership Board	Cabinet		S & T	Cllr P L E Bucknell	Cllr P L E Bucknell
Red Tile Wind Farm Community Fund	Cabinet			Cllr P L E Bucknell	Cllr P L E Bucknell
Road Safety Committees – Norman Cross Area	Cabinet	12	S & T		
St. Ives Area		6		Cllrs E R Butler and J S Watt	Cllrs E R Butler and J S Watt
				Cllrs, M F Newman and T V Rogers and Mrs J Chandler	Cllrs, M F Newman and T V Rogers and Mrs J Chandler
St. Neots Museum Management Committee	Cabinet	6	S & T	Cllr A Hansard	vacant
St. Neots Volunteer Bureau Management Committee	Cabinet	5 & AGM	S & T	Mrs P J Longford	Cllr D Harty
Stilton Children and Young People's Facilities Association	Cabinet	6	S & T	Cllr P G Mitchell	Cllr P G Mitchell
The Law Centre, Huntingdon	Cabinet	6 - Huntingdon	S & T Organisation reimburses travelling	Mrs M Wheeler	Vacancy

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Town Centre Management Initiatives – Huntingdon	Cabinet	12	S & T	Cllr J M Sadler (Deputy: Cllr L M Simpson)	Cllr J M Sadler (Deputy: Cllr L M Simpson)
Ramsey		12		Cllr I R Muir (Deputy: Cllr P A Swales)	Cllr P A Swales (Deputy: Cllr I R Muir)
St Ives		12		Cllr D B Dew (Deputy: Cllr Mrs D Reynolds)	Cllr D B Dew (Deputy: Cllr Mrs D Reynolds)
St Neots		12		Cllr K J Churchill (Deputy: vacant)	Cllr Mrs M J Thomas (Deputy: Cllr Mrs M J Thomas)
Trustees of Kimbolton School Foundation	Cabinet	3	S & T	Cllr J A Gray	Cllr J A Gray
Cambridgeshire Consultative Group for the Fletton Brickworks Industry	Licensing & Protection	2	S & T	Cllr E R Butler and Director of Operational Services	
Little Barford Power Station Liaison Cttee	Licensing & Protection	2	S & T	Cllr A Hansard and Director of Operational Services	
Needingworth Quarry Local Liaison Cttee	Licensing & Protection	4	S & T	Cllr T V Rogers and Mr K Reynolds	
St Ives/Fen Drayton Quarries Restoration and after use forum	Licensing & Protection	2	S & T	Cllrs D Dew and S J Criswell together with Head of Planning Serv ices	
Warboys Landfill Local Liaison Cttee	Licensing & Protection			Head of Environmental Health Services and of Planning Services (or their nominees) Cllr P L E Bucknell	

\* Five representatives to be appointed directly by the District Council from which one will be nominated to by the HHP Board to Luminus and the Oak Foundation

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\*\*\* Nomination should be Chairman of Sawtry Parish Council and not named individual.

\*\*\*\* In nominating two representatives to the Bureau in this way the District Council is accepting its responsibilities as a member organisation

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