



The Planning Inspectorate

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# **Report to Huntingdonshire District Council**

**by Kevin Ward BA (Hons) MRTPI**

**an Inspector appointed by the Secretary of State**

**Date: 29 April 2019**

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## **Report on the Examination of the Huntingdonshire Local Plan**

The Plan was submitted for examination on 28 March 2018

The examination hearings were held between 17 July and 27 September 2018

File Ref: PINS/H0520/429/9

## **Abbreviations used in this report**

EEA	Established Employment Area
EEFM	East of England Forecasting Model
ELS	Huntingdonshire Employment Land Study
GTAA	Cambridgeshire (excluding Fenland), King's Lynn and West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment 2016
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
MM	Main Modification
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need
PPG	Planning Practice Guidance
SEL	Strategic Expansion Location
SHMA	Strategic Housing Market Assessment

## Non-Technical Summary

This report concludes that the Huntingdonshire Local Plan (the Local Plan) provides an appropriate basis for the planning of the District, provided that a number of main modifications are made to it. The Council has specifically requested me to recommend any main modifications necessary to enable the Local Plan to be adopted.

The main modifications all concern matters that were discussed at the examination hearings. The Council has provided the detailed wording for the main modifications, many of which are based on suggestions it put forward during the examination. The Council carried out sustainability appraisal of the main modifications. Following the hearings, the main modifications and sustainability appraisal were subject to public consultation over a seven-week period. An updated Habitats Regulations Assessment (HRA) report was also produced. I have recommended the inclusion of the main modifications in the Local Plan after considering all the representations made in response to consultation on them, the sustainability appraisal and the updated HRA report.

The main modifications can be summarised as follows:

- Amend the Development Strategy and associated policies and text to remove the separate category of Local Service Centres. Delete Policy LP9 and delete the site allocations in these settlements (AL1, BL1, BL2, GS1 and GS2);
- Delete Policy LP29 on Community Planning Proposals as it is not justified, effective or consistent with national policy;
- Amend the text supporting the site allocations SEL1.1, SEL1.2, HU1 and SEL2 to ensure that it is realistic and effective in terms of the combined rate of housing completions in the plan period;
- Add a summary housing trajectory to ensure that the Local Plan is effective in setting out clearly a realistic trajectory and explaining the contribution that different elements of the supply will make;
- Combine site allocations HU5 and HU6 and associated policies and text to take account of the up to date situation regarding proposals for the sites;
- Delete site allocations HU9, HU16, SN5 and SI4 due to concerns over flood risk;
- Delete site allocation SM5 as the site is not deliverable due to a lack of access;
- Amend Policies HU10 and HU17 to ensure that the site boundaries for the allocations are justified and effective; and
- Amend the detailed wording of a number of policies to ensure that they are justified, effective and consistent with national policy.

## Introduction

1. This report contains my assessment of the Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Local Plan's preparation has complied with the duty to co-operate. It then considers whether the Local Plan is sound and whether it is compliant with the legal requirements. Paragraph 182 of the 2012 National Planning Policy Framework (NPPF) makes it clear that in order to be sound a Local Plan should be positively prepared, justified, effective and consistent with national policy. The revised NPPF was published in July 2018 and further updated in February 2019. It includes a transitional arrangement in paragraph 214 whereby, for the purpose of examining this Local Plan, the policies in the 2012 NPPF will apply.
2. Similarly, where the Planning Practice Guidance (PPG) has been updated to reflect the revised NPPF, the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement. Therefore, unless stated otherwise, references in this report are to the 2012 NPPF and the versions of the PPG which were extant prior to the publication of the 2018 NPPF.
3. The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. Prior to submitting the Local Plan, the Council produced a schedule of minor modifications (CORE/12) to provide clarity, consistency, updates and address typographical errors. The basis for the examination is therefore the submitted Local Plan of March 2018, which is the same as the Proposed Submission Document of December 2017 incorporating these minor modifications.

## Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications necessary to rectify matters that make the Local Plan unsound and /or not legally compliant and thus incapable of being adopted. My report explains why the recommended main modifications, all of which relate to matters that were discussed at the examination hearings, are necessary. The main modifications are referenced in bold in the report in the form **MM1, MM2, MM3** etc, and are set out in full in the Appendix.
5. The Council has provided the detailed wording of the main modifications, many of which are based on suggestions it put forward during the examination. The Council carried out sustainability appraisal of the main modifications. Following the hearings, the main modifications and sustainability appraisal were subject to public consultation over a seven-week period. An updated HRA report was also produced. I have recommended the inclusion of the main modifications in the Local Plan after considering all the representations made in response to consultation on them, the sustainability appraisal and the updated HRA report.

## **Policies Map**

6. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting the Local Plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted Local Plan. In this case, the submission policies map comprises the set of plans in CORE/02 and CORE/03.
7. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, several of the main modifications to the Local Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective. These further changes to the policies map were published alongside the main modifications.
8. When the Local Plan is adopted, in order to comply with the legislation and give effect to the Local Plan's policies, the Council will need to update the adopted policies map to include all the necessary changes.

## **Assessment of Duty to Co-operate**

9. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Local Plan's preparation.
10. Huntingdonshire forms part of the Cambridge Sub-Region Housing Market Area (the HMA) along with the other Cambridgeshire authorities (Cambridge City, East Cambridgeshire, South Cambridgeshire and Fenland) and the Suffolk authorities of Forest Heath and St Edmundsbury<sup>1</sup>. The Council co-operated with these other authorities to produce a Strategic Housing Market Assessment (SHMA) in 2013. A Memorandum of Co-operation was also produced in 2013 which included an agreed distribution of housing between the five Cambridgeshire authorities in the HMA and Peterborough City Council. This involved a combined total of 2,500 dwellings from identified need in East Cambridgeshire and Fenland being accommodated in Peterborough. The Memorandum of Co-operation did not provide for any redistribution of identified housing need to or from Huntingdonshire specifically.
11. The 2013 SHMA and the Memorandum of Co-operation preceded the publication of the PPG and the 2014 based household projections. It is therefore no longer appropriate to rely on these to inform plan preparation in terms of housing requirements. Plan preparation has progressed at different rates across the authorities concerned and they have taken the

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<sup>1</sup> As of 1 April 2019 Forest Heath and St Edmundsbury became West Suffolk Council

reasonable and pragmatic decision to produce updated assessments of housing need on an authority basis rather than an updated SHMA for the whole HMA. Cambridge City and South Cambridgeshire Councils undertook a joint study to inform the examination of their local plans, which are both now adopted. These assessments have been carried out using a consistent methodology and have involved considerable discussion and co-operation between authorities.

12. In the case of Huntingdonshire, the Objectively Assessed Housing Need Study of April 2017 (the 2017 OAN Study) provides evidence on housing need solely for the District, rather than the wider HMA. Given the clear benefits of producing an up to date local plan for the District and the varying stages of progress with other plans in the HMA, I consider that this was an appropriate and justified course of action.
13. In identifying housing need and considering the level of housing to be provided for in the Local Plan, the Council has continued to work closely with other authorities in the HMA and other neighbouring authorities. The Council has demonstrated that it can accommodate all of its identified housing need within its own area and there is no evidence that it should accommodate unmet need from elsewhere. No authority has raised concerns with the level of housing provision set out in the Local Plan.
14. In relation to economic growth and employment land provision, the Council has long established and effective working relationships with other authorities, the Greater Cambridgeshire Greater Peterborough Local Enterprise Partnership and more recently the Cambridgeshire and Peterborough Combined Authority<sup>2</sup>. The preparation of the Local Plan has taken a co-ordinated approach to housing and employment growth and taken account of the inter-relationships with other areas. The wider implications of the Alconbury Enterprise Zone have been properly considered and addressed through close working with other authorities.
15. The Council has engaged effectively with Cambridgeshire County Council, Highways England and Network Rail in respect of the transport implications of the Local Plan and associated infrastructure requirements. It worked in partnership with the County Council to produce the Strategic Transport Study. It has been closely involved with Highways England in the development of the A14 improvement scheme which is currently under construction and will have significant implications for a number of proposals in the Local Plan and transport generally within the District.
16. Close co-operation has taken place with Central Bedfordshire Council in relation to the proposed Strategic Expansion Location (SEL) at St Neots East. This has enabled the cross-boundary implications of this proposed allocation to be effectively addressed, in particular in respect of the impact on the highway network.

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<sup>2</sup> The Greater Cambridgeshire Greater Peterborough Local Enterprise Partnership has been subsumed into the Cambridgeshire and Peterborough Combined Authority

17. Overall, the Council has demonstrated constructive, active and ongoing engagement with local authorities and relevant organisations on strategic matters. The issues have been resolved effectively and there are no concerns from these authorities and organisations regarding the duty to co-operate. I conclude therefore that the Council has complied with the duty to co-operate.

## **Assessment of Soundness**

### **Main Issues**

18. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified the following main issues upon which the soundness of the Local Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

### **Issue 1 – Whether the Development Strategy is justified, effective and consistent with national policy**

#### *The strategy for development and the distribution of growth*

19. The Local Plan proposes to continue the long established strategy of focussing the majority of development and growth in and around Huntingdon (including Brampton and Godmanchester), St Neots (including Little Paxton), St Ives and Ramsey (including Bury). These four “Spatial Planning Areas” are centred on the largest towns within the District which offer the greatest access to services, facilities and job opportunities.
20. Together the Spatial Planning Areas can accommodate substantial growth. The scale of development planned in the individual Spatial Planning Areas varies and reflects the particular circumstances, opportunities and constraints that exist in each case.
21. In preparing the Local Plan, the Council has considered reasonable alternatives in terms of the scale of growth, its broad distribution across the District and the specific site allocations. It has assessed options appropriately.
22. The Huntingdon and St Neots Spatial Planning Areas provide a wide range of opportunities to accommodate development within and adjacent to the existing built up area. In addition to a number of other site allocations the Local Plan proposes SELs at Alconbury Weald (to the north west of Huntingdon) and St Neots East. These are a key element of the strategy for development set out in Policy LP2.
23. I deal with the SELs and individual site allocations in more detail later in my report. In principle though the SELs are justified given the need to accommodate the scale of housing and employment growth identified and the strategy of focussing the majority of this growth on locations within or well related to the larger towns. They provide the opportunity to deliver

large scale development involving housing, employment and a wide range of social and community facilities in a co-ordinated fashion.

24. In identifying the two SELs, the Council has considered reasonable alternatives to accommodate growth and taken account of physical, environmental and infrastructure constraints. It has rightly sought to identify proposals which evidence has demonstrated will be deliverable.
25. A potential third SEL at Wyton Airfield was considered during the earlier stages of plan preparation. This was not taken forward to the Proposed Submission Document however due to the significant transport infrastructure requirements identified and associated costs and environmental constraints. My consideration of the housing requirement and the supply of housing land is set out later in my report. However, given my findings on these matters, there is no need to include a third SEL either at Wyton Airfield or elsewhere in the District.
26. The scale of development proposed for the St Ives Spatial Planning Area is relatively modest in relation to its size and population. This reflects the significant constraints that exist, particularly in terms of flood risk, highways/transport infrastructure and the physical form of the town and its relationship with surrounding countryside and smaller villages.
27. Ramsey (including Bury) is the smallest of the Spatial Planning Areas. The scale of development proposed reflects this whilst recognising particular opportunities to accommodate development on suitable sites.
28. The strategy of focussing the majority of development on the Spatial Planning Areas including the two SELs is justified, as is the broad scale of development proposed in each case. The geographical definition of the Spatial Planning Areas and the approach to development in them set out in Policy LP7 is effective and justified.
29. Policy LP2 also identifies seven Key Service Centres. These are large villages which provide a range of services and facilities to meet day to day needs and are reasonably well served by public transport. They also have a role in providing services for surrounding rural communities. There is a clear distinction between these centres and other villages in terms of their size, population and the level and range of services and facilities which they offer. The Key Service Centres are appropriate locations for housing and other development of a suitable scale. They will assist in providing a good range and choice of development opportunities in a variety of locations across the District and help to sustain rural communities. The strategy of promoting development on a suitable scale in the Key Service Centres, including through site allocations, and the approach to development in them set out in Policy LP8 is effective and justified.
30. The villages of Alconbury, Bluntisham and Great Staughton are identified in Policy LP2 as Local Service Centres and the Local Plan goes on to allocate sites for housing in them. This category of settlement was introduced at the proposed submission stage of plan preparation with the intention of



broadening and increasing the potential supply of housing land and supporting rural communities. It followed the decision not to include Wyton Airfield as a third SEL.

31. The basis for identifying the three Local Service Centres was that they possessed five key services and sites had been put forward through a call for sites process. It became clear during the hearings that the evidence on services within villages was not sufficiently up to date or robust. The Council sought to address this situation with an updated assessment in August 2018 (EXAM/04).
32. Whilst there is a clear distinction between the number and range of services available in Key Service Centres compared with other villages, the difference between the three Local Service Centres and a number of other villages categorised as small settlements is not so apparent. In some cases, the level of services is broadly similar. The exact nature of the service offered by some facilities such as doctor's surgeries and local shops also raises questions over the distinction as does the actual capacity of services such as local schools to accommodate further growth.
33. Other than allocating sites for housing, the Local Plan does not set out a significantly different policy approach to new development on land within or well-related to Local Service Centres compared with small settlements.
34. On the basis of my conclusions in relation to the housing requirement and the supply of housing land set out later in my report, the proposed site allocations in the Local Service Centres are not necessary to ensure an adequate supply of housing land. Removing the category of Local Service Centre and including the villages concerned in the list of small settlements would still allow for suitable sites to come forward for development and they would be assessed against the criteria set out in Policy LP10.
35. Given the above, the identification of Local Service Centres and the allocation of sites within them is not justified. Main modifications **MM1, MM4-MM8, MM11** and **MM34-MM39** would remove references to Local Service Centres, delete Policy LP9, delete the site allocations and confirm that the three villages concerned are regarded as small settlements. These main modifications are necessary to ensure that the Local Plan is justified in this respect.
36. The definition of built up areas, the list of small settlements in the Local Plan (subject to the inclusion of the three villages above) and Policy LP10 are justified and provide a clear and effective framework to consider development proposals within or well-related to such settlements. The Local Plan will allow for development on an appropriate scale in a wide range of small settlements, making an important contribution to meeting affordable and market housing needs and supporting and sustaining rural communities.
37. Whilst Policy LP11 sets out an effective and justified approach to development in the countryside, the wording of criterion b. is not fully

consistent with national policy which seeks to "recognise" the intrinsic character and beauty of the countryside. This would be addressed by main modification **MM9**. Main modification **MM1** would address the same issue in relation to the wording of Policy LP2.

### *Infrastructure*

38. The Council has comprehensively and effectively assessed the implications of the Local Plan and the proposals within it for the full range of infrastructure. It has liaised closely with a range of infrastructure providers and the Local Plan sets out a clear and justified policy and delivery framework.
39. In terms of Grafham Water, Policy LP3 is unduly onerous in its requirement to demonstrate a need for proposals relating to the operation or enhancement of the reservoir, treatment works and associated networks. In this respect the policy is not justified or consistent with national policy. This would be addressed by main modification **MM2**.
40. Policies LP4 and LP6 set out an effective and justified approach to infrastructure delivery and waste water management. Although there are some issues with existing waste water capacity and in some cases treatment works will need to be upgraded to accommodate additional housing growth, such upgrades can be implemented with conventional technology and are addressed in the Strategic Plan of Anglian Water. The need for improved waste water capacity will not act as a barrier to growth.

### *Flood risk*

41. Whilst Policy LP5 sets out a justified approach to flood risk, it lacks sufficient clarity in relation to taking opportunities to reduce flood risk and taking account of the impacts of climate change. In these respects, the Local Plan is not effective or consistent with national policy. Main modification **MM3** would address this.
42. I have concerns with the approach to the consideration of flood risk in relation to some specific site allocations which I deal with later in my report.

### *Conclusion on Issue 1*

43. Subject to the main modifications referred to above, the Development Strategy is justified, effective and consistent with national policy.

## **Issue 2 – Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the overall provision for housing**

44. Given the transitional arrangements which apply to local plans such as this submitted on or before 24 January 2019, it is appropriate for the overall provision for housing to be informed by an assessment of Objectively Assessed Need (OAN) produced in line with the advice set out in the PPG which existed prior to the publication of the 2018 NPPF. It is not necessary

to base this Local Plan on a local housing need assessment, conducted using the standard method set out in the current PPG.

45. It is acknowledged that the standard method indicates a need for 1,010 dwellings per annum (results published in 2017) compared with the requirement of 804 dwellings per annum set out in the Local Plan. However, it will be for a future review of the Local Plan to take account of a local housing need assessment carried out at the appropriate time. The Council is required to review the Local Plan at least every five years and therefore it will be reviewed well before the end of the plan period, providing the opportunity to alter the supply of housing land if necessary.
46. As explained in relation to the duty to co-operate, given the circumstances, it is appropriate for the Council to have produced evidence on OAN solely for the District rather than the wider HMA.
47. The 2017 OAN Study followed the approach advocated in the PPG (as existed prior to the 2018 NPPF). It used the 2014 based household projections as the starting point; as these were the most up to date available at the time. On the basis of these projections, the study identifies a demographic starting point of 19,140 dwellings between 2011 and 2036 (approximately 765 dwellings per annum).
48. Sensitivity testing of population projections based on alternative migration trends (5, 10 and 14 year periods) does not provide evidence for adjusting the underlying demographic projections. Unattributable population change between 2001 and 2011 is minimal (-381) and so again does not provide evidence for an adjustment to the projections.
49. Household formation rates in 2014 for all age groups in the District were similar to those in the HMA as a whole and England. For the 25-34 age group they were higher than in the HMA as a whole and England. However, household formation rates for this age group have been declining and are projected to continue to decline in the District over the plan period (2011-2036). They are projected to decline more rapidly compared to the HMA as a whole and England.
50. It is clear that there is an issue with the projected continued decline in household formation rates for this age group. However, it is not clear to what extent the trend of decline may have been affected by affordability, the supply of housing, wider economic conditions and social change. It is also not clear to what extent this trend may form part of a more fundamental and permanent shift in household formation among younger age groups. Given this uncertainty as to the causes and the extent to which they each affected the trend, it is not possible with any degree of accuracy to assess what specific alternative projection of household formation rates would be realistic.
51. I deal below with the justification for a 5% uplift to the demographic starting point to address market signals. However, this will allow for some increase in household formation rates compared with the 2014 based

projection. The Local Plan also takes a very proactive approach to the delivery of affordable housing which is likely to improve opportunities for those in younger age groups to form households.

52. Within this context the 2017 OAN Study is justified in not building in a specific assumption about increased household formation rates. An increase to the demographic starting point to accommodate improved household formation rates in addition to the 5% market signals uplift would risk double counting.
53. Overall the 2017 OAN Study is justified in using the 2014 based household projections without alteration to provide the demographic starting point of 19,140 dwellings between 2011 and 2036.
54. The 2017 OAN Study then goes on to use the East of England Forecasting Model 2016 (EEFM) to consider the need for any uplift to the demographic starting point to account for future jobs growth.
55. Future economic/jobs growth is difficult to predict. The EEFM provides an up to date forecast, integrating economic and demographic circumstances and providing a consistent approach between local authority areas within the region and neighbouring regions.
56. The EEFM forecasts lower job growth than the historic trend and the 2013 SHMA. However, it takes account of more up to date information including on progress and actual job creation at the Alconbury Enterprise Zone. The baseline forecast of a growth of 12,370 jobs between 2011 and 2036 takes proper account of the effect of the Enterprise Zone and is a robust assessment.
57. Taking what I consider to be a reasonable and justified approach including in relation to employment rates and commuting ratios the EEFM forecasts a growth in working age population above that set out in the 2014 based ONS population projections. To accommodate this additional growth in working age population the EEFM recommends an uplift of 4% to the demographic starting point for the OAN. This would indicate a need for some 19,910 dwellings between 2011 and 2036. It is estimated that this would be able to support jobs growth of 14,250 over this period, a figure well above the baseline forecast.
58. On the basis of a range of indicators in relation to market signals the 2017 OAN Study justifiably concludes that an uplift to the demographic starting point for OAN would be appropriate. The extent of such an uplift is to some extent a matter of judgement however and Inspectors examining Local Plans elsewhere in the HMA and indeed across the Country have reached different conclusions based on their assessment of local circumstances. Given the evidence relating to Huntingdonshire and how that compares to other authorities and England as a whole, the uplift of 5% recommended by the 2017 OAN Study is reasonable and justified. This results in a need for 20,100 dwellings between 2011 and 2036. It is estimated that this would be able to support jobs growth of some 14,350, again a figure well above

the baseline forecast. The 4% uplift for job growth would be absorbed within this market signals uplift and so there is no need to add them together.

59. Overall the 2017 OAN Study concludes that the OAN for Huntingdonshire is 20,100 dwellings between 2011 and 2036. It provides a robust and credible assessment and I therefore consider that the OAN is indeed 20,100 dwellings (804 per annum). Such a figure allows for significant growth in population and households and would support job growth above baseline forecasts. It would provide the opportunity for an increase in household formation rates for younger age groups.
60. The Local Plan sets out a housing requirement of 20,100 and includes a commitment to providing for this level of housing in Policy LP1. As discussed in relation to the duty to co-operate, there is no evidence that the Local Plan should accommodate unmet housing need from elsewhere.
61. There is a significant need for affordable housing in the District with the 2017 OAN Study quantifying this as 7,897 dwellings between 2011 and 2036 (approximately 39% of the overall OAN). Meeting this need in full represents a considerable challenge and would require an increase in delivery both in terms of actual affordable dwellings and the proportion of total housing completions compared with past trends. However, as noted above, the Local Plan takes a proactive approach to the delivery of affordable housing. It sets a target of 40% affordable housing on eligible market housing sites. Although this target has not always been achieved and in particular from the early phases of the SELs, the majority of housing schemes permitted recently have secured this proportion of affordable housing.
62. The Local Plan also includes a positive and flexible policy approach to rural exceptions sites (Policy LP30) which will provide significant opportunities to deliver affordable housing. The Council is working closely with social housing providers and there are strong indications that additional funding for affordable housing will be forthcoming. The 5% uplift to the OAN for market signals is likely to have some benefit in terms of improving affordability.
63. Taking all of this into account the Local Plan is justified in not increasing the housing requirement further to assist in affordable housing delivery.
64. The housing requirement is appropriate therefore. As I have discussed above, the Local Plan will need to be reviewed at least every five years and such a future review would provide the opportunity to re-assess the housing requirement.
65. In conclusion, the Local Plan has been positively prepared and is justified, effective and consistent with national policy in relation to the overall provision for housing.

**Issue 3 – Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach towards building a strong, competitive economy**

66. The Huntingdonshire Employment Land Study (ELS) provides a robust assessment of employment land requirements and identifies a need for 42-46ha in the plan period in addition to the 150ha at the Alconbury Enterprise Zone (total requirement of 192-196ha). Existing commitments with a reasonable prospect of delivery are estimated to total approximately 221ha. In addition, almost 13ha is estimated to be available within Established Employment Areas (EEAs) and some 35ha is on sites allocated in the Local Plan (without planning permission). This would provide for a total supply in the order of 269ha.
67. The Local Plan provides for an adequate supply and range of employment land in a good choice of locations. It provides for a significant level of flexibility to meet the needs of a growing economy.
68. The ELS involved a comprehensive review of EEAs in terms of their continued suitability and viability. Whilst it recommended some adjustments to particular areas, it concludes that they are all worthy of retention. The list of EEAs set out in Paragraph 6.17 of the Local Plan and shown on the Policies Map is justified. Policy LP19 sets out a positive, justified and effective approach to development in such areas which ensures business use is protected and promoted whilst providing some flexibility for other uses subject to reasonable criteria.
69. Policy LP20 sets out a positive and effective approach to business development in the countryside whilst focussing on land within or adjoining EEAs, the re-use of land in business use and the re-use or replacement of existing buildings. It is justified and consistent with national policy in relation to the rural economy.
70. Policy LP21 provides a clear and effective approach to proposals for homes for rural workers which is justified and consistent with national policy.
71. The Retail and Commercial Leisure Needs Assessment 2017 identifies a total District wide capacity for only 2,000-2,500 sqm of new convenience retail floorspace by 2036. For comparison retail floorspace the District wide capacity is estimated at 18,200-28,500 sqm. The Local Plan includes a number of site allocations which would incorporate retail uses, including the SELs at Alconbury Weald and St Neots East. Taking into account recent developments and the positive approach to retail development in Town Centres and Key Service Centres set out in Policies LP22 and LP23, the Local Plan will provide for these relatively modest retail needs to be met. No specific need for other main town uses has been identified.

72. The boundaries of the Town Centres (Huntingdon, St Neots, St Ives and Ramsey), the Primary Shopping Areas and Primary Shopping Frontages have been recently and comprehensively re-assessed and form an appropriate basis for the application of Policy LP22. This policy sets out a positive, effective and justified approach to Town Centres and development proposals for retail and other main town centre uses which is consistent with national policy. The threshold of 600 sqm when requiring an impact assessment is appropriate in light of evidence regarding the size of existing units and the potential impact on the vitality and viability of centres and is endorsed by the Retail and Commercial Leisure Needs Assessment.
73. The provision and retention of local services and facilities is an important element in sustaining communities and the role of settlements, particularly those in the more rural parts of the District. Policy LP23 sets out a positive and justified approach to the provision of new facilities and services, including main town centre uses, and the retention of those that currently exist whilst allowing sufficient flexibility for change where justified.
74. Policy LP24 sets out a justified approach to tourism and recreation uses in the countryside. However, the Council accepted that the reference to the need to demonstrate that new development for tourist accommodation would be viable set out in Paragraph 6.54 should in fact be included in the policy itself. This is addressed by main modification **MM12** which is necessary to ensure that the policy is clear and therefore effective.
75. Subject to this main modification the Local Plan has been positively prepared and is justified, effective and consistent with national policy in relation to the approach towards building a strong, competitive economy.

**Issue 4 – Whether the Local Plan is justified, effective and consistent with national policy in relation to the approach towards requiring good design**

76. Policies LP12, LP13 and LP14 provide a comprehensive and clear framework to encourage and deliver high quality design in development which takes full account of its local context. They promote accessibility and sustainable design and construction.
77. The requirement for the higher optional water efficiency standard is justified by evidence in the Detailed Water Cycle Study which confirms that the District is an area of serious water stress. The need for water efficiency is also set out in the Water Resource Management Plans of Anglian Water and Cambridge Water. The Local Plan Viability Study factored in the use of these higher optional standards and demonstrated that they would not undermine the viability of development.
78. Policy LP15 deals comprehensively with a range of issues relating to amenity and living conditions and provides a justified and effective policy approach.
79. Dealing with surface water and potential surface water flooding is a key issue for the Local Plan, including in relation to a number of site allocations.

Policy LP16 sets out a justified approach which promotes the use of sustainable urban drainage systems and will provide a robust policy framework for addressing issues with individual site allocations and development proposals. Main modification **MM10** is required however to ensure that Paragraph 5.39 is sufficiently clear, effective and consistent with national policy in terms of giving priority to sustainable urban drainage systems.

80. Policies LP17 and LP18 set out a justified and effective approach to travel, vehicle movements and parking. They promote safe and sustainable travel and are consistent with national policy.
81. Subject to the main modification referred to above, the Local Plan is justified, effective and consistent with national policy in relation to the approach towards requiring good design.

**Issue 5 – Whether the Local Plan is justified, effective and consistent with national policy in relation to the approach towards strengthening communities**

82. As set out above, the 2017 OAN Study identifies a significant need for affordable housing in the District (7,897 affordable homes in the plan period). The Council has identified a range of potential mechanisms to deliver affordable housing but undoubtedly the provision of an element of affordable housing on market housing schemes will continue to play a key role.
83. Policy LP25 sets an ambitious target of 40% affordable housing on sites of 11 homes or more. Such a target and the tenure mix sought is justified by the evidence on need and the Local Plan Viability Study concludes that this would be viable for most typologies of housing development across the District. There may well be specific cases where such a level of affordable housing provision or the tenure mix sought is demonstrated to be unviable. However, the policy is sufficiently flexible to allow for particular circumstances affecting viability to be taken into account and for the level and type of provision to be adjusted accordingly.
84. The policy takes a justifiable approach to the integration of affordable housing within the wider housing scheme, both in terms of the clustering of dwellings and their appearance. This will help to deliver balanced, mixed and inclusive communities.
85. Policy LP30 sets out a proactive approach to rural exceptions housing which allows for up to 40% of the site to be developed for market housing. Given market conditions in the District this is likely to provide a significant incentive to bring such sites forward, deliver much needed affordable housing and make an important contribution to overall housing supply.
86. The issue of housing mix is dealt with effectively in Policy LP26. The approach to the use of optional standards for accessible and adaptable dwellings (M4(2)) and wheelchair adaptable dwellings (M4(3)) is justified by evidence in relation to the age profile of the District and the accessibility



and adaptability of existing stock (Accessible and Specialist Housing Evidence Paper). The Local Plan Viability Study Addendum factored in the use of the M4(2) optional standard and concluded that this would be viable for most typologies of housing development across the District. The approach to seeking a proportion of dwellings to meet the M4(3) optional standard reflects the evidence from the Local Plan Viability Study Addendum that flexibility is required to take account of specific viability issues.

87. Policy LP27 sets out justified and effective criteria to consider proposals for self-contained specialist housing and residential institutions.
88. The Cambridgeshire (excluding Fenland), King's Lynn and West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment 2016 (the GTAA) identifies a need for 9 pitches for Gypsies and Travellers in Huntingdonshire between 2016 and 2036 including 7 pitches up to 2021. This is based on the definition of Gypsies and Travellers in the 2015 Planning Policy for Traveller Sites. Since the base date of the GTAA, planning permissions for 9 pitches have been granted, meeting this need.
89. The GTAA identifies a potential additional need for up to 19 pitches for "unknown" households that may meet the definition. Based on a considerable number of interviews nationally by the authors of the GTAA (ORS) it was estimated at the time of the hearings that in the order of 10% of these "unknown" households would meet the definition. This would indicate a potential additional need for only two pitches up to 2036.
90. Policy LP28 allows for new sites to be developed subject to a number of justifiable and reasonable criteria. Given that actual identified need has been satisfied with planning permissions and the very limited scale of potential additional need from "unknown" households, the Local Plan is justified in not allocating sites for Gypsies and Travellers. The GTAA found no evidence of need for plots for Travelling Showpeople although again Policy LP28 would allow for such development subject to criteria should proposals come forward.
91. Policy LP29 would allow for community-based development proposals as an exception to the requirements of relevant policies. Although Paragraph 7.45 sets out a list of examples of community-based development, it is not sufficiently clear what would and would not be supported by the policy. Policy LP23 already takes a positive approach to the development of local services and community facilities. The Council accepted that in some cases the examples listed would not necessarily need to be considered as exceptions to other policies and in other cases proposals for community facilities could be dealt with and potentially justified on their merits, even without such a policy.
92. Significantly, the policy would allow for market housing on sites where it would not otherwise be permitted solely in order to help to fund the provision and upkeep of the community facility. The provision of community facilities is an appropriate aim and I appreciate that funding for such facilities can be challenging. However, this is not sufficient to justify

such an approach. Unlike for rural exceptions housing sites, there is no basis in national policy to allow for such cross subsidy. There is also insufficient clarity as to how this aspect of the policy would be implemented in practice, what it would allow for in terms of housing and the relationship between the housing and the funding for the community facility.

93. Taking all these factors into account I consider that Policy LP29 is not justified, effective or consistent with national policy. Main modification **MM13** would address these concerns by deleting the policy and supporting text.
94. Policy LP31 is justified and takes a proportionate approach to the requirements for health impact assessments on large scale and large scale major developments.
95. Subject to the main modification referred to above, the Local Plan is justified, effective and consistent with national policy in relation to the approach towards strengthening communities.

#### **Issue 6 – Whether the Local Plan is justified, effective and consistent with national policy in relation to the approach towards conserving and enhancing the environment**

96. Policies LP32, LP33 and LP34 provide a comprehensive and justified policy framework for the natural environment and open space. They will give adequate protection, secure mitigation where necessary and encourage enhancement, consistent with national policy. Subject to main modification **MM14**, which concerns Policy LP32 and is necessary to provide sufficient clarity in respect of the types of mitigation to address the effects of increased recreational pressure, particularly on European designated sites, these policies are also effective.
97. The approach to the conversion and replacement of rural buildings set out in Policy LP35 and to heritage assets and their settings in Policy LP36 provides an effective policy framework on such issues which is justified and consistent with national policy.
98. Policy LP37 provides effective and justified criteria by which to consider renewable and low carbon energy schemes. Having considered potential options to identify areas suitable for wind energy development and undertaken specific consultation on the matter, the Council concluded that other than the Great Fen and its landscape and visual setting, the whole of the District was suitable in principle. This is a clear, effective and justified approach. The policy for renewable and low carbon energy development including wind energy is consistent with national policy.
99. In terms of the effects of new development on air quality, Policy LP38 provides an effective approach. It justifiably identifies circumstances where an Air Quality Assessment would be required, including when large scale major development is proposed and takes a proportionate approach to the nature of such an assessment and the potential need for a low emissions strategy. It is consistent with national policy.

100. Policies LP39 and LP40 set out a clear and comprehensive approach to ground contamination and groundwater pollution and water related development. Policy LP40 includes appropriate criteria which would allow for residential moorings to meet the need for such development and satisfies the Council's obligations under S8 of the 1985 Housing Act (as amended by the Housing and Planning Act 2016) in terms of the needs of people residing in or resorting to the District with respect to the provision of places on inland waterways where houseboats can be moored. The policies are effective, justified and consistent with national policy.
101. Subject to the main modification referred to above, the Local Plan is justified, effective and consistent with national policy in relation to the approach towards conserving and enhancing the environment.

**Issue 7 – Whether the site allocations for the Huntingdon Spatial Planning Area are justified, effective and consistent with national policy**

*SEL at Alconbury Weald – SEL 1.1 and SEL 1.2*

102. The SEL at Alconbury Weald consists of two site allocations, the former Alconbury Airfield and Grange Farm (SEL1.1) and RAF Alconbury (SEL1.2).
103. SEL1.1 would accommodate some 5,000 homes (with potential for more subject to detailed capacity work) and includes the 150ha Alconbury Enterprise Zone, expected to provide for at least 290,000 sqm of business floorspace. The site would include local centres incorporating retail uses, a range of social and community facilities including new schools and strategic green infrastructure. Outline planning permission for the above uses was granted in 2014 and a number of reserved matters applications have been submitted and approved since then. Development on the site is well underway and by the end of 2017/18, 163 dwellings had been completed along with some business uses, a school and retail development.
104. SEL1.2 is currently in use as an operational military base by the US Air Force. It has been declared surplus to military requirements and is expected to be available for development from 2024 onwards. It is allocated for 1,680 homes and social and community facilities including a primary school. No planning applications for the uses proposed have been submitted to date.
105. Together these two sites would involve a major expansion of the built up area to the north west of Huntingdon. Given the scale of housing growth required in the District and the limited potential for development within the existing built up area, this is justified in line with the overall strategy for development. The sites contain significant areas of previously developed land and the proposed development would make a very significant contribution to the housing and employment needs of the District. They provide the opportunity to bring forward mixed development and a range of social and community facilities to support new housing.
106. Policies SEL1.1 and SEL1.2 set out a comprehensive range of criteria to guide development on the sites and along with other policies in the Local

Plan they will ensure that appropriate infrastructure and mitigation is put in place and that site specific issues relating to the potential adverse impacts of development are addressed effectively.

107. Planning permissions are in place on site SEL1.1 and delivery has already started. It is clearly a large and complex site to bring forward and sensibly this is being done in phases and development will be spread over many years. On the basis of available evidence, site SEL1.2 will become available for redevelopment and the timescale envisaged by the Council, which would see completions from 2028/29 onwards, is realistic.
108. The Council's housing trajectory (updated during the hearing sessions and set out in EXAM/26) assumes annual completions on SEL1.1 being consistently above 200 dwellings throughout the plan period and rising to a peak of 300 dwellings. Taking account of evidence of past performance on sites in the District and comparison with sites in other parts of the region and nationally, this in itself is an ambitious rate of development. However, the Council's trajectory also forecasts completions on SEL1.2 of at least 180 dwellings per annum from 2029/30 onwards. It also forecasts completions on site HU1 (Ermine Street) from 2022/23 onwards of at least 100 dwellings per annum and up to 180 dwellings per annum. I deal with HU1 in more detail below, but it is a large site allocation which would also see development extending to the north west of Huntingdon in close proximity to the SEL. Given the nature and close proximity of the sites, I consider that there will inevitably be some impact on overall market demand and the capacity of housebuilders to deliver.
109. From 2022/23 the Council's trajectory anticipates combined completions on these three sites averaging approximately 470 dwellings per annum and peaking at 585 per annum. Whilst they would be separate sites and it is likely that a number of developers and sales outlets would be involved, this level of combined completions, particularly over such a sustained period of time, is not realistic. Although I am satisfied that the three sites could all be delivered and that completions could start to take place when envisaged, planning on a combined maximum rate of completions of some 300 dwellings per annum is more realistic given the evidence available.
110. Progress on the individual sites will of course depend on circumstances and the Local Plan is justified in identifying the overall capacity on each. However, in order for the Local Plan to be realistic, it is necessary to be clear that it is not anticipated that all of the dwellings proposed on each site will be delivered by the end of the plan period. Main modifications **MM15**, **MM16** and **MM17** will address this and are necessary to ensure that the Local Plan is justified and effective in this respect.

#### *Ermine Street, Huntingdon – HU1*

111. The site consists of two parcels of land, one to the north and one to the south of Ermine Street. In total Policy HU1 provides for approximately 1,440 homes, social and community facilities, retail uses and strategic green infrastructure. Development of the site would see a significant

extension of the built up area of Huntingdon onto land currently in open agricultural use.

112. Again, given the overall strategy for development, the scale of housing growth required in the District and the limited potential for development within the existing built up area, this allocation is justified. The proposed development would make a significant contribution to the housing needs of the District.
113. Policy HU1 sets out a comprehensive range of criteria to guide development on the site and along with other policies in the Local Plan will ensure that appropriate infrastructure and mitigation is put in place and that site specific issues relating to the potential adverse impacts of development are addressed effectively.
114. There is clear interest in bringing forward both parcels of land for development and a planning application for the southern part of the site was submitted in September 2018. The intention is to develop both parts of the site in a co-ordinated fashion. It is realistic to anticipate completions on the site from 2022/23 onwards as the Council suggest, however, as discussed above, there is a need for main modification **MM17** to reflect the realistic position that not all of the dwellings proposed will be delivered by the end of the plan period.

*Other site allocations in the Huntingdon Spatial Planning Area*

115. I deal with specific issues relating to a number of the other site allocations in the Huntingdon Spatial Planning Area below and identify main modifications where necessary. The remainder of the site allocations, not specifically referred to, are justified and the policies associated with them set out effective criteria to guide development. In association with other policies in the Local Plan they will ensure that necessary infrastructure and mitigation is put in place and that site specific issues relating to the potential adverse impacts of development are addressed effectively. They will make an important contribution to meeting development needs particularly for housing and are consistent with the overall strategy for development.
116. The sites West of Edison Bell Way (HU5) and at George Street (HU6) are on adjacent land, centrally located within the urban area of Huntingdon. Planning applications have been submitted for both sites with the intention of developing them comprehensively and the Council has taken a positive view of this revised approach. To ensure that the Local Plan is effective in reflecting this updated situation and promoting comprehensive redevelopment, main modifications **MM18** and **MM19** are required. These would combine the two site allocations into one and adjust the policy wording and capacity of the site for housing accordingly.
117. Although some 44% of the site at the Gas Depot, Mill Common (HU7) is within Flood Zones 2 and 3b, the allocation is based on residential development being limited to that part of the site within Flood Zone 1.

Along with other relevant policies, Policy HU7 sets out adequate safeguards to ensure that development would be safe and takes full account of the particular constraints that exist. On this basis planning permission for 11 dwellings was granted in January 2018.

118. The site at Brampton Park (HU13) is previously developed and formerly in use as an RAF base. It is allocated for some 600 homes and associated supporting uses. Flood Zones 2, 3a and 3b cover 50% of the site. However, a number of planning permissions have been granted on the site and development is well underway with 96 completed dwellings up to the end of March 2018 and a further 243 under construction. The scheme focusses residential development on those parts of the site in Flood Zone 1 but also recognises that former staff accommodation blocks were in areas of higher flood risk and redevelopment for new housing can improve this situation.
119. Flood Zone 2 covers 59% of the site at Brampton Park Golf Club Practice Ground (HU14). The Council accepted at the hearings that the sequential test had not been carried out correctly in respect of this site allocation. However, full planning permission was granted for 68 dwellings in February 2018 and construction is underway with completions expected in 2018/19. This followed a previous outline planning permission for 56 dwellings approved in March 2017. The permitted schemes included site specific flood risk assessments and agreed mitigation measures. Under these circumstances, the site allocation is justified.
120. The site at Main Street (HU9) is entirely within Flood Zone 2. The Council acknowledged at the hearings that the sequential test had not been carried out correctly in respect of this site allocation and accepted that it should be removed from the Local Plan. An application for outline planning permission for residential development has recently been submitted although I understand that the position of the Council and the Environment Agency in relation to flood risk remains as it was at the hearings. Given its situation in terms of flood risk, the allocation of the site is not justified or consistent with national policy. An adequate supply of housing land can be provided without this site allocation. Main modification **MM20** would delete the site and is required to ensure that the Local Plan is justified and consistent with national policy.
121. Tyrell's Marina, Godmanchester (HU16) is allocated for mixed use, potentially including residential development, food and drink, office and leisure uses. The site is heavily constrained by flood risk with 77% being within Flood Zone 3b, the functional floodplain, a further 9% being in Flood Zone 3a and 2% in Flood Zone 2.
122. The site is previously developed and contains some buildings in a poor state of repair. It is a visually prominent site along the river frontage and is within the Huntingdon Conservation Area. Redeveloping the site would clearly have benefits in terms of visual amenity and the character and appearance of the Conservation Area. Given these site specific factors, I consider in this case that there are no reasonably available sites appropriate

for the proposed development in areas with a lower probability of flooding and that the sequential test has been satisfied.

123. In terms of the exception test, I accept that there would be wider sustainability benefits to the community as set out above. However, it has not been satisfactorily demonstrated that these would outweigh the flood risk or that the site would be safe for its lifetime. A planning application for mixed use including 16 dwellings was submitted and I understand is yet to be determined. The Environment Agency objected to the application on the basis of flood risk and the inclusion of "more vulnerable" and "less vulnerable" development in the functional floodplain.
124. Given the above, there is insufficient basis to conclude that the exception test has been satisfied and that a suitable and safe scheme to redevelop the site can be achieved. There is considerable doubt that the site allocation is deliverable. The Council's housing trajectory does not include any completions on the site. The allocation of the site is not justified or consistent with national policy. An adequate supply of housing land can be provided without this site allocation. Main modification **MM23** would delete the site allocation and is required to ensure that the Local Plan is justified and consistent with national policy.
125. The site at RGE Engineering, Godmanchester (HU17) is partly in Flood Zone 3b (24%), Flood Zone 3a (3%) and Flood Zone 2 (7%). However, the estimated dwelling capacity in Policy HU17 is based on residential development being limited to that part of the site within Flood Zone 1. The allocation includes the re-provision of some of the public car parking which currently exists on the site. In order to accommodate this, along with residential development and taking account of site constraints and potential access arrangements, the Council accepted that the site boundary should be extended to include land under the A14 flyover. Main modification **MM24** would amend Policy HU17 to achieve this and is required to ensure that the policy is effective.
126. Policy HU10 allocates land for an extension to Hinchingsbrooke Country Park in Huntingdon as part of the overall strategy to provide additional green infrastructure and to mitigate the recreational impacts of new residential development on designated nature conservation sites, in particular the Portholme Special Area of Conservation, by providing alternative natural greenspace. Given the opposition of a landowner and their reluctance to facilitate the extension of the country park, the Council proposed a reduced site area during the examination. This amended proposal would still see a substantial extension to the country park of some 27.5ha and enable a significant enhancement of the country park and the facilities available, including a car park with access from Huntingdon Road. It would still enable the objectives of the allocation to be achieved. Main modification **MM21** would amend Policy HU10 accordingly and is necessary to ensure that the site allocation is realistically deliverable and therefore effective.
127. Policy HU11 sets out a justified approach to further development at Huntingdon Racecourse with appropriate criteria to take account of the

particular constraints and issues relating to the site. Main modification **MM22** is necessary however to ensure that the policy is sufficiently clear and therefore effective in terms of the requirements for a transport assessment and travel plan.

*Conclusion on Issue 7*

128. Subject to the main modifications referred to above, the site allocations for the Huntingdon Spatial Planning Area are justified, effective and consistent with national policy.

**Issue 8 – Whether the site allocations for the St Neots Spatial Planning Area are justified, effective and consistent with national policy**

*SEL at St Neots East - SEL2*

129. Policy SEL2 allocates the site at St Neots East for some 3,820 homes, 22ha of employment land, a local centre and neighbourhood centre including retail uses, a range of social and community facilities including new schools, transport infrastructure and strategic green and open space. Planning applications have been submitted for the northern part of the site (1,020 dwellings on the land known as Loves Farm 2) and for the southern part (2,800 dwellings on the land known as Wintringham Park). At the time of the hearings the Council was minded to approve both applications subject to s106 agreements and a final list of conditions.
130. The SEL would represent a very substantial extension of the built up area onto open agricultural land to the east of St Neots, beyond the East Coast Main Railway Line. The site allocation is justified in line with the overall strategy for development, given the scale of housing growth required in the District and the limited potential for development within the existing built up area. It will make a very significant contribution to the housing and employment needs of the District. It provides the opportunity to bring forward mixed development and a range of social and community facilities to support new housing. The development on the site will be seen in the context of the large first phase of the Loves Farm site which was nearing completion at the time of the hearings. It will be a continuation of the strategic growth of the built up area in this direction.
131. Policy SEL2 sets out a comprehensive range of criteria to guide development on the site. In association with other relevant policies in the Local Plan it will ensure that appropriate infrastructure and mitigation is put in place and that site specific issues relating to the potential adverse impacts of development are addressed effectively.
132. It is realistic to expect completions to start to take place from 2019/20 (Wintringham Park) and from 2020/21 (Loves Farm 2) as set out in EXAM/26. However, the Council's trajectory envisages combined completions in excess of 300 dwellings per annum for a sustained period and peaking at 385 dwellings per annum. Although it is likely that a number of developers and sales outlets would be involved, this level of combined completions, particularly over such a sustained period of time, is



not realistic. It is not supported by evidence of past performance on sites in the District including the first phase of Loves Farm or in terms of comparable sites elsewhere in the region and across the country.

133. Planning on a combined maximum rate of completions of approximately 200 dwellings per annum would remain ambitious but is more realistic in the light of evidence available.
134. Progress on delivering the site will depend on circumstances and the Local Plan is justified in identifying the overall capacity of approximately 3,820 homes. However, in order for the Local Plan to be realistic, it is necessary to be clear that it is not anticipated that all of the dwellings proposed will be delivered by the end of the plan period. Main modification **MM25** will address this and is necessary to ensure that the Local Plan is justified and effective in this respect.

*Other site allocations in the St Neots Spatial Planning Area*

135. The site at St Mary's Urban Village (SN1) is largely within Flood Zone 2 (88%) with the remainder in Flood Zones 3a and 3b. The site is previously developed and contains listed buildings including Brook House (Grade II\*) and some buildings in a poor state of repair. It is a visually prominent site within the Town Centre and Conservation Area. It is adjacent to the Grade I listed St Mary's Church.
136. Sensitive redevelopment of the site would have benefits in terms of visual amenity and the character and appearance of the Conservation Area and the setting of other heritage assets. Given these site specific factors, I consider in this case that there are no reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding and that the sequential test has been satisfied. Given that the bulk of the site is within Flood Zone 2 and no "highly vulnerable" uses are proposed, there is no need to apply the exception test. A number of planning permissions have been granted for residential use on the site. Whilst the site allocation is justified, main modification **MM26** is necessary to ensure that Policy SN1 is effective in accurately reflecting the planning permissions on the site in terms of the number of dwellings and the type of uses.
137. Policy SN2 allocates the Loves Farm Reserved site for approximately 40 dwellings. It was assessed as being partly within Flood Zone 2 (36%), Flood Zone 3a (37%) and Flood Zone 3b (26%). This assessment was revised as a result of a site specific flood risk assessment and the Environment Agency accepted that the site is in fact all in Flood Zone 2. However, I am not satisfied that the sequential test was carried out correctly in relation to this site and the Council accepted at the hearings that they could not point to an assessment of relative flood risk compared to other reasonably available sites. Nor was it argued that the site had particular characteristics that meant there were no reasonably available alternatives.

138. Notwithstanding this, the site benefits from planning permission for 41 dwellings granted in January 2017. The site specific flood risk assessment took account of upstream attenuation on the Fox Brook and hydraulic modelling to conclude that development would be safe for its lifetime and reduce flood risk overall. The Environment Agency accepted these findings and subject to appropriate conditions did not object to the application. Taking this into account the site allocation is justified.
139. The sites at Cromwell Road North (SN3) and Cromwell Road Car Park (SN4) provide the opportunity to use previously developed land within the built up area and add to the range and diversity of housing sites available. Site SN3 contains land in Flood Zones 3b (32%), Flood Zone 3a (2%) and Flood Zone 2 (2%) and a culverted water course. However, there is adequate scope to accommodate the number of dwellings proposed on land within Flood Zone 1 and to minimise, and potentially eliminate the need to build over the culvert.
140. The site of the Former Youth Centre on Priory Road (SN5) is largely in Flood Zone 3a (93%) and Flood Zone 3b (6%). It is previously developed and has a rather untidy appearance. It is within the Conservation Area and relatively close to the Town Centre. The Council argued at the hearings that on this basis there were no reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding and that the sequential test had been satisfied. I am not convinced in this case that the characteristics of the site and the potential benefits of redeveloping it are such that it can be concluded that there are no reasonably available alternatives that could accommodate the development.
141. In any event, even if the sequential test had been satisfied, there is insufficient basis to conclude that the wider sustainability benefits to the community outweigh flood risk. Whilst the visual appearance of the site could be improved, it is not particularly prominent, does not currently detract significantly from the Conservation Area and would only provide for a limited amount of new housing.
142. I appreciate that the site benefitted in the past from planning permission for 14 dwellings and that a site specific flood risk assessment concluded that development would be safe for its lifetime and not increase flood risk elsewhere. However, that permission lapsed and whilst a new application has been submitted it was still to be determined at the time of the hearings. It is notable that the Council's housing trajectory does not include any completions on the site. Given all of this there is insufficient basis to conclude that the issues with flood risk have been properly and fully addressed and that the site is realistically deliverable.
143. The allocation of the site is not justified or consistent with national policy. An adequate supply of housing land can be provided without this site allocation. Main modification **MM27** would delete the site allocation and is required to ensure that the Local Plan is justified and consistent with national policy.

144. The site North of St James Road, Little Paxton (SN6) is within Flood Zone 1. It will make an important contribution to the supply of housing land and there are adequate policy safeguards in relation to the adjacent nature conservation site.

*Conclusion on Issue 8*

145. Along with other relevant policies in the Local Plan the policies associated with the site allocations will ensure that appropriate infrastructure and mitigation is put in place and that site specific issues relating to the potential adverse impacts of development are addressed effectively. Other than in the case of site SN5, the site allocations are appropriate and will make an important contribution to the development needs of the District, particularly in relation to housing.
146. Subject to the main modifications referred to above, the site allocations for the St Neots Spatial Planning Area are justified, effective and consistent with national policy.

**Issue 9 – Whether the site allocations for the St Ives Spatial Planning Area are justified, effective and consistent with national policy**

147. The site at St Ives West (SI1) is allocated for approximately 400 homes along with social and community facilities and a significant amount of green space. It occupies a sensitive location between the western outskirts of St Ives and the east of Houghton and Wyton and is subject to a number of constraints. There is a complex planning history to the site with a number of planning applications and planning permissions. The eastern part of the site (The Spires) has planning permission for residential development (184 dwellings) and is currently under construction with 48 dwellings completed by the end of 2017/18.
148. The site allocation will make a significant contribution to the housing needs of the District and will be important in sustaining the role of St Ives in line with the overall spatial strategy and within the context of the constraints to growth in the town that exist.
149. Policy SI1 sets out appropriate criteria which will be effective in guiding development on the site and ensuring a co-ordinated approach. It will also ensure that issues relating to the potential adverse impacts of development are addressed effectively and appropriate infrastructure and mitigation is put in place. In particular, criterion g), the indicative illustration on page 206 of the Local Plan and the requirement in Policy SI1 for approximately 23ha of green space, give adequate safeguards in relation to the maintenance of a sense of separation between developments at Houghton Grange and The Spires whilst providing for some flexibility in terms of the layout of development. They provide a sufficient basis to ensure that the individual and distinct identities of Houghton and Wyton and St Ives are respected.
150. There are some issues to resolve in terms of bringing different elements of the site forward for development. However, there is clear and definite

interest in doing so and good progress has been made at The Spires. I am satisfied that the site overall is deliverable and that the timescales and rates of development set out in the Council's housing trajectory are realistic.

151. Main modification **MM28**, which would delete Paragraph 11.11 is required to provide clarity regarding retail uses on the site and is therefore necessary for effectiveness.
152. Policy SI2 allocates the St Ives Football Club site for approximately 30 homes. Planning permission was granted in September 2018 for the development although this was conditional on new facilities for the football club being provided elsewhere in St Ives. An application for such replacement facilities has been submitted. I am satisfied that the site is deliverable and that the timescale and rate of development set out in the Council's housing trajectory are realistic.
153. The 5.6ha site at Giffords Farm (SI3) is allocated for employment uses. Although 15% of the site is within Flood Zones 2 and 3a, there is sufficient scope within the site to accommodate the uses proposed on lower flood risk areas (Flood Zone 1). The allocation will make a small but important contribution to employment land provision and is well located in relation to the Compass Point Business Park to the south.
154. Policy SI4 allocates the site of the Former Car Showroom, London Road for 50 dwellings. There are significant flood risk issues associated with the site with 52% being in Flood Zone 3a and the remaining 48% in Flood Zone 2. It is previously developed and at the time of the hearings was occupied by empty buildings and areas of hardstanding. I agree with the Council that it currently detracts from the character and appearance of the Conservation Area and redevelopment of the site would lead to an improvement in the visual amenity of the area. Given these site specific factors, I consider in this case that there are no reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding and that the sequential test has been satisfied.
155. In terms of the exception test, I accept that there would be wider sustainability benefits to the community. However, it has not been satisfactorily demonstrated that these would outweigh the flood risk or that the site would be safe for its lifetime. A planning application for 62 dwellings has been recently submitted but I understand that the Environment Agency continue to have concerns in terms of flood risk and the flood risk assessment.
156. Given the above, there is insufficient basis to conclude that the exception test has been satisfied and that a suitable and safe scheme to redevelop the site can be achieved. There is considerable doubt that the site allocation is deliverable. The allocation of the site is not justified or consistent with national policy. An adequate supply of housing land can be provided without this site allocation. Main modification **MM29** would delete the site allocation and is required to ensure that the Local Plan is justified and consistent with national policy.

### *Conclusion on Issue 9*

157. The policies associated with the site allocations in association with other relevant policies will ensure that necessary infrastructure and mitigation is put in place and that the potential adverse impacts of development on a site specific level are addressed effectively. Other than in the case of site SI4, the site allocations are appropriate and will make an important contribution to the development needs of the District.
158. Subject to the main modifications referred to above, the site allocations for the St Ives Spatial Planning Area are justified, effective and consistent with national policy.

### **Issue 10 – Whether the site allocations for the Ramsey Spatial Planning Area are justified, effective and consistent with national policy**

159. The site at Ramsey Gateway (High Lode) (RA1) is significantly affected by flood risk issues with 81% being in Flood Zone 3a, 1% in Flood Zone 3b and 5% in Flood Zone 2. It is in a prominent position at the northern end of the town and partly within the Conservation Area. However, whilst there are some buildings, the allocation site is largely undeveloped and relatively open.
160. The Council argued that there were no reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding and that the sequential test had been satisfied. I am not convinced in this case that the characteristics of the site and the potential benefits of redeveloping it are such that it can be concluded that there are no reasonably available alternatives that could accommodate the development.
161. However, the site benefits from planning permission for 110 dwellings and although none of the dwellings have yet been built, the Council confirmed that a lawful start to development had taken place and that the permission remains extant. Progress has recently been made in securing funding from the Combined Authority to support the delivery of affordable housing on the site and this is likely to help to facilitate the development. There is a realistic prospect of the site being developed and taking this into account the site allocation is justified.
162. The site at West Station Yard and Northern Mill (RA3) would need to be accessed through the site at Ramsey Gateway (RA2) and would be dependent on that being developed. There is no reason to suggest that this would not be feasible however and the Council's housing trajectory sensibly envisages completions on site RA3 later in the plan period. Both site allocations are justified. Although it is appropriate to seek to retain the historic Northern Mill building on site RA3 if possible, it is necessary to provide flexibility to take account of the impact of this on the viability of a scheme. Main modification **MM30** would achieve this and is necessary for effectiveness.

163. The sites at Field Road (RA4), Whytefield Road (RA5), 94 Great Whyte (RA6) and East of Valiant Square (RA7) are all justified and would make an important contribution to housing needs. Site RA4 has planning permission and is under construction with good progress being made. Site RA6 has planning permission.
164. The site at the Former RAF Upwood and Upwood Hill House (RA8) is large and complex and subject to a number of constraints, many of which relate to its previous use as an air base. It is allocated for approximately 450 homes, community facilities to support the housing and 2ha of employment land. The site allocation provides the opportunity to make a significant contribution to development needs, particularly housing and to make effective use of previously developed land.
165. There are some issues to resolve in terms of bringing the site forward for development. However, Policy RA8 sets out clear and comprehensive guidance including the need for the site overall to be developed in a comprehensive fashion. Planning permission for demolition and clearance, environmental remediation, business development and up to 160 dwellings as a first phase was granted in June 2017. I am satisfied that the site is deliverable and that the timescales and rates of development set out in the Council's housing trajectory are realistic. The site allocation is justified.

#### *Conclusion on Issue 10*

166. Along with other relevant policies, the policies associated with the site allocations will provide for necessary infrastructure and mitigation to be put in place and ensure that the potential adverse impacts of development on a site specific level are addressed effectively. The site allocations are appropriate and will make an important contribution to the development needs of the District.
167. Subject to the main modification referred to above, the site allocations for the Ramsey Spatial Planning Area are justified, effective and consistent with national policy.

#### **Issue 11 – Whether the site allocations for the Key Service Centres are justified, effective and consistent with national policy**

168. The Local Plan allocates sites in all seven of the Key Service Centres. These allocations will assist in providing a good range and choice of development opportunities in a variety of locations across the District and help to sustain rural communities. Taken together, they will make a significant and important contribution to the development needs of the District, particularly in relation to housing including affordable housing. In a number of cases planning permission exists for the proposed development and construction is underway on some sites. I deal below with specific issues relating to some sites, where main modifications are necessary.
169. Main modification **MM31** is required in the interests of effectiveness to add a criterion to Policy SM2 (Newlands, St Ives Road, Somersham) relating to the proximity of the nearby listed Somersham House and its setting.

170. The Council confirmed at the hearings that given land ownership issues, it was not possible to access the site East of Robert Avenue, Somersham (SM5). The site is not deliverable therefore and main modification **MM32** is required to delete the site allocation and ensure that the Local Plan is effective in this respect.
171. The Council confirmed that it was not necessary to relocate the existing farmyard at Manor Farm Buildings, Warboys (Policy WB2). Given this and in order for the policy to be justified and effective, main modification **MM33** is required.
172. The remainder of the site allocations, not specifically referred to, are justified and the policies associated with them set out effective criteria to guide development. In association with other policies in the Local Plan they will ensure that necessary infrastructure and mitigation is put in place and that site specific issues relating to the potential adverse impacts of development are addressed effectively.
173. Subject to the main modifications referred to above, the site allocations for the Key Service Centres are justified, effective and consistent with national policy.

**Issue 12 – Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy**

174. As discussed above, the Local Plan is based on making provision for the housing requirement of 20,100 dwellings between 2011 and 2036. The Council's updated position regarding the supply of housing land following discussions during the hearing sessions is set out in its revised housing trajectory (EXAM26) and the note setting out an explanation of other sources of housing supply (EXAM41). Interested parties were given the opportunity to comment on this information and I have taken account of these comments.
175. Between 2011/12 and 2017/18 there were 4,421 dwellings completed. Excluding those sites allocated in the Local Plan, the Council estimates that 605 dwellings will be delivered on sites which had planning permission as of 31 March 2017. This factors in a 10% reduction for small sites (less than 10 dwellings) which were not yet under construction. An additional 363 dwellings have been granted planning permission since then. The Council's estimate of supply from these sources is justified.
176. Based on the average for the five years up to 2017/18 and including a 3% lapse rate, the Council estimated that an average of 37 dwellings per annum would be provided through prior approvals from 2019/20 onwards. Prior approvals have only been recorded in the District since 2013/14 and there have been significant fluctuations in annual completion rates. Whilst it is reasonable to conclude that prior approvals will continue to deliver new dwellings over the plan period, there is some uncertainty as to the number that will realistically be delivered. Taking a cautious approach, I consider it appropriate to estimate that an average of 20 dwellings per annum will be

- delivered from 2018/19 onwards, a total of 360 in the plan period. This includes the 92 dwellings which are already subject to prior approval.
177. The Council estimated that an average of 116 dwellings per annum would be delivered on small windfall sites (less than 10 dwellings). This was based on the average between 2002/03 and 2017/18. It is likely that windfall sites will continue to come forward and the Local Plan broadly takes a more positive and flexible approach to additional sites compared with previous policies. On the other hand, the Local Plan process has allocated a large number of housing sites in a wide variety of locations and it could be argued that the scope for future windfall sites has been reduced accordingly. Given this, it is again appropriate to take a cautious approach and I consider that an estimate of 80 dwellings per annum from windfalls from 2021/22 onwards is reasonable. This would provide 1,200 dwellings in the plan period.
  178. Policy LP30 provides a new and more positive approach towards rural exceptions housing which is likely to make an important contribution to housing supply, particularly given that up to 40% market housing could be provided on sites. There are signs that this policy is starting to generate interest from developers, but the particular approach is still in its infancy. The Council estimated that an average of 45 dwellings per annum (combined market and affordable) would be delivered from this source based on very recent levels of planning permissions. Given the limited data available and once more taking a cautious approach, I consider that an estimate of an average of 35 dwellings per annum from 2021/22 is reasonable. This would avoid the risk of double counting with sites already with planning permission. This would provide for 525 dwellings in the plan period.
  179. Turning finally to sites allocated in the Local Plan, my assessment of supply is based on my conclusions on individual sites set out above and takes account of the main modifications. These include the deletion of a number of site allocations. It also recognises that the SEL at Alconbury Weald and site HU1 will not be fully developed during the plan period and that a maximum combined completion rate of 300 dwellings per annum has been assumed. Likewise, it takes account of the realistic combined completions of a maximum of 200 dwellings per annum on the SEL at St Neots East and that it will not be fully developed during the plan period.
  180. Subject to these adjustments, the Council's trajectory for the site allocations as set out in EXAM26 is realistic in terms of the timescales and rates of annual completions. Taking into account these adjustments to the trajectory set out in EXAM26, it is estimated that 13,594 dwellings will be delivered on allocated sites in the plan period. This figure includes sites allocated but already with planning permission.
  181. Taking all of these sources, along with completions to date, there would be an estimated total supply of 21,068 dwellings in the plan period. It will be sufficient to meet the housing requirement of 20,100 and provide for some flexibility. Although the level of flexibility in the figures is not particularly



substantial, this is based on a cautious approach to other sources of supply (prior approvals, windfalls and rural exceptions sites). There would also be no policy restriction on additional delivery on the SELs and site HU1, up to the allocated capacity. The plan will need to be reviewed within five years in any case and issues of housing supply could be addressed at that point and well before the end of this current plan period.

182. Completions in the seven years between 2011/12 and 2017/18 totalled 4,421 dwellings, an average of just over 630 per annum. Since 2012/13 they have been consistently below the annual requirement figure of 804 set out in the Local Plan. The Council accepts that there has been persistent under delivery of housing and that a 20% buffer for the five-year housing requirement should be applied.
183. In assessing a five-year supply of housing, I have taken 1 April 2019 as the base date, given that this is the closest to the likely point of adoption. This relies on an estimated figure for completions of 1,076 for 2018/19 which is derived from the figure set out in EXAM26 with adjustments made in line with my conclusions above.
184. The basic five-year requirement is 4,020 dwellings (5 x 804). The shortfall in completions between 2011/12 and 2018/19 is 935 dwellings (5,497 completions compared with a requirement of 6,432). This gives a figure of 4,955 to which the 20% buffer is applied to give a five-year requirement of 5,946 dwellings.
185. The supply of housing land for the five-year period from 1 April 2019 is estimated at 7,151 dwellings. This takes account of the main modifications and my findings in relation to specific site allocations and other sources of supply and is justified. It is sufficient to provide for a five-year supply with a significant degree of flexibility should some sites not progress as quickly as anticipated.
186. There is no need to allocate any additional sites in order to provide a five-year supply of housing land or to make adequate provision for housing needs over the plan period.
187. Main modification **MM1** includes a summary of the housing trajectory based on my conclusions and is necessary to ensure that the Local Plan sets out a clear and effective explanation of housing supply.
188. Subject to this main modification the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy.

## **Public Sector Equality Duty**

189. During the course of the examination I have had due regard to the aims set out in Section 149(1) of the Equality Act 2010. This includes consideration of the Local Plan's provision to meet the accommodation needs of gypsies and travellers, the need for accessible and adaptable housing and inclusive design.

## **Assessment of Legal Compliance**

190. My examination of the legal compliance of the Plan is summarised below.
191. The Local Plan has been prepared in accordance with the Council's Local Development Scheme.
192. Consultation on the Local Plan and the main modifications was carried out in compliance with the Council's Statement of Community Involvement.
193. Sustainability Appraisal has been carried out and is adequate.
194. The HRA report of May 2017 and the Addendum of November 2017 set out that an Appropriate Assessment was necessary and this was carried out. This concludes that the Local Plan will not have adverse effects on the integrity of any European Site. The HRA report for the main modifications reaches the same conclusion.
195. The Local Plan includes policies designed to secure that the development and use of land in the District contribute to the mitigation of, and adaptation to, climate change. Examples of such policies are LP5, LP13 and LP37.
196. The Local Plan complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

## **Overall Conclusion and Recommendation**

197. The Local Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
198. The Council has requested that I recommend main modifications to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Huntingdonshire Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the NPPF.

*Kevin Ward*

Inspector

This report is accompanied by an Appendix containing the Main Modifications.