

Overview and Scrutiny (Performance and Growth)
Panel – 02/09/2026
Cabinet – 09/09/2026
Council – 09/09/2026

Report by: Head of Planning, Infrastructure and
Public Protection

Lead Cllr: Tom Sanderson
Executive Councillor for Planning



Wards
All

Open / Exempt
Open

Key Decision?
Yes

Report Title: Pre-Submission Local Plan to 2046, Sustainability Appraisal and supporting documents

Executive Summary:

This report sets out the context in which the Regulation 19 Pre-Submission Local Plan to 2046 has been prepared and the implications for its preparation of recent changes in national legislation regarding plan-making. It draws attention to the statutory nature of this phase in inviting representations on soundness and legal compliance.

The report summarises responses received to the consultations on the Preferred Options draft Local Plan, the Sustainability Appraisal and the Additional Sites Allocations and identifies the key proposed changes to the draft Local Plan made in response to these. It identifies the evidence base prepared to inform and support the Local Plan. It also lists the alternative options considered for plan preparation and explains the reasons why they were not recommended.

The report also presents the Sustainability Appraisal that accompanies this stage of Local Plan preparation which considers the environmental, economic and social implications of the proposed Local Plan. In addition, it presents the Habitats Regulations Assessment which considers the impact of the proposed policies and sites on sites of international and national nature conservation value both individually and in combination. The report seeks approval for their publication for consultation.

Recommendations

- 1.1. That the Council approve the Pre-Submission Local Plan to 2046 (Appendix 1) for representations to be made under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for a period of six weeks starting on 16th September and closing on 28th October 2026.
- 1.2. That the Council approve the accompanying Policies Map (Appendix 2) for publication for a period of six weeks starting on 16th September and closing on 28th October 2026.
- 1.3. That the Council approve the Sustainability Appraisal (Appendix 3) for public consultation for a period of six weeks starting on 16th September and closing on 28th October 2026.
- 1.4. That the Council approve the Habitats Regulations Assessment (Appendix 5) for public consultation for a period of six weeks starting on 16th September and closing on 28th October 2026.
- 1.5. That the Council approve for publication on 16th September 2026 the Statement of the Representations Procedure (Appendix 6) explaining how and when representations can be made on the documents listed above.
- 1.6. That the Council note the above documents will be supported by an extensive suite of evidence that will be made available through the Council's website.
- 1.7. That the Council delegate any presentational changes and minor amendments such as correcting typographical errors or factual inaccuracies to the Planning Policy Team Leader in consultation with the Executive Councillor for Planning.

Key Corporate Plan Priorities

- | | |
|---|---|
| 1 | Improving quality of life for local people. |
| 2 | Creating a better Huntingdonshire for future generations. |

Place Strategy Priorities

- | | |
|---|--------------------------|
| 1 | Pride in place |
| 2 | Inclusive economy |
| 3 | Health embedded |
| 4 | Environmental innovation |
| 5 | Travel transformed |

Report Author(s)

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1. PURPOSE OF THE REPORT

1. The purpose of this report is to enable Council to consider and approve the Pre-Submission Local Plan to 2046 and its statutorily required supporting documents of the Sustainability Appraisal and Habitats Regulations Assessment for the purpose of publication for representations under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This is the final statutory stage for representations to be made about the proposed local plan and its supporting documents prior to the submission of the local plan to the Planning Inspectorate for independent examination.
2. The recommended Pre-Submission Local Plan to 2046 is available at Appendix 1.
3. A series of supporting documents are prescribed under Section 20(3) of the Planning and Compulsory Purchase Act (2004) to be published alongside the Local Plan. These are:
 - The Policies Map which can be found at Appendix 2 – this is a spatial interpretation of the development plan policies covering the district
 - The Sustainability Appraisal which can be found at Appendix 3 – this presents an iterative assessment of the significant social, environmental and economic effects of the local plan to ensure that it will contribute towards achieving sustainable development
 - The Statement of Consultation which can be found at Appendix 4 – this provides a summary of the comments received at each stage of preparing the draft local plan identifying key issues raised, providing responses to them reflecting how they have been taken into account in preparing the Pre-Submission Local Plan to 2046
4. In addition, a supporting document required under Regulation 105 of the Conservation of Habitats and Species Regulations (2017) is set out in Appendix 5. This is:
 - Habitats Regulations Assessment of the Huntingdonshire Local Plan Proposed Submission HRA
5. Three further supporting documents are provided:
 - The Statement of Representations Procedure which is set out in Appendix 6
 - The Infrastructure Readiness Report which is set out in Appendix 7
 - The Equalities Impact Assessment which is set out in Appendix 8.

2. BACKGROUND & CONTEXT

1. A local plan sets out planning policies and identifies how land is used determining what will be built where. Adopted local plans provide the framework for development across England and the government has repeatedly emphasised the importance of universal plan coverage. The National Planning Policy Framework (NPPF) (December 2024) states that local plans should be reviewed at least every five years to determine whether they need to be updated and to do so if necessary. Huntingdonshire's Local Plan to 2036 was adopted in May 2019 and following a review the decision was taken at the Cabinet meeting on 24 January 2023 to commence a full update to the local plan.

2. The legislation for plan-making in England is currently in a transition phase. The Pre-Submission Local Plan to 2046 has been prepared under the Planning and Compulsory Purchase Act (2004) and the Town and Country Planning (Local Planning) (England) Regulations 2012. This is now known as the 'legacy' system. The amendments to Part II of the Planning and Compulsory Purchase Act introduced by the Levelling Up and Regeneration Act (2023) and the Town and Country Planning (Local Planning) (England) Regulations 2026 are now superseding these as of 25 March 2026. Local planning authorities currently well advanced in preparing a local plan have been set a national deadline of 31 December 2026 to submit their Regulation 19 local plan for examination in public for it to be considered under the legacy legislation. Failure to do so will necessitate pivoting to the new legislation and starting again from the beginning of the new processes. No consultation undertaken under the legacy system and very limited evidence would be transferrable to the new system.
3. Multiple phases of public engagement have been carried out to meet the requirements of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 to ensure that the Pre-Submission Local Plan to 2046 has been strongly shaped by inputs from local communities, businesses and organisations. These are set out in the Statement of Consultation in Appendix 4.
4. Engagement on the Preferred Options Draft Local Plan and its supporting Sustainability Appraisal took place between 5th November and 17th December 2025. Over 2,950 representations were received. Engagement on a small Additional Site Allocations element took place between 13th May and 10th June 2026. Over 240 representations were received. Representations can be viewed in full on our engagement portal: [draft local plan update representations](#). All representations have been reviewed and taken into account when preparing the Pre-Submission Local Plan to 2046.

3. WHAT IS REGULATION 19 PUBLICATION?

1. The Regulation 19 draft local plan is more commonly known as the 'Pre-Submission' or 'Publication' version. It is published by the Council on the basis that the Council thinks it is sound and legally compliant and therefore suitable for submission to the Secretary of State for Housing, Communities and Local Government for examination in public via the Planning Inspectorate.
2. It is the final, statutory representations stage for a local plan. In line with the Regulations this will last for a minimum of 6 weeks and is proposed to start on 16th September and complete on 28th October 2026. This will be widely publicised through multiple channels in addition to the publication of the formal Statement of the Representations Procedure (Appendix 6) which explains how and when representations can be made. Following the representations period all representations received will be registered, made public on the Council's engagement portal and assessed to identify whether there is a need to propose any ~~minor~~ modifications to the Pre-Submission Local Plan prior to formal submission for examination in public.
3. Subject to the Regulation 19 representations period progressing as set out above a further report will be brought to Council on 16th December 2026 reporting key outcomes of the engagement on both the Local Plan and the Sustainability

Appraisal. This will seek agreement to formally submit the Regulation 19 Local Plan and all supporting materials for examination in public.

4. The timetable for the examination in public is wholly in control of the Planning Inspectorate. Examination in public will include consideration of representations received at the Regulation 19 stage in both written form and through a series of public hearings. Dates for the examination hearings are anticipated to be in 2027 but will be dependent on Inspector availability due to the expected increase in volume of local plans being submitted under the legacy system for the 31st December 2026 deadline.
5. Once submitted for examination the local plan will be assessed by the Planning Inspector in terms of whether it is legally compliant and meets the following tests of soundness as set out in the NPPF. Plans are considered to be sound if they are:
 - a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.

Relationship with National Planning Policy

6. The Pre-Submission Local Plan to 2046 has been prepared in accordance with relevant provisions of the National Planning Policy Framework (NPPF) published in December 2024. The government published a draft replacement NPPF for consultation between 16th December 2025 and 10th March 2026. This contained substantial revision to national planning policy including publication of a draft set of national decision-making policies to be applied to planning applications. A final version of the revised NPPF was published on 17th August 2026. Annex A of the revised NPPF (2026) makes it clear that, as this local plan is being prepared under the legacy plan-making system, its soundness in relation to consistency with national policy will be assessed against the December 2024 NPPF. However, the revised NPPF (2026) has potential to impact on some aspects of policy implementation.

4. SUMMARY OF RESPONSES RECEIVED TO THE PREFERRED OPTIONS DRAFT LOCAL PLAN AND ADDITIONAL SITE ALLOCATIONS AND KEY PROPOSED CHANGES TO THE DRAFT LOCAL PLAN

1. The Cabinet meeting of 21/10/2025 approved the contents of the Preferred Options Local Plan to 2046 and its accompanying Sustainability Appraisal for public consultation. This took place between 5 November and 17 December 2025. Details of responses received and changes that have been made to the draft local plan in response to these are set out in the Statement of Consultation (Appendix 4). A total

of 2,867 responses were received to the Preferred Options Local Plan, and 85 responses were submitted on the Sustainability Appraisal.

2. The Additional Site Allocations consultation took place between 13 May and 10 June 2026. This included one potential reserve site in the North Huntingdon growth corridor, one additional site in a Local Service Village and five additional sites in villages. The responses on these are addressed within their respective categories.

Section A: What is this Local Plan?

3. Responses received on the Local Plan proposals as a whole are included in this section. A strong campaign 'Pause the Plan' led by Houghton and Wyton Parish Council stimulated substantial responses from people focused on delaying preparation of the local plan to resolve three initial areas of concern:
 - pause the plan until the boundaries of the new unitary authorities are precisely defined and understood
 - challenge the inflated housing target
 - conduct comprehensive infrastructure studies that examine the true capacities and limit of current systems; secure necessary funding prior to committing to large scale developments
4. Responses related to concerns about the overall ability of the district to accommodate the level of housing growth prescribed by the government's standard methodology for calculating housing need with some calling on the Council to challenge the methodology at a national level. The section on 'what evidence do we have?' was challenged that the local plan was happening too quickly before key infrastructure delivery commitments are in place. Primary concerns focused on roads and traffic congestion especially around north Huntingdon and in the Hinchingsbrooke area; flooding, water supply and waste water management; and provision of education and healthcare services. Strong concerns were expressed regarding the completion of all evidence base material prior to moving forward with the next stage of the local plan.

Outcomes

5. The Local Development Scheme was revised to defer the proposed Regulation 19 consultation to September to maximise the available time to address the issues raised. The local government reorganisation outcome for Cambridgeshire has been delayed from the anticipated July date to October 2026. While the section in the Preferred Options Local Plan was useful in drawing attention to this given the anticipated adoption date of 2028 it has been removed from the Regulation 19 version.
6. The overall housing number has been retained at that based on the standard methodology to ensure Huntingdonshire contributes adequately to national housing growth aspirations. There are no circumstances in the Council's area that justify departing from the standard method to assess the area's local housing need. Further explanation is set out in section 7 on what alternatives were considered.
7. The evidence base process for local plan preparation is iterative reflecting the content of the plan as it evolves. Substantial further evidence has been prepared building on that available at the Preferred Options stage. Further details are

provided in Section 4 of this report. An additional ‘Infrastructure Readiness Report’ has been prepared in response to the motion raised at Council on 15 July 2026. This is to aid understanding of the key elements of the Infrastructure Delivery Study (IDS) and how the Regulation 19 Local Plan has responded to the IDS. The report is presented in Appendix 7.

- 8. The section on strategic policies and neighbourhood plans has been updated to reflect changes in national guidance on neighbourhood planning issued in March 2026.
- 9. Chapter 2 ‘How to get involved’ has been deleted as it set out advice on how to engage with the Preferred Options Local Plan. Given the statutory nature of the Regulation 19 representations procedure the equivalent is inappropriate in what is intended to be the future adopted Local Plan. Relevant material will be provided elsewhere as explained in Section 3 of this report.

Section B: Our Strategy for Huntingdonshire

Chapter 3: Our Vision and Approach to Net Zero (now chapter 2)

- 10. Many responses supported the overall direction of the vision and objectives including the close alignment to the Corporate Plan and Huntingdonshire Futures. The vision itself was thought to be too long and a clearer structure connecting the vision to objectives to policies was sought, as was explicit reference to a series of detailed points including new communities, housing delivery and strategic economic opportunities. Extension of the vision end date to 2050 and beyond was suggested. Broad concerns were raised regarding more explicit planning and funding of infrastructure to support implementation.
- 11. The route to net zero chapter received general support with suggestions for both higher standards and easing of ambitions. The key facts about Huntingdonshire infographic only generated 5 responses on minor details.

Outcomes

- 12. The chapter has been retitled to ‘Our Vision and Approach to Climate Resilience’ to better reflect its focus on supporting our communities in responding and adapting to change. The Vision and Objectives section has been restructured to provide a succinct Vision statement supported by a series of aims and objectives, still structured around the Huntingdonshire Futures framework. Additional details have been incorporated regarding new communities, housing diversity and delivery, economic opportunities and the defence sector. The infographic has been removed.

Chapter 4: How Huntingdonshire will grow and change

- 13. This chapter presented the key strategic policies for consideration attracting 732 (25%) of the total number of responses to the Preferred Options Local Plan. The individual policies and summary of responses are set out in the following table.

Policy	Summary of issues raised
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General comments	• Objections to further growth proceeding before major road upgrades and flood mitigation measures are secured • Housing figures must reflect national policy while ensuring growth supports affordable housing delivery • Support for growth in principle, emphasising that residents must recognise the district is a developing area that cannot remain static • Should focus on creating an environment attractive to major investors if the district is to achieve long term economic ambition • The plan underestimates future job growth and fails to reflect the Combined Authority's ambitions for the North Huntingdonshire cluster
LP1: How much development do we expect?	• Approach to calculating housing need is overly complex and the start date should be revised to 2025 or 2026 • The housing target should be higher to support economic growth and housing affordability • The housing target should be lower due to the rural nature of the district • Over-dependence on a few strategic sites with complex infrastructure requirements which risks early under-delivery • Need for more sites of 50-200 homes to sustain delivery • The jobs figure is too low to support the housing number • Promotion of further logistics capacity • A housing trajectory should be included
LP2: Our strategy for change	• Broad support for focusing development in sustainable places • Concerns over deliverability and infrastructure capacity • Geographic imbalance suggested with over-reliance on strategic sites and inadequate distribution of growth to other sustainable settlements • Clarification sought on role of the North Huntingdon growth cluster
LP3: How will infrastructure be provided?	• Support for overall intent of ensuring development provides the infrastructure needed, coordinating with service providers and phasing delivery so infrastructure keeps pace with growth • Criticism that key infrastructure evidence was incomplete or published late • Cumulative impacts should be assessed particularly in the Huntingdon/ St Ives growth corridor • Policy should explicitly cover a diverse range of infrastructure types
LP4: Securing infrastructure provision	• Concern over duplication with LP3 • Double counting between CIL and site specific costs must be clearly prevented • Large strategic allocation should not be subject to CIL and policy should reflect their high on-site infrastructure provision

	• Concern over whether the underlying assumptions in the Whole Plan Viability Assessment are unrealistic • Land safeguarding request for Fens Reservoir and Lincolnshire Reservoir transfer infrastructure corridors
Key diagram	• Display of all settlements and better labelling sought
LP5: Settlement hierarchy	• Broad support for structure, a few challenges to specific categories settlement have been placed in • Contention that Market Towns should take a greater share of growth
How we will decide where a built up area boundary is	• Strong support but some requests for formal mapping and inclusion of mapped boundaries from Neighbourhood Plans • The definition should include commercial buildings as well as homes
LP6: Market towns	• Prioritisation of market towns supported but more allocations at St Neots sought due to its strategic location • Uncertainty over how the policy applies to sites adjacent to market towns
LP7: Service centres	• Questioned over why some service centres have allocations and others do not • Wider use of well related land sought, for more than rural exceptions schemes, particularly for service and employment uses
LP8: Local service villages	• Overall support for the concept of adding this category • Concerns over the 30 homes upper limit for individual rural exceptions sites – both too high and too low • Made Neighbourhood Plan policies should take precedence where they exist • Questioned over why some local service villages have allocations and others do not
LP9: Villages	• Policy is too tight and overly constrains growth • Concerns over the 30 homes upper limit for individual rural exceptions sites – both too high and too low • Should be more allocations/ growth in villages and on adjoining land
LP10: Hamlets and the countryside	• Stronger safeguarding sought of best and most versatile agricultural land and mapping of all grades • Deletion of major logistics sites in the countryside sought as contradictory to the policy • Clearer support sought for provision of essential infrastructure in the countryside
LP11: health and well-being	• Support for positive intentions but greater clarity sought on how they will be secured • Clearer thresholds sought for health impact assessments • Healthy design covered in other policies so delete or refocus this one • Active travel should cover all non-motorised forms

LP12: Green and blue infrastructure	• Firmer safeguards sought for priority landscapes, especially the Great Ouse Valley • Concerns over reliance on future developer contributions appendix/ SPD not published at the time of consultation • Explicit safeguarding or heritage settings sought • Additional green infrastructure assets and corridors suggested • Should emphasise support for a variety of users
LP13: Managing flood risk	• Policy wording goes beyond NPPF/G and lack of clarity about sequential testing • Concerns the individual site assessments inadequately cover cumulative impacts • Need mandatory flood risk assessments in defended areas and strict standards for floodplain compensation and to protect vulnerable users • Impacts on floodplain sensitivity should be considered
LP14: Managing waste water	• Concerns over water recycling centre capacity; emphasis on confirming upgrades before development is approved • Objections to any requirements for developers to demonstrate capacity or pay for upgrades highlighting Anglian Water's legal responsibility for wastewater infrastructure • Stronger guidance sought for drainage connections
LP15: Managing surface water	• Clearer definitions and standards sought • Clarity sought over surface water discharge to foul or combined sewers • Challenge to national SUDS standards based on their non-statutory status • Stronger emphasis on ensuring no increase to downstream or off site flood risk
LP16: Water efficiency	• Support for tighter water efficiency standards given level of water stress in the area • Challenge to water standards being tighter than Building Regulations optional standards with concerns over viability
LP17: Approach to renewable energy schemes	• Policy should avoid reliance on the Renewable Energy Assessment • Should clarify allocated sites are not prioritised for renewable energy provision over others • Clarification sought of community led scheme requirements • Utility providers sought additional support for schemes to provide resilience for other critical infrastructure • Impacts on radar, communications and defence installations should be considered
LP18: Transport, travel and connectivity	• Reference should be added for key infrastructure proposals such as East West Rail

	• Concerns that the A141 and St Ives improvement plans will not meet the needs of growth resulting from the local plan • Policy should be split into 'Transport, travel and connectivity' and 'Strategic transport improvements' • Addition sought of references to inclusive and accessible sustainable active and low impact travel
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Outcomes

14. The section has been restructured to give two chapters. Chapter 3 is now 'How Huntingdonshire will growth and change' focusing on the quantity and distribution of growth, blue and green infrastructure priority areas, the settlement hierarchy and the locational based policies. Chapter 4 'How we will enable sustainable growth' has been created to bring together all policies focusing on infrastructure provision, transport and travel, health and well-being, affordable housing provision, heritage, strategic scale climate resilience and water-related policies.
15. The housing target has been updated to account for the latest inputs to the standard methodology. The Local Plan is required to include a housing trajectory which indicates how much housing is expected to be built when across the plan period. It is also necessary to demonstrate 5 years supply of deliverable housing in the first five years after the expected date of adoption (2028). A housing trajectory and 5 year housing land supply statement have been added to Appendix 7 of the Local Plan.
16. Clarification has been added on the housing numbers and a stepped housing delivery trajectory introduced. This is a cautionary approach given global economic challenges currently being experienced. It will also allow for additional time for infrastructure providers to plan and source funding to support development. The housing trajectory does not represent a cap on development and national policy encourages a pro-growth attitude towards housing delivery.
17. An extra consultation was undertaken on 'Additional Site Allocations for the Local Plan' between 13th May and 10th June 2026. This presented six smaller sites in local service village/ village locations for consideration as additional allocations to assist with the supply of smaller, more diverse sites with very limited constraints and potential to be brought forward rapidly. These have all been added to the Regulation 19 Local Plan with the land west of Warren Lane Bythorn being removed and substituted with Home Farm Bythorn where 8 homes already benefit from permission in principle and which offers a heritage asset redevelopment opportunity.
18. Substantial additional evidence on infrastructure and viability has been prepared to support the deliverability of the Regulation 19 Local Plan. The Infrastructure Delivery Study provides details infrastructure required to support the local plan including funding; site delivery trajectories have been phased where necessary to allow for infrastructure provision. The Whole Plan Viability Assessment has also been updated to assess the impacts of proposed policies and sites. Additional evidence has been completed reconciling the number of jobs and homes and further reflecting the Local Growth Plan aspirations for North Huntingdon. A new policy has been introduced 'Supporting and enabling strategic infrastructure' which responds to

concerns around strategic transport improvements, East West Rail, strategic water infrastructure and rural accessibility initiatives.

19. The overall strategy has been broadly retained with three new communities and a mixture of housing, commercial and mixed-use sites incorporated across the district focusing on areas of available land where flood risk is lowest or can be appropriately mitigated within the sites and may offer betterment to the local community. Changes have been made to include reference to economic specialisms and a substantial section added on the Local Growth Plan and the impact of East West Rail on shaping the development strategy.
20. The proposed new communities have been added to the Settlement Hierarchy policy. The Lodge Farm new community has been included within Market Towns reflecting its position as an extension to Huntingdon. Wyton Airfield has been classified as a Service Centre given the scale of anticipated services and facilities and opportunities for these to serve Wyton-on-the Hill. The Lattenburys has been classified as a Local Service Village reflecting its slightly smaller scale. Great Gransden has been reclassified as a village.
21. Land around Market Towns is widely constrained by flooding, limiting opportunities for further allocations. Allocations at St Neots are limited due to the impacts of the safeguarding land requirements for East West Rail.
22. Clarification has been added that the basis for definition of a settlement is 30 homes rather than including commercial buildings to reflect the resident population using services and community facilities. Additional text has been included stating that land allocated for development will form part of the built up area once the scheme is under construction.
23. Amendments have been made throughout the hierarchy level policies to clarify class F uses on land well-related to the built up area. The limitation of rural exceptions housing proposals on land well-related but outside the built up area of Local Service Villages has been clarified to be no more than 1 ha and in Villages to be no more than the equivalent of 5% growth in the number of homes in the parish within which the village is situated.
24. LP11 Health and well-being (now LP17) has been relocated to the new chapter 4 and the threshold for health impact assessments reduced to 50-199 for a rapid health impact assessment and 200 or more homes or 10ha or more of mixed use commercial or employment uses now being required to complete a full health impact assessment.
25. The green and blue infrastructure policy LP12 has been split into 2 separate policies. The new policy LP4 now focuses on 'Green and Blue Infrastructure Priority Areas' and a separate policy LP19 created in Chapter 4 on 'Green and Blue Infrastructure' focusing on proposals which support provision, accessibility and associated facilities.
26. The suite of flood and water related policies have been updated in line with the latest Integrated Water Management Studies and advice from the Environment Agency and Lead Local Flood Authority and grouped into the new chapter 4. For 'Managing Flood Risk' LP13 (now LP21) amendments have included guidance on proposals

for irrigation or flood storage reservoirs, land in defended areas, and critical drainage areas. For LP14 'Managing Waste Water' (now LP22) amendments relate to sewer capacity, agreement with the Council in liaison with Anglian Water regarding waste water capacity and connection availability and inclusion of a new section on non-mains drainage. For LP15 'Managing Surface Water' (now LP23) additions include reference to updated national standards for Sustainable Drainage Systems, separation of surface and foul water flows and critical drainage areas. LP16 'Water Efficiency' (now LP24) has been further tested and the proposed limit for residential development set at no more than 90 litres per person per day.

27. LP17 Approach to renewable energy schemes (now LP16) has been moved into the new chapter 4. It has been amended to include additional advice on the range of impacts that have to be made acceptable to gain support, provide allowance for renewable energy installations specifically to support resilience of critical utilities infrastructure and simplify the policy overall.
28. LP18 Transport, travel and connectivity has also been into the new chapter 4. It has been amended to remove the section on strategic transport improvements which has been combined into a new policy on 'Supporting and enabling strategic infrastructure'.

Section C: Our Development Management Policies

29. Responses on the Preferred Options development management policies are set out by chapter rather than individually due to the lower overall level of concerns raised that required changes to be made and the frequency with which comments applied across multiple policies. The details of comments on individual policies and the changes made as a result can be seen in full in Appendix 4: Statement of Consultation.

Chapter 5: How we will create well-designed places

30. Overall, there was strong support for the design led approach, use of local design guidance and the emphasis on creating high quality distinctive places. Comments received focused very much on minor details of wording, the desire for greater flexibility, and concerns over thresholds at which particular elements of policies would be applied rather than matters of principle.

Outcomes

31. LP21 Placemaking for larger scale developments has been relocated to chapter 3 How Huntingdonshire will grow and change in reflection of its role in shaping strategic scale growth. LP26 (now LP20) Supporting carbon capture through nature (now LP11) has been relocated to the new chapter 4 'How we will enable sustainable growth' and significantly simplified to focus on protection of primary natural carbon stores. Policies LP23 Minimising embodied carbon in new buildings and LP24 Minimising operational energy consumption in new buildings have been combined into a single policy now LP28 Minimising embodied and operational carbon in new buildings and significantly simplified.
32. A series of minor changes have been made to the wording of policies and their supporting text. Examples include adding reference to neighbourhood plan design

guides/codes to the wording of LP19 Design context and character (now LP25) and inclusion of additional criteria and text on communal parking requirements in policy LP28 Parking provision and vehicle movement (now LP31).

Chapter 6: How we will support a strong local economy

33. The greatest level of concern was expressed around policy LP36 Enabling logistics and distribution (now LP39) with people considering that the policy (and related allocations) would support both insufficient and too much land for these uses. Greater flexibility was sought in LP35 Enabling key clusters and innovation-led growth (now LP38) particularly relating to supporting national defence related projects and concerns over location of such development expressed.
34. LP32 Protecting and enhancing established employment areas (now LP35) was broadly supported with responses focusing on flexibility for their expansion, and inclusion of extensions as allocations. The location of where LP40 Supporting local services and facilities (now LP 43 and LP44) was to be applied was queried, criteria relating to provision of hot food takeaways were both supported and opposed and clarification sought by the Education service and the NHS on changes to provision. Responses on other policies were very limited in number and scope.

Outcomes

35. LP36 Enabling logistics and distribution (now LP39) has been supplemented with more detailed guidance on last mile logistics. LP35 Enabling key clusters and innovation-led growth (now LP38) has been amended to remove reference to exceptional circumstances, criteria and the supporting text clarified to refer to the Local Growth Plan or future Spatial Development Strategy and Alconbury Weald and a sequential brownfield land first requirement added. LP32 Protecting and enhancing established employment areas (now LP35) has been clarified to identify those sites where allocations are included and extensions being allowed on well related land to allow for logical extensions.
36. LP40 Supporting local services and facilities has been split into two policies: LP43 Supporting Local Centres and LP44 Services and facilities outside designated centres to provide more locationally specific guidance. Supporting text amended on location of schools and loss or change of healthcare facilities. Minor wording amendments have been made to other policies to provide clarification

Chapter 7: How we will support homes for all

37. Policies LP41 – LP44 provoked most of the responses received on this chapter. For LP41 Affordable homes (now LP18) the requirement for affordable housing within specialist older persons housing schemes and space standards were opposed on viability grounds. Greater clarity was sought on the clustering approach. Responses on LP42 Promoting a mix of housing (now LP45) highlighted concerns over the rigidity of the housing mix table, sought greater emphasis on homes for older people, and guidance on use of supporting evidence. LP43 Accessible homes (now LP46) generated concerns over clarity, viability, the need for greater flexibility and potential over provision of wheelchair accessible homes. LP44 Facilitating self and custom build homes (now LP47) was challenged for requiring a 5% plot requirement within schemes of over 100 homes, the marketing requirements were considered

excessive and greater flexibility sought regarding design codes. LP45 Supporting specialist housing (now LP48) was broadly supported other than concerns over affordable housing requirements and the wish for a wider range of potential residents to be allowed for. Policies LP46-48 (now LP49-51) only attracted 8 responses between them with few minor amendments suggested.

Outcomes

38. LP41 Affordable homes (now LP18) has been relocated to chapter 4 to sit with other policies on sustainable growth. The requirement for affordable housing within specialist older persons housing schemes has been deleted, space standards clarified and an exception included for military affordable housing. LP42 Promoting a mix of housing (now LP45) has been amended by removal of the table with numerical mix guidance, enhanced site specific flexibility, clarification on specialist housing and locational relevance of specific evidence documents. LP43 Accessible homes (now LP46) has been restructured to provide clearer guidance on differing requirements at different scales of development addressing clarity and viability. LP44 Facilitating self and custom build homes (now LP47) has been substantially amended with the 5% requirement deleted, marketing requirements simplified and more flexibility included into the design requirements. LP45 Supporting specialist housing (now LP48) has been amended to only require affordable housing within a proposal for 50 or more self-contained specialist homes and clarity provided on the range of potential residents. Minor amendments were made to policies LP46-48 (now LP49-51) allowing gypsy and traveller pitches on rural exception sites and clarification added that a rural exceptions site should be proportionate in scale to the size of the existing settlement.

Chapter 8: How we will conserve and enhance the environment

39. Overall responses on this chapter criticised the lack of measures to address environmental impact and the proposed 20% biodiversity net gain proposal. Policy LP49 Protecting our nature conservation sites (now LP52) sought a series of minor detailed amendments and points of clarification. LP50 Enhancing biodiversity and geodiversity (now LP53) promoted the greatest response rate in this chapter with substantial objection to the proposed 20% biodiversity net gain requirement although some respondents supported this as promoting effective nature restoration. LP51 - Protecting our trees, woodlands, hedges and hedgerows (now LP54) received objections relating to its scope and that increased tree planting and green infrastructure may limit development land. LP52 Protecting our open spaces (now LP55) responses focused on the need for clarification and separation of criteria. Concerns on the Heritage Strategy included the suggestion it be integrated into the Vision, elevated to a strategic policy and the lack of reference to heritage at risk. LP53 Heritage Assets and their Settings (now LP56) raised some concerns over duplication of national guidance, excessive requirements for archaeological work and clearer guidance on conservation areas. Most responses on LP54 Water related development (now LP57) raised concerns on issues outside the scope of the local plan. Those of direct relevance sought additions regarding operational development at Grafham Water, Middle Level Commissioners and more flexibility around settlement boundaries and residential moorings.

Outcomes

40. LP49 Protecting our nature conservation sites (now LP52) has amended to separate out the specific mitigation hierarchy for internationally protected sites which differs from nationally and locally designated sites and include text about internationally protected sites in neighbouring authority areas that may be impacted by proposals within Huntingdonshire. LP50 Enhancing biodiversity and geodiversity (now LP53) was retested through the Whole Plan Viability Assessment and the requirement for biodiversity net gain reduced to 10% in line with the Environment Act. LP51 - Protecting our trees, woodlands, hedges and hedgerows (now LP54) has been extended to include orchards but the scope refined to focus on arboricultural, ecological and landscape value. LP52 Protecting our open spaces (now LP55) has been reworded to open spaces, outdoor sport and recreational facilities and overlapping criteria simplified. The Heritage Strategy has been moved to the strategic chapter 4 on 'How we will enable strategic growth' as it works to set the Council's overarching approach to the historic environment and heritage at risk has been added. LP53 Heritage Assets and their Settings (now LP56) has been amended to include a section on heritage at risk to align with the Heritage Strategy and archaeology requirements aligned with national policy. LP54 Water related development (now LP57) has been amended to support operational development at Grafham Water, include reference to the Middle Level Commissioners and to simplify text around residential moorings and allow support for them outside of a built up area where the location has sustainable access to services.

Section D: Our Development Sites

General

41. All site references in this section relate to the Preferred Options Draft Local Plan to 2046.
42. A number of comments were received focusing on the development site proposals as a whole rather than individual sites. These raised concerns that the Local Plan relies heavily on a small number of major allocations, creating delivery and infrastructure risks, and a housing trajectory is needed. Lack of assessment of cumulative impacts of growth on transport, flooding, water quality, biodiversity and landscape and key infrastructure capacity were of concern. Concerns were raised over flood risk, drainage, nutrient neutrality, wastewater treatment and heritage impacts. The over concentration of growth in North Huntingdon was challenged with more growth in other sustainable settlements promoted by many site promoters. Stronger measures were also sought to enhance active travel, green infrastructure, biodiversity and valued landscapes.

Outcomes

43. Substantial further testing of the infrastructure requirements and potential impacts of development at site, settlement and district level has been completed. A stepped housing trajectory has been incorporated into chapter 3. This approach will allow additional time for infrastructure providers to plan for required improvements to meet the needs of the planned growth. Further flood risk, water supply, waste water capacity assessment and sequential testing of sites has been completed. Other sites promoted have been reviewed again and an additional consultation completed on potential additional allocations.

North Huntingdon Growth Cluster Opportunity Zone

44. Most responses received focused on the growth cluster as a whole rather than the individual sites. Concerns focused on severe transport, flooding and infrastructure constraints, with calls for independent modelling and major upgrades before growth proceeds. Respondents highlighted risks to the Great Ouse Valley, village identity, and environmental quality, and uncertainty over proposals at Brampton Cross. National Highways and Anglian Water raised concerns about road and wastewater capacity. Greater infrastructure certainty was sought. Brampton Cross promoters argued it is a nationally significant, well-supported growth and innovation opportunity with major job creation potential.
45. Historic England raised concerns on North Huntingdon 1 regarding nearby heritage assets. Responses on North Huntingdon 2 focused on traffic congestion, wastewater capacity and impact on the local area. North Huntingdon 3 attracted most responses. Concerns were raised over its scale and deliverability, dependence on unfunded A141 upgrades and transport capacity constraints. Stronger green infrastructure, flood and environmental mitigation, heritage assessment, drainage strategies, and integration with Huntingdon were all sought as amendments to the proposal. The site promoter sought greater flexibility on delivery of infrastructure and education requirements reflecting the duration of the site's delivery. For North Huntingdon 4 concerns focused on the number of homes, transport capacity, unfunded A141 upgrades, accessibility and infrastructure phasing. Amendments were sought to address settlement coalescence, landscape and water impacts, delayed housing delivery, and playing field loss. The promoter sought greater flexibility on uses, housing mix, infrastructure requirements, BNG and education provision.
46. The Additional Site Allocations consultation sought responses on possible inclusion of the Sapley Park Garden Village proposal to the west of North Huntingdon 3 as a reserve site with potential to be released in a phased manner depending on the level of need demonstrated for alternative or additional development. While some support was expressed for having a reserve site to give flexibility and resilience responses were strongly focused on the disproportionate concentration of growth in the North Huntingdon area, the lack of infrastructure capacity, loss of countryside, viability, harm to conservation areas of nearby villages and lead in times for delivery.

Outcomes

47. A stepped housing trajectory has been introduced to help address concerns over timing and funding of development in the growth corridor and collaboration with the Cambridgeshire and Peterborough Combined Authority continues on the A141 and St Ives Improvements Scheme. North Huntingdon 1 is now supported by a Heritage Impact Assessment. North Huntingdon 2 has been amended to include the requirement for an assessment of impact on four sites of special scientific interest as the site falls within their Impact Risk Zone and to support the provision of a private on-site waste water treatment facility if needed. Minor amendments have been made to the proposed uses to better align with the planning application to support the allocations' deliverability. North Huntingdon 3 has been retained at 4,900 to provide critical mass for provision of services and infrastructure. Education requirements have been amended to provide flexibility at each stage of reserved matters to assess needs and secure appropriate education provision for each phase

of development. A Heritage Impact Assessment has been completed. The requirement for natural flood management has been added. The masterplanning and place-making strategy requirements for North Huntingdon 4 have been amended to include clarification of the need for separation from Houghton and Wyton village. The supporting text has also been amended to stress the need for a gap between the site and the proposed development at Lodge Farm. The requirement for early engagement and agreement with water resource and wastewater infrastructure providers has been added. The allowance for B8 uses has been amended to include last mile distribution. Additional text has been included to reflect the diverse housing mix which is required.

48. Sapley Park Garden Village has not been included as a reserve site as further evidence testing has demonstrated it has substantial sustainability challenges at the moment. No other reserve sites have been included either. Given the expectations of local government reorganisation and for a new unitary authority to commence a new local plan within a short timeframe it is not considered necessary to include a reserve site as by the time the suggested triggers are reached a replacement plan is likely to be in preparation. The CPCA's forthcoming Spatial Development Strategy is expected to present further opportunities to consider this site.

Market Towns

49. General responses focused on cumulative impacts of growth changing Market Towns' identities or merging parishes into larger conurbations. Huntingdon 1 was largely supported but amendments sought to access arrangements, active travel enhancements and car parking provision. Inclusion of affordable/key worker housing for NHS staff was sought. Responses on St Neots 1 raised concerns over infrastructure provision, transport and connectivity to amenities, particularly the impact of East–West Rail safeguarding land on site deliverability. St Ives 1 generated concerns over increased traffic congestion, harm to landscape, calls for fully funded, strategic drainage upgrades before development and that local health, education, water, and emergency services lack the capacity and funding for further development. Bury 3 generated general concerns about overstretched infrastructure, flood risk and traffic and noise impacts. Ramsey 1 led to concerns about losing mature hedgerows and trees displacing wildlife, and increased flood risk from cumulative developments. Ramsey 3 raised most concerns in the area with objections focusing on the disruption to community events and vital car parking threatening their viability and the impact on Ramsey's green fringe.
50. Only minor amendments were sought for other sites.

Outcomes

51. Huntingdon 1 has a planning application submitted through which negotiations on access, active travel and parking aspects are ongoing. The requirement for strategic green infrastructure has been enhanced. A requirement to provide affordable key worker housing within the site has been added. St Neots 1 has been amended with enhanced references to East West Rail safeguarding and early engagement with Anglian Water on wastewater flows. St Ives 1 has been amended to allow for a more flexible junction solution with the A1123/ Sawtry Way. In Ramsey 1 early engagement with Anglian Water on wastewater flows has been added as a requirement; 65% of the site is proposed for green infrastructure to provide

important landscaping and opportunities to support wildlife and habitats. Ramsey 3 has been removed from the Regulation 19 Local Plan.

52. Minor amendments have also been made to other proposed site allocations.

Service Centres

53. Responses on Service Centres in general included concerns of over-reliance on large strategic sites coupled with promotion of other sites for potential addition. Concerns over the disproportionate distribution of growth across different Service Centres were raised. Many sites received few responses with only very minor amendments being sought.
54. Responses on Godmanchester 2 called for sequential testing, detailed flood risk modelling and remediation before development. Concerns were expressed about local identity and impact on the character of Godmanchester. Strategic green infrastructure and recreational space were sought. Little Paxton 1 generated concerns over proximity to an active quarry, unsafe access, physical separation from the village and need to ensure the proposal does not adversely affect the operation, restoration or aftercare of Little Paxton Quarry. Little Paxton 2 responses focused on existing wider transport and flooding issues for the village. Sawtry 1 faces concerns over cumulative flood risk, safety and connectivity and green space provision. Somersham 1 responses raised issues on highway safety, congestion, flooding, drainage, infrastructure capacity and density of development integrating with the village. Somersham 2 responses highlighted infrastructure capacity, cumulative impact of all draft allocations on the village, transport impacts, landscape harm, biodiversity sensitivities, scale of the proposal and limited wastewater capacity. The limited growth proposed through Yaxley 1 was supported but phased planning with thorough assessments sought.
55. Only minor amendments were sought for other sites.

Outcomes

56. The most significant amendment relating to the proposed Service Centre allocations has been the removal of Somersham 2. The capacity of Little Paxton 2 has been increased following removal of the primary education capacity constraint through the Infrastructure Delivery Study evidence. Detailed amendments have been made to other allocations in response to points raised above.

Local Service Villages

57. Responses on the category overall queries reasons for specific settlements being in the category and distribution of related site allocations and their cumulative impact. Some promoters of sites not proposed as allocations objected and provided additional information explaining why their site should be added.
58. Tightening of requirements in Abbots Ripton 1 was sought to require enforceable mitigation on transport, drainage, runoff rates and cumulative impacts as well as a Heritage Impact Assessment. Alconbury 1 and Alconbury 2 faces calls for amendments regarding surface water runoff risk, Heritage Impact Assessments and safe pedestrian connections. Responses on Bluntisham as a whole objected to the

overall scale of growth, disruption of historic growth patterns in the area and inadequate infrastructure. Strong concerns were raised about the impacts on heritage assets and on Berry Fen SSSI of developing Bluntisham 1. Hemingford Abbots 1 generated concerns over potential traffic impacts on a variety of roads and places, retention of a permanent gap between the proposed site and Godmanchester was sought and early delivery of infrastructure requested. Needingworth 1 responses cited concerns over highway capacity, surface water flooding, landscape sensitivity and being effectively an expansion of St Ives. Needingworth 2 generated concerns over traffic impacts, flood risk, coalescence with neighbouring settlements, landscape impacts and the size of the site. In the Additional Site Allocations consultation Spaldwick 1 received objections to the overall scale with suggestions of development being reduced or phased along with concerns over infrastructure capacity.

Outcomes

59. The most significant amendments relating to the proposed Local Service Village allocations has been the removal of Bluntisham 1 and the reduction in scale of Needingworth 2 from 290 homes to 100 by deletion of the western portion of the site. Detailed amendments have been made to other allocations in response to points raised above. Clarification has been added to Hemingford Abbots 1 regarding its status a separate new community.
60. Following review of further information submitted and additional consultation, Spaldwick 1 has been added to the Pre-Submission Local Plan as an extra allocation to support retention of Spaldwick Primary School which has a significant number of surplus places.

Villages

61. General concerns raised the ability of village services and infrastructure to support additional residents and stressing the importance of maintaining the distinct rural identity of small parishes. Some promoters of sites not proposed as allocations objected and provided additional information explaining why their site should be added.
62. Responses to Alwalton 1 objected on grounds of heritage, transport impacts, scale of the proposal and impacts on the River Nene meadows. Bythorn 1 generated concerns on development intruding into open countryside and destroying heritage assets as well as increased traffic causing safety risks and conflict with agricultural and service vehicles. Great Paxton 1 objections focused on the value of part of the site as parking for the recreation ground and football club.
63. Haddon 1/ Peterborough Services generated the most comments within the villages category. Opposition focused on A605 safety and congestion, unsustainable car-dependent access, landscape and countryside harm, biodiversity and farmland loss, heritage impacts, and fears of wider warehouse sprawl.
64. Waresley 1 responses sought a reduction in the number of homes to help overcome landscaping, access, heritage and infrastructure concerns.

65. In the Additional Site Allocations consultation support was received for Bythorn 1 (Home Farm) to be substituted for Warren Lane on traffic and potential heritage benefits although concerns were also raised on the same grounds. Catworth 1 received comments on the impact on local character but was broadly supported as being preferred through their neighbourhood plan survey. Ellington 2 received some support but was seen as a significant increase. Grafham 2 area and capacity was challenged and concerns raised over neighbourhood plan alignment and impact on rural character. Ramsey Forty Foot 2 was supported subject to the need for water management; the site promoter sought to increase capacity to 42 homes.

Outcomes

66. Amendments have included the removal of Alwalton 1 and Bythorn 1 (Warren Lane) from proposed allocations. The site area of Great Paxton 1 has been reduced to remove the land used for parking and a requirement added for a transport assessment to be completed. Bythorn 1 Warren Lane has been removed and Home Farm added as a proposed allocation. Catworth 1 has been added as a proposed allocation. Grafham 2 has been recalculated to 1.1ha and the capacity reduced to 25 homes. Ramsey Forty Foot 2 has been added as a proposed allocation with a capacity of 30 homes. Haddon 1 has been retained as Peterborough Services 1 and minor amendments made regarding minerals extraction, sequential layout with respect to flood risk and alignment with national policy on the freight industry.

Appendices

67. Overall the appendices received very few comments. Responses on Appendix 1 'Neighbourhood Plan housing requirement figures' queries why not all parishes were listed and reflection of updated completions and commitments. Appendix 2 was broadly supported with a request to widen monitoring of LP49 to include local sites of nature conservation value and to add explanation of actions if indicators are not met. Other appendices were supported.

Outcomes

68. The neighbourhood plan housing requirements have been updated; all areas currently designated are listed. Monitoring of local sites has not been included in Appendix 2 due to the resource implications of doing so. Appendix 5 has been included to provide a list of policies for ease of reference. Appendix 6 has been added to identify which development plans the Local Plan to 2046 would replace on adoption. Appendix 7 has been added to provide a housing trajectory.

5. SUMMARY OF RESPONSES RECEIVED TO THE SUSTAINABILITY APPRAISAL AND KEY CHANGES

1. Overall comments on the Sustainability Appraisal (SA) expressed concern that it did not properly test different growth levels, spatial strategies, or the implications of higher/lower housing numbers, making the process legally non-compliant. Inadequate consideration was observed of water supply, sewerage capacity, flood risk, traffic impacts, pollution, and catchment-wide effects. Concerns were raised about inconsistencies, unclear reasoning, and contradictory scoring. Objections were raised to development on best and most versatile farmland, rural character, biodiversity, and the integrity of landscapes such as the Great Ouse Valley.

2. Comments on the policies regarding *How Huntingdonshire will grow and change* focused on promotion of sites that were not included as proposed allocations. Others highlighted sustainability challenges of growth overall with regard to infrastructure provision, use of greenfield land and over-concentration in the North Huntingdon growth corridor.
3. Responses on the policies regarding *How we will create well-designed places* were not related specifically to the details of the SA but focused on wider policy responses to integrating biodiversity, greenspace, active and sustainable travel and infrastructure which would have consequential impacts on the SA. Responses on the policies regarding *How we will support a strong economy* and *How we will support homes for all* focused solely on St Neots seeking specific employment targets, a review of the town centre boundary and greater provision of bungalows and specialist homes which again which would have consequential impacts on the SA. Responses on the policies regarding *How we will conserve and enhance the environment* sought incorporation of wildlife movement corridors, adoption of a brownfield first approach for St Neots and pre-commencement delivery plans for infrastructure.
4. Responses to development sites in general sought inclusion of full assessment of reasonable alternatives using latest evidence and iterative changes when additional impacts or mitigations are identified. Historic England expressed concern over potential under-scoring of some heritage impacts.
5. *North Huntingdon growth cluster* sites' responses highlighted concerns over misclassified agricultural land and incorrect statements about previously developed land. Responses on *Market Towns* highlighted concerns about insufficient wastewater capacity, flood-prone land, traffic pressures, lack of safe walking routes, and overstated assumptions about transport accessibility. Responses on *Service Centres* contested classification of Bluntisham and expressed concerns over road access, high-speed roads, lack of footways, poor public transport, and limited local services suggesting the proposed growth is unsustainable. Promoters raised concerns over specific scoring particularly around flood risk, agricultural land classification, and achievability. Responses on Local Service Villages criticised the SA for inconsistent scoring, overstating benefits, failing to demonstrate viability, and not explaining why some villages receive large allocations while others receive none. Concerns on Bluntisham highlighted growth levels being higher due to current planning applications and that the SA fails to assess cumulative effects on infrastructure, landscape, and the Berry Fen SSSI. Responses on Villages criticised detailed elements of the SA for Haddon 1 and the need for cumulative assessment of the impact of the North Huntingdon Growth Cluster on villages such as Ellington.

Outcomes

6. A substantial review of the SA has been undertaken with significant additional material included to assist with interpretation of the testing of growth levels, different spatial strategies and consideration of reasonable alternatives. Additional explanation has been included on how it has evolved through preparation of the local plan, a tracker added to reflect responses and changes at each stage by theme and sustainability benefits more clearly identified.

7. Where policies and site allocations have been amended appraisals have been updated. Minor amendments and factual corrections have been throughout.
8. Taken together with the wider evidence base on infrastructure, delivery, and habitats impacts the SA demonstrates a clear and logical evolution of the Local Plan strategy. The process began with a broad exploration of alternative futures for Huntingdonshire. Through consultation, evidence gathering and Sustainability Appraisal, weaker-performing alternatives were progressively discounted and stronger-performing elements were combined.
9. Across all the technical evidence documents, a strategy focused on sustainable locations served by public transport employment and infrastructure was viewed as being the most favourable. This is because this strategy focuses development in locations that are already sustainable (towns and larger villages) reducing the carbon impact of new development, maximising use of existing infrastructure, facilitating accessibility to transport routes and it can facilitate expansions towards infrastructure and sustainable travel options in a more sustainable way. It places some development in villages but this is not the focus.
10. The technical evidence identified potential benefits to all other strategy options lending to the potential for a hybrid strategy with the core being based on a strategy focused on sustainable locations served by public transport, employment and infrastructure, with elements of the remaining strategies incorporated. For example, placing slightly more emphasis on some dispersed growth to assist in supporting rural areas and sustainable growth of other settlements across the district. Solely focusing on the most sustainable locations could result in some social and economic disparity. Placing development along public transport routes that are located within sustainable settlements reinforces this.
11. The SA clearly demonstrates that the final strategy did not emerge from a single preferred option but rather from the integration of the most successful components of several alternatives. This explains why the Regulation 19 Plan ultimately adopts a hybrid approach: concentrating most growth in sustainable settlements, delivering strategic growth locations and new communities, supporting approximately 32,200 homes and 14,400 jobs, and aligning development with infrastructure investment, climate objectives and long-term economic growth.

6. THE EVIDENCE BASE IN SUPPORT OF THE LOCAL PLAN AND PRESCRIBED DOCUMENTS

1. National planning policy requires a Local Plan to be informed by a proportionate suite of relevant and up-to-date evidence. The Regulation 19 Local Plan to 2046 is supported by an extensive evidence base which is available on the [Council's website](#). Evidence has evolved throughout preparation of the Local Plan with many

elements being prepared in an iterative manner as the Local Plan has moved through each stage of public engagement.

2. At present it includes:

Core documents

- **Sustainability Appraisal Scoping Report** - this sets baseline information for Huntingdonshire to inform the development of sustainability objectives to test the Local Plan against
- **Statement of Consultation** - sets out the key responses to Local Plan consultations to date and how we have responded to these
- **Habitats Regulations Assessment Screening Report** - this provides a screening and assessment of the likely significant effects of the policies and site proposals set out in the Preferred Options draft Local Plan to 2046 on designated nature conservation sites.

Collaboration documents

- **Statement of Common Ground between HDC, Environment Agency and Lead Local Flood Authority**
- **Statement of Common Ground between HDC and UK Power Networks**
- **Statement of Common Ground Between HDC, NHS Central East Integrated Care Board and NHS Property Services**
- **Statement of Common Ground Between HDC and Anglian Water (Updated August 2026)**
- **Greater Cambridge Proposed Submission Plan - Draft Statement of Common Ground**
- **Memorandum of Cooperation with HDC, Environment Agency and Lead Local Flood Authority**
- **Statement of Common Ground between HDC and Peterborough City Council**
- **Statement of Common Ground between HDC and Cambridgeshire County Council (Education)**

Economy and employment

- **Economic and Employment Needs Assessment 2025** - evidence for the economic and employment needs for Huntingdonshire, including a review of Established Employment Areas and Economic Growth Scenario
 - **Appendix B - Site Assessment Approach**
 - **Appendix C - Established Employment Area Assessment Portfolio.**
- **Economic and Employment Needs Assessment Addendum**

Housing and social infrastructure

- **Gypsy and Traveller, Travelling Showperson, Boat Dwellers and Other Caravan Dwellers Accommodation Assessment 2024** - this provides an assessment of provision across Huntingdonshire and the level

of future need anticipated over both the short term and the longer term to 2041/42

- **Huntingdonshire Local Housing Needs Assessment** - This provides information on the local housing market, affordable housing needs and housing needs of specific groups, including older people
- **Huntingdonshire Leisure and Sports Facility Strategies.**

Historic environment

- **Heritage Note on Preferred Options draft Local Plan site allocations** - This note provides a high-level initial identification of known heritage assets to shape the Preferred Options Local Plan and heritage impact based on proposed uses
- **Heritage Impact Assessments** - a proportionate assessment of heritage impact to inform site allocation policy criteria on all preferred sites consulted on in the Preferred Options Local Plan to 2046 between November and December 2025 and additional site allocations consultation in May to June 2026.

Natural environment

- **Habitats Regulations Assessment Scoping Report for assessing growth strategy options** - this report provides outputs of the scoping process and provides a high-level assessment of the four potential growth strategy options for the Local Plan to help inform the plan-making process and avoid or mitigate any adverse effects upon the site integrity of any European sites
- **Ecological Constraints Assessment** - this report assesses the potential ecological constraints of all preferred sites consulted on in the Preferred Options Local Plan to 2046 between November and December 2025 and additional site allocations consultation in May to June 2026 in relation to Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR), providing recommendations to inform the plan-making process.
- **An Interim Nature Recovery Network for Huntingdonshire** - report prepared by the Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire. It will inform implementation of biodiversity policies and delivery of the Local Nature Recovery Strategy. The work will also inform other green infrastructure and natural capital investments, as well as Parish Neighbourhood Plans and organisational nature recovery plans.

Flooding and water

- **Huntingdonshire Integrated Water Management Strategy: Stage 1 Water Cycle Study** - an evidence base for the Local Plan update, looking at an integrated approach to water management, including issues such as water quality, water balance and options for water management
- **Huntingdonshire Integrated Water Management Strategy: Stage 2 Water Cycle Study: Interim Report**
- **Huntingdonshire Integrated Water Management Strategy: Stage 2 Water Cycle Study - Final Report (updated July 2026)**

- **Huntingdonshire Integrated Water Management Strategy: Level 1 and 2 Strategic Flood Risk Assessments** - an evidence base for the Local Plan Update, looking at an integrated approach to flooding.
- **Sequential Test** – demonstrating application of sequential flood risk testing to sites

Infrastructure and viability

- **Infrastructure Delivery Study Baseline Assessment** - The first stage of the Infrastructure Delivery Study, an evidence-based assessment of existing and future infrastructure requirements to support the Huntingdonshire District Council's Preferred Options Draft Local Plan to 2046 (Regulation 18). It includes strategic growth options and some strategic scale sites that were put forward to the council
 - **Stage 2 Infrastructure Delivery Study** - provides an assessment of infrastructure to inform the Pre-Submission Local Plan and presents a schedule of infrastructure, at a range of prioritisation scales, to be delivered across the Plan Period to 2046, and beyond (in the case of strategic allocations)
 - **Appendix B: Infrastructure Schedules - Strategic Sites**
 - **Appendix C: Infrastructure Schedules - Settlements**
 - **Appendix D: Infrastructure Schedules - District-wide**
 - **Whole Plan Viability Assessment (Stage 1)** - a baseline assessment establishing locally specific development costs and assumptions, assessment of draft local policies, strategic growth options, some strategic scale sites that were put forward to the council and viability in the area to support Huntingdonshire District Council's Preferred Options Draft Local Plan to 2046 (Regulation 18)
 - **Whole Plan Viability Assessment (Stage 2)** - A Whole Plan Viability Assessment including an update of locally specific development costs and assumptions from Stage 1, an assessment of local policies, viability in the area and of the proposed strategic allocations ready to support the Regulation 19 consultation.
3. Infrastructure provision to support the Pre-Submission Local Plan has been an area of very significant concern to a wide range of Town and Parish Councils, local interest groups and individuals. Preparation of the Local Plan has not shied away from acknowledging the need for substantial infrastructure improvements, particularly regarding transport, travel, water supply and wastewater management. The evidence identified in the two sections immediately above has explored these challenges in considerable detail. It is recognised that delivery is frequently dependent on collaborative working and on infrastructure projects being delivered by others. Other infrastructure providers frequently use late-stage preparation and adopted local plans to inform their own project planning, delivery programmes and funding bids.
4. In relation to transport and travel key infrastructure proposals are progressing through:
- CPCA's A141 and St Ives Improvements Programme which is preparing a full business case for substantial infrastructure improvements to facilitate delivery of growth around North Huntingdon and St Ives. While this project has initially focused on supporting allocated growth it will provide additional

capacity for early growth of site allocations proposed within the Pre-Submission Local Plan and may be further supplemented by more enhancements to facilitate delivery of additional growth

- A428/A421 improvements from the A1 Black Cat junction to the A428/A1198 Caxton Gibbet junction are well advanced the improvements will particularly benefit the southern part of the district
- East West Rail proposals include rail connectivity between Cambridge and Oxford with railway stations proposed at Cambourne and Tempsford. Services on the full route are not anticipated to commence until late 2030s. Safeguarded land has been recognised with the Local Plan but no significant reliance placed on the project for supporting additional growth at this stage. A development consent order application is expected to be submitted in 2027.

5. In relation to water supply and wastewater management extensive collaboration has taken place with Anglian Water. A Statement of Common Ground has been prepared which sets out how development is being planned and delivery phased to demonstrates that no deterioration of quality and no adverse impacts can be achieved to the satisfaction of the Environment Agency and Natural England. Seven water recycling centres are identified as not having immediate capacity or having limited capacity for the future residential growth proposed in the Local Plan. Anglian Water have agreed that they will assess infrastructure improvements for Huntingdon (Godmanchester), Brampton, Elton and Somersham for their Asset Management Plan 9 covering the period 2030 – 2035. Subject to securing funding in agreement with water industry regulators this would mean sites within these catchments should be deliverable between 2030-35.
 6. The regulatory processes to bring forward additional water supplies through the Fens and Lincolnshire Reservoirs are underway. Although neither are situated with the district supporting infrastructure such as pipework will need to be provided. This has been allowed for through proposed policy LP14 'Supporting and enabling strategic infrastructure'.
 7. A guidance note circulated in June 2026 to local planning authorities on Anglian Water's approach to strategic sites (500+ dwellings identified in an emerging or adopted local plan) also outlines how they will support the delivery of strategic development sites including temporary foul drainage connections to facilitate early phases of development.
 8. On 15th July 2026 Matthew Pennycook, Minister of State for Housing and Planning, wrote to the Planning Inspectorate concerning consideration of deliverability and viability in local plan examinations. The letter is included in the background documents. The letter sets out the government's determination to move local plans forward to adoption as quickly as possible to contribute to house building and infrastructure delivery. It emphasises "the importance of taking an appropriately pragmatic and proportionate approach in respect of deliverability and viability when examining local plans". This highlights to Inspectors that concerns over deliverability and viability should be "approached pragmatically" where a "robust evidence base exists and there is a reasonable basis for concluding that allocations are capable of delivery over the plan period as a whole".
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Strategic transport study

- **Baseline Conditions Technical Note** - this assesses the current transport and travel situation within the district
- **Accessibility Technical Note** - this assesses the current accessibility of the largest site proposals put forward
- **Phase 1 Technical Note** - this tests the transport implications of four potential development scenarios to recommend the most sustainable in transport terms
- **Phase 1 Technical Note Appendix** - this is the multi-criteria assessment framework testing potential development scenarios against key transport objectives
- **Mitigation log** - analysis of potential mitigation packages of the potential development scenarios
- **Phase 2 Technical Note** - this tests the transport and travel implications of the preferred option of the development strategy
- **Mitigation log phase 2** - this sets out the mitigation elements needed for the preferred option.
- Phase 3 Technical Note – awaiting finalisation as of 19th August

Climate change

- **Document A - The role of the Local Plan Update in responding to climate change** - This is an introductory document explaining what is meant by net zero carbon and the context in which the Local Plan Update's climate change response will operate
- **Document B - Position statement and analysis of baseline and forecast future emissions** - This sets out the district's current position including an emissions profile to explain the current baseline which the Local Plan Update will operate within and seek to influence
- **Document C - The contribution of sustainable design to achieving Net Zero** - This document provides specific policy advice on achieving net zero carbon development in Huntingdonshire
- **Document D - Assessment of spatial strategy options** - This assesses some initial spatial strategy options and their carbon impact, recommending the most effective spatial strategy from a climate change perspective for the Local Plan Update
- **Document E - Renewable Energy Assessment** - This analyses the contribution of renewable energy in reaching net zero and the technical potential for renewable energy across Huntingdonshire
- **Document F - Offsetting and Sequestering Emissions** - This assesses the role of sequestration and provides policy recommendations to support Huntingdonshire in delivering sequestration of carbon emissions and their offsetting where necessary and appropriate.

Land Availability Assessments and Sustainability of Settlements

- **Sustainability of Settlements** - this sets out how we will assess the sustainability of settlements and will aid in the decision-making on their suitability for future growth in the next Local Plan

- **Land Availability Assessment Methodology** - this sets out how we will consider potential sites that have been put forward for potential allocation in the Local Plan
- **Update Land Availability Assessment (Sustainability Appraisal of Sites) 2026**

7. ALTERNATIVE OPTIONS CONSIDERED & NOT RECOMMENDED

1. The primary alternative to progressing the Pre-Submission Local Plan to 2046 through to Regulation 19 consultation is to stop its preparation and pivot to the new plan-making system. This is not recommended as it runs counter to the Government's aim to see universal plan coverage as soon as possible (recently reiterated in the Housing and Planning Minister's letter to the Chief Executive of the Planning Inspectorate of 15th July 2026) and in addition poses a series of risks:
 - Reputational damage - 3 years' worth of work and public engagement will have to be set aside.
 - Confusion among our communities because the new legislation dictates that the Council would have to start again immediately with similar questions to those asked in 2023 and 2024 also risking consultation fatigue
 - Limited transferability of evidence to the new system would have significant financial costs for replacements/ updates
 - Any replacement local plan would have to be prepared under the new legislation with its set timetable
 - A local plan prepared under the new legislation would not expect to complete until nearly 2 years after vesting day of the new unitary authority
 - The new processes allow less scope for local input and engagement
 - Our communities would not have the protection and developers would not have the certainty of a plan-led approach to planning/decision making for longer
 - This would give the potential to remain in tilted balance for decision-making for an extra 2 years.
 2. It is noted that at Basildon Borough Council's Council meeting of 21st July 2026 a motion was agreed for the Leader to write to the Minister of State for Housing and Planning asking for withdrawal of the housing target based on what they considered to be the 'flawed standard method for calculating housing need'. They stated that the resulting target for Basildon is too high and they have significant concerns over the implications of accommodating that level of development and the pressure it would place on local infrastructure and services.
 3. On 21st July 2026 the Minister of State for Housing and Planning, issued a formal intervention letter to Basildon Borough Council requiring them to progress their local plan through Regulation 19 consultation, submission by 31st December 2026 and progress the plan up to the end of the examination process. Whilst Basildon's local plan situation differs from Huntingdonshire's, this is highlighted here to illustrate the Minister's intervention powers.
- 8. COMMENTS OF OVERVIEW & SCRUTINY**
(If the report is not going to Overview and Scrutiny please note this as N/A).

(The comments of the relevant Overview and Scrutiny Panel will be included in this section prior to its consideration by the Cabinet.)

1. Text

9. POST-DECISION IMPLEMENTATION

1. Once the decisions are approved the Pre-Submission Local Plan to 2046 and its supporting documents will be published for representations to be made from 16th September to 26th October 2046. A Statement of Representations Procedure is set out in Appendix 6. The content of what this must specify is spelt out in Regulation 17 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
2. All duly made representations will be published on the Council's Planning Policy engagement portal for public viewing. Officers will read and confirm all comments so that they are publicly available to view on the engagement portal. If high volumes of representations are received, generally in the last few days of any engagement period, it may take a while before they are processed. This is necessary to ensure that comments do not offend equalities legislation, are not discriminatory, offensive, racist or threatening in their language.
3. A high-level summary of all duly made representations will be collated into a Statement of Representations which will also include an initial response to them.
4. A report will be brought to Council on 16th December summarising the key issues raised on the Pre-Submission Local Plan and the Sustainability Appraisal. This will seek formal approve from Council to submit all representations received, the Pre-Submission Local Plan, the Sustainability Appraisal and all other supporting documents to the Planning Inspectorate for the formal examination in public process.

10. IMPLICATIONS OF THE DECISION

1. Council Key Priorities and Performance

- 10.1.1** Chapter 2 of the Local Plan sets out its Vision, Aims and Objectives of the Local Plan for the development of Huntingdonshire up to 2046 and beyond. This is structured around both the Corporate Plan and Huntingdonshire Futures. The Local Plan will contribute substantially to the priorities of improving quality of life for local people and creating a better Huntingdonshire for future generations. It will do this through policies on delivering sustainable development and promoting climate resilience, through identifying and supporting new homes for people that meet their needs and is a major source of promoting affordable homes. It also supports sites for new, expanded and diversified businesses to enhance people's opportunities to gain meaningful work. To balance growth it provides a framework for supporting strategic green and blue infrastructure as well as promoting local scale biodiversity and green spaces.

2. Financial Implications

10.2.1 Representations submitted on the Pre-Submission Local Plan to 2036 under Regulation 19 will all be subject to scrutiny through an examination in public led by an Inspector appointed by the Planning Inspectorate. The costs of hosting the examination, the Inspector, the required Programme Officer and legal support are all borne by the local planning authority. In anticipation of this a reserve fund has been built up since adoption of the currently adopted local plan. This has been drawn on, alongside an agreed baseline budget as per HDC's agreed MTFS, to fund preparation of the necessary evidence base where specialist consultants have been required and the balance remains to meet anticipated examination costs. It is expected that costs will primarily be incurred through 2026/27 and 2027/28.

3. Policy Implications

10.3.1 If successfully adopted the Local Plan to 2046 would replace Huntingdonshire's Local Plan to 2036 which was adopted in May 2019 in its entirety.

4. Legal & Constitutional Implications

10.4.1 The Pre-Submission Local Plan to 2046 has been prepared under the Planning and Compulsory Purchase Act (2004) and the Town and Country Planning (Local Planning) (England) Regulations 2012. It will be examined under the transition arrangements and will use the NPPF (December 2024).

5. Community Impact

10.5.1 The Local Plan has a significant potential community impact through shaping the growth of the district through to 2046 and beyond. It includes policies specifically focused on provision of affordable homes, accessible and adaptable homes to meet the needs of people with mobility constraints and supports the provision of specialist housing. It also supports protection of town centre uses and defines town and local centres to support their retention as foci for community services.

6. Environment & Climate Change Implications

10.6.1 Promoting environmental balance to growth aspirations and enhancing climate resilience are key features of the Local Plan to 2046. Policies are including for protecting and enhancing strategic green and blue infrastructure and promoting sustainable development with a particular focus on reducing water consumption reflecting the serious water stress the district faces. In terms of climate resilience policies targets for building standards are aligned to national standards to enhance viability.

7. Equality & Diversity Implications

10.7.1 The Regulation 19 Local Plan to 2046 is supported by an Equalities Impact Assessment as this is a required document for the examination process. This can be found in Appendix 7.

8. Implications on Resources

10.8.1 Preparation of the Local Plan so far has taken a substantial amount of resources, not just from the Council but across many partner organisations and our local communities. Internal resources for publication of the Regulation 19 materials, processing and analysing of representations received have been identified within the Planning Policy team.

9. Health & Wellbeing Implications

10.9.1 An assessment of the health and well-being implications of the Local Plan policies and sites has been incorporated into the Sustainability Appraisal and can be found in Appendix 3.

10. Local Government Reorganisation (LGR) Implications

10.10.1 MHCLG published information for two-tier authorities about transitioning plan-making to single tier unitary authorities in the form of draft guidance on 6th July 2026. This states that the government has made a commitment to achieving universal plan coverage. And that they have been clear that they intend to drive local plans to adoptions as soon as possible. The draft guidance clearly advises that 'forthcoming local government reorganisation is not a reason to delay plan-making' and that 'This is the case even if you will not be able to progress the plan to adoption before the unitary authority is operational in your area'.

10.10.2 Transitional regulations are due to be published to advise on:

- how an emerging plan can be progressed by a new unitary after reorganisation
- the ability for more than one local plan to have effect in relation to a local planning authority's area at any one time during the transitional period
- complexities arising where an emerging plan will not fit neatly into a single new unitary area

10.10.3 It is expected that adopted plans will remain in force for the part of the new unitary area to which they relate until they are superseded by a new unitary-wide plan.

11. RISK MANAGEMENT

1. The Local Development Scheme sets out a comprehensive risk assessment of preparing the Local Plan to 2046 in chapter 6. The greatest risk to its progress at this stage would arise from the Council either voting not to support its publication to seek representations under Regulation 19 or delaying the decision on whether or not to do so.
2. Voting not to support progressing to Regulation would mean termination of the current draft version of the Local Plan to 2046. Due to requirements of the Levelling-Up and Regeneration Act (2023) it would be necessary to pivot to the new plan-making system and issue a Notice of Intention to commence local plan preparation no later than 31st December 2026. The risk to the Council's reputation is high as

responses to public consultations held during 2023 to 2026 cannot be carried across to the new plan-making system. It would be necessary to restart with consultations on the scope of the local plan and a call for sites. There would also be a significant financial cost due to the limited transferability of the evidence base to the new plan-making system as much is informed by site specific assessments. Mitigation options are very limited other than returning to Council very soon with a require to proceed on value for money grounds.

3. Delaying progression to Regulation 19 would risk the inability to complete the representation period and subsequent preparation of submission materials ready for presentation to Council on 16th December and subsequent submission to the Planning Inspectorate if approved. The government have issued a national deadline of 31st December 2026 for submission of local plans for examination under the transition arrangements.

12. BACKGROUND PAPERS – LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

Document List	Custodian	File Location
Huntingdonshire Local Plan Review and Proposed Update (24/01/2024 - Item 5)	Head of Planning, Infrastructure and Public Protection	Huntingdonshire Local Plan Review and Proposed Update
Statement of Community Involvement (24/01/2023 – item 6)	Head of Planning, Infrastructure and Public Protection	statement of community involvement 2023.pdf
Sustainability Appraisal Scoping Report (24/01/2023 – Item 7)	Head of Planning, Infrastructure and Public Protection	sustainability appraisal scoping report.pdf
Draft Settlement Hierarchy Methodology 2023 (21/03/2023 – Item 4)	Head of Planning, Infrastructure and Public Protection	draft settlement hierarchy methodology 2023.pdf
Call for Sites (21/03/2023 – Item 5)	Head of Planning, Infrastructure and Public Protection	call for sites.pdf
Draft Land Availability Assessment Methodology (21/03/2023 – Item 6)	Head of Planning, Infrastructure and Public Protection	draft land availability assessment methodology.pdf
Local Plan Issues Engagement Papers (18/04/2023 – Item 3)	Head of Planning, Infrastructure and Public Protection	local plan issues engagement papers.pdf
Further Issues and Options 2024 Engagement Paper (10/09/2024 – Item 4)	Head of Planning, Infrastructure and Public Protection	further issues and options 2024 engagement paper for the local plan update.pdf
Land Availability Assessments and Sustainability Appraisal for Additional Sites	Head of Planning, Infrastructure and Public Protection	land availability assessments and sustainability appraisal for additional sites submitted between 1 .pdf
Local Plan Engagement Review (O&S 08/07/2025 – Item 5)	Head of Planning, Infrastructure and Public Protection	local plan engagement review.pdf

Preferred Options Draft Local Plan to 2046 and supporting Sustainability Appraisal (21/10/2025 – Item 2)	Head of Planning, Infrastructure and Public Protection	Preferred Options Draft Local Plan to 2046 and supporting Sustainability Appraisal.pdf
Minister of State for Housing and Planning letter to Basildon Council 21 July 2026	Ministry of Housing, Communities and Local Government	Letter to Basildon Council
Minister of State for Housing and Planning letter to the Planning Inspectorate 15 th July 2026	Ministry of Housing, Communities and Local Government	Letter to Planning Inspectorate

APPENDICES

Appendix 1 - Pre-Submission Local Plan to 2046

Appendix 2 - [The Policies Map](#) which contains a link to the interactive map.

Appendix 3 - The Sustainability Appraisal

Appendix 4 - The Statement of Consultation

Appendix 5 – Habitats Regulations Assessment

Appendix 6 – Statement of Representations Procedure

Appendix 7 – Infrastructure Readiness Report

Appendix 8 – Equalities Impact Assessment