Report to Huntingdonshire District Council

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION INTO THE HUNTINGDONSHIRE DISTRICT

DEVELOPMENT PLAN DOCUMENT – CORE STRATEGY 2008

Document submitted for examination July 2008

Examination hearings held between 17 March and 1 April 2009

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1 Introduction and Overall Conclusion

1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:

(a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document.

(b) whether it is sound.

1.2 This report contains my assessment of the Core Strategy in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act.

1.3 I am satisfied that the Core Strategy meets the requirements of the Act and Regulations. My role is also to consider the soundness of the submitted DPD in terms of it being "justified, effective and consistent with national policy" as set out in Planning Policy Statement 12 (2008). In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The changes I have specified in this binding report are made only where there is a clear need to amend the document in the light of soundness. None of these changes should materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes already undertaken.

1.4 My report firstly considers the procedural tests, and then deals with the relevant matters and issues considered during the examination in terms of the tests of conformity, coherence, consistency and effectiveness. My overall conclusion is that the Core Strategy is sound, provided it is changed in the ways specified.

1.5 The report sets out all the detailed changes required, including those suggested by the Council, to ensure that the plan is sound. The Annexe contains the changes proposed by the Council including those minor changes which improve or clarify wording. In some cases I have further amended the wording of the proposed changes suggested by the Council. Although I consider that a number of changes are necessary to ensure the document is sound, none of these affect the fundamental approach taken by the Council towards development in the district contained in the Core Strategy. There are, therefore, no "main" changes which I need to make specific reference to here.

1.6 The references to Regulations 31 and 33 of the Town and Country Planning (Local Development) (England) Regulations 2004 in the Council's submissions are because the Core Strategy was submitted to the Secretary of State before 1 September 2008. This has triggered the transitional provisions of Regulation 3(2) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 which means that the 2008 regulation

amendments removing Regulations 31 and 33 do not apply to this Core Strategy.

2 Legal Requirements

2.1 The Core Strategy is contained within the Council's Local Development Scheme, which was approved in March 2007. There, it is shown as having a submission date during the spring of 2008. The timescale and content of the Core Strategy accord with the Local Development Scheme as required by paragraph 4.50 of Planning Policy Statement 12.

2.2 The Huntingdonshire Statement of Community Involvement (SCI) has been found sound by the Secretary of State and was formally adopted by the Council in 2006. The Council has also had due regard to the Sustainable Community Strategy for Huntingdonshire. It is evident from the documents submitted by the Council, including the Regulation 28 and 31 Statements and its Self Assessment Paper, that the Council has met the requirements as set out in the Regulations.

2.3 Alongside the preparation of the Core Strategy it is evident that the Council has carried out a parallel process of sustainability appraisal. The key sustainability issues were identified in the Scoping Report as land, water and resources; biodiversity; landscape, townscape and archaeology; climate change and pollution; healthy and inclusive communities; and economic activity. The sustainability appraisal identified the need to retain the district's historic and architectural heritage, the particular pressures for growth on greenfield land, and a high incidence of outward commuting which affects the local economy.

2.4 In accordance with the Habitats Directive, I am satisfied that an Appropriate Assessment has been undertaken by specialist external consultants and with full assessment where necessary so that there would be no significant harm to the conservation of European sites as a result of the policies and proposals within this Core Strategy.

2.5 Accordingly, I am satisfied that the legal requirements listed under paragraph 4.50 of Planning Policy Statement 12 have all been satisfied. In addition, the Regional Assembly has indicated that the Core Strategy is in general conformity with the approved Regional Spatial Strategy. It also accords with national policy.

3 Justified, effective and consistent with national policy.

3.1 As the district is within a growth area the main issues are housing and employment, their location and quantity.

3.2 *Issue 1 – Whether the strategic vision and objectives are appropriate for the district*

3.3 The District lies in the East of England Region within London/Stansted/Cambridge/Peterborough Growth Area. In East of England Plan, Policy CSR1- the Vision for the Cambridge sub-region – includes the statement; "to continue to develop as a centre of excellence and world leader in the fields of higher education and research, fostering the dynamism, prosperity and further expansion of the knowledge based economy spreading outwards from Cambridge." The southern part of the district, including the towns of Huntingdon, St Neots and St Ives falls within the Cambridge Sub Region. The northern part is influenced by its relationship with Peterborough.

3.4 The Core Strategy should emphasise that its policies are overarching and will apply to all subsequent Local Development Documents. This is inferred but the wording requires clarification for soundness. The importance of employment land suitable for high quality business and employment opportunities is not referred to in the Core Strategy and the Council accepts that this needs to be emphasised. However, hi-tech jobs account for only 9.5% of all employment within Huntingdonshire and these are established and concentrated in the three market towns of Huntingdon, St Neots and St Ives. Because of this I see no need to specifically mention hi-tech firms in Policy CS7. The supporting text which explains the influence of the Cambridge Sub-Region needs further clarity for soundness.

3.5 To ensure that the Spatial Vision is up to date and the objectives and policies that follow are clearly related to that Spatial Vision amended wording of the text is necessary for soundness. These are listed below.

3.6 A section on climate change should be introduced because of new responsibilities contained in the Planning Act 2008.

3.7 The addition of a section is required to cover more fully the future needs and sustainability issues of the villages and countryside.

3.8 The approach to development in villages and the countryside, where strategic growth is not proposed should be set out. With government support for the rural economy, under Objective 6 exceptionally business development on a limited scale will be permitted in rural areas.

3.9 Clarification is required regarding the status of Key Service centres where strategic growth is to be directed.

3.10 Having the regard to the Council's approach to growth within the district it is important for soundness to state that it is the Spatial Planning Areas as a whole which are considered to be sustainable for growth, not just the market towns.

3.11 It is also necessary to amend the text under the heading *Increased Capacity of the Transport Network* to incorporate the latest advice from the Highways Agency on the impact of individual developments on traffic flows within the Huntingdon Spatial Planning Area on the A14. I have dealt with this under Infrastructure at Issue 4 below.

3.12 I am of the view that a mechanism for specialist housing does not need to be part of Policy CS4. I agree with the Council that it has no direct spatial dimension and is a local issue which can be better dealt with in a subsequent Local Development Document. However, specialist housing should be mentioned in the supporting text

3.13 Tourism in Huntingdonshire is of a modest scale and is spread widely across the district. Apart from adding reference to the importance of the Great Fen and water features in the Core Strategy, any further policies and guidance should be provided through subsequent Local Development Documents.

3.14 With the changes below I consider there would be consistency between the Spatial Vision and other policies of the Core Strategy, and regional and national policy.

3.15 Therefore, subject to the changes below I find the Spatial Vision and Objectives justified, effective and in accordance with national policy.

3.16 **The following changes are necessary to make the document sound:**

i) Amend paragraph 1.4

~~It will not include detailed development control policies or identify specific development sites.~~ **The Core Strategy is a strategic document. The vision and objectives are overarching and form the basis for the whole Local Development Framework; they will therefore be used for subsequent Local Development Documents. Because of the strategic nature of the Core Strategy the Council has chosen not to include detailed development control policies or identify specific development sites.** These will be dealt with separately by the Development ~~Control~~ **Management** DPD, the Planning Proposals DPD and the Huntingdon West Area Action Plan~~.~~ **as appropriate**. (PC/1/00200 as amended)

ii) Insert in the Spatial Vision after Protection of Character

Villages and Countryside

To promote the sustainability of our villages and countryside appropriate investment in the rural economy will be encouraged, including complementary diversification of agricultural holdings. Provision of affordable housing on rural exceptions sites will be encouraged to help people remain in, or return to, their local communities. Transport services, communication links and access to key services and facilities

will be protected and improved where possible to help people living in, working in or visiting villages and the countryside pursue sustainable lifestyles. Huntingdonshire's villages and countryside offer abundant habitats for plants and wildlife; opportunities will be maximised to maintain and enhance the quality and diversity of habitats supported. (PC/3/00400)

iii) Insert new statement in The Spatial Vision

Sustainable Development and Responding to Climate Change

Delivering the required growth sustainably and in a way that mitigates against and responds to our changing climate will be the most significant challenge for the Development Plan. Development will therefore respond to the need to reduce emissions of greenhouse gases by ensuring that energy is used efficiently both in the construction and use of buildings and more of the energy used comes from zero or low carbon sources. The location of development will minimise the need to travel especially by car, make sustainable forms of travel more convenient and so reduce the impact of transport on climate change. Global warming is likely to enhance extremes of weather and the potential of increased risk of flooding that comes from the likelihood of wetter and milder winters could affect much of Huntingdonshire. Also the East of England is already one of the driest areas in the country for much of the year and this is likely to get worse with climate change and will have implications for the use of water in new and existing development. (PC/3/00300 as amended)

iv) ...More limited development will be supported in larger villages to help sustain their existing facilities and amenities, without damaging their character. In ~~our rural areas~~ **other villages,** schemes that sustain and enhance the vitality of established communities**, through the appropriate development of homes and businesses,** will be supported **where they are compatible with environmental designations and constraints.** ~~With the housing growth the~~ **In conjunction with the proposed housing growth** appropriate provision of health, education, training, and community, leisure and open space facilities will be secured. (PC/3/00500)

v) Future **strategic** employment development will be located in the most sustainable locations of the market towns. This is primarily in order to ensure delivery of the most marketable sites but it also follows housing growth to ensure the creation of balanced communities. **The Council will promote the** provision of a wider range of local employment opportunities, particularly ~~in~~ **high quality sites for** advanced manufacturing, environmental technologies, ICT and creative industries. This will help limit levels of out-commuting to London, Peterborough and Cambridge and ensure the continuing success of the District's economy. (PC/3/00800 and PC/3/00900)

vi) (Paragraph 3.3) ... continuing in the 1980's and 1990's. **As a result of their location within the Cambridge Sub Region pressures for development will continue to be felt within St Neots and Huntingdon as well as St Ives. Other settlements, within the east and south of the District, will also feel increased pressure for development resulting from the District's location within the London/ Stansted/ Cambridge/Peterborough growth area.** Opportunities are arising to regenerate the Town Development Scheme estates and the town centres of Huntingdon and St Neots. The District has a high net out-commuting pattern to London, Cambridge and Peterborough. **It** ~~but~~ also has a buoyant local economy which now ~~contains~~ **includes** ~~the~~ **Cambridgeshire's** largest cluster of high-technology firms **outside the immediate area of Cambridge in the market towns of Huntingdon, St Neots and St Ives**. ~~in Cambridgeshire outside the immediate area of Cambridge~~ **However, it has to be noted that this is not the most dominant part of the local economy.** (PC/3/00200)

vii) amend paragraph with heading

Sustainable Patterns of Growth and Sufficient Housing to Meet Needs

During this time Huntingdonshire will play a proactive role in accommodating housing growth, including **any appropriate specialist housing and** much needed affordable housing, required as part of the London-Stansted-Cambridge-Peterborough growth corridor while respecting, maintaining and enhancing the special character of its natural, historic and built environments. The majority of growth will be concentrated in the most sustainable locations. ~~namely the market towns.~~ More limited development will be supported in larger villages to help sustain their existing facilities and amenities, without damaging their character. In our rural areas schemes that sustain and enhance the vitality of established communities will be supported. With the housing growth the appropriate provision of health, education, training, and community, leisure and open space facilities will be secured. (PC/3/00650 and PC/3/00700)

viii) (Additional Objective) **To support the District's tourism sector, particularly opportunities relating to the Great Fen and water based activities.** (PC/3/01700)

ix) Amendment to Objective 1

Start Objective 1 **To facilitate required growth in locations……..**

x) Objective 6: To ~~enable~~ **support** business development in ~~rural areas~~ **the District's villages and countryside**, in locations and on a scale which helps to provide local jobs, limits commuting and minimises or mitigates against adverse environmental impacts (PC/3/01200)

xi) Objective 9: Delete "identify opportunities to" and add **infrastructure while improving the natural habitat and biodiversity** (PC/3/01400 and PC/3/01500)

xii) Objective 16: Insert after "energy used," **encouraging the uptake of sustainable travel modes** (PC/3/01600)

xiii) Additional Objective 18: **To support the District's tourism sector, particularly opportunities relating to the Great Fen and water based activities. (**PC/3/01700)

3.17 ***Issue 2 – Whether the overall policies of the Core Strategy will lead to development that meets the needs of the district in a sustainable way***

3.18 The major part of the housing and employment development is directed to the two major Spatial Planning Areas of Huntingdon and St Neots, 1800 homes in Huntingdon Spatial Planning Area and 2650 in St Neots Spatial Planning Area. In St Ives Spatial Planning Area at least 500 homes would be provided and in Ramsey Spatial Planning Area at least 300 homes are proposed. In addition certain Key Service Centres outside of the Spatial Planning Areas will accommodate about 250 homes.

3.19 Key Service Centres have been identified consistent with the broad criteria set out in the East of England Plan (REG10). Outside of the Spatial Planning Areas only the two villages of Yaxley and Sawtry meet all 5 criteria. Fenstanton misses 1 criterion, access to secondary education, but in my view has rightly been included as a Key Service Centre because of its sustainable location within the Cambridge Sub-Region and the sequential approach in the East of England Plan.

3.20 Concern was expressed by some representors about the lack of flexibility for development in the Key Service Centres and other villages. It was argued that there should be a range of categories for the villages, instead of lumping them all into one category below Key Service Centres. However, I found the range of settlements overall identified in Policies CS2 and CS3 to be wider than is first apparent. There are the market towns and Spatial Planning Areas to which development is directed. There are the Key Service Centres within the Spatial Planning Areas within which strategic development will occur. Those Key Service Centres which have been included within the Spatial Planning Areas have higher levels of sustainability as they are closely related and accessible to their market town.

3.21 Outside the Spatial Planning Areas only 3 Key Service Centres have been identified for limited strategic growth. Fenstanton, within the Cambridge Sub-Region. Sawtry to serve the centre of the district and Yaxley which is closely related to Peterborough and Hampton to the north of the district. In addition there are smaller Key Service Centres

identified which will take a limited amount of development commensurate with their character and scale.

3.22 Under these are the remainder of the villages which, although from my visit I found to be of different size and varied character, I support the Council's cautious approach and strict control over development in these mainly more remote settlements. In my view even in these smaller villages Policy CS3 provides reasonable flexibility by stating that development proposals of a larger scale may be allowed where site specific circumstances demonstrate that this secures the most sustainable option for the site.

3.23 In the past there was a policy of dispersal and some villages I saw have accommodated high levels of development over the years and have reached a reasonable size. This may well have helped these villages to become more balanced settlements but I consider it sound to strictly control future development in the rural villages by directing growth to more sustainable locations. In the East of England Plan it is stated that it is difficult to identify a correlation between the number of houses, and the range of facilities provided in villages and development has been unable to halt closure of local services. Substantial housing in non sustainable locations would be needed to ensure the maintenance and retention of some village facilities

3.24 I do not agree with the arguments that on the grounds of flexibility more strategic development should be directed towards the Key Service Centres, as I share the view of the Council that some will always be at the margins of sustainability. The smaller Key Service Centres will have opportunities for varying degrees of limited growth. Development in the smaller villages below Key Service Centre level will be strictly controlled.

3.25 I consider that the dispersed option to the Key Service Centres and villages in the Preferred Options Report is the least sustainable option and that the 250 figure for dwellings to be spread across the 3 most sustainable Key Service Centres should not be increased to encourage further dispersal.

3.26 I see no reason on grounds of strategy that directions of growth should be indicated for all Key Service Centres, neither do Key Local Services need to be identified in the Core Strategy. It is only necessary to show directions of growth that are strategic and village services and facilities are normally not. Such services and facilities, if they need to be identified at all, should be dealt with in a later Local Development Document.

3.27 Policy CS3 promotes a sustainable and modest scale of development and identifies those circumstances where such development will be permitted. It also sets out circumstances where different scales of development may be appropriate. This is complemented by Policy CS5 which provides for affordable housing as an exception in rural areas.

3.28 However, the settlement hierarchy needs clarification as a framework for housing development on unallocated sites. It should be stated that Policy CS3 will manage other development on non allocated sites whereas Policy CS2 is intended to guide strategic growth.

3.29 The Core Strategy has a criteria based policy to control development in the villages instead of the former village boundaries approach which some representors, including some parish councils, preferred because they consider it is more definite. To my mind both approaches are acceptable and I do not find a criteria approach unsound. I would expect the criteria to be further defined in the forthcoming Development Management Local Development Document. This should be made clear by a change to paragraph 5.15 and the Glossary. Otherwise I do not find it inappropriate to establish the basic definition of the "built up area" of a village in the Core Strategy at paragraph 5.15, as amended by a proposed change.

3.30 For soundness, sustainable drainage systems should be specifically mentioned in paragraph 4.10 and sites of nature conservation value in paragraph 4.14.

Affordable Housing

3.31 Turning to the sustainability of the Affordable Housing policy CS4, on the 19 February 2009 there were 3139 applicants on the housing register awaiting affordable housing in Huntingdonshire. When compared to the Regional Spatial Strategy target for housing growth, Huntingdonshire has the greatest level of housing need in Cambridgeshire. There is therefore, a sound case for the high target figure in Huntingdonshire.

3.32 Following the publication of Planning Policy Statement 3 and the requirements of paragraph 19, site viability appraisals were carried out across the district. These were assessed both on the basis of a buoyant and a depressed market. If a site is found to be unviable the Council will apply a cascade mechanism which is set out in the Council's Supplementary Planning Document. However, for soundness it should be made clear that the 40% affordable housing requirement is a target "to be aimed for" not necessarily achieved. Also "may" should be substituted by "will" in the third paragraph of Policy CS4 to ensure that site specific circumstances are taken into account. Otherwise Policy CS4 is flexible enough to deal with market variations by taking into account "other material considerations".

3.33 Even in the cheapest areas, the lowest quartile house price is 4.5 times local incomes. As Planning Policy Statement 3 requires separate targets to be set for social rented housing and intermediate housing I do not find it inappropriate in principle to include them within the policy, but the tenure figures need to be clarified. Policy CS4 allows for the percentages of social rented housing and intermediate housing to be varied where this is justified.

3.34 Although concern was expressed about the availability of funds to support a 40% target the Council has a grant programme of £1m per year and has already been successful in attracting Growth Area funding.

3.35 Paragraph 29 in Planning Policy Statement 3 requires Councils "to set out the approach to seeking developer contributions." Although the transfer of free serviced plots is a long established practice it does not occur in every case. It is, therefore not sound to require it and the criterion should be deleted from the policy.

3.36 Although there are differences between the 2006 survey and the later survey, to accord with current government guidance the Strategic Housing Market Assessment 2008 (Document HOU4) supersedes the 2006 survey.

3.37 I have considered gypsy policy CS6 – Gypsies, Travellers and Travelling Showpeople - in the light of national policy in Circular 01/2006. The second criterion would be unattainable as there is always likely to an adverse impact of some kind. The issue is whether that any adverse impact would be substantial or significant having regard to the location of the site. The criterion should be reworded to reflect this.

3.38 I consider that subject to the proposed changes below, the proposals in the Core Strategy are sustainable, justified, effective and in compliance with national policy.

3.39 **The following changes are required to make the document sound:**

i) Proposed Changes to Policy CS4

In order to address the need for affordable housing in the ~~d~~ **Di**strict, ~~40% of~~ all housing proposed in developments in the following categories should ~~be provided as~~ **seek to achieve a target of 40%** affordable housing:

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

on proposals of 3 or more homes or 0.1ha, in all smaller settlements as defined in the settlement hierarchy. (PC/5/01100 as amended)

ii) ..The affordable housing provision should ~~comprise at least~~ **seek to achieve a target of** 70% social rented accommodation with the balance being provided as intermediate housing. (PC/5/01200 as amended)

iii) … In determining the amount **and mix** of affordable housing to be delivered, specific site conditions and other material

considerations including viability, redevelopment of previously developed land or mitigation of contamination ~~may~~ **will** be taken into account. (PC/5/01300)

iv) Delete from policy CS4 the words **Provision shall be made in the form of free serviced land** (PC/5/01150)

v) Policy CS3 Settlement Hierarchy

The settlement hierarchy provides a framework to manage the scale of housing development appropriate on unallocated sites. (PC/5/00900)

vi) Paragraph 5.15

The definition of the built-up area will be set out in more detail in the Development Management DPD but for the purposes of the Core Strategy it ~~The built-up area~~ is considered to be the existing built form excluding:

- buildings that are clearly detached from the main body of the settlement;

- gardens and other undeveloped land within the curtilage of buildings at the edge of the settlement, ~~especially~~ where these relate more to the surrounding countryside than they do to the built-up parts of the village**; and**

- ~~Also~~ ~~excluded are~~ agricultural buildings where they are on the edge of the settlement. (PC/5/00700)

vii) Glossary

…. **The built-up area is the existing built form excluding:** ~~Excludes~~

- buildings that are clearly detached from the main body of the settlement;

- gardens and other undeveloped land within the curtilage of buildings at the edge of the settlement, ~~especially~~ where these relate more to the surrounding countryside than they do to the built-up parts of the village; **and**

- ~~Also~~ ~~excluded are~~ agricultural buildings where they are on the edge of the settlement (PC/7/00100)

viii) Insert in paragraph 4.10 after "water shortages by" **incorporating sustainable drainage systems into new developments and also….** (PC/4/00200)

ix) Amend the second criterion of Policy CS6 as follows:

The development should not **have a significant adverse** impact on the…..

3.40 ***Issue 3 – Whether Policies CS2 and CS3 will produce the required housing to meet the needs of the district during the Plan and provide for development in appropriate locations.***

3.41 The Council extended the Core Strategy period to 2026 to meet the 15 year supply requirement in Planning Policy Statement 3. This brought the total to at least 14,000 homes between 2001 and 2026, with some 11,000 to be delivered between 2006 and 2026. All allocations were assessed as deliverable in the Strategic Housing Land Availability Assessment (Document HOU7). Non allocated sites with planning permission or agreement in principle are capable of short term delivery. Since the submission of the Core Strategy development of some sites has commenced. These are identified in the Annual Monitoring Report 2008 (Document LOC27). The Strategic Housing Land Availability Assessment identified potentially suitable sites that have a capacity of 8734, far more than the 5500 identified and required for new allocations. I, therefore, find no need to discount for non delivery.

3.42 Concern has been expressed about the balance of housing/employment between Huntingdon, St Neots, and St Ives. The East of England Plan urges concentration of development in settlements, particularly market towns, in the Cambridge Sub-Region. In the Huntingdon and St Neots Spatial Planning Areas 4500 of the 5500 homes are proposed. Huntingdon is the largest market town in the district with a good balance of housing and employment. Looking at the town of Huntingdon in isolation from its Spatial Planning Area it does not appear to be getting its fair share of housing. However, it is important to recognise at the outset that the Council are not starting with a blank sheet. The Council cannot ignore the history of planning and existing development in the area, including outstanding commitments, and the recognition of RAF stations which will become available for development during the plan period. These have influenced the definition of the Spatial Planning Areas by including settlements around the market towns.

3.43 In the case of Huntingdon Spatial Planning Area this includes Godmanchester and Brampton. Godmanchester is virtually contiguous to Huntingdon and relies on the market town for most of its needs, and at RAF Brampton there is an extensive area of previously developed land which can be used for large scale mixed development, avoiding the need to take further greenfield land around Huntingdon. I find this to be a sound and realistic approach which would recognise the close relationship between the Market Town and the Key Service Centres nearby. These developments with their improved public transport will be served by Huntingdon railway station and extensive bus services, including the new

priority bus and guided bus route linking Huntingdon/St Ives with Cambridge.

3.44 St Ives is also a sustainable location for development and will become more so with the introduction of the Cambridge Guided Bus route. However, it has less opportunity for growth other than to the west where it can link with existing allocations and commitments. From my visits I agree with the Council that separation between St Ives and Houghton should be retained. There are also flood risks constraints to the south and south east making land unsuitable for housing development, and land to the north and north-west is remote from the town centre. Nevertheless 500 homes are proposed during the plan period and 17ha is available for employment generating uses. If there is any imbalance relating to inward and outward commuting advantage can be taken of the guided bus provision between Cambridge and St. Ives.

3.45 Ramsey is remote and the least sustainable of the market towns, but there may be some opportunities for employment led regeneration as attempts at housing led regeneration have not been successful in the past. RAF Upwood, which is within the Ramsey Spatial Planning Area, presents an opportunity for employment generation. Although there is local support to regenerate Ramsey by encouraging employment led development I do have some concern about the likely success of employment led regeneration in this most remote of the Spatial Planning Areas, where in the past housing led generation failed. Nevertheless, there is some flexibility in Policy CS7 in that the area identified for growth at Ramsey to the north west of the town is for mixed use development, not employment led, and with the two areas available for development there will be the opportunity for both housing led and employment led development to come forward in the Ramsey area.

3.46 With its grouping of settlements within the Spatial Planning Area Huntingdon has ample opportunity for sustainable growth. There is previously developed land at Huntingdon West which is the subject of a forthcoming Area Action Plan. Brampton and Godmanchester are closely linked to Huntingdon and RAF Brampton, a previously developed site, has potential for mixed use after 2012. Although the Godmanchester and Fenstanton developments may have to wait for road improvements, the development at Huntingdon West and RAF Brampton is not similarly constrained.

3.47 For soundness it should be made clear in paragraph 5.4 the realignment of the A14 and removal of the viaduct will help facilitate further development in Huntingdon West.

3.48 St Neots is the largest of the market towns and there is opportunity for relatively unconstrained development to the east with a limited number of landowners. Although there is concern that there might be too much housing in one place in terms of marketability, I consider that it is because of its scale that a highly sustainable urban extension could be provided, with homes, employment, a district centre and other infrastructure advantages. It also has potential for further future growth.

3.49 I conclude that with the changes made below the Core Strategy will be sound in terms of overall housing policy

3.50 **The following change is required to make the document sound:**

i) Amend paragraph 5.4 to include the words **in Huntingdon West** (PC/5/00250)

3.51 ***Issue 4 – Whether the policies of the Core Strategy satisfactorily provide for delivery of development and its implementation and there is appropriate monitoring of their effectiveness***

3.52 Because of the highway's strategic importance the A14 improvements have been identified as high priority schemes throughout its length in the government white paper Britain's Transport Infrastructure: Motorways and Trunk Roads. The A14 improvements are fundamental to the growth strategy of the Cambridge Sub-Region.

3.53 Early delivery of around 800 homes and 6 ha of employment land is potentially limited by A14 improvements. However, in the housing trajectory there is estimated to be an oversupply of housing between 2007/8 and 2018/19 and with the current slow down in house building I share the view of the Council that a potential short term delay in the delivery of the A14 improvements (the A14 Ellington to Fen Ditton Scheme) would not undermine the soundness of the Core Strategy as other development around Huntingdon and St Ives could proceed without restriction. However, since the Core Strategy was submitted for examination various changes have been agreed to the wording with the Highways Agency and phasing of strategic Greenfield sites close to the A14 will now be required to demonstrate "nil detriment" on traffic flows on the A14 with development that takes place prior to the A14 improvements.

3.54 Turning to the A428 the Highways Agency is satisfied that with the major housing and employment growth planned to the east of the St Neots that localised improvements will provide sufficient capacity up to 2026. This will be complemented by a High Quality Public Transport bus route along the A428 corridor between St Neots and Cambridge. The text needs to be clarified and updated for soundness.

3.55 The extract from the recently completed phase 1 Watercycle Study (INF2) confirms the measures proposed to ensure the growth of St Neots can be accommodated. An increase in the discharge limit is proposed to accommodate up to 2000 additional homes between 2009 and 2016 with a later possible tertiary treatment works funded by Anglian Water Services

during 2016-2020. The present estimate is that there will be capacity up to 2018. Following the results of the recent study the wording in the Core Strategy needs amending to alleviate any fears about the St Neots development being delayed.

3.56 Although Policy CS10 requires contributions to infrastructure from stakeholders, the nature and scale of any planning obligation sought will be related to the form of development and its potential impact. Infrastructure requirements for each site will be subject to negotiation as required by national guidance. I have assessed the sites chosen for housing and employment elsewhere in this report and conclude there are no insurmountable barriers to delivery during the plan period.

3.57 I conclude that with the inclusion of the changes below, in terms of implementation, infrastructure and monitoring the Core Strategy has been justified, is effective and in accordance with national policy.

3.58 **The following changes are required to make the document sound:**

i) Changes to The Spatial Vision:

The proposed A14 improvements will **assist** much of the development in the Huntingdon area to take place and will improve access to and around the town centre, **but individual developments within the Huntingdon SPA may take place subject to demonstrating either 'minimal impact' or 'nil detriment' on traffic flows on the A14.** ~~while the dualling of the A428 in the St Neots area will be promoted to facilitate development there~~ **In the longer term an enhanced A428 in the St Neots area will facilitate the continuing development of a sustainable community beyond the plan period.**
Improvements in public transport will enable the promotion of sustainable travel options, particularly through the Cambridge to St Ives Guided Bus with associated bus priority measures between St Ives and Huntingdon, **enabling more convenient sustainable travel to and from Cambridge.** The provision of high quality public transport along the A428 corridor **will enable similar convenience between St Neots and Cambridge**. (PC/3/01000, PC/3/00950, PC/3/01000A, PC/3/01100)

ii) Paragraph 5.5

The St Neots Spatial Planning Area includes St Neots and Little Paxton and has a combined population of around 31,200. Little Paxton has its own distinctive identity and is physically separated from St Neots by the River Great Ouse. However, the key concentration of services and facilities of St Neots town centre are as close to Little Paxton as to many parts of the town itself. Along with land in Bedfordshire around Wyboston, the area is also a key driver of the local economy particularly for the manufacturing and

warehousing and distribution sectors. The SHLAA has identified that this area offers significant opportunities for development especially through the creation of a large sustainable urban extension to the east of the town. ~~The capacity of the A428 may be an issue until the section between the A1 and Caxton Gibbet can be upgraded to a dual carriageway~~. (PC/5/00200)

iii) Paragraph 5.93

The transport network across Huntingdonshire is dominated by the north-south corridor of the A1(M) and East Coast mainline and east-west A14(T) route. Existing infrastructure contributes to the dominance of the car both in physical terms as a barrier and in operational terms through congestion. The A14 Ellington to Fen Ditton improvement scheme will alleviate the situation, with the preferred route having been confirmed. The Cambridgeshire Guided Busway is programmed to commence operation in spring 2009. Phasing of strategic greenfield sites close to the A14 within the plan period will be required to coincide with the associated works with the A14 improvements. ~~Junction improvements will be required to the A428 to overcome objections to further development in St Neots~~. **Improvements will be needed to the three roundabouts on the A428 to mitigate the impact of development related traffic arising from the Core Strategy proposals.** Any further works to the road network (such as the A1 at Buckden) that are identified during the plan period may affect the phasing of sites where it is proven that the development is significantly dependent on that infrastructure. (PC/5/03900)

iv) Paragraph 5.92

Research for the Council's ~~emerging~~ Watercycle Study has identified where current treatment infrastructure has insufficient capacity for development in its catchment. The scale of proposed development at St Neots is such that a new treatment works and increase in discharge consent ~~is likely to~~ **will** be required. ~~The design, construction and commissioning period for a new treatment plant is in the order of 5 years and, if land purchase negotiations are added, the period could be 8 years~~ **The timing of growth however will not be affected as an increase in the discharge consent has been granted allowing development to proceed up to 2018 by which time any expansion of the treatment works can be delivered.** This constraint could have a significant impact on the timing of growth at St Neots, particularly if funding is not obtained until the period 2015 – 2020. Any development proposals falling within the Upwood Sewage Treatment Works catchment will need to ensure that no adverse effect would arise impacting on Woodwalton Fen. (PC/5/03800A)

3.59 ***Issue 5 – Whether the Core Strategy justifies and deals flexibly and effectively with employment issues and town centre policy.***

3.60 Although some housing is proposed in the town centre I concentrate here mainly on employment provision.

3.61 Forecasts predict there will be around 13,000 jobs created in Huntingdonshire. The Employment Land Review considered that a "low carbon future" approach would be the most appropriate model and the strategy aspires to this approach, but has factored in flexibility to ensure an adequate supply of deliverable land in locations where significant housing growth will be delivered. The Employment Land Review model indicated that with a "low carbon future" approach at least 66ha of land for employment uses should be identified.

3.62 There were diverse views from representors during examination on employment land provision some considered the total provision too little, others considered it to be too much and others thought it about right, but not necessarily in the right place.

3.63 Employment projections are notoriously difficult to assess with a significant degree of accuracy. As far as total provision is concerned I consider Policy CS7 to be flexible. The figure of 85ha is in excess of the 66ha "low carbon figure" and Policy CS7 requires *at least* 85ha of employment land to be provided before 2026. Inserting "about" instead of *at least* would add to the soundness of the plan, but the policy does not preclude more land coming forward during the plan period if required. The amount of employment land in St Neots has been increased to reflect the housing growth and small scale employment opportunities are also identified at RAF Upwood in the Ramsey Spatial Planning Area. Also potential sites in Huntingdon West can make up for loss of employment land through regeneration. I am satisfied that in respect of total provision Policy CS7 will meet the requirement of the East of England Plan and provide sufficient flexibility of choice.

3.64 It is part of the overall strategy to concentrate the major part of the employment growth in Huntingdon and St Neots Spatial Planning Areas. Most of the job growth in recent years has been in Huntingdon and I would expect this to continue. Some 51ha of employment land will be provided in the Huntingdon Spatial Planning Area. At least 13ha of this will be on previously developed land.

3.65 Some 25ha of employment land are proposed for development in the St Neots Spatial Planning Area on Greenfield land in a mixed use urban extension for B1, B2 and B8 uses to the east of the town. The figure of 25ha is higher than that identified in the Employment Land Review but I consider this will help to ensure a balanced community with less out commuting, particularly as the employment development would be part of an integrated mixed use scheme in the form of a Sustainable Urban Extension.

3.66 In January 2009 in the St Ives Spatial Planning Area existing commitments amounted to 16.85ha. There is planning permission for 32,899m2 of mainly offices on 15.25ha of this land. The average take up of employment land over the last seven years was less than 1ha. There is potential for additional supply from redevelopment and intensification of uses within the 33ha Somersham Road Industrial Estate. Taking into account employment development which may come forward during the plan period and relating this to the expected rate of housing completions, I consider this to be sufficient to match growth and market pressure for a settlement of this size.

3.67 In Ramsey Spatial Planning Area at least 9ha of employment land will be provided with at least 2ha on previously developed land. The previous approach to provide a large scale allocation was not successful and was deleted under the 2002 LPA (LOC4). In 2004 informal planning guidance was adopted by the Council. This retained 7.24ha of employment land, 3.9ha re allocated for a food store, 1.6ha for predominantly residential and 5.43ha for potential redevelopment. This development is now coming forward. Some new employment has been generated at the former RAF Upwood. A new Tesco store has been permitted and there is no evidence to indicate this will not be delivered in the short term. Whether employment led growth will rectify the imbalance will need to be monitored but I share the view of the Council that an alternative strategy which involves substantial housing growth would fuel unsustainable out commuting.

3.68 Yaxley and Sawtry are Key Service Centres outside the Spatial Planning Areas, which have existing employment commitments. Little Paxton and RAF Brampton lie within the St Neots and Huntingdon Spatial Planning Areas respectively. From my visits and the representation submitted on sustainability and service provision I consider these Key Service Centres are only suitable for limited development which would not be strategic in scale and, if thought to be necessary, could come forward through a later Development Plan Document. I do not consider Hemingford Abbots, Hemingford Grey and Conington are sustainable locations for strategic employment development.

3.69 It should be made clear in the Core Strategy that all employment contributes to the 13000 target, not just B1 uses.

3.70 Policy CS8 sets a minimum target of 20,000sq.m for comparison sector growth and 4,000sq.m for convenience sector growth. No upper limits are set. The retention rate for convenience goods is 75.6% and it is not expected this is likely to be increased because of large modern food stores just outside the district boundary. Only 38% of comparison sector expenditure is retained in the Huntingdonshire catchment area as it suffers from high leakage to Cambridge, Peterborough and Bedford. To improve this retention rate it is important to seek an increase in the existing comparison retention rate. Additional comparison floor space within a range 11,319 and 21,662 sq.m was suggested. All figures are net floor space and this should be clarified in the text. They do not include non strategic retail development and other uses in the Sustainable

Urban Extensions or town centres. These should be identified in the future Development Management DPD. Also the text should better reflect the diversity of town centre uses and their importance to the local economy.

3.71 Huntingdon is at present failing to fulfil its potential as the principal town centre of the district and there is a clear need for an enhancement of the town centre comparison retail offer.

3.72 Chequers Court is an important integral part of the town centre and its regeneration should be given priority. The Council accepts this and has proposed a change to the wording of Policy CS 8. I consider the policy now not only recognises the importance of Chequers Court but also has the flexibility to bring forward the Huntingdon West at the appropriate time, which will secure an improved road network for the future. This was not clear in the previous wording of the policy. The retail element of the Huntingdon West scheme is so close to the centre that I do not consider it would fall foul of advice in PPS6 paragraph 2.46. However, it is necessary for soundness to ensure that the complementary nature of Huntingdon West be clearly identified, as that development will be required at some stage to deliver the improvements to shopping required by the plan.

3.73 It will be necessary to serve the proposed development at Godmanchester with convenience shopping, and the developers acknowledge that about 500 to 600 square metres net retail floorspace could be supported by the urban extension. With the close proximity of Godmanchester to Huntingdon, I consider it unlikely that such convenience shopping would need to be strategic in scale, as it would then become a competitive attraction for convenience shopping, rather than serve the locality. I do not consider it appropriate to mention non strategic shopping in Policy CS8.

3.74 I find the employment policies flexible but sound and the retail floor space targets to be flexible and sufficient to encourage investment.

3.75 I conclude that subject to the changes below, in terms of sustainability the Core Strategy is justified, effective and in accordance with national policy.

3.76 **The following changes are required to make the document sound:**

i) Policy CS7

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

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

In addition to this, an existing commitment at Little Paxton, which might come forward during the plan period.

.....

Outside the Spatial Planning Areas, in the Key Service Centres of ~~Little Paxton~~, Sawtry and Yaxley, on existing commitments which might come forward during the plan period. (PC/5/01700 as amended)

ii) About 85ha of new land for employment will be provided before 2026 in order to ~~support~~ contribute to the creation of at least 13,000 jobs, assist the diversification of local job opportunities and reduce the significant level of out-commuting. (PC/5/01650 - as amended). **The reuse of previously developed land will be promoted within the Market Towns and other sustainable locations, with the result that…….** (PC/5/01500)

iii) In the Huntingdon Spatial Planning Area **about** 51ha ….

In the St Neots Spatial Planning Area where **about** 25ha… (PC/5/01600 - as amended)

iv) Paragraph 5.49

The Council's *Economic Strategy* is promoting jobs that will feed off the growth in the high-tech economy around the Cambridge area and is seeking higher quality, more sustainable locations to achieve this. **These locations will also provide for competition, between developers and choice, between occupiers.** ~~These will tend to be closer to the town centres and built at higher densities and often~~ **They will be** on previously developed industrial ~~sites~~ **land and on new allocations; closer to the town centres and built at higher densities; in mixed use developments on previously developed and greenfield sites and edge of town sites for larger scale general industry and warehousing.** Other local jobs will be created in the retail, leisure and tourism sectors as a result of population growth. The area of land identified has~~, however,~~ been increased to ~~take into account a number of factors~~ **support the operation of the market.** ~~To reflect the main market preference for new employment land, the potential locations available and as Huntingdon has been identified as having the best balance between jobs and homes, it is considered appropriate to identify locations for additional local employment opportunities in the Huntingdon Spatial Planning Area. This would help to ensure an adequate supply of deliverable sites around Huntingdon. All the options considered were evaluated to ascertain their potential highway impacts. Details of the *Huntingdonshire Spatial Strategy Options Assessment* are given in Annex 1 of the Statement of Consultation: Audit Trail.~~ **This is characterised by long term development pipelines through which developers bring land forward through site identification, planning and advance**

infrastructure investment for take up by business users over many years.

Additional local employment opportunities have been identified in the Huntingdon Spatial Planning Area as this area is the main focus of market activity and this presents an opportunity to maintain the good balance between homes and jobs. In addition the town offers a range of general locations which could provide high quality development in sustainable locations (adjoining the town centre, on previously developed land and within mixed use development) and for larger scale general industry and warehousing (to the north west of the town with good links to residential areas and the highway network). (PC/5/01800)

v) Policy CS8

Add the following footnote to policy CS8:

Note: all floorspace figures given are net sales area. (PC/5/02300)

vi) Paragraph 5.59

Huntingdon is the higher order centre within the District and market demand for further retail development is greatest. **The Council is looking to facilitate developments that benefit the vitality and viability of the town centre as a whole.** The implementation of ~~the~~ **further development and improvement of retail facilities at** Chequers Court ~~Phase II scheme~~ in Huntingdon town centre is the Council's top retail priority ~~as this is a previously developed site within the existing town centre~~. Delivery of this scheme is expected to attract additional comparison goods retailers to Huntingdon offering a greater diversity of shopping opportunities which is critically important for the retention of comparison retail expenditure. **This will be supplemented by limited, complementary retail and leisure provision on previously developed land on the edge of the existing town centre on land within the area covered by the Huntingdon West Area Action Plan. Schemes in this area will be carefully controlled to ensure they are complementary to the existing town centre, rather than competing directly with it, and contribute to the provision of retail and town centre uses within Huntingdon.** ~~Compared to the other Market Towns, Huntingdon has more opportunities for use of previously developed land in and adjacent to the town centre to strengthen the range of retail provision in locations most easily accessed by sustainable modes of transport.~~ (PC/5/02800)

vii) Paragraphs 5.54 and 5.55

Huntingdonshire**'s market towns** face~~s a number of~~ **many** challenges over the plan period ~~in terms of retailing and the District's town centres~~ **as they compete with larger centres nearby to attract investment and maintain their vitality and viability.** These ~~have been identified as~~ **include the need to:**

- ~~the need~~ ~~to~~ retain ~~more of the retail~~ **a higher proportion of residents'** expenditure **by improving the retail and leisure facilities** to the benefit of the town centres and the wider economy of the District
- to continue to ~~improve~~ **safeguard** the ~~environment and public realm in town centres and~~ **unique character of each historic town as places to visit**
- to provide opportunities for residents to access town centre services sustainably
- **boost the diversity of uses including retail, leisure, housing, parking, tourism and cultural facilities**

paragraph 5.55 National planning policy for town centres requires local authorities to identify where new retail facilities will be focused **as they are a key driver of the local economy.** Huntingdon and St Neots, being the main ~~foci~~ **locations** for growth will take the larger proportion of ~~retail~~ development **of retail and other town centre uses.** Retail development in the other ~~key settlements~~ **market towns and key service centres** is important for maintaining services, providing sustainable options for residents and retaining ~~retail~~ expenditure **locally.** (PC/5/02200)

viii) Change to heading after paragraph 5.55

Retail **and Town Centre Uses** (PC/5/02100)

ix) Amend Policy CS8:

Retail and **Town Centre Uses**

At least 20,000m^2 of comparison floorspace and 4,000m^2 of convenience floorspace will be provided before 2026. As part of the overall development strategy to concentrate the majority of growth in the Huntingdon and St Neots Spatial Planning Areas **it is proposed to locate retail development in the following areas whilst observing environmental designations and constraints:**

At least 9,000m^2 of comparison floorspace will be located in Huntingdon, concentrated in the town centre **with priority given to the further development and improvement of retail facilities at Chequers Court. ~~and c~~ C**omplementary and appropriate development, **that does not jeopardise the delivery of further redevelopment of Chequers Court,** will be located in

a significant mixed use redevelopment in the area west of the town centre covered by the Huntingdon West Area Action Plan

At least 9,000m^2 of comparison floorspace will be located in St Neots, **with priority given to proposals** ~~concentrated~~ in the town centre. ~~and c~~ Complementary and appropriate development **will be located** as part of **a** significant mixed use urban extension on greenfield land to the east of the town;

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

At least 4,000m^2 of convenience floorspace **primarily** in town centres across the District. (PC/5/02400 and PC/5/02500)

x) Add to paragraph 5.86 after "Caxton to St Neots" **and the possible future improvements to the A428 from Caxton to the A1 bypassing St Neots** (PC/5/03700)

xi) Add to the fifth line paragraph 5.93 after "spring 2009" **The release of development sites within the Huntingdon SPA will be required to demonstrate 'minimal impact' or 'nil detriment' on traffic flows on the A14 prior to the A14 improvements talking place.** Delete the next two sentences and add **Improvements will be needed to the three roundabouts on the A428 and other traffic management measures to mitigate the impact of development related traffic arising from the Core Strategy proposals.** (PC/5/03850A and B and PC/5/03900)

xii) Add to third item in the contributions list after "strategic green infrastructure" **and biodiversity enhancement mitigation;** (PC/5/04000)

xiii) Add to monitoring paragraph 6.5

….particularly the Huntingdon **Spatial Planning Area.** The next phase will see the start of strategic Greenfield development **that** will be dependent on the provision of a significant amount of infrastructure, **and in the case of sites close to the A14 in Huntingdon Spatial Planning Area demonstrate 'nil detriment' to the A14 if they wish to be developed prior to the A14 improvements.** Delete remainder of last two sentences. (PC/6/00050)

4 Other changes

4.01 The Council wishes to make several changes to the submitted Core Strategy in order to clarify, correct and update various parts of the text. They are often words of explanation which makes the Core Strategy easier to read and understand. Although these changes do not address key aspects of soundness, I endorse them on a general basis in the interests of clarity and accuracy. These changes are listed for convenience in the Annexe. The Annexe is a comprehensive list of all changes proposed by the Council, some of which have been further amended by me in this report.

5 Overall Conclusions

5.01 I conclude that, with the amendments I recommend, the Core Strategy satisfies the requirements of s20(5) of the 2004 Act and the associated Regulations, is sound in terms of s20(5)(b) of the 2004 Act, and meets the soundness requirements in Planning Policy Statement 12.

Eric T Searle
INSPECTOR

Annexe
Schedule *of changes put forward by the Council*