

**HUNTINGDONSHIRE REGULATION 123 AND INFRASTRUCTURE BUSINESS PLAN  
2013/14 LIST**

**(Report by Assistant Director Environment, Growth & Planning)**

**1. INTRODUCTION**

- 1.1 The purpose of this report is to recommend that the Cabinet approves the Huntingdonshire Community Infrastructure Levy (CIL) Regulation 123 List .

**2. BACKGROUND**

- 2.1 The CIL is a mechanism, introduced by Government in 2010, to allow local planning authorities to raise funds from development to pay for the infrastructure that is, or will be, needed as a result of new development. Cabinet has been kept informed of the development of the CIL Charging Schedule and its adoption by HDC Council in April 2012 with an implementation date of 1<sup>st</sup> May 2012.
- 2.2 The CIL Regulation 123 list restricts the use of planning obligations for infrastructure that will be funded in whole or in part by the CIL, to ensure no duplication between the two types of developer contributions (CIL and S106 agreements).
- 2.3 At its meeting on 21 March 2013, Cabinet approved a revised Draft Huntingdonshire CIL Regulation 123 List for public consultation.
- 2.4 The Government published a new Community Infrastructure Levy Guidance document in December 2012 which included changes to previous practice and stated that state that when charging authorities wish to revise their regulation 123 list in this way, they should ensure that these changes are clearly explained and subject to appropriate local consultation. The Draft Huntingdonshire CIL Regulation 123 list incorporating the IBP 2013/14 was consulted on for a period of 8 weeks from 2 April to 24 May 2013 inclusive.
- 2.5 The local consultation was publicised widely through a number of means, including:
- Email notification to all local planning authorities adjoining the district, the county council, parish/town councils, partner consultees, infrastructure providers and other organisations and individuals subscribed to the Limehouse consultation system
  - Email notification to partners through the Local Strategic Partnership
  - Letters to all Town and Parish Councils
  - Email notification to business networks
  - Notification to voluntary / community networks
  - Notification at the Neighbourhood Forum meetings
- 2.5 The document will also be available for anyone to access at:

- public libraries across the district
- Customer Service Centres across the district

2.6 Details regarding the consultation were also available on the Council website.

### **3. CONSULTATION RESPONSES**

3.1 Representations from 12 respondents were received within the consultation time. One response was received out of time. The key themes raised within the representations were regarding further projects for consideration and the impact speculative development could have on an area. Only 2 respondents stated that they did not support the approach taken in this work. The Council believes that it has adopted an appropriate approach and is in line with the regulatory requirements.

3.2 The detailed representations and related officer comments are shown at Appendix A.

3.3 Having considered the representations made, it is not considered that any changes or modifications to the document consulted on are required.

### **4. REGULATION 123 LIST**

4.1 A CIL charging authority is expected to publish on its website its approved Regulation 123 list of infrastructure that could be funded by CIL. Huntingdonshire District Council (as CIL Charging Authority) had its current Regulation 123 list published for 1<sup>st</sup> May 2012 implementation date and agreed this could be reviewed annually where necessary as part of its CIL governance process.

4.2 It is not considered that the revised Regulation 123 list that has been consulted on would have a significant impact on the viability evidence that supported examination of the charging schedule.

### **5. RECOMMENDATION(S)**

5.1 It is recommended that Cabinet:

- a) Approve the revised Regulation 123 List incorporating the Huntingdonshire Infrastructure Business Plan 2013/14.

#### **Background Papers:**

- Core Strategy 2009
- [http://www.huntingdonshire.gov.uk/SiteCollectionDocuments/HDCCMS/Documents/Planning%20Documents/PDF%20Documents/Local%20Development%20Framework/core\\_strategy\\_final.pdf](http://www.huntingdonshire.gov.uk/SiteCollectionDocuments/HDCCMS/Documents/Planning%20Documents/PDF%20Documents/Local%20Development%20Framework/core_strategy_final.pdf)
- CIL Examination documents, which can be found on the HDC website at <http://www.huntingdonshire.gov.uk/Planning/Community%20Infrastructure%20Levy/Pages/CommunityInfrastructureLevyExamination.aspx>
- Draft Regulation 123 List

- [http://www.huntingdonshire.gov.uk/SiteCollectionDocuments/HDCCMS/Documents/Planning%20Documents/PDF%20Documents/Local%20Development%20Framework/Draft%20Reg%20123%20List%202013\\_14.pdf](http://www.huntingdonshire.gov.uk/SiteCollectionDocuments/HDCCMS/Documents/Planning%20Documents/PDF%20Documents/Local%20Development%20Framework/Draft%20Reg%20123%20List%202013_14.pdf)
- 
- Huntingdonshire Infrastructure Business plan
  - [http://www.huntingdonshire.gov.uk/SiteCollectionDocuments/HDCCMS/Documents/Planning%20Documents/PDF%20Documents/Local%20Development%20Framework/Infrastructure%20Business%20Plan%202013\\_14.pdf](http://www.huntingdonshire.gov.uk/SiteCollectionDocuments/HDCCMS/Documents/Planning%20Documents/PDF%20Documents/Local%20Development%20Framework/Infrastructure%20Business%20Plan%202013_14.pdf)

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Representations on the Draft Huntingdonshire CIL Regulation 123 List

Name, Company/ Organisation	Comment	Officer View
Mr John Atkinson	Agreed the Council has adopted the right approach in developing the Draft Regulation 123 List as required by the CIL Regulations 2010 (as amended).	Support noted.
Roy Reeves Warboys Parish Council	I noticed that there was nothing included for Warboys. Is that because there is little development scheduled for Warboys in the new Local Plan? However with the expected free for all with effect from yesterday with the NPPF changes, where does that place Warboys if we get some large speculative proposals for development?	The infrastructure detailed in the Infrastructure Business Plan (IBP) is based on infrastructure requirements supplied by infrastructure partners based on growth in the Core Strategy to 2026. It has not taken into account potential 'in fill' development nor can it foresee future speculative development. If a large scale speculative development came forward for Warboys then the needs for that development would be considered as usual in line with policy requirements.
Angela Atkinson Marine Management Organisation	Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. As this does not have consequences for the work of the MMO we have no comments to submit in relation to these consultations.	Noted.
Rick Carroll Head teacher at Longsands Academy.	I have spent time looking at all documentation and raise concern that with reference to Secondary Schools in St Neots it is recorded as no Project Detail. I worked with fellow Head teachers of the Secondary provision in St Neots to produce a detailed business plan for the necessary expansion at both Longsands and Ernulf.  Please can you explain why this has not been acknowledged? I wish to support the use of CIL monies as much as possible to ensure the best possible educational facilities for out young people.	The Infrastructure Business Plan does not record the secondary schools expansion project in St Neots as " No project detail" but records it as a "Project". Respondent has been contacted to discuss and has stated that following the reassurance that the Secondary requirements for education are incorporated in the business plan, he is "happy with draft documentation."
Ann Enticknap St Ives Town Council	Members considered that clarification should be sought on where the St Ives West money would be allocated to as although the development was in Houghton Parish, it was considered part of the St Ives Planning Area. No specific schemes had been identified for Houghton The HDC Business Plan which included CIL schemes do not include improved access to the town from the Marsh Harrier and adjacent area and no improvements were planned on either the A1123 or A1096 which, it was considered, ought to be included. Mention was made of a Library on Cromwell Road. As this road did not exist comment should	Unlike Section 106 developer obligations, CIL receipts are not tied to the development area to which they relate. The Infrastructure Business Plan 2013/14 has recommended CIL project spend for the current financial year and this has been approved by Cabinet. CIL funding is limited and prioritisation will need to

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	<p>be made. It was noted that the existence of a Neighbourhood Plan would enable 25% of CIL money to go to the Town Council, but not having one would lead to a cap of £100 per property in the Town.</p>	<p>be agreed of the projects that can be funded. Other complementary funding sources will be required to deliver many elements of infrastructure.</p> <p>The Council has recently started work to develop the 2014/15 Infrastructure Business Plan. Town and Parish Councils have already been written to on this and asked to submit their top infrastructure priorities. The Town Council are asked to ensure the projects highlighted in their response are noted within their reply to that letter to feed into the next stage of the IBP process.</p>
<p>Chris Swain Environment Agency</p>	<p>The Environment Agency welcomes the opportunity to feed into the proposed Regulation 123 List amendment.</p> <p>We support the CIL charging schedule, and the recognition in the associated Infrastructure Business Plan that waste water treatment and water supply are critical elements of infrastructure for sustainable growth. We also support the use of prioritisation categories (on page 4) so that all involved can be clear about priorities over time. We recognise that whilst CIL receipts are lower than expected, that there is value in building up a substantive pot to achieve meaningful outcomes later on.</p> <p>The viability assessment work will need to factor in the costs of infrastructure funded by other means, such as waste water, as this has the potential to have a significant impact on the availability of funding for less critical infrastructure. Water companies are continuing to plan infrastructure as part of their business planning round for 2014 and we advise keeping track of this for areas such as Alconbury where options with significant cost elements are still being appraised.</p> <p>As surface water management planning develops around the county, we advise staying abreast of projects where CIL might unlock further flood defence or Water Framework Directive grant in aid funding. These may have the potential to provide significant benefit relative to the contribution.</p> <p>We look forward to continuing our joint working around the District and updating one another on opportunities and risks for delivering sustainable growth and infrastructure as the context evolves.</p>	<p>Support noted of document and prioritisation process.</p> <p>The Council fully supports the recognition of the importance of other funding streams, such as the utility company asset management plans. Work has recently started on the 2014/15 Infrastructure Business Plan, which will include sites from the Local Plan Stage 3 consultation that are not part of the existing Core Strategy, such as Alconbury.</p> <p>The involvement of the Environment Agency in the Huntingdonshire Strategic Partnership Growth &amp; Infrastructure Group is welcomed and will ensure that all water matters are fully considered in the IBP preparation.</p>
<p>Paul Ryan The Stukeleys Parish Council</p>	<p>Huntingdonshire is expected to have a lot of development over coming years so it is important that sufficient funding is available to implement necessary public works across the district to maintain quality of life. If sufficient new funding, for example from developers, is not provided</p>	<p>Support of developer contributions noted. The contributions from CIL and S106 are linked to a number of factors including development mitigation, viability and the need for sustainable growth.</p>

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	<p>then the shortfall would have to be made up from local taxation which penalises the population and is a drag on the economy. We support the principle that major developments should directly pay for necessary public works (for example by S106) closely associated with the development and, via CIL, for development and investment requirements more widely. We believe that development payments by S106 and via their CIL contribution should be sufficient to pay for all necessary development throughout the district. The forecast shortfall of CIL indicates this is not the case and is a major concern.</p> <p>There remains the risk of reduced developer contributions (via CIL or S106) as a result of “affordability” analysis; this should be resisted. If a development cannot afford to fund necessary public works then it shouldn’t go ahead.</p> <p>The consultation refers directly to: “Draft Huntingdonshire Community Infrastructure Levy: Regulation 123 Community Infrastructure Levy Regulations 2010 (as amended) List”</p> <p>We generally support the principles in this. However it makes reference to the “Infrastructure business plan” and we have a number of comments on this document, listed below. It is a classic example of the “Devil is in the Details”.</p> <p><b>1 Utilities</b></p> <p>We note that utility development costs are included in the lists with a note showing “CIL” as a potential contribution e.g. P77:</p> <table border="1" data-bbox="421 1114 1234 1313"> <thead> <tr> <th rowspan="2">Project Type Summary</th> <th rowspan="2">Locality</th> <th rowspan="2">Project Type Detail</th> <th rowspan="2">Project Name</th> <th rowspan="2">Project Status</th> <th colspan="3">Potential Contributions</th> </tr> <tr> <th>CIL</th> <th>S106</th> <th>Other</th> </tr> </thead> <tbody> <tr> <td>Utilities</td> <td>Huntingdon</td> <td>Water &amp; Sewage</td> <td>New Strategic Sewer</td> <td>Project_No Detail</td> <td>CIL</td> <td></td> <td>AMP</td> </tr> <tr> <td></td> <td>Huntingdon</td> <td>Water and Sewerage</td> <td>Improvements required at Brampton WWTW</td> <td>Project_No Detail</td> <td>CIL</td> <td></td> <td>AMP</td> </tr> <tr> <td></td> <td>Huntingdon</td> <td>Electricity</td> <td>Godmanchester general works</td> <td>Project_No Detail</td> <td>CIL</td> <td></td> <td>AMP</td> </tr> <tr> <td></td> <td>Huntingdon</td> <td>Gas</td> <td>Mains Reinforcement</td> <td>Project_No Detail</td> <td>CIL</td> <td></td> <td>AMP</td> </tr> </tbody> </table> <p>The discussion on P111 says “The funding for utilities at a strategic level is usually paid for by the respective utilities company through their asset management plans”.</p> <p>We ask that it is made clear that ALL investment required for utilities infrastructure development is paid for by the (for-profit) utilities companies and none is taken from CIL or (for works not closely associated with new land developments) from other developer contributions. The latter consideration is relevant because demands on develop S106 contributions for utilities (which</p>	Project Type Summary	Locality	Project Type Detail	Project Name	Project Status	Potential Contributions			CIL	S106	Other	Utilities	Huntingdon	Water & Sewage	New Strategic Sewer	Project_No Detail	CIL		AMP		Huntingdon	Water and Sewerage	Improvements required at Brampton WWTW	Project_No Detail	CIL		AMP		Huntingdon	Electricity	Godmanchester general works	Project_No Detail	CIL		AMP		Huntingdon	Gas	Mains Reinforcement	Project_No Detail	CIL		AMP	<p>Whilst there is a shortfall in CIL receipts to meet infrastructure delivery, this is not new and has always been the case. Other funding mechanisms must also be considered.</p> <p>CIL rates have been set through a formal process and are mandatory. S106 has always been through a negotiation process. If viability is raised this is considered as set out within the Developer Contributions Supplementary Planning Document.</p> <p>Support of the principles within the Regulation 123 list is welcomed.</p> <p>The funding for utilities is noted as ones that could <u>potentially</u> receive CIL funding. All infrastructure items have clearly been identified if they could legally receive CIL funding. It is not to state that the item would receive. The Council recognises the government funding process already in place for utility companies and one of the objectives of the IBP is to prioritise projects that would receive money. This financial year that has only been agreed for the Huntingdon West Link Road.</p> <p>The IBP 13/14 has not stated many items for the smaller settlements as there is likely to only be infill growth in those areas. No reference is specifically given to requirements due to the growth from the Alconbury Weald proposal as this is not development within the approved Core Strategy. However, the Council has recently started work to develop the 2014/15 Infrastructure Business Plan, which will include sites from the Local Plan Stage 3 consultation including those that are not part of the existing Core Strategy, such as Alconbury Weald. Town and Parish Councils have already been written to on this and asked to submit their top infrastructure priorities.</p> <p>It will be for each Town and Parish Council to determine locally their priorities for spending any ‘meaningful proportion’ that they receive,</p>
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	<p>are likely to be “critical”) would tend reduce their CIL contribution via the “affordability” consideration.</p> <p><b>2 Smaller settlements</b></p> <p>We see in Appendix A many projects for the SPAs and KSCs and very few for smaller settlements. Obviously, larger projects may be better sited within the larger settlements but this should not be to the exclusion of improvements to smaller ones. As an example, we see CIL funding scheduled for community buildings and play space in the SPAs. Here, in The Stukeleys, we have had to rely on grant funding and local taxation to pay for improvements to our (GS) village hall and play spaces. In the discussion below we outline specific local projects we would like to see implemented. In consideration of projects listed for the SPAs and KSCs, our local projects should not be funded from the 15% “meaningful proportion” that may come to SPC from Alconbury Weald (noting, of course, that “Northbridge” was removed from our Parish, so HTC will benefit from that development’s 15%).</p> <p><b>3 Transport</b></p> <p>This is the main concern of the population in regard to new developments, in particular roads congestion. The degree of development forecast for the District, and Huntingdon area in particular, will have a major impact. Obviously the “A14” issue causes uncertainty, but it is very likely that parts of the local road network will suffer congestion whatever happens to the A14.</p> <p>We have commented previously on transport assessments offered by major developers, saying that the are often optimistic about congestion and do not properly address the effects of combinations of development. A significant deficiency of recent transport assessments of major projects has been that junctions have been modelled in isolation rather than in combination. Hence “backing up” from one junction to a previous has not been included. In particular we are very concerned about the Huntingdon northern bypass (A141) and the “iron bridge” junction (Stukeleys Road &amp; St. Peters Road) in relation to forecast developments of “Northbridge”, Alconbury Weald and Wyton Airfield. Congestion at this junction will be made worse by additional traffic flow attracted by the new Huntingdon West bypass route. It appears to us that the roads works proposed by developers are insufficient to deal with traffic impact more widely in the District. If this turns out to be the case then there will be a call on local authority funds to address the consequences. Whole-district modelling should be undertaken, trying whatever solutions can be conceived. Costs of these solutions should be apportioned to new developments.</p> <p>However, we do not support general development of the roads network simply to allow for increase in one-person-per-car travel because this would significantly degrade amenity and the environment. It is disappointing that the priorities assigned to transport projects listed in Appendix A suggests emphasis on car travel rather than more sustainable modes. This is, of course, contrary to the agreed Cambridgeshire transport objectives. To maintain (and hopefully improve) quality of life in the District, we need to achieve modal shift away from private car</p>	<p>recognising that this is not new money but part of the available funding to meet infrastructure needs. The Council wishes to work with local communities on this matter.</p> <p>Transport is a key infrastructure consideration. Details for individual sites are approved in partnership with Cambridgeshire County Council and the Highways Agency, utilising agreed transport assessments and traffic modelling. This is part of the development management process and undertaken in line with appropriate legislative requirements.</p> <p>The Council supports alternative modes of transport but it cannot ignore that Huntingdonshire is a rural area with particular reliance on car travel to achieve economic growth. The Council continues to work with CCC on its transport agenda that looks to achieve modal shift where appropriate and work is now commencing on the development of a Cambridgeshire Long Term Transport Strategy (to 2050) and it is expected that this will consider many of your issues raised. This Council is clear that it wishes this work to provide a much clearer plan of what Huntingdonshire will look like in transport terms through to 2050.</p> <p>The reference to additional transport projects is noted. The Parish Council is asked to ensure the projects highlighted in their response are noted within their reply to that letter referred to earlier in order to feed into the next stage of the IBP 14/15 process.</p> <p>The school education projects within the IBP 13/14 have been submitted by the LEA, with its partners, and have been determined from the growth trajectory.</p>

Name, Company/ Organisation	Comment	Officer View
	<p>travel. In particular we ask for much more significant support for bus priority, walking and cycling. In the projects list it appears the last two are regarded as leisure pursuits rather than realistic and attractive daily travel options. It should not be so.</p> <p>Around our Parish, particular projects we ask for:</p> <ul style="list-style-type: none"> <li>• Traffic calming on Ermine St.</li> <li>• Creation of strategic green space around Grange Farm, and its protection from development in perpetuity.</li> <li>• Hard-surface off-road cyclepath connecting:               <ul style="list-style-type: none"> <li>○ Stukeley Meadows, “Northbridge”, Gt. and Lt. Stukeley to Alconbury village and further North. E.g. as Sustran’s proposed re-routing of national cycle route 12</li> <li>○ St. Peters Hill, Great Stukeley, Alconbury Weald, Abbots Ripton and further North towards the Great Fen project</li> </ul> </li> </ul> <p>Around Huntingdon town, priority projects should include:</p> <ul style="list-style-type: none"> <li>• A141 Northern bypass. Though “more roads” should not be the preferred solution to increase transport demand, it is clear that this route will need modification.</li> <li>• “Iron Bridge” junction. It is constrained by the railway/bridge and existing buildings so there are few opportunities to improve flow and increase capacity. However, doing nothing will not be acceptable since it will be the main access to the town from the NW, including the new developments of Northbridge and Alconbury Weald.</li> <li>• River crossing. We should expect large changes in traffic flows as a result of whatever changes are made to the A14. However, we should not simply expect big reductions. Modelling will be needed to inform us of possible consequences. Whatever is the outcome, river crossing will be critical and the old town bridge could suffer in fabric, amenity and congestion. These must be avoided.</li> <li>• Town centre cyclepaths. To encourage modal shift for daily travel, we need to improve cycle connectivity around and through the town centre. It is unacceptable that there is no N-S or E-W routes through the centre. Likewise, connections to immediate residential areas need to be good and this is not the case from the large area NE of the centre; Though there is a cyclistroute through the area, it stops before the ring road leaving users with a daunting barrier and expected to travel around the ring road to continue their journey.</li> <li>• Hinchingsbrooke park connections. Presently, both the residential and (separated) employment area are isolated from the town centre and from NW Huntingdon. Most residents/employees see the only option to be private car, hence the congestion at the junction to Brampton Road. Alternative sustainable and attractive modes of transport need to be provided.</li> </ul> <p><b>4 Education</b></p> <p>It is correct to fund Education infrastructure via S106 and CIL contributions. However, the</p>	



Name, Company/ Organisation	Comment	Officer View
	<p>details need careful attention, particularly in relation to:</p> <ul style="list-style-type: none"> <li>• Location, convenience and sustainable travel</li> <li>• Value for money</li> </ul> <p>We note from recent discussions in connection with Alconbury Weald that strategy for provision of College education around the north of the District is unresolved, but there are likely to be implications for Huntingdon Regional College and Sawtry College. This needs to be resolved; development of Alconbury Weald will rightly have a significant impact on provision and appropriate location. Large investments are involved and it is critically important to ensure these are wisely made. In particular, the listed projects for HRC California Road should only be made if there is a commitment that the site will remain the main location of the College and it will not move or split to other sites such as Hinchingsbrooke or Alconbury Weald. Relevant timescales for restrictions should reflect the scale of investment. For investments of the scale indicated in the projects list we would expect the commitment to extend over, say, 20 years. Considering the uncertainty over college provision in the area, it would be wise to resolve the strategy before spending the money.</p> <p>Local to The Stukeleys we have the issue of primary school provision for children in our Parish. At present our children are not allocated to the nearest primary school at Stukeley Meadows with the consequence of less sustainable and convenient travel into Huntingdon town. It appears there is a risk that this will be repeated in connection with "Northbridge" where the primary school (planned as 1.5 FE) so our children will end up being bussed past two schools. Much better would be to make the small additional provision at Northbridge so that many of our children could walk or cycle to school.</p>	
<p>Dan Clarke Capital and Funding Manager Cambridgeshire County Council</p>	<p>Thank you for inviting comments on your Draft Regulation 123 List. We have previously worked with Huntingdonshire officers inputting into the business plan infrastructure requirements needed to support development within Huntingdonshire.</p> <p>We do however have concerns over the significant funding shortfalls for infrastructure, and as such it will be important that the most critical and essential infrastructure receives funding to support sustainable growth in a timely manner. In this regard we want to work with Huntingdonshire on prioritisation of infrastructure and agreement on what will be funded and when.</p> <p>We recommend the development of a protocol to provide greater clarity on priorities and how funding will be shared and allocated to delivery bodies such as ourselves towards priority infrastructure. There is a real risk that without this certainty that essential infrastructure could be delayed unless CIL funding is made available for infrastructure projects in a timely manner.</p> <p>Given the significant funding gap, it will be important that we work in partnership to ensure as far as possible that future CIL related neighbourhood funding should be directed towards</p>	<p>The Council has and continues to welcome the County Councils (CCC) input into the infrastructure planning process.</p> <p>The infrastructure funding shortfall has been acknowledge and recognised from all past infrastructure planning and CIL nor S106 should never be seen as the only funders of infrastructure. The Council welcomes CCC membership of the Local Strategic Partnership Growth &amp; Infrastructure Group which leads on the development of the business plan in partnership.</p> <p>The IBP is the process through which agreement is reached, with Cabinet approval, of the priorities for funding from CIL. The IBP also provides a mechanism for considering all other potential funding opportunities to maximise infrastructure delivery.</p>

Name, Company/ Organisation	Comment	Officer View
	<p>essential infrastructure requirements in the first instance before being considered towards additional aspirational requirements.</p> <p>Other matters raised by officers include the need for the Business Plan to properly prioritise infrastructure such as the Secondary School expansions at Ernulf Academy and Longsands Academy at a potential cost of £17m. These two schools will accommodate pupils from the Wintringham park development and are critical to the deliver of the development. There is a similar issue in St Ives where additional primary school places equivalent to 1FE (30 places) at Eastfields/Westfields/Wheatfields. are required to support development. Clarity is sought as to how these will be funded.</p> <p>Pressure on CIL contributions will be particularly acute within Huntingdonshire in the immediate and medium term. This is given the scale of infrastructure requirements, plus commitments to repaying loans for West of Town Centre Link Rd from CIL. It is currently anticipated that approx £5.4m is required. This is anticipated to leave less than £1.4m towards essential infrastructure to 2016 when the cost of this alone has been estimated to be £37.87m. Further prioritisation is needed to ensure there is real clarity early over what CIL funding will be available over the next 3 years to help deliver critical and essential infrastructure.</p> <p>In answer to the consultation question;</p> <p>'Do you consider the Council has adopted the right approach in developing the Draft Regulation 123 List as required by the CIL Regulations 2010 as amended?'</p> <p>We consider the approach being taken by Huntingdonshire to be appropriate as long as the business plan is reviewed on an iterative basis, ensuring that it accurately reflects the infrastructure needed to allow development.</p>	<p>The 'meaningful proportion' allocated to Town and Parish Councils from CIL receipts can be spent on the priorities determined by the local community. The Council, with its partners, will work with the Town and Parish Councils to support them in this process to consider their local needs in full. It is not the purpose of the IBP to provide the answers and funding for all infrastructure delivery. The Council and all its partners need to consider all funding options, as has already been highlighted, the CIL contribution will only be able to support the minority, not the majority, of infrastructure requirements.</p> <p>The CIL contribution levels and timeframe for the Huntingdon West Link Road have yet to be agreed. The Council and CCC are already working with partners to develop the IBP 2014/15 to consider further prioritisation. Support of the approach being taken is welcomed. It has already been agreed with partners that the IBP will be reviewed annually, as necessary.</p>
Simon Sutton	<p>Does not consider the Council has adopted the right approach in developing the Draft Regulation 123 List as required by the CIL Regulations 2010 as amended.</p> <p>The planning outlines for the Sawtry section of this "Draft" have only just come to light for the residents of Sawtry. The whole thing seems to have been worked out behind the backs of residents and parish councilors alike. I am confused at the wording used, "consultation" ..? At what point have we been consulted over these potential planning applications?</p>	<p>Comment noted. The Council believes that it has adopted an appropriate approach and is in line with the regulatory requirements. All Parish Councils have been kept informed of work on the community infrastructure levy and associated infrastructure planning. The document is regarding strategic planning requirements. Planning applications are consulted on individually.</p>
Mrs Sarah Wilson Godmanchester	<p>Does not consider the Council has adopted the right approach in developing the Draft Regulation 123 List as required by the CIL Regulations 2010 as amended. Godmanchester TC consider this consultation document to be incomprehensible and not fit for</p>	<p>Comment noted. The Council believes that it has adopted an appropriate approach and is in line with the regulatory requirements.</p>

Name, Company/ Organisation	Comment	Officer View
<p>Town Council</p>	<p>purpose. It is impossible for us to comment fully and effectively, following your guidelines, without seeking legal, technical and financial advice.</p> <p>Godmanchester TC continue to have a fundamental objection to any large scale development in Godmanchester.</p> <p>We note Executive summary 1.1 and implementation and Monitoring 7.2 which state "... living document and will be consistently reviewed in order to respond to emerging proposals.....does not represent an exhaustive list ..... expected to be refined.. or amended. This indicates to us this document is very fluid and is allowing HDC to regularly change its mind, and also that this consultation is part of a tick box exercise. We are consulting on shifting sand. It is interesting HDC holds this document as fluid, when other planning documents like the adopted local plan are considered sacrosanct. We expect certainty about the process going forward including clear timetable and process for future consultation</p> <p>We note the discussion about Alconbury Weald Enterprise zone is not formally included within this document except as a discussion item, as Alconbury Weald is not in current local plan, or Core Strategy. This development is huge, 5000 houses, representing a proposal that will nearly double housing units to be built in Huntingdonshire if everything proceeds. It would have been helpful if HDC produced figures with and without Alconbury Weald.</p> <p>HDC has previously pledged £8M towards the funding of the upgrading of the A14. Within this CIL document £1.98M is pledged. Where is the extra £6M to come from?</p> <p>The following comments relate to Huntingdon SPA specific sites, Bearscroft Area, which is highly relevant to Godmanchester TC. This site does not yet have planning permission, and any comments we make here should not prejudice due planning process. As stated before, Godmanchester TC continue to have a fundamental objection to this development.</p> <p>Cash flow and spending plan 6.6 . We note the emphasis on providing the enabling infrastructure to the sites within Huntingdon SPA speedily to secure these future CIL receipts. We trust the planning application for Bearscroft is considered on its own merits, not on its ability to bring in future CIL.</p> <p>Appendix A . infrastructure project list. Huntingdon SPA specific site Bearscroft farm.</p> <p>We are surprised to see a list of projects to potentially be funded by s106. We assume these are general lists subject to amendment at a later stage. It is impossible to know what has been included or excluded, and we request further information about what is provided under each of the headings. The list of planning obligations proposed by GMC TC is still under discussion, so the list in appendix A is incomplete.</p> <p>We are highly surprised to see costing for the above projects to the exact pound. For example - Children and young people's play space- £457,589. Please can tell us how these precise figures were arrived at?</p> <p>Appendix C- project categorisation Huntingdon SPA Bearscroft</p> <p>We are disappointed and object to the prioritisation categories allocated to the projects at Bearscroft. If this development proceeds it represents a huge 25% increase in the population of GMC. All the given categories, allotments, play space, community, recreation and primary education, are considered essential to reduce potential detrimental effect on the current population of GMC, and to provide a sustainable environment for current and future residents.</p>	<p>It is acknowledge that the document is a complex one. The chapters have been written to provide information as clearly as is possible and the appendices provide the detailed breakdown of infrastructure requirements.</p> <p>The Regulation 123 and associated IBP 13/14 is not part of the planning suite of documents and does not provide any policy for what development will or will not happen. It needs to be seen as a 'living' document as new sites come forward or delivery timescales change that would impact on infrastructure delivery. That is not to change whether it could or could not be funded via CIL, the purpose of the Regulation 123 list.</p> <p>It would not have been appropriate to include full details on Alconbury Weald at this stage. The IBP 14/15 will include this site.</p> <p>The A14 is highlighted in its original plan. A revised scheme has yet to be formally agreed. The £1.98 billion was the HA estimated cost of the scheme. The £8 million you refer to is with regards the on-going development work for the revised scheme.</p> <p>As noted above, the Regulation 123 and associated IBP 13/14 is not part of the planning suite of documents and does not provide any policy for consideration in the assessment of planning applications.</p> <p>The details shown from S106 projects listing for strategic sites is to identify infrastructure items that will fall within the S106 requirements, and so cannot be funded by CIL. The document states that it aims to reflect the latest understanding of requirements and must not be taken to represent an exhaustive list of requirements through to 2026.</p> <p>The projects and costs are indicative in many cases. Where more precise figures are shown, theses are calculated using the policy and calculations within the Developer Contributions SPD. However, they are also noted as "need project". Once firmer detail is known the cost would be updated accordingly in the next review. It is fully recognised that infrastructure items are</p>

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		important to communities. Given the limited funding, prioritisation is the only option. The criteria used is explained in table 4.1 and highlights the difference between those that are critical to enabling development and mitigating impact arising from the development and those that are important to deliver good place making principles, but would be appropriate to deliver at a later date.
Ramune Mimiene, Assistant Clerk Brampton Parish Council	<p>Outlined below Brampton Parish Council's interpretation, and a few observations, on the Infrastructure Business Plan (IBP) 2013-14 – Consultation Draft.</p> <ul style="list-style-type: none"> <li>• Process logic outlined well, with separate Sections reflecting different elements of the analysis. <ul style="list-style-type: none"> <li>○ Section 2 – full review of policy content.</li> <li>○ Section 3 – List of currently identified projects.</li> <li>○ Section 4 – Prioritization process for infrastructure.</li> <li>○ Section 5 – Outcomes of initial prioritization undertaken as part of this IBP.</li> <li>○ Section 6 – Cashflow modeling required for CIL, S106 or other means.</li> </ul> </li> <li>• One of the early recommendations in the report is that funding for the Huntingdon West Link road, identified as a Critical Short Term project, be approved forthwith to allow pre-conditions project work to proceed.</li> <li>• The IBP seeks to foster shared ambitions between delivery partners and ensure that development in Huntingdonshire is supported by required infrastructure.</li> <li>• It will be updated annually and be continually revised to keep pace with delivery requirements across the district.</li> <li>• CIL provides developers with certainty over costs applicable to development; as well as planning authorities with the flexibility to direct funds to infrastructure as appropriate.</li> <li>• It is intended to simplify the process of developer contributions, by providing the infrastructure to support the development of an area, rather than having to make individual planning applications in that area (the purpose of S106 agreements).</li> <li>• An important distinction (at para 2.21) is that neighbourhoods which accept development through a Neighbourhood Plan will get 25% from CIL; whereas those without such a plan will be restricted to 15%. <ul style="list-style-type: none"> <li>○ The definition of 'local' needs definition.</li> <li>○ Councils therefore need to work with the HDC and the Local Strategic Partnership (which is??) for planning to take place in partnership – <i>a bit of a non sequiter!</i></li> </ul> </li> <li>• The Huntingdonshire Core Strategy already sets out the strategic spatial planning framework out to 2026.</li> <li>• At para 2.27 there is CIL rate per square metre by building class.</li> <li>• <u>Section 3, Table 3.1</u> lists the multi-area projects necessary to deliver the core strategy. <ul style="list-style-type: none"> <li>○ Split between education; green corridors; major green sites; bus; and roads.</li> <li>○ Under Roads is listed the West Link Road; A141/Sawtry Way junction improvement; A14</li> </ul> </li> </ul>	<p>Support of process logic welcomed. It is noted that the definition of local will vary. In terms of the 'meaningful proportion', local communities are defined as Town and Parish Councils.</p> <p>The infrastructure types notes in the IBP are, as stated in response, comprehensive. No further sub-headings were submitted. However, the Council has recently started work to develop the 2014/15 Infrastructure Business Plan, which will include sites from the Local Plan Stage 3 consultation including those that are not part of the existing Core Strategy, such as Alconbury Weald. Town and Parish Councils have already been written to on this and asked to submit their top infrastructure priorities.</p> <p>Affordable housing is as defined in the National Planning Policy Framework.</p> <p>The HDC CIL Instalment Policy has been approved and is now in place. The policy supports scheme viability and does not alter the end level of receipts that will be received.</p>

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	<p>Ellington to Milton; and A1 Buckden roundabout improvement.</p> <ul style="list-style-type: none"> <li>• Spatial Planning Area Projects are covered at para 3.10; and under the Huntingdon SPA:               <ul style="list-style-type: none"> <li>○ RAF Brampton is listed for approx 49ha of land for mixed use development to include approx 400 homes, 3.2ha of employment land, 300m2 of retail floor space and community facilities.</li> <li>○ Although not mentioned specifically in the Core Strategy, Alconbury Weald's designation as an Enterprise Zone in 2011 means it has implications for future planning considerations. It will be included in the emerging Local Plan to 2036.</li> </ul> </li> <li>• Table 3.2 identifies the Huntingdon SPA projects necessary to deliver the Core Strategy; and identifies where the funding line will fall, ie CIL, S106 or other.               <ul style="list-style-type: none"> <li>○ Projects are listed under Allotments, Play Space, Cemetery, Community, Police, Library, Leisure and Recreation, Education, Healthcare, Major Green Sites, Bus, Road, Walking and Cycling, Water and Sewage, Electricity, Gas, and Econ &amp; Regeneration.</li> <li>○ So fairly comprehensive..... <b>but are there further additions we need to make under each of these sub-headings?</b></li> </ul> </li> <li>• The CIL Infrastructure Prioritization – at <u>Section 4</u> – makes the point that a target of at least 14,000 homes need to be built from 2001 to 2026 to achieve the Core Strategy. So detailed development trajectories are required and need to be continuously reviewed, as changes and agreements occur.</li> <li>• Fig 4.1 provides a conceptual line diagram of the Project Interdependencies necessary from 2012 onwards.</li> <li>• CIL Implementation covers:               <ul style="list-style-type: none"> <li>○ Short Term Projects – one year period – 2013/14</li> <li>○ Medium Term Projects - two year period – 2014/15 &amp; 2015/16</li> <li>○ Long Term Projects - remaining period – 2016-2026</li> </ul> </li> <li>• <u>Section 5</u>, Table 5.1 covers these project periods against time-line and Table 5.2 covers Huntingdon SPA in particular; with projects listed as above.</li> <li>• <u>Section 6</u> outlines the Cash Flow and Spending Plan. The estimated CIL receipt income is based on the following assumptions:               <ul style="list-style-type: none"> <li>○ A revised Dec 12 housing trajectory is to be used as the planning baseline.</li> <li>○ An average unit size of 82sqm is to be applied.</li> <li>○ An affordable housing rate of 40% is applied to all developments – <b>but what is the definition of affordable?</b></li> <li>○ Calculations are based on a CIL rate of £85 per sqm</li> <li>○ HDC CIL payment installment policy allows payments to be spread over more than one year on large developments – <b>an adverse affect for receipts from RAF Brampton site?</b></li> </ul> </li> <li>• Analysis suggests that across the district some £33m could be collected 2012 to 2026.</li> <li>• However during the short and medium term only £1.6m and £6.3m could be collected.</li> <li>• <b>Other funding options are described at paras 6.7 to 6.9; with the implication that shortfalls will exist.</b></li> <li>• Indeed a funding gap does exist and is outlined at 6.13 onwards: it is substantial.               <ul style="list-style-type: none"> <li>○ As 6.14 makes clear the long term imbalance/shortfall of some £1.6billion can be reduced to</li> </ul> </li> </ul>	

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	<p>£100m by the removal of three large scale transport projects (A14 Ellington to Milton; and A1 Buckden roundabout improvement ;and the A428 Caxton Common to A1) – if they are then funded by the Highways Agency.</p> <ul style="list-style-type: none"> <li>○ Outside projects prioritized as critical, short term essential and policy high priority are recorded in the two largest SPA – Huntigdon and St Neots.</li> <li>○ Importantly, the report acknowledges that these two areas are also the two greatest contributors to the CIL pot; so this interdependency must be taken into account when prioritizing the spending of CIL income.</li> </ul> <p><b>Note: I have made no attempt here to go into the specific line entries of costs vs individual projects – an assumption is made that these are accurately derived.</b></p> <p>Appendix A lists the Full Infrastructure Project list, and whether each project has a funding contribution; and whether it has started or is complete; is to start by a date; and what the completion target date is.</p> <ul style="list-style-type: none"> <li>• The Huntingdon SPA S106 projects are separately listed, as are other SPAs.</li> </ul> <p>Appendix B shows the CIL Applicable Housing Trajectory; which indicates in the first table that some 7025 new units will have been completed by 2025/26 across the district.</p> <ul style="list-style-type: none"> <li>• Specifically within the Huntingdon SPA the total is 2579: with 200 at Huntingdon West; 400 at RAF Brampton; 750 at Bearscroft Farm; and 190 at other sites.</li> <li>• The 400 units on the RAF Brampton site will accumulate at 80 units per year between 2015 and 2020.</li> </ul> <p>Appendix C provides a Project Categorization in an overall sense, but there is no attempt made here to categorize them across the district in a priority order: as this will be entirely dependent on the individual SPA CIL and S106 et al allocations and their own preferences.</p> <ul style="list-style-type: none"> <li>• Not an easy process to see a way ahead on currently.</li> </ul> <p>Appendix D is a Funding Source Review – and outlines the areas of involvement by the 3 main organizations with access to funding, namely:</p> <ul style="list-style-type: none"> <li>• HDC,</li> <li>• CCC, and</li> <li>• the Greater Cambridge Greater Peterborough Enterprise Partnership (The LEP);</li> </ul> <p>with explanations provided as the role and authorities vested in these organizations.</p> <p>Sources of funding are identified and do make for quite interesting reading; indeed the various tolling options for the A14 are covered but with no decision as to the level of toll or the collection process.</p>	
Tom Gilbert- Wooldridge English Heritage	<p>Thank you for the email dated 2 April consulting English Heritage on the above list. We do not wish to make specific comments, but would like to offer the following general observations:</p> <p>English Heritage recognises the importance of Community Infrastructure Levy (CIL) as a source of funding to deliver the infrastructure required to underpin the sustainable development within Huntingdonshire. English Heritage advises that CIL charging authorities identify the ways</p>	<p>Note no specific comments to make.</p> <p>The Council supports the conservation and enhancement of the historic environment. The observations stated are noted.</p>

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	<p>in which CIL, planning obligations and other funding streams can be used to implement the strategy and policies within the Local Plan aimed at achieving the conservation and enhancement of the historic environment, heritage assets and their setting, in accordance with paragraphs 6, 126 and 157 of the NPPF.</p> <p>In terms of using the CIL to fund infrastructure, although the historic environment is not mentioned explicitly by Section 216 of the Planning Act 2008 (as amended), it can form part of different infrastructure types. Roads and other transport facilities may include historic structures (such as bridges); school facilities can include historic buildings; and open/recreational spaces can contain archaeology and/or form part of the character and setting of designated heritage assets such as listed buildings and conservation areas. Heritage assets can also be described as community infrastructure in their own right (such as specific tourist attractions). The Localism Act also allows CIL to be used for maintenance and ongoing costs, which may be relevant for a range of heritage assets. At the same time, it is important that any CIL projects minimise any harm that might be caused to heritage assets.</p> <p>Development specific planning obligations (e.g. S106 agreements) continue to offer further opportunities for funding improvements to and the mitigation of adverse impacts on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets.</p> <p>The CIL Regulations emphasise the need to strike an appropriate balance between the desirability of funding infrastructure from the levy with the potential effects which CIL might have upon the economic viability of development across its area. This is an important consideration for any development proposals involving or affecting heritage assets, where development costs may be increased due to the special considerations necessary. We note that the Council can offer discretionary relief for exceptional circumstances, and suggest that such relief could be applied to schemes affecting specific heritage assets. For example, CIL relief could enable the restoration of heritage assets identified on English Heritage's Heritage at Risk Register.</p> <p>We hope that the above comments are of use.</p>	

Consultation response received after the closing date

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<p>Mrs Gail Stoehr Cambridgeshire Local Access Forum</p>	<p>This submission constitutes formal advice from the Cambridgeshire Local Access Forum. Huntingdonshire District Council is required, in accordance with section 94(5) of the Countryside and Rights of Way Act 2000, to have regard to relevant advice from this forum in carrying out its functions.</p> <p>The Cambridgeshire Local Access Forum has considered the consultation being carried by Huntingdonshire District Council on its Community Infrastructure Levy (CIL) list of projects provided in the document "<i>Huntingdonshire Infrastructure Business Plan 2013/14</i>".</p> <p>The Cambridgeshire Local Access Forum is pleased to note that the CIL list of projects includes a number of projects related to green infrastructure and walking and cycling infrastructure. The Cambridgeshire Local Access Forum draws to the attention of Huntingdonshire District Council of the benefits that such infrastructure will bring to growing communities in the District, including those relating to the economy, the environment and health and well-being.</p> <p>The Cambridgeshire Local Access Forum notes that in relation to the Ramsey Spatial Planning Area (SPA) (page 24) there is a lack of green infrastructure projects proposed for funding and that there is a lack of cycling and walking infrastructure proposed for funding that would provide new or improved routes for non-motorised users to the „Great Fen Project“. The Cambridgeshire Local Access Forum advises that serious consideration should be given by Huntingdonshire District Council to remedying these omissions before the CIL list of projects is approved.</p> <p>The Cambridgeshire Local Access Forum notes that in relation to the Key Service Centre and Small Settlement Projects (page 25) there is a lack of green infrastructure projects proposed for funding and that there is a lack of cycling and walking infrastructure proposed for funding. The Cambridgeshire Local Access Forum advises that serious consideration should be given by Huntingdonshire District Council to remedying these omissions before the CIL list of projects is approved. For proposals and ideas relating to projects relevant to the villages in the District the Council should carry out a specific consultation exercise with the relevant parish councils.</p> <p>The Cambridgeshire Local Access Forum notes that in relation to the CIL Implementation Plan (Section 5) that the green infrastructure projects identified in earlier sections are split within the implementation tables (Tables 5.1 – 5.3) between the categories "Policy High" and "Desirable".</p> <p>The Cambridgeshire Local Access Forum advises that the creation of this split is not convincingly demonstrated by the process described in Section 4 CIL Infrastructure Prioritisation and is not convincingly demonstrated by the evidence base in the consultation document. The Cambridgeshire Local Access Forum advises that consideration should be given by Huntingdonshire District Council to providing better evidence for the „downgrading" of certain infrastructure projects from "Policy High" and "Desirable".</p> <p>Cambridgeshire Local Access Forum was set up by Cambridgeshire County Council as required by the Countryside and Rights of Way Act 2000, and its remit is to advise relevant bodies as</p>	<p>Support of the green infrastructure and walking and cycling projects noted.</p> <p>Ramsey Spatial Planning Area (SPA) is not anticipated to have significant growth during the period of the Core Strategy to 2026 necessitating additional infrastructure requirements.</p> <p>The Council supports the comments on the Great Fen. A number of infrastructure items, including access, are covered in the IBP under the multi-area projects.</p> <p>The Key Service Centres and the small settlement projects are not anticipated to have significant growth during the period of the Core Strategy to 2026 necessitating additional infrastructure requirements. However, the Council has recently started work to develop the 2014/15 Infrastructure Business Plan. Town and Parish Councils have already been written to on this and asked to submit their top infrastructure priorities.</p> <p>The project categorisation should not be seen as a down grading of projects but a prioritisation process necessary to consider use of limited funding.</p> <p>Projects may, over time, change in that categorisation process. The detail on this will be reviewed during the next stage of the IBP 14/15.</p>



## Appendix A

<b>Name, Company/ Organisation</b>	<b>Comment</b>	<b>Officer View</b>
	defined in Section 94(4) of the Countryside and Rights of Way Act 2000 on matters relating to access to the countryside. Section 94(4) bodies are required by the legislation to take the views of the Local Access Forum into account, and the latest Guidance issued by The Secretary of State at the Department for Environment, Food and Rural Affairs lists Huntingdonshire District Council as a Section 94(4) body.	