

**HUNTINGDONSHIRE DISTRICT COUNCIL**

**Title/Subject Matter:** Planning: Local Plan Consultation Review

**Meeting/Date:** CMT 30<sup>th</sup> June 2015  
Overview and Scrutiny Panel (Environmental Wellbeing)  
14<sup>th</sup> July 2015

**Executive Portfolio:** Executive Councillor for Strategic Planning and Housing

**Report by:** Head of Development

**Ward(s) affected:** All

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**Executive Summary:**

The report updates members on the key issues arising from the targeted consultation on the Local Plan to 2036. It identifies the issues that need to be addressed and additional work and evidence requirements to resolve these.

**Recommendation(s):**

That the Panel receives an update on the targeted consultation on the Local Plan to 2036.

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## **1. WHAT IS THIS REPORT ABOUT/PURPOSE?**

1.1 Further to the 'Huntingdonshire Local Plan to 2036: Position Statement' report that was presented to this panel on 14<sup>th</sup> April 2015, this report:

- Reflects on the key issues arising from the targeted consultation on the Local Plan to 2036.
- Identifies the issues that need to be addressed and additional work and evidence requirements to resolve these.

## **2. WHY IS THIS REPORT NECESSARY / BACKGROUND**

2.1 The Local Plan to 2036 was published for a 'targeted' non-statutory consultation from 23<sup>rd</sup> January to 20<sup>th</sup> March 2015. The consultation was conducted by invitation only involving Members of the District Council, County Councillors representing wards in Huntingdonshire, all Town and Parish Councils, adjoining District Councils, landowners and the agents of sites proposed for allocation, environmental and community interest groups and 'duty to co-operate' organisations which must be involved in the production of statutory development plans where there are strategic issues.

2.2 The targeted consultation was a non-statutory consultation process which was designed to engage with key stakeholders in the Local Plan preparation process. It was not a full public consultation process. All comments from respondents have been acknowledged.

2.3 The targeted consultation sought to identify the most important issues that need to be addressed in order to progress to the next stage of the process. Addressing these issues requires further work on the evidence base that supports the Local Plan. In particular, further work is required to understand:

- The highways and transport planning needs to support the development of the Strategic Expansion Location at Wyton Airfield and other developments in the Huntingdon, Alconbury and St Ives area, involving detailed highways and transport modelling and analysis
- Strategic and localised flood risks in relation to the Environment Agency's new flood model for the Lower Great Ouse area
- Planning for gypsy and traveller sites
- Planning for the delivery of affordable housing
- The Local Plan Viability Assessment
- The status of Ramsey as a market town
- Planning for town centre uses and an update of the retail study to take new patterns of retailing into account
- Consideration of potential alternative sites in relation to sites that are already under consideration
- Planning effectively for an ageing population

2.4 Work continues on the preparation of the Local Plan to ensure that meaningful progress is made over the next 12 months. The timescales for the next stages of preparation of the Local Plan are under review, given the complexity of some of the work required. For example, the highways and transport modelling and analysis work to support growth around Huntingdon and St Ives, including Wyton Airfield, may take a further 6 to 9 months to complete. It is important to ensure that the next stages of work are done properly and in formats that are likely to be acceptable at the Local Plan Examination.

- 2.5 The review of the Local Plan preparation timescales will be encapsulated in a revised Local Development Scheme (which is the authority's project plan for production of development plans). This will be prepared over the summer period and will be made available to the public when completed.
- 2.6 It is expected that the majority of the work required to complete the evidence base will take 6 to 9 months to complete. This is subject, in particular, to further discussions with Cambridgeshire County Council (on highways and transport issues) and the Environment Agency (on flood risk issues).

### 3. TARGETED CONSULTATION RESPONSES

- 3.1 A total of 305 people and organisations were invited to participate in the targeted consultation. There were 82 respondents in total, and they made 836 specific comments. A list of the respondents to the targeted consultation is attached at Annex A. Table 1 summarises the level of response.

<b>Table 1</b>	
<b>Consultees</b>	<b>Number of respondents</b>
20 County Councillors	0 responses
52 District Councillors	5 responses
77 Parish Councils	28 responses
92 landowners	27 responses
64 Duty to Co-operate, environment and community organisations	22 responses
<b>305 consultees in total</b>	<b>82 respondents in total</b>

- 3.2 The responses to the targeted consultation were made available for viewing by the public on 12<sup>th</sup> May 2015 through the HDC website. The responses can be viewed at the following link:

<http://consult.huntingdonshire.gov.uk/portal/pp/hlp2036/lptc?tab=list>

### 4. KEY ISSUES

- 4.1 The National Planning Policy Framework (NPPF) defines four inter-related 'tests of soundness' that are used by independent planning inspectors to judge the acceptability of Local Plans. Local Plans must be:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

- 4.2 Table 2 identifies the key issues that were raised in the consultation responses. It also assesses whether the issues are a significant risk to the 'soundness' of the Local Plan and how they may be resolved.

**Table 2**

<b>Key issue</b>	<b>Soundness risk</b>	<b>Method of resolution</b>
Need for an updated Strategic Flood Risk Assessment (SFRA) level 1 on all sources of flooding to take account of the new lower Great Ouse modelling due to be published by August 2015 as well as new surface water flood mapping and the Local Flood Risk Management Strategy.	Justified; Effective	Exploration of scope of replacement SFRA required. Initial scoping discussion with the Environment Agency (EA) and Cambridgeshire County Council (CCC) as Lead Local Flood Authority held on 4 <sup>th</sup> June 2015. Brief for a replacement study under preparation in co-operation with the EA and CCC.
Completion of a flood risk sequential test and production of a Strategic Flood Risk Assessment level 2 to support all allocations in areas at potential risk from flooding.	Justified; Effective	Sequential testing and SFRA level 2 would need to follow on from completion of level 1 replacement, in co-operation with the EA and CCC.
Need to update evidence on flood risk and water framework directive compliance in order to complete the Sustainability Appraisal (SA) process satisfactorily. The SA needs to identify and test challenging but realistic alternatives to the Local Plan's policy approach and allocation strategy.	Justified	Completion of SFRA level 1 and 2 in conjunction with existing Water Cycle Study should provide sufficient evidence to allow completion of the SA and facilitate testing of alternatives. This work needs to be done in co-operation with the EA and CCC.
Need to ensure that infrastructure plans are in place to demonstrate deliverability of allocated development sites in a timely and sustainable manner.	Positively prepared; Justified; Effective	Evidence is required to demonstrate this. The most significant will be the: <ul style="list-style-type: none"> <li>• Long Term Transport Strategy and additional detailed transport modelling for which discussions are ongoing with CCC</li> <li>• Local Plan Infrastructure Study under preparation by AECOM</li> <li>• Viability Assessment under preparation by Deloitte</li> </ul>
Objections to the proposed allocation of the former RAF Wyton airfield due to uncertainties over the transport infrastructure needed and the environmental implications of providing this.	Justified; Effective	Additional detailed transport modelling is required for which discussions are ongoing with CCC. SFRA level 2 required to inform flood risk mitigation. Ongoing engagement with Crest Nicholson (the Defence Infrastructure Organisation's developer partner for the site).

**Table 2**

<b>Key issue</b>	<b>Soundness risk</b>	<b>Method of resolution</b>
Level of need for affordable housing and deterioration in affordability over time.	Positively prepared; Consistent with national policy	Review of the Cambridge sub-region Strategic Housing Market Assessment (SHMA) in co-operation with all relevant authorities to refine affordable housing targets. Consideration of options to boost affordable housing contributions (subject to NPPF constraints on viability). Consideration of implications of changes to affordable housing thresholds which are likely to reduce delivery in small settlements. Promotional engagement with Parish Councils to facilitate additional rural exceptions schemes.
Concerns over the need for and outcomes of Viability Assessment, particularly the potential impact on affordable housing provision especially within the three strategic expansion locations.	Positively prepared; Effective	Completion and consideration of Viability Assessment under preparation by Deloitte. Consideration of affordable housing targets within the three strategic expansion locations. Consideration required of alternative ways to increase affordable housing provision.
Need to factor in an allowance to the housing target to account for the considerable undersupply anticipated in London. Given Huntingdonshire's rail connections it may be subject to increased demand from people unable to afford or access suitable accommodation in London.	Positively prepared	The Council has to date receive no requests for assistance with meeting housing requirements from other authorities. Options to increase delivery would be reviewed in response to any requests.

**Table 2**

<b>Key issue</b>	<b>Soundness risk</b>	<b>Method of resolution</b>
<p>Gypsy and Traveller accommodation needs may not be met through the Local Plan. East Cambridgeshire DC (ECDC) was robustly challenged over the shared evidence base which predates publication of the national Planning Policy for Traveller Sites (PPTS) in 2012. Under the duty to co-operate South Cambridgeshire DC may seek assistance with meeting their needs for Gypsy and Traveller site provision.</p>	<p>Positively prepared; Effective; Consistent with national policy</p>	<p>An updated assessment of gypsy and traveller needs is required based on primary research to overcome the ECDC Inspector's statement that the GTANA 'is not robustly justified'. CCC Research Group led production of the GTANA (2011) but cannot produce an update. Potential alternative consultants have been identified. Consideration needs to be given on commissioning this work in conjunction with neighbouring authorities.</p>
<p>Need to consider the implications of USAF withdrawal from RAF Alconbury and RAF Molesworth in terms of the potential to accommodate development currently proposed for allocation elsewhere (RAF Wyton and St Ives West) and the potential reduction of the objectively assessed need for housing (due to relocation of military personnel).</p>	<p>Justified</p>	<p>Ongoing engagement with the Defence Infrastructure Organisation. Consideration of potential within the next iteration of the Local Plan if substantial land releases are confirmed.</p>
<p>A substantial increase is predicted in the proportion of elderly residents within Huntingdonshire. Need for greater consideration of requirements for specialist housing and downsizing opportunities within current settlement.</p>	<p>Positively prepared; Justified</p>	<p>Review of the Cambridge sub-region SHMA in co-operation with all relevant authorities to refine need for different types and sizes of housing including specialist older people's housing. Consideration and implementation of the Cambridgeshire Older People Strategy (2014).</p>
<p>Major changes sought to the proposed St Ives West allocation to reduce the number of houses provided and ensure the gap between St Ives and Houghton and Wyton is appropriately maintained.</p>	<p>Justified; Effective</p>	<p>Ongoing engagement with landowners and relevant town / parish councils. Consideration of Houghton and Wyton Neighbourhood Plan proposal for part of the site and outcomes of submission consultation and examination of the NP. Consideration of outcomes of planning application appeal decisions.</p>

**Table 2**

<b>Key issue</b>	<b>Soundness risk</b>	<b>Method of resolution</b>
The future sustainability of Ramsey as a settlement was questioned with Ramsey Town Council suggesting Ramsey be 'demoted' to a service centre due to concerns that the scale of development is not adequately matched with transport infrastructure improvements.	Positively prepared; Effective	The outcomes of evidence sought above on the Long Term Transport Strategy and additional detailed transport modelling for which discussions are ongoing with CCC and the Local Plan Infrastructure Study under preparation by AECOM will need consideration over the most sustainable future strategy for Ramsey.
Proposed retail provision in Huntingdon and town centre boundaries need reconsideration since Sainsbury's confirmed withdrawal from Huntingdon West, and rapidly changing retail trends.	Justified; Effective	Commissioning of new Retail Study including a new household survey required to measure impacts of changing shopping trends and impact on forecast floorspace requirements. Ongoing discussions with Sainsbury's over alternative proposals.

## **5. LINK TO THE CORPORATE PLAN**

- 5.1 This report links to the corporate objective 'Enabling sustainable growth: to improve the supply of new and affordable housing to meet future needs' and the related key action to 'implement an action plan to adopt the Local Plan to 2036'.

## **6. RESOURCE IMPLICATIONS**

- 6.1 Specialist consultancy support will be required, at the appropriate times, to undertake technical studies required as evidence to demonstrate soundness of the Local Plan at examination.
- 6.2 The costs of the evidence base work, due to its complexity, are likely to be significant. For example, the highways and transport modelling and analysis work may cost in the region of £250,000 to £300,000 (though this is partly budgeted, and contributions towards it are being discussed with the Local Enterprise Partnership, and the developer partnership for Wyton Airfield). The flood risk modelling and analysis work is likely to cost in the region of £50,000 to £75,000. The other specific elements of work identified in Table 2 are likely to cost up to £50,000 per project. Budget planning is under discussion with the Executive Councillor for Strategic Planning and Housing.

## **7. OTHER IMPLICATIONS**

- 7.1 A fully justified and effective evidence base is essential to support the Local Plan to 2036 through examination. This is intended to promote a sustainable strategy for growth in the district protecting the environment and promoting economic and social well-being.



## **8 REASONS FOR THE RECOMMENDED DECISIONS**

- 8.1 The report is to inform Members on the progress with the Local Plan to 2036 and raise awareness of the issues to be addressed in preparation of the next stage. The recommendation is that:

The Panel receives an update on the targeted consultation on the Local Plan to 2036.

## **BACKGROUND PAPERS**

Huntingdonshire Local Plan to 2036: Targeted Consultation 2015

## **CONTACT OFFICER**

Clare Bond, Planning Policy Team Leader  
Tel: 01480 388435

<b>ANNEX A</b>		
<b>Consultee Name</b>	<b>Organisation</b>	<b>Agent Name / Organisation</b>
Alex Bach	NHS Cambridgeshire	
Alison Melnyczuk	Town Clerk St Ives Town Council	
Amanda Augstein	Clerk Woodhurst Parish Council	
Angela Gemmill	Relationships Manager Marine Management Organisation	
Anna McComb	Graduate Trainee Planner NHS Property Services	
	Bedford Borough Council	
Braybrook	Landowner (non LP site)	Mr Andrew Campbell
Church Commissioners	Landowners (Corpus Christi Lane GMC, Silver St Buckden & The Pasture, Somersham)	Mr Andrew Hattersley, Smiths Gore
Cllr John Davies	St Ives South Ward Councillor Huntingdonshire District Council	
Councillor Robin Carter	Ward Councillor Huntingdonshire District Council	
Councillor Sarah Conboy	Ward Councillor Huntingdonshire District Council	
Daniels & Camvil Dev Ltd	Landowner (West of Ramsey Rd, Warboys)	Mr Andrew Campbell
Ed Reilly	St Neots Town Council	
James Stevens	Consultant to Regional Planner Home Builders Federation	
Janet Nuttall	Planning and Conservation Advisor Natural England	
Judit Carballo	Planning Officer Cambridgeshire County Council	
Lee Crawford	Persimmon Homes (East Midlands) Ltd	
Linda Crook	Clerk Pidley-cum-Fenton Parish Council	
Mark Holman	Chairman Elton Parish Council	
Messrs A E JUGGINS	Landowner (non LP site)	Mr Andrew Campbell
Michael Monk	CPRE Cambridgeshire	
Mr B C Wright	Chair Chesterton Parish Meeting	
Mr B E A Augstein	Landowner (Fenton Field Farm, Warboys)	Mr Andrew Campbell
Mr Gary Cook	Town Clerk Ramsey Town Council	
Mr George Sykes	Architectural Liaison Officer Cambridgeshire Constabulary	
Mr Graham Moore	Middle Level Commissioners	
Mr John Chase	Clerk Buckden Parish Council	
Mr John Dadge	Landro Ltd (West of Railway, Huntingdon)	John Dadge, Barker Storey Matthews
Mr Lionel Thatcher	Clerk Kimbolton & Stonely Parish Council	
Mr Mark White	Homes and Community Agency	
Mr Martin Baker	Cambridgeshire Wildlife Trust	
Mr Martin Page	D H Barford for Tyrells Marina, Cambridge Rd, Fenstanton and Main St, Huntingdon	

<b>ANNEX A</b>		
<b>Consultee Name</b>	<b>Organisation</b>	<b>Agent Name / Organisation</b>
Mr Mike Humphrey	Hartford Conservation Group	
Mr Nairn Davidson	Business Excellence Manager Luminus Group	
Mr Richard Probyn	St Ives Civic Society	
Mr Roy Reeves	Clerk Warboys Parish Council	
Mr Stephen Dartford	Clerk Fenstanton Parish Council	
Mr Stephen Highland	Landowner (non LP site)	Mr Andrew Campbell
Mr Stewart Patience	Anglian Water	
Mr Tom Gilbert-Wooldridge	Planner English Heritage	
Mrs Anna Gillings	Turley representing Frontier Estates ( Nelson Road St Neots)	Mrs Anna Gillings, Turley Associates
Mrs B Alagawi	Landowner (Main Street, Hartford)	John Dadge, Barker Storey Matthews
Mrs Carole Pollock	Parish Clerk The Stukeleys Parish Council	
Mrs Caroline Hunt	Planning Policy Manager South Cambridgeshire District Council	
Mrs Denise Benham	Old Hurst Parish Council	
Mrs E Jack	Chair Waresley-cum-Tetworth Parish Council	
Mrs Gail Stoehr	Secretary Cambridgeshire Local Access Forum	
Mrs H Taylor	Clerk Yaxley Parish Council	
Mrs J Osborn	Parish Clerk Holme Parish Council	
Mrs Janet Innes-Clarke	Clerk Brampton Parish Council	
Mrs Jenny Gellatly	Parish Clerk Little Paxton Parish Council	
Mrs M Pink	Parish Clerk Earith Parish Council	
Mrs Madelaine Liddiard	Clerk Godmanchester Town Council	
Mrs Nancy Packham	Clerk Wyton on the Hill Parish Council	
Mrs R Carey-Townsend	Chair Kings Ripton Parish Council	
Ms Diane Davis	Clerk Sawtry Parish Council	
Ms G Stoehr	Clerk Hemingford Grey Parish Council	
Ms J Bowd	Parish Clerk Holywell-cum-Needingworth Parish Council	
Ms V Pryce	Clerk Abbots Ripton Parish Council	
Needingworth Consortium	Landowner (non LP site)	Mr Andrew Campbell
Penny Bryant	Clerk Somersham Parish Council	
Peter Quest	Great Ouse AONB Working Group	
Richard Taylor	Environment Agency	
Silk Family & Somersham Town Football Club	Landowner (Somersham Town Football Club)	Mr Andrew Campbell
Tim Leathes	Urban and Civic (Alconbury Weald)	Andrew Fisher,

<b>ANNEX A</b>		
<b>Consultee Name</b>	<b>Organisation</b>	<b>Agent Name / Organisation</b>
		David Lock Associates
Mr Rex Wadsworth	Landowner (non LP site)	Mr Andrew Campbell
Wagstaffe, Abblitt, Fellowes	Landowner (non LP site)	Mr Andrew Campbell
Wendy Hague	East Cambs District Council	
Sainsburys Supermarkets Ltd	Landowner (George St, Huntingdon)	David Graham, Indigo Planning Ltd
Hallam Land Management	Landowner (Giffords Park, St Ives)	Mark Hyde
Campbell Buchanan LLP	Developers (Brampton Park)	Matt Hill, DLP Consultants Ltd
Clients of Andrew S Campbell Associates Ltd	Various landowners (non LP sites)	Mr Andrew Campbell
Linden Homes Strategic Land	Developers (Field Rd, Ramsey and Glebe Farm, Sawtry)	Mr Matt Smith, Marrons Planning
Strawsons Holdings Limited	Owners (RAF Upwood)	Mr Tony Aspbury, Antony Aspbury Associates
Gallagher Estates Ltd	Developers (St Neots Eastern Expansion & Loves Farm Reserved Site)	Mrs Sarah Bevan, Savills
Barratt Northampton	Developers (St Ives West)	Mrs Stacey Rawlings, Bidwells
Spittal Field Holdings Ltd	Developers (Ermine Street, Huntingdon)	Mrs Stacey Rawlings, Bidwells
The Wintringham Park Consortium	Developers (St Neots Eastern Expansion)	Mrs Stacey Rawlings, Bidwells
Crest Nicholson	Developers (Wyton on the Hill)	Will Lusty, Savills
Anneli Harrison	Office for Rail Regulation	