HUNTINGDONSHIRE DISTRICT COUNCIL

Title/Subject Matter: Huntingdonshire Local Plan to 2036

Meeting/Date: Overview and Scrutiny Panel (Economy and Growth) – 12th

December 2017

Cabinet – 13th December 2017 Council – 13th December 2017

Executive Portfolio: Housing and Planning

Report by: Planning Service Manager (Growth)

Ward(s) affected: All

Executive Summary:

This report proposes that the Local Plan which the local planning authority proposes to submit to the Secretary of State is a sound plan and should proceed to the Regulation 19 stage of the process, namely publication of the plan for representations to be made. Publication will be for 7 weeks (1 additional week than the minimum prescribed in the Regulations acknowledging that it would cover the Christmas/New Year period) and then submission to the Secretary of State by the end of March 2018.

This report sets out the timetable to ensure that we are still able to meet the expected Government deadline to have submitted a new Local Plan by the end of March 2018.

The report summarises responses to the Regulation 18 consultation which concluded on the 25th August 2017, as well as summarises the 'Call for Sites' consultation that ran side by side with the Regulation 18 Consultation.

In September 2017 the Government issued a consultation – 'Planning for the right homes in the right places: consultation proposals' which proposes a standardised methodology for calculating Objectively Assessed Need (OAN). If the proposed methodology is introduced Huntingdonshire would see housing need rise from 804 units per annum to 1010, namely an additional 206 residential units to be delivered in Huntingdonshire per year. If the numbers were increased there would then be significant further work to be undertaken to identify the appropriate 'policy on' housing requirement, with the potential for new site allocations, viability testing, further consultation, and further sustainability appraisal. All of this work would materially delay progress on taking the Local Plan through to adoption, and any delays would also be likely to require other elements of the evidence base to be updated. That same paper highlights that there are transitional arrangements available to Councils that submit their Local Plan to the Secretary of State on or before the 31st March 2018, or before the revised Framework is published, whichever is later which allows them to continue with their current plan preparation rather than

using the new standardised methodology.		
Pec	ommendation(s):	
	recommended that Full Council:	
1.	Approves the Proposed Submission ('Proposed Submission 2017') Local Plan as attached at Appendix 1, and the Policies Map at Appendix 2, The Sustainability Appraisal and The Statement of Consultation for the purpose of publication for representations to be made for seven weeks commencing on or around the 18 th December 2017;	
2.	Delegates to the Managing Director and Executive Leader, in consultation with the Head of Development, Housing and Planning Portfolio Holder and the Chair of the Development Plans Policy Advisory Group any presentational improvements or other inconsequential changes (e.g. correcting typographical errors or factual inaccuracies) to the 'Proposed Submission 2017' that (taken together) do not materially affect the policies set out in the Local Plan.	
3.	Approves the subsequent submission of the Plan to the Secretary of State for the purpose of independent examination.	

1. PURPOSE OF THE REPORT

- 1.1 The purpose of this report is to enable Council to consider and approve the Proposed Submission Local Plan for the purpose of publication for representations in December 2017 and then submission to the Secretary of State by the end of March 2018.
- 1.2 The recommended Proposed Submission Local Plan is available at **Appendix** 1. (http://www.huntingdonshire.gov.uk/media/2856/draft-local-plan.pdf)
- 1.3 A series of supporting documents are prescribed under Section 20(3) of the Act to be published alongside the Local Plan. These are
 - The Policies Map which can be found at Appendix 2 (http://www.huntingdonshire.gov.uk/media/2858/local-plan-policies-map.pdf)
 - The Sustainability Appraisal (http://www.huntingdonshire.gov.uk/media/2685/draft-final-sustainability-appraisal-report.pdf)
 - The Statement of Consultation (http://www.huntingdonshire.gov.uk/media/2860/statement-of-consultation.pdf)
- 1.4 The Evidence Bases in support of the Local Plan are set out in Section 4 of this report. The Housing and Employment Land Availability Assessment (HELAA) December 2017 can be found at http://www.huntingdonshire.gov.uk/planning/new-local-plan-to-2036/monitoring-research-and-evidence-base/housing-and-economic-land-availability-assessment/

2. WHY IS THIS REPORT NECESSARY/BACKGROUND

2.1 At the Cabinet meeting on 19 November 2015 it was resolved that quarterly reports on progress with preparation of the HLP2036 should be provided. A decision is required now as to whether the Plan proceeds to the Regulation 19 stage because, unless it does, the submission of the Plan by the end of March 2018 will not be achievable.

3. SUMMARY OF CONSULTATION DRAFT 2017 COMMENTS RECEIVED AND RESULTANT PROPOSED CHANGES TO THE PLAN

- 3.1 In June 2017 Cabinet agreed an extra round of public consultation, known as the Huntingdonshire's Local Plan to 2036: Consultation Draft 2017 produced on the 23rd June 2017. That additional round of consultation was undertaken.
- 3.2 At part of the Local Plan process the Council also formally asked Parish Councils, landowners, agents, developers and the public to identify sites for future housing and employment growth that are both deliverable and achievable.
- 3.3 Following the move away from the Local Development Framework process to Local Plans, detailed work commenced on the Huntingdonshire Local Plan process as far back as the Huntingdonshire Local Plan 2036: Issues and

Options Consultation in 2012. Officers have carefully considered all representations received pursuant to all consultations and have been very open in accepting comments from any party at any time since 2012. While it is recognised that not every individual will be satisfied with the Plan as it has evolved, the Plan has very much been shaped by those with an interest in Huntingdonshire.

- 3.4 The consultation which took place during July August covered four main elements:
 - Huntingdonshire Local Plan to 2036: consultation draft 2017
 - Huntingdonshire Local Plan to 2036: draft final sustainability appraisal
 - Housing and Economic Land Availability Assessment June 2017 (HELAA)
 - Call for sites 2017
- 3.5 A total of 791 representations were received on the draft Local Plan itself, of which 200 related to chapter 4 The Development Strategy. The Sustainability Appraisal attracted only 26 representations although some respondents blend sustainability issues in with their Local Plan comments. The HELAA attracted 68 representations as most respondents do not duplicate the comments submitted on proposed allocations. The Call for Sites attracted 227 submissions.
- 3.6 Following the consultation a series of amendments were incorporated into the Proposed Submission 2017 Plan in light of representations and can be summarised as set out below:

Representations on and proposed changes to Section A and B: Chapters 1-4

- 2.8 Chapters 1 and 2 attracted few representations directly relevant to the content of the chapters with a number of the representations relating to the plan as a whole.
- 2.9 Changes made to this section arising from the consultation include:
 - Addition of further reference to historic settlement patterns and their role in shaping the character of the district in para 2.5
 - Opportunities arising from access to high speed broadband have been added as a key issues under the 'Economic' heading in chapter 3
 - Additional key issues under the 'Environmental' heading in chapter 3 included cover:
 - o Recognition of the need to conserve the historic environment
 - Opportunities to create more resilient and better connected ecological networks, enhance biodiversity and create habitats
 - Tackling climate change and reducing flood risk by protecting land foreseeably needed for flood water, and/or water supply.
 - Objectively assessed needs moved from chapter 3 to be the first policy in chapter 4.
 - Nene Valley added to list of strategic green infrastructure in objective 25
- 2.10 Following the consultation a series of amendments were made in light of representations and can be summarised as:

Policy:		Summary of comments received:
LP1:	Strategy	 The objectively assessed housing

for
Development
and its
supporting text
attracted more
representations
than any other
part of the draft
Local Plan.

need figure should be higher, with a variety of alternative calculations put forward

- Housing target should be clearly set out in policy
- The 5 year housing land supply is not robust - additional sites should be allocated to address this
- Challenges to the 70:30% distribution between SPAs and KSC/ Small Settlements and its deliverability
- Over-reliance on SELs greater flexibility/ buffer needed to provide a buffer against slippage
- Fails to significantly boost the supply of housing
- Need allocations in small settlements/ rural areas to create/ support thriving rural areas
- Should have a more refined categorisation of Small Settlements
- Support for categorisation of various individual settlements
- Environmental objections to any potential third river crossing to facilitate redevelopment of Wyton Airfield
- Wide variety of additional sites promoted for allocation

LP2: Green
Infrastructure attracted
relatively few
comments in
comparison with
other policies in
this chapter

- Identifying a number of new or updated supporting documents that would usefully be referenced as justification for elements of the policy
- Seeking a new policy on development adjacent to watercourses
- Seeking early/ timely provision of new green infrastructure
- A number of detailed amendments or additions to the policy relating to heritage assets, Grafham Water with regards to Anglian Water's water services functions, and provision for leisure uses as part of/ within green infrastructure

Many of the comments on the Delivering the strategy section repeated or raised similar issues to those on Policy LP1.

- There should be more allocations to add flexibility
- There should be an over allocation to ensure delivery
- The delivery tests should be deleted or set out in a policy
- The Infrastructure Delivery Plan has too many 'unknowns' regarding timing of delivery of critical elements
- Previously identified highway improvements should be delivered
- Scenario tested for Strategic Transport Study appears to fall short of the OAN
- Seeking clarification on no double charging from CIL and S106

	 Suggested additional text on timing of infrastructure provision
Policy LP4 Waste water The Key Diagram	suggesting additions or amendments to policy text relating to: • Adding flexibility to accommodate any changes to responsible authorities • Provision for refusal where capacity can't be readily increased • Clarification of waste water treatment capacity • Adding flexibility to reflect locationally specific circumstances • Positive confirmation should be required for development from EA and other responsible authorities Comments were mostly related to specific concerns about individual features, such as the existing and under construction development to the east of the A1198 at
	Godmanchester not being reflected. There was a potentially more significant issue raised in that the diagram did not give a good representation of the location or amount of development being allocated, except for the strategic expansion locations.
The built up area (commented on both through the definition and in conjunction with many representations on other policies)	There were a few expressions of support but the concerns raised can be broadly summarised as: Definition is too rigid and contrary to presumption in favour of sustainable development Approach to unallocated sites is too restrictive and precludes sustainable growth outside the built up area No evidence for 30 dwellings threshold
LP5 Spatial Planning Areas and LP6 Key Service Centres	 Clearer definition of exact extent of SPAs sought and they should be mapped Approach to unallocated sites is too restrictive and precludes sustainable growth outside the built up area Retail threshold challenges as both too high and too low Objections to omission of various sites as allocations
LP6 'Small Settlements' (also attracted a significant number of representations)	 Objections to restriction of growth outside built up area to community planning proposals and rural exceptions should be extended to include employment uses Allocations in small settlements would provide more flexibility Market led growth well related to the built up area would allow for a wide range of sites to come forward and allow

	·		
	villages to thrive		
	Support/ objection to classification		
	of various individual settlements		
	10% growth suggested unlikely to		
	be achievable within the built up area		
Policy LP7	There was concern about the impact of		
'Flood risk.'	development on flood risk for existing		
	development elsewhere, but most		
	comments sought additions or		
	amendments to policy text. These related		
	to:		
	Accurate reflection of the national		
	sequential and exception tests		
	Provision for and requirements of		
	development in defended areas		
	Improving the accuracy of the use		
	of some terminology		

2.11 The following table summarises the changes that are proposed for the various policy and other elements of Chapter 4.

Policy/ Section	Summary of Proposed Changes
Amount of	This is a new policy, was previously text at the end of
development	chapter 3 that is added so that the objectively assessed
	needs of the district are formally set out in a policy
Strategy for	Now policy LP2, this has had more detail added to the
Development	'Distribution of Growth' section of the policy, specifically
	identifying all of the spatial planning areas, key service
	centres and the new proposed 'Local Service Centres'
Green	Limited changes to the detail of criteria and to Grafham
Infrastructure	Water Priority Area
Delivering the	Text amended to explain approach where under-delivery
Strategy	is identified.
	Additional text included on transport infrastructure
	improvement proposals.
	Infrastructure Delivery Plan to be finalised for proposed
	submission.
Delivering	A supplement to the Strategic Transport Study will be
Infrastructure	produced for clarification.
	Text on timing of infrastructure provision and footpaths
E. 15:1	added.
Flood Risk	Text of policy changed to reflect submissions from EA and Anglian Water.
	Policy moved from end of chapter so that it carries on from
	delivering infrastructure and is followed by Waste Water
	Management
Waste Water	A number of relatively minor amendments made as
Management	suggested by EA and Anglian Water. Supporting text
	clarified in response to other comments
The Key Diagram	Introductory text expanded.
	Allocations to be listed for each spatial planning area, the
	Key Service Centres and the Local Service Centres.
	A number of amendments to the image still to be made.
Built-up Areas	Definition reworded to be more positive and specific about
definition	what is included in the built-up area and what is excluded
Spatial Planning	Very minor changes for clarity.
Areas	

Key Service	Supporting text has been added to be more positive and
Centres	specific about development.
Local Service	New policy added which is similar to the Key Service
Centres	Centres policy but reflects the more limited nature of
	services and facilities available.
Small Settlements	Supporting text has been added to be more positive and
	specific about development.
The Countryside	Very minor changes to supporting text for clarity.

Representations on and proposed changes to Section C: Chapters 5-8

2.12 Given the variety of representations on the policies in the Development Management section they are summarised with the relevant proposed changes in the table below. The changes are in general of a minor nature. However, Members' attention is in particular drawn to comments received on Policy LP36 Renewable and Low Carbon Energy which did not receive any representations of support and has been revised. It is also highlighted that in order to accommodate the amount of development as a policy the numbering has changed. For the avoidance of doubt the numbering reported below is as per the Regulation 18 consultation. In the Proposed Submission 2017 all the numbering has been moved forward by one number to accommodate LP1 i.e LP36 is now referred to as LP37.

Chapter 5: Requiring Good Design

Summary of Comments Received	Summary of Proposed Changes	
LP10 Design Context		
Including reference to specific SPD in the policy reduces flexibility	It is considered that SPD should be reasonably long lived and 'or successor documents' is included in policy, so no changes are considered necessary.	
 LP11 Design Implementation Reasoning for BREEAM 'Good' rather than 'Excellent' needed Concern about the clarity of criteria and consequent consistency of their application 	Supporting text has been amended to identify that 'Excellent' is particularly challenging in some circumstance so 'Good' is considered to be realistic but challenging. Some changes have been made to the supporting text in order to help clarify criteria with clear links to the Design Guide for more detailed information and guidance.	
LP12 Strategic Placemaking	Policy name changed to 'Placemaking'	
 Concerned that the thresholds for masterplanning and design codes are too low Concerned that Design Review is ill defined and potentially over burdensome Concerned about pressure during masterplanning for mixed use sites to reducing the proportion of non-residential uses Concerned about design code 	to better reflect importance of requirements encompassed by policy to design of developments more generally. Added 'proportionate to the scale and complexity of the site and development proposed' after 'masterplanning process' at end of first sentence. Design code level is considered to be appropriate, minor amendments made to wording for clarity. Policy text regarding design review has been	

requirement slowing down planning decisions

LP13 Amenity

- Identifying a disconnect between the introduction paragraph and the policy
- Concerns about securing good equestrian provision/ facilities
- Concerns about securing good nonmotorised user provision/ facilities
- Objection to the broadband infrastructure requirement

amended, supporting text is considered to strike the correct balance as extra detail may date.

Introduction paragraph has been revised to more clearly relate to purpose of the policy with regards to amenity.

No changes made regarding equestrian or non-motorised user provision/ facilities, but those issues were referred to consideration of Sustainable Travel policy. Policy and supporting text revised regarding broadband requirements so that the requirement is clearer.

LP14 Surface Water

- Seeking a requirement for 50+ parking spaces to have surface water run-off interceptor
- Seeking water retaining SuDS to help improve condition of Ouse Washes
- Concern about surface water impact on existing development
- Concern with pollution risk from deep infiltration SuDS
- Seeking an increase in floodplain storage

New text has been added into policy and supporting text regarding surface water run-off interceptor and also for the Parking Provision policy. New criterion regarding water retaining

SuDS has been added into policy and supporting text has been revised.
Concern about surface water impacts on existing development to be

considered in relation to the Flood Risk policy.

A statement regarding deep borehole soakaways has been added at end of the policy based on suggested change. Supporting text has also been added.

The issue of flood plain storage will be considered with other issue relevant to the flood risk policy.

LP15 Sustainable Travel

- Suggested adding to supporting text to identify limitations eg short term funding for bus services
- Concern about/ seeking improvement to bridleway/ nonmotorised user/ cycling provision and clarification on routes
- Seeking a change so that refusal would only result where evidence shows that impact will be severe
- Concerns about congestion
- Seeking specific reference to DfT Circular 02/2013
- Concerned with loss of public transport
- Concerned about provision for public transport and private cars
- Seeks more connection between this and parking & renewable energy policies recognising predictable future changes to

Supporting text has been amended to identify limitations eg short term funding for bus services.

Supporting text has been amended to clarify policy with regards to bridleway/ non-motorised user/ cycling provision and routes.

Policy wording clarified with regards to severe impacts.

The concerns about congestion did not specific issue relate to the policy. Specific reference to DfT Circular 02/2013 has been made.

The concern expressed with loss of public transport was considered to not relate to policy wording.

Concerns about provision for public transport and private cars are considered to be suitably addressed within the policy and supporting text. Connection between policies recognising predictable future changes to majority electric/ driverless cars is

majority electric/ driverless cars considered to be unnecessary, • Seeks early engagement with however supporting text has been Highways England regarding the amended for this and the parking Strategic Road Network provision policy. Supporting text has been amended to include early engagement with Highways England regarding the Strategic Road Network. **LP16 Parking Provision** The policy and supporting text have been amended with regards to Seeking greater provision for charging cars and cycles as well as charging cars and cycles as well as points at public car parks points at public car parks. Supporting text has been amended Queries regarding future parking with regards to future parking provision requirements provision requirements Seeking reduction in cycle parking The cycle parking provision provision and clarification on requirements have been disabled parking clarified. Links to disabled user • Concerns about the consistency of provision have been corrected. applying the policy With regards to concerns about the consistency of applying the policy, the wording has been reviewed and minor amendments have been made.

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Chapter 6: Building a Strong, Competitive Economy

Issues Raised

Issues Raised	Response	
 LP17 Established Employment Areas Opportunity for further employment development Retail development in employment areas should be considered acceptable in principle 	The policy was revised to allow for extension onto land immediately adjoining and capable of integration with an Established Employment Area. Main town centre uses are directed to town centres first and need to undertake a sequential test to justify alternative locations.	
 Concern that existing businesses are limited to expansion within their existing site Overly restrictive and does not support a thriving rural economy Over-reliance on Alconbury Weald; greater flexibility needed to bring economic benefits to the wider district 	The policy was revised to allow for extension onto land immediately adjoining and capable of integration with an Established Employment Area	
LP19 Homes for Rural Workers The policy was broadly supported with a minor change sought to removing occupancy conditions. LP20 Town Centre Vitality and Viability Should reflect Combined Authority work on St Neots town centre regeneration Add reference to historic environment	The policy was revised in accordance with the suggested wording; replacing 'no interest' with 'no reasonable offer to purchase' The policy was revised to acknowledge the requirement for a proportionate retail impact assessment. Reference to Combined Authority market town regeneration programme added to the chapter's overall	

 Objection to 600sqm threshold Requirement for impact assessments to be proportionate Safeguard A1 premises Town centres should be made easier to use 	introduction.
LP21 Local Services and	The policy was revised to include
Community Facilities	reference to cemeteries.
Reference should be included to	
the need for cemeteries, an	
assessment done on need over the	
next 20 years and allocations made	
 Would look to protect local assets 	
of community value through this	
LP22 Tourism and Recreation	No change. Rights of way addressed
Reference to improving multi-user	in the sustainable Travel policy and
rights of way to support the rural	LP7 amended to allow greater
economy	flexibility.
 Inconsistent with LP7 over flexibility 	
regarding proposals in the	
countryside near small settlements	

Chapter 7: Strengthening Communities

Issues Raised	Response	
 LP23 Affordable Housing Provision Range of affordable housing types, sizes and tenures should be clearly set out within the main policy text Concern about requirement for dispersal across the development in 'small clusters of about 15 dwellings' Tenure split of affordable housing should be remain fluid to respond to the most up to date evidence and market conditions 	The proposal will need to reflect the latest evidence based on need. Dispersal pattern amended to seek small clusters. Tenure split responds to primary need for social or affordable rented properties. Allowances built in for site specific circumstances.	
 Should allow for alternative mixes to be approved in circumstances where the applicant can justify that the mix is required to address operational needs or updated local evidence Concerned about the robustness of the evidence that has been put forward: little local evidence; a consistent reliance on national figures and studies which are not specific to Huntingdonshire Does not go far enough in providing serviced plots to meet demand for self and custom build housing. 	Criteria d. and e. allow for consideration of other assessments of housing and demographic need that can be referred. The Huntingdonshire Accessible and Specialist Housing Evidence Paper was updated to include more local and clearer evidence of need. The Council is currently meeting its identified need for self and custombuild plots. The policy provides flexibility to address this further should the need increase significantly.	
LP25 Specialist Housing	Development on sites well-related to a	
Should include an allowance for	settlement could be achieved through	

developments on sites which are well related to a built-up area as an exception to the requirements of relevant policies

 Specialist accommodation may need to be located to address healthcare needs, even if such accommodation does not meet all of the locational criteria in the draft policy the current draft exceptions housing policy.

If material considerations justify a location that does not meet policy requirements this would be addressed at application stage.

LP26 Gypsies, Travellers and Travelling Showpeople

- Concern raised that the Cambridgeshire, King's Lynn, Peterborough, and West Suffolk Gypsy and Traveller Accommodation Assessment, October 2016 (GTAA 2016) is not robust.
- Should include allocations to meet additional pitch needs, including provision for ethnic Gypsies and Travellers who fall outside the Planning Policy for Traveller Sites (PPTS) 2015 Gypsy and Traveller definition

GTAA is being considered by the inspectors examining the Cambridge City and South Cambridgeshire Local Plans whose recommendations are expected shortly and therefore no evidence to suggest the methodology used by our consultant is not robust. Proposals for occupants who do not meet the definitions set out in the PPTS will be assessed against other relevant policies in the Local Plan, subject to the provisions of the Equality Act 2010.

LP27 Community Planning Proposals

- Most comments supported this policy.
- Further clarification sought over the relationship between market housing quantity and use of CIL/ S106 to support facilities necessary for that development
- Concern over demonstrating community initiative rather than developer led proposals and open book viability assessment

The introductory text to the policy was revised to clarify that this related to exceptions to development strategy policies rather than those provided as necessary to support a proposed development which would be expected to be delivered through CIL payments or as part of a S106 agreement.

LP28 Rural Exceptions Housing

- A reference to encouraging community engagement and/or support should be included in the supporting text
- Concern that the policy could increase land values.
- Stated that the policy should seek to ensure that public subsidy is used unless in specific circumstances
- Should be a stronger emphasis on ensuring the affordable units are delivered as a priority. Open market units should be subject to

Supporting text was amended to state that promoters will be expected to work with communities to resolve any concerns expressed regarding a specific proposal. However, given that any individual scheme is likely to receive both support and objections, a balanced judgement will be taken reflecting community views and the merits of the proposal.

Supporting text was amended to state that where public subsidy is available for a scheme, the market housing element should be reduced to reflect

occupation trigger points this. • A wider description of what constitutes a local connection Local connection criteria have been should be used in 7.52, to include clarified. those with close family in the parish Concern expressed that perpetuity Perpetuity restrictions addressed restriction should be relaxed as this is discriminatory against residents living in rural areas; conversely this should be strengthened **LP29 Health Impact Assessment** · Concern that the thresholds are of 50 dwellings for a rapid Health It can be evidenced that these are Impact Assessment and 200 for a appropriate thresholds given that all full Health Impact Assessment are development has health impacts. too low • Concern that the other policies in the Local Plan should be sufficient to enable the health and wellbeing of residents and users on and affected by new development. Recommended to delete the policy.

Chapter 8: Conserving and Enhancing the Environment

Issues Raised	Response
 Minor changes sought to text relating to nature conservation sites. Seeking inclusion of national and local nature conservation sites Seeking enhancement of valued spaces 	Minor change to text relating to nature conservation sites. National and local sites already included. Regarding the issue of enhancement of valued spaces this is considered to be adequately addressed in the Protection of Open Space policy.
LP31 Trees, Woodland, hedges and Hedgerows Comments on this policy were supportive.	No changes made
 LP32 Protection of Open Space The supporting evidence is flawed The policy is too vague Concern about Local Green Space 	Shortcomings in the evidence base (Huntingdonshire Sports and Leisure Facilities Strategy 2016-2021) have been referred to colleagues in Lifestyles. Amendments to the policy have been made to address clarity. No changes made with regards to Local Green Space as the Local Plan is not allocating any so current level of detail is considered appropriate.
LP33 Rural Buildings	Policy has been simplified and clarified

- Potentially conflicts with NPPF and principles of sustainable development, particular relating to replacement
- Prior approval should be identified as a material consideration

to address issues identified.

Supporting text on Prior Approval has been expanded including reference to it being a material consideration.

LP34 Heritage Strategy

- Object to requirement for intrusive archaeological investigation
- A number of detailed separate concerns with wording
- Concern about the application of the policy with regards to nondesignated assets
- Concern about the consistent use of terminology specifically 'historic environment' vs 'heritage assets' and 'substantial' harm

Archaeological requirements have been review and are considered to be appropriate.

A number of detailed changes made to policy wording to improve clarity, consistency with national policy and conservation legislation, and more consistency with the use of terminology.

LP35 Heritage Assets and their Settings

- Object to requirement for intrusive archaeological investigation
- A number of detailed separate concerns with wording
- Concern about the application of the policy with regards to nondesignated assets
- Concern about the consistent use of terminology specifically 'historic environment' vs 'heritage assets' and 'substantial' harm

A number of detailed changes made to policy wording to improve clarity, consistency with national policy and conservation legislation, and more consistency with the use of terminology.

LP36 Renewable and Low Carbon Energy

- Objections to no support for wind energy proposals as not justified or supported by evidence
- Concern about existing wind turbine installations' futures beyond permitted period
- Identifies the benefits to Warboys area from the turbines nearby, that would be denied to other places with the policy
- Identifies conflict with national policy and strategies
- · Identifies conflict with CRIF
- Would prevent public bodies from developing wind turbines on its assets in Huntingdonshire.

Five Town/ Parish Councils objected broadly seeking a more proactive approach to renewable energy provision along with Cambridgeshire County Council, Anglian Water and one local resident. The policy put forward in chapter 8 reflects the evidence base which suggests that wind energy development may be acceptable in principle, subject to a full and robust assessment under all planning policies in all areas of the District outside the Great Fen and its visual and landscape setting.

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 Policy would add to local's energy costs Concern that as worded the policy would not provide a positive setting to encourage renewable energy Seeking a positive approach for single 'local' turbines and hydroelectricity schemes **LP37 Air Quality** Requirements for when an air quality assessment will be required are considered to be appropriate and give Suggesting a more site by site certainty. basis for requiring an air quality The use of 'proposal' is consistent assessment across all policies and is considered to Seeks change from 'proposal' to be beneficial as it would include pre-'planning application' and definition application work/ discussions. for large scale major Large scale major is defined in the glossary. **LP38 Ground Contamination and** Policy text has been revised based on **Groundwater Pollution** suggestion. Supporting text has been updated to include reference to brownfield Suggesting a revision to 1st para of land. The Brownfield Land Register is policy regarding controlled waters considered to be a detailed but receptors and preliminary risk separate issue. assessments • Seeking reference to brownfield land and Brownfield Land Register **LP39 Water Related Development** Policy wording changed to aid clarity. Supporting text reviewed. Suggesting clarifications Supports short stay berths with residential use only if facilities are available Suggesting additional text referring to the River Basin Management Plan

4. SUMMARY OF CALL FOR SITES CONSULTATION AND RESULTANT PROPOSED CHANGES TO THE PLAN

- 3.1 A formal 'Call for Sites' was publicised alongside the draft Local Plan consultation seeking submissions of additional sites that landowners, developers and agents wished to put forward for potential residential development. They were asked to put forward sites which met the following criteria:
 - 1) Previously developed land which is available and potentially suitable for residential development throughout Huntingdonshire; and
 - 2) Greenfield land which meets the criteria set out below:
 - A) Is located in or adjacent to one of the:

- spatial planning areas identified in the Huntingdonshire Local Plan to 2036: Consultation Draft 2017 which are Huntingdon, St Neots, St Ives and Ramsey; or
- Key Service Centres identified in the Huntingdonshire Local Plan to 2036: Consultation Draft 2017 which are Buckden, Fenstanton, Kimbolton, Sawtry, Somersham, Warboys and Yaxley; or
- small settlements which has a range of services including at least four of the following: primary school, doctors surgery, public hall, food shop or public house; and
- B) Does not comprise:
 - Grade 1 agricultural land, which is the highest quality agricultural land
 - Land designated as functional floodplain (flood zone 3b) determined by consideration of the Council's Strategic Flood Risk Assessment (SFRA)
 - Land designated as being a Site of Special Scientific Interest (SSSI) or other important nature designation such as a Special Area of Conservation (SAC), a Special Protection Area (SPA) or Ramsar Site
 - Land within the 400m safeguarding area of a waste water treatment works in accordance with Policy CS31 of the Cambridgeshire and Peterborough Minerals & Waste Core Strategy 2011.
- 3.2 The Call for Sites attracted 227 submissions, not all of which met the criteria specified.
- 3.3 All site submissions were reviewed and allocated to a settlement category based on the level of service provision available. Sites related to a spatial planning area or key service centre were taken forward for a detailed assessment by default. The many sites put forward in small settlements were reviewed and grouped into three basic categories:
 - Small settlements with good sustainability those with all five specified services of primary school, doctors surgery, public hall, food shop and public house
 - Small settlements with reasonable sustainability those with four of the five specified services
 - Small settlements with limited sustainability those with three or fewer of the specified services
- 3.4 The table below lists the detailed site assessments completed and published for consultation as the HELAA. These covered the spatial planning areas, key service centres, small settlements with good sustainability and small settlements with reasonable sustainability. Sites in small settlements with limited sustainability were not assessed in detail; however, some may have potential for rural exceptions development. A small number of sites had been assessed in previous versions of the HELAA but significant amendments were put forward involving changes to the land area and so were reassessed.

Detailed Site Assessments

Location Category	Number of sites	
Potential new settlement proposals		
Sibson Aerodrome		
RAF Molesworth		
West of A1 from Buckden to Brampton		
Abbotsley Squash Club and Cromwell golf course, South of B1046, Abbotsley		
Abbotsley Golf course, surrounding Eynesbury Hardwicke Manor, Abbotsley		
Spatial Planning Areas		
Huntingdon	15	

St Neots	4
St Ives	7
Ramsey	5
Key Service Centres	
Buckden	1
Fenstanton	3
Kimbolton	4
Sawtry	3
Somersham	5
Warboys	10
Small Settlements with Good Sustainability	
Alconbury	7
Bluntisham	7
Great Staughton	5
Small Settlements with Reasonable Sustainability	
Abbots Ripton	2
Catworth	1
Elton	6
Farcet	5
Great Gidding	2
Great Gransden	4
Hemingford Grey	5
Hilton	5
Houghton and Wyton	2
Needingworth	3
The Offords	5
Stilton	5
Waresley	1
Exception to address Parish Council concerns	
Southoe	1

- 3.5 The HELAA consultation attracted 700 responses plus an additional form letter which was circulated around Hail Weston of which some 260 copies were signed and returned.
- 3.6 As a result of consultation responses it has been recognised that Great Paxton was omitted in error from the list of settlements with reasonable sustainability. Assessments have now been added for 4 sites, and we should have not have included the sites in Hilton and Waresley and they have since been removed.
- 3.7 The Parish of Elton does not currently meet the criteria for a settlement with reasonable sustainability due to the closure of the village shop in August 2017. The site assessments have been retained as the shop is currently being marketed.

Proposed Additional Site Allocations

- 3.8 Of the 128 sites for which detailed assessments were completed many were considered unsuitable for development for technical and/ or landscape impact reasons. Consultation responses have provided further details for some initially considered to be potentially suitable which have identified other technical constraints including a review of potential access arrangements by the local highway authority.
- 3.9 Of the remaining sites twelve are proposed as additional allocations for the Proposed Submission Local Plan. These are shown in Table 2.

Table 2: Proposed Additional Allocations

Site	Number of Dwellings
East of Valiant Square, Bury (Ramsey SPA)	88
North of St James Road to North of High Street, Little	34
Paxton (St Neots SPA)	
East of Silver Street and South of A1, Buckden	247
North of Station Road/ Stowe Road, Kimbolton	66
East of Robert Avenue, Somersham	Assessed at 74,
	proposed revision to 49
College Farm, West of Newlands industrial estate,	57
Somersham	
South of Stirling Close, Warboys	49
North of School lane, Alconbury	95
North of 10 Station Road, Bluntisham	29
West of Longacres, Bluntisham	150
Between 20 Cage Lane and Averyhill, Great Staughton	14
South of Perry Road, Great Staughton	20

3.10 The sites would add a total of 898 dwellings to the housing supply put forward in the Proposed Submission Local Plan. Initial estimates of the possible delivery trajectory have been undertaken for the purposes of infrastructure testing. These suggest that together the sites might add approximately 175 dwellings to the Council's 5 year housing land supply as well as provide additional resilience for it in future years. 3.11 An additional category is proposed for the Development Strategy of 'Local Service Centres' made up of the three settlements categorised as having 'good' sustainability as they contain all five of the services considered. These are Alconbury, Bluntisham and Great Staughton. Additional allocations are proposed where they are in accordance with the adopted development strategy and in the new category of Local Service Centres as these provide an opportunity for sustainable growth to support communities with greater facilities.

4. THE EVIDENCE BASE IN SUPPORT OF THE LOCAL PLAN AND PRESCRIBED DOCUMENTS UNDER S20(3) OF THE ACT

Strategic Transport Study

4.1 The Strategic Transport Study can be found via the following link

The Strategic Transport Study Addendum/Development Scenario 6 dated 28th November 2017 can be found here:

http://www.huntingdonshire.gov.uk/media/2641/huntingdonshire-strategic-transport-study-baseline-report.pdf

http://www.huntingdonshire.gov.uk/media/2642/huntingdonshire-strategic-transport-study-development-scenario-comparative-assessment.pdf

The Strategic Transport Study Addendum can be found here: http://www.huntingdonshire.gov.uk/media/2852/habitats-regulations-assessment-addendum.pdf

Strategic Flood Risk Assessment (SFRA):

4.2 No further amendments were required or made to the SFRA prepared in advance of the Consultation Draft 2017 and for the avoidance of doubt can be found here:

https://www.huntingdonshire.gov.uk/environmental-issues/flooding/strategic-flood-risk-assessment/

Retail and Commercial Leisure Needs Assessment:

4.3 No further amendments were required or made to the Retail and Commercial Leisure Needs Assessment prepared in advance of the Consultation Draft 2017 and for the avoidance of doubt can be found:

http://www.huntingdonshire.gov.uk/media/2604/retail-and-commercial-leisure-needs-assessment.pdf

Wind Energy Development

4.4 Consideration of the responses to the consultation document issued in November 2016 and the Regulation 18 has informed the policy contained in the Plan.

Habitats Regulations Assessment

4.5 The Habitats Regulations Assessment can be found here:

http://www.huntingdonshire.gov.uk/media/2684/habitats-regulations-assessment-2017.pdf

The Habitats Regulations Assessment Addendum can be found here:

http://www.huntingdonshire.gov.uk/media/2852/habitats-regulations-assessment-addendum.pdf

Local Plan Viability Testing:

- 4.6 A Local Plan Viability Study was published during the last consultation over the summer period evidencing that the local plan policies are deliverable and identifying the appropriate percentage of affordable housing to be sought to help meet local need.
 - http://www.huntingdonshire.gov.uk/media/2695/local-plan-viability-study.pdf
- 4.7 Following the Call for Sites, an Addendum to this Study has now been prepared. This has shown that the cumulative viability position has improved and confirmed that a policy relating to a requirement of up to 40% affordable housing across all residential developments is included in the Local Plan. The Local Plan Viability Study and the Addendum can be found via the following links:

http://www.huntingdonshire.gov.uk/media/2855/local-plan-viability-study-addendum.pdf

Growth and Infrastructure Investment and Delivery Plan

4.8 Following the Huntingdonshire Local Plan to 2036 consultation, which took place from 3 July to 25 August 2017 and included a Call for sites 2017, an additional piece of work has been undertaken to consider the change in infrastructure needs over the plan period due to the additional sites and minor changes in site number provision. The addendum to the Infrastructure Delivery Plan and the Infrastructure Schedule (June 2017) has now been finalised. The Infrastructure Delivery Plan, Infrastructure Schedule and the Addendum can be found via the following links:

http://www.huntingdonshire.gov.uk/media/2694/infrastructure-delivery-plan.pdf

http://www.huntingdonshire.gov.uk/media/2693/infrastructure-schedule.pdf

http://www.huntingdonshire.gov.uk/media/2861/infrastructure-delivery-planaddendum.pdf

4.9 As outlined to Members in the last update in June 2017 (Minute 12 refers), a further piece of work has also been undertaken covering Infrastructure Prioritisation, Funding and Programme Management. This will now be updated further following the Addendum work to provide a programme management tool to assist the Council and its partners in delivering the necessary infrastructure to support growth in the district.

Duty to Co-Operate

4.10 The Duty to Co-operate Statement can be found via the following link http://www.huntingdonshire.gov.uk/planning/new-local-plan-to-2036/

5. THE LOCAL PLAN PROCESS AND NEXT STEPS

5.1 The Plan has been prepared in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and is the result of effective discussion and consultation with local communities, businesses and other interested parties. The report to Cabinet in June 2017 identified the Local Plan timetable as set out below, and no changes are proposed

Timetable: Key stages- completed	
Sustainability appraisal scoping report	February – March 2012
Issues and options consultation	May – June 2012
Strategy and Policy consultation	August – November 2012
Full draft Local Plan (stage 3) consultation	May – July 2013
Additional sites consultation	November – December 2013

(Long Term Transport Strategy preparation led be Cambridgeshire County Council)	yMay – November 2014
Huntingdonshire Local Plan to 2026: Targeted Consultatio n 2015	January – March 2015
Finalisation of evidence base – including Housing and Employment Land Availability Assessment Strategic Flood Risk Assessment, Growth Investment Infrastructure Delivery Plan, Growth Viability Assessment and Gypsy and Travelle Accommodation Needs Assessment	t, June 2017 & h
Strategic Transport Study in collaboration with Cambridgeshire County Council	January 2016 - June 2017
Full draft Local Plan (July 2017) consultation, Housin and Economic Land Availability Assessment Jun 2017, and a call for sites.	
Housing and Employment Land Availability Assessment (October 2017)	ntOctober – November 2017
Timetable: key stage – to be completed/undertaken	
Statutory publishing the Local Plan (and the other proposed submission documents) for representations to be made, prior to the Plan being submitted for independent examination (accompanied by those representations) on proposed submission Local Plan to 2036 (Reg. 19)	December 2017
Submission to Secretary of State	March 2018
Estimated examination	March - May 2019
Receipt of Inspector's report	June 2019
Estimated date for adoption	July 2019

- 5.2 Local planning authorities must publicise the version of their Local Plan that they intend to submit to the Planning Inspectorate for examination to enable representations to come forward that can be considered at examination. This is known as the publication stage. As part of this report agreement is sought to agree the updated Local Development Scheme for publication on the Council's website.
- 5.3 Regulation 19 is not in itself a public consultation as the Council will not be considering the responses to the publication, rather they are submitted alongside the plan to the Secretary of State for his consideration. While anyone can comment on the Regulation 19 stage the comments must be based on the questions of legal compliance and soundness, the latter as set out in paragraph 182 of the NPPF, namely the Plan 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
- The examination starts when the Local Plan is submitted to the Planning Inspectorate and concludes when a report to the local planning authority has been issued. During the examination a planning Inspector will assess whether the Local Plan has been prepared in line with the relevant legal requirements (including the duty to cooperate) and whether it meets the tests of 'soundness' contained in the National Planning Policy Framework.
- 5.5 It is considered that the Proposed Submission 2017 Plan has been prepared in line with the relevant legal requirements and is Sound, and should be the Plan the Council intends to submit to the Secretary of State for independent examination.
- 5.6 The Inspector should work proactively with the local planning authority. Underpinning this is the expectation that:
 - issues not critical to the plan's soundness or other legal requirements do not cause unnecessary delay to the examination of the plan
 - Inspectors should identify any fundamental concerns at the earliest possible stage in the examination and will seek to work with the local planning authority to clarify and address these
 - where these issues cannot be resolved within the examination timetable, the
 potential of suspending the examination should be fully considered, with the
 local planning authority having an opportunity to assess the scope and
 feasibility of any work needed to remedy these issues during a period of
 suspension, so that this can be fully considered by the Inspector
 - consideration should be given to the option of the local planning authority
 making a commitment to review the plan or particular policies in the plan within
 an agreed period, where this would enable the Inspector to conclude that the
 plan is sound and meets the other legal requirements.
- If necessary, the Inspector may be asked by the local planning authority to recommend modifications to the Local Plan that would address any issues with soundness or procedural requirements that are identified during the examination. The Inspector can only recommend modifications if they are asked to do so by the local planning authority itself. If, in doing so, the Inspector identifies any fundamental issues with the plan, they may recommend that the plan should not be adopted by the local planning authority. The local planning authority will then need to consider whether to withdraw the plan and prepare a new document for submission. In this situation, any existing Local Plan policies will remain in force while a new plan is prepared, although some of those existing policies are likely to become increasingly out-of-date.

6. COMMENTS OF OVERVIEW & SCRUTINY AND CABINET

6.1 The comments of the relevant Overview and Scrutiny Panel and Cabinet will be provided at the Council meeting on the 13th November.

7. KEY IMPACTS / RISKS

- 7.1 If the Inspector identifies any fundamental issues with the plan, they may recommend that the plan should not be adopted by the <u>local planning authority</u>. The local planning authority will then need to consider whether to withdraw the plan and prepare a new document for submission. In this situation, any existing Local Plan policies will remain in force while a new plan is prepared, although some of those existing policies are likely to become increasingly out-of-date.
- 7.2 In September 2017 the government launched a consultation, namely 'planning for right homes in the right places: consultation proposals'. As part of that document the government proposes a standardised methodology for calculating objectively assessed need (OAN). If the government was to formally introduce that methodology Huntingdonshire's housing need could potentially rise from 20,100 to over 25,000 homes by 2036. However, that same consultation also proposes a transitional arrangement for a proposed approach to standardised OAN methodology. That consultation advises that the new standardised method should be used, unless the plan will be submitted for examination on or before 31st March 2018, or before the revised Framework is published (whichever is later).
- 7.3 If the currently proposed methodology is introduced, the Council would need to prepare a Plan with that method informing the assessment of housing need (subject to any changes that may emerge from the Government's consultation). If the numbers were increased there would then be significant further work to be undertaken to identify the appropriate 'policy on' housing requirement, with the potential for new site allocations, viability testing, further consultation, and further sustainability appraisal. All of this work would materially delay progress on taking the Local Plan through to adoption, and any delays would also be likely to require other elements of the evidence base to be up-dated. Thus, the timescale for putting this important part of the plan-led system in place would be significantly extended and subject to considerable uncertainty. It would therefore be preferable, provided that the Council agrees with the officer assessment that the Local Plan as currently formulated is sound, to proceed to submit the Plan for examination before the end of March 2018

8. WHAT ACTIONS WILL BE TAKEN/TIMETABLE FOR IMPLEMENTATION

8.1 The timetable for implementation will be in the hands of the Secretary of State, once submitted. However, it is anticipated that a plan will have been considered by the Secretary of State, found to be sound and will be presented back to Full Council for formal adoption by summer 2019.

9. LINK TO THE CORPORATE PLAN, STRATEGIC PRIORITIES AND / OR CORPORATE OBJECTIVES

- 9.1 The production of the HLP2036 and associated evidence relates to the 2017/18 strategic priority of Delivering Sustainable Growth and specifically two associated strategic objectives.
- 9.2 The first objective under the strategic priority is as follows:

	To improve the supply of new and affordable housing, jobs and community facilities to meet future need." Our work programme includes: "ensuring an adequate supply of housing to meet objectively assessed
	needs;
	□ planning and delivering the provision of decent market and affordable housing for current and future needs;
	ensuring that there are the right community facilities to accommodate the housing growth."
9.3	The relevant key actions for 2017/18 are:
	□ prepare the submission draft of the Local Plan;
	□ facilitate delivery of new housing on the large strategic sites at: o St Neots
	o Alconbury Weald ☐ maintain a 5 year housing supply position
	3 3 11 7 1 3 3
9.4	The second related objective under the strategic priority is as follows: "Support development of infrastructure to enable growth" Our work programme includes:
	☐ influencing the development of the Highways and Transport Infrastructure Strategy; and
	☐ facilitating the delivery of infrastructure to support housing growth.
	10. CONSULTATION
10.1	Summaries of the various consultations that have taken place and have helped shape the Proposed Submission 2017 Plan are provided above.
	11. LEGAL IMPLICATIONS
11.2	Legal requirements, including the tests of soundness, for the preparation of Local Plans are set down. It is considered that the Proposed Submission 2017

Local Plans are set down. It is considered that the Proposed Submission 2017 Plan has been prepared in line with the relevant legal requirements and is Sound, and should be the Plan the Council intends to submit to the Secretary of

State for independent examination.

12. RESOURCE IMPLICATIONS

12.1 A single Planning Policy earmarked reserve was agreed at the Cabinet meeting of 17th March 2016 enabling money to be drawn down to support production of the Local Plan.

13. REASONS FOR THE RECOMMENDED DECISIONS

13.1 It is considered that the Proposed Submission 2017 Plan has been prepared in line with the relevant legal requirements and is Sound, and should be the Plan the Council intends to submit to the Secretary of State for independent examination. It should therefore be published for representations with the intention that the Plan be submitted to the Secretary of State by the end of March 2018. Policies in the Local Plan will have more weight, and thereby provide more certainty, when they have been published and there is no counter reason why publication should be delayed.

14. LIST OF APPENDICES INCLUDED

Appendix 1 – The Huntingdonshire Local Plan 2036: Proposed Submission 2017

Appendix 2 - The Policies Map

BACKGROUND PAPERS

BACKGROUND PAPERS

Cabinet Report June 2017 Item

http://applications.huntingdonshire.gov.uk/moderngov/documents/s86239/Item%203%20-

%20Huntingdonshire%20Local%20Plan%202036%20Quarterly%20Update%20Approval%20for%20Consultation%20and%20Infrastructu.pdf

HM Treasury July 2015 Fixing the Foundations

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/443898/Productivity_Plan_web.pdf

Written Ministerial Statement July 2015 Local Plans

http://www.parliament.uk/documents/commons-vote-office/July%202015/21%20July/8-Communities-and-Local-Government-Local-Plans.pdf

Written Ministerial Statement 18 June 2015 on Wind Turbine Development http://www.parliament.uk/documents/commons-vote-office/June%202015/18%20June/1-DCLG-Planning.pdf

The Town and Country Planning (Local Planning)(England) Regulations 2012 http://www.legislation.gov.uk/cy/uksi/2012/767/made/data.xht?wrap=true

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