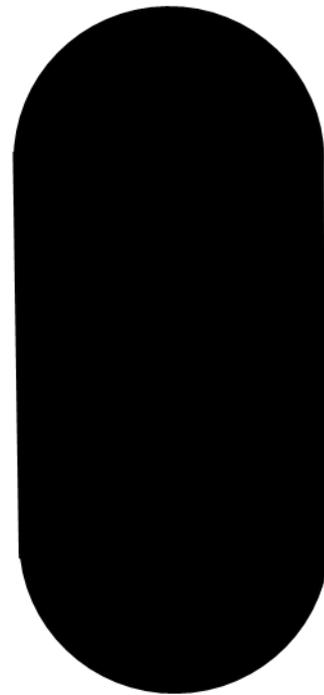
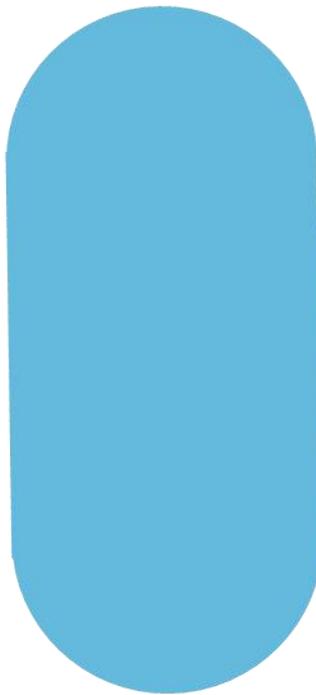


**WRITTEN STATEMENT IN RESPECT OF THE
HUNTINGDONSHIRE LOCAL PLAN TO 2036 FINAL DOCUMENT
FOR SUBMISSION MARCH 2018**

**MATTER 10 – PROPOSED SITE ALLOCATIONS – KEY SERVICE
CENTRES**

On Behalf of Larkfleet Homes
HLP2036-PS:688/690/674/689



1. INTRODUCTION

- 1.1 This Written Statement is made on behalf of our client, Larkfleet Homes, in respect of its interests at Land at Glatton Road, Sawtry as part of the forthcoming examination (EIP) of the Huntingdonshire District Submission Local Plan (March 2018).

2. MATTER 10: PROPOSED SITE ALLOCATIONS – KEY SERVICE CENTRES

- 2.1 The specific representations made below follow the form of the specific questions raised in the Inspector’s Matters and Issues paper for the Examination and are applied to the proposed Key Service Centre sites that we have specific comments on. It is not considered necessary to answer every single question in respect of each site, therefore responses have been provided only where relevant.
- 2.2 The Inspector’s specific questions in respect of the Key Service Centre proposed site allocations are as follows:

1) What is the background to the site allocation? How was it identified and which options were considered?

2) What is the scale and type/mix of uses proposed?

3) What is the basis for this and is it justified?

4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

5) What are the benefits that the proposed development would bring?

6) What are the potential adverse impacts of developing the site? How could they be mitigated?

7) How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary,

exception tests been applied?

8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

9) In particular what is the situation with waste water treatment capacity and how would any issues be resolved?

10) Is the site realistically viable and deliverable?

11) What is the expected timescale and rate of development and is this realistic?

12) Is the boundary of the site appropriate? Is there any justification for amending the boundary?

13) Are the detailed policy requirements effective, justified and consistent with national policy?

General – All Sites

2.3 The site allocations on the whole have emerged through a process of site submission and analysis. It is understood from the submitted Sustainability Appraisal that each site was initially analysed in the Environmental Capacity Study 2012 (and updated 2013) and then assessed again through the Housing and Economic Land Availability Assessment process in 2016 and 2017 (HELAA). However, it appears that the initial document (Environmental Capacity Study 2012 (ECS)) has not been submitted as part of the examination process. This should be rectified given its importance to the site selection process.

2.4 It appears that the Council has undertaken a detailed appraisal of all potential sites, which is contained within the Housing and Economic Land Availability Assessment (HELAA) December 2017, using a Sustainability Appraisal scoring framework (for example +++ is given to likely positive impacts and --- is given to likely negative impacts, etc). However, it is not

clear how the Council has then compared these scores in arriving at its selected preferred site allocations. Although the Council has gone to the trouble of scoring the various impacts of development in relation to each site in a quantitative fashion, it then appears to have simply provided a qualitative summary of the various impacts in respect of each site. Ranking the sites based on their quantitative performance would allow ease of comparison, even if the Council then went on to make its final decision based on a qualitative assessment. By simply disregarding the quantitative scoring results of the site assessments, there is significant capacity for overlooking various impacts and undermining the whole aim of the assessment, which is to identify the most sustainable sites.

2.5 The NPPF at paragraph 182 sets out that the plans will need to be prepared in accordance with the duty to cooperate, legal and procedural requirements and that they must be 'sound'. There are four tests of 'soundness', one of which is that the plan must be '*Justified*' i.e. the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Whilst it is clear that the Council has assessed the impacts of the various site options, as stated above, it is not clear how it has then selected what it considers to be the most appropriate sites for development. This makes it very difficult to draw direct comparisons between sites in order to determine which site options are the most sustainable and/or deliverable.

2.6 It is also noted that a number of the proposed site allocations are on areas of Grade 1 or 2 agricultural land. Their allocation may be perceived as inconsistent with emerging policy LP11 of the Local Plan, which seeks to use land of a lower agricultural value and seeks to avoid developing on Grade 1 or 2 agricultural land unless there are 'exceptional circumstances' where the benefits of any proposal significantly outweigh the loss of land. It is not considered that the Council have demonstrated 'exceptional circumstances' in this respect for all these sites.

[Buckden: BU1 – East of Silver Street and South of A1](#)

2.7 [Furthermore, in the Housing and Economic Land Availability Assessment](#)

(HELAA) December 2017, in response to the question *'is more than half the site located on grade 3 agricultural land or lower?'* the Council has given BU1 a 'neutral' rating. Since most of the land is classified as Grade 2, this rating should be 'negative'.

- 2.8 In its assessment of broad locations, the HELAA concludes on Broad Location A: East of Buckden, within which proposed allocation BU1 is contained, as follows:

'This is an area of open countryside east of Buckden which contributes to the rural setting of the village. It is mainly good quality agricultural land that has not been previously developed. Development in the majority of this area would be visually intrusive and adversely affect the open character of the agricultural land which provides the setting to the village. There may be potential for limited development in a small part of the north western corner, close to existing residential development in Silver Street.'

- 2.9 However, in response to the question *'will development have a significant impact on the surrounding townscape or landscape?'* contained in the HELAA, the Council state that the impact is likely to be 'neutral', notwithstanding the fact that the proposed BU1 allocation is neither 'limited' nor 'small', as per the Broad Location Assessment conclusion.

- 2.10 Finally, it is unclear why the HELAA states that the site has an estimated capacity of 247 dwellings, yet is allocated for 270.

KB2 – North of Station Road/Stowe Road

- 2.11 In its assessment of broad locations, the HELAA concludes on Broad Location A: North of Kimbolton, within which proposed allocation KB2 is contained, as follows:

'This is an extensive area of open countryside north of Kimbolton. The existing urban edge is clearly defined and development in this area would be visually intrusive from the road and footpaths

to the east and would extend built development across areas of rising land which form an important part of the rural setting of the village. This area is considered to offer no capacity for development allocations.'

- 2.12 Notwithstanding this, in response to the question '*will development have a significant impact on the surrounding townscape or landscape?*' contained in the HELAA, the Council state that the impact is likely to be 'neutral'. The Council offers no justification or reasoning as to why proposed allocation KB2 represents such a significant departure from the Council's own evidence-base.

Somersham: SM1 - College Farm, West of Newlands Industrial Estate

- 2.13 In the SHELAA, in response to the question '*is more than half the site located on grade 3 agricultural land or lower?*' the Council has given proposed allocation SM1 a 'neutral' rating. Since all of the land is classified as Grade 2, this rating should be a 'negative' rating.

SM4 – Somersham Town Football Club

- 2.14 The Council's assessment of SM4 contained within the HELAA states that before it can be developed, the football club would need to be relocated to an alternative appropriate recreational facility.

- 2.15 Footnote 11 of para 47 of the NPPF is clear that in order for a site to be deliverable, and therefore included within the 5 year tranche, it should be 'available now' for development. Since the football club will require relocation to an appropriate facility elsewhere, it is not 'available now' for development. As such, the 25 units included within year 5 (2021/2022) in the Council's Annual Monitoring Report (December 2017) should be pushed back to later in the plan period.

SM5 – East of Robert Avenue

- 2.16 Based on the red line site location plan assessed within the HELAA, there appears to be insufficient land available to secure an access on to

Robert Avenue. Instead, it would appear that a property (or two) on Loftsteads or Robert Avenue would need to be purchased in order to achieve access to the site.

2.17 Furthermore, the site is bound to the east by St Ives – March Disused Railway County Wildlife Site. This will be a significant ecological constraint to development and a substantial green buffer (probably in the region of 20m) will be required by the County Ecologist/Local Wildlife Trust. This is likely to impact substantially on the 50 dwelling capacity of the site.

2.18 Furthermore, the Council envisage that all 50 of the dwellings will come forward in years 4 and 5 of the trajectory; in light of the unknown extent of the access problems, it is considered that this is unrealistic and that this delivery should be pushed back to later in the plan period.

SM6 – North of the Bank

2.19 The proposed allocation is detached from the settlement, is not a logical extension or rounding-off of the settlement, and there are a number of technical constraints that are likely to mean that any planning application for development of the site will be found unacceptable and refused. The site is in close proximity to St Ives March Disused Railway County Wildlife Site and any appropriate mitigation buffer is likely to sterilise most of the western edge of the site; the site is also bound to the east by a bus depot, against which on-site mitigation is likely to be required in the form of structural planting or a noise bund. Again, it is considered that this is likely to sterilise part of the eastern edge of the site.

2.20 Finally, due to its detachment from the settlement, trips on foot from the site to the limited services/facilities offered by the village are unlikely; as such, it is considered that allocation of this site will result in a development that will encourage vehicular trips over short distances. This is not considered to represent sustainable development and can be easily avoided by allocating other more suitable sites.

Warboys: WB1 – West of Ramsey Road

- 2.21 The access area of the site is located within a Conservation Area and within close proximity to a number of Listed Buildings. In light of the fact that demolition of a good-quality building and the removal of mature trees are required (both of which are situated within the Conservation Area), there is a strong likelihood that a scheme that is acceptable in planning terms will not be achievable and that planning consent will be refused.
- 2.22 It is noted that the 'Availability' part of the HELAA in respect of this site refers to the fact that the agent for only 'part of the site' has confirmed its availability in response to the 2016 AMR Survey. Therefore, the Council cannot claim that this site is entirely 'available now', as required by footnote 11 of para 47 of the NPPF. Therefore, the 45 units to be delivered from this site shown in the 5 year tranche should be pushed back to later in the plan period. Notwithstanding the availability uncertainty, it is still considered that the above-mentioned technical issues and the fact that there is currently no developer interest or planning application for the site, means that the delivery of 10 units in year 3 (2019/2020) is considered extremely unlikely.

WB2 – Manor Farm Buildings

- 2.23 Given the presence of the Conservation Area, which completely surrounds the site, and the extent and proximity of Listed Buildings around the site, as well as the extensive demolition and site clearance required to facilitate development, it is considered that development of the site for circa 11 units (the identified capacity of the site) is unlikely to be viable.
- 2.24 Furthermore, the HELAA indicates that the site will only be available once the 'farmyard is suitably relocated.' As such, in accordance with footnote 11 of the para 47 of the NPPF, the site is not considered to be 'available now' and the 10 units envisaged as coming forward in years 3 (2019/2020) and 4 (2020/2021) of the trajectory, should be moved back towards the latter stages of the plan period.

WB3 – South of Stirling Close

- 2.25 The site is a completely illogical extension to the settlement and does not follow any established field boundaries or landscape features whatsoever. This will create a harsh southern edge to the settlement of Warboys and will place development pressure on surrounding agricultural land. There appears to be no justification as to why this site performs better in landscape/visual terms than other sites.

WB5 – Extension to West of Station Road

- 2.26 The site is to be an extension of an existing residential development to the east and will be accessed through this site accordingly, on to Station Road. The Council indicate that WB5 will deliver 20 units in year 3 (19/20), 30 units in year 4 (20/21) and 30 units in year 5 (21/22). However, clearly a start on the site will not be made (particularly if it's under control by the same developer as land to the east) until the site to the east has been built out – this is a typical and logical approach; developers will build out the farthest away units last, rather than spend money on infrastructure at the outset to link these farthest units up in terms of utilities and access. Since, as indicated by the AMR (December 2017), only 18 of the 96 units permitted on land to the east are completed, it is unlikely that 20 units will be constructed on the extension site by the end of year 3 of the trajectory. It is considered that delivery from this site should be pushed back to 20 units in year 5 only and the remaining units to be delivered in years 6 and 7.