

**HUNTINGDONSHIRE LOCAL PLAN 2036: CONSULTATION DRAFT JULY 2017  
RESPONSE BY CAMBRIDGESHIRE COUNTY COUNCIL****1. INTRODUCTION**

- 1.1 Cambridgeshire County Council welcomes the opportunity to respond to Huntingdonshire's draft Local Plan. These comments have been prepared by Officers of the Council and submitted in accordance with the instructions and timescales set out by Huntingdonshire. It should be noted that the same comments will be reported to the next meeting of the Economy and Environment Committee (12th October) for formal endorsement by this Council.
- 1.2 Each representation is prefixed with 'support', 'object' or 'comment' to clarify the status of each comment.

**2. TRANSPORT****Background**

- 2.1 SUPPORT: The Huntingdonshire Local Plan is supported by the Transport Strategy team. The team has had the opportunity to work on various strategies and projects, including but not limited to the Huntingdon & Godmanchester Market Town Transport Strategy (MTTS), St Neots MTTS refresh, Third Local Transport Plan for Cambridgeshire (including the Long Term Transport Strategy for Cambridgeshire). In developing these strategies we have had the good fortune of liaising with colleagues in HDC's Planning Services and the strategies have been developed with an awareness of the forthcoming needs of the Local Plan. Furthermore, the team has worked closely with key officers in HDC in bringing forward the Huntingdonshire Strategic Transport Study, which will provide a substantial evidence base to support the Local Plan. In preparing this together, both teams have been fully seized of the other's objectives and we are happy to support the evidence and recommendations of this study.
- 2.2 SUPPORT: We are pleased to confirm that the aims and objectives of the plan align with the aforementioned County Council strategies and are fully supported. The remainder of comments will refer to specific sections within the Local Plan.

**Improvement to key transport infrastructure are critical to support economic growth**

- 2.3 SUPPORT: The Transport Strategy team welcomes that this link is designated as 'critical': a number of vital projects are underway to facilitate this improvement, such as the HE development of the A14 and the GCP studies for the A428 corridor. Strategy for development (4.18-4.22).

- 2.4 SUPPORT: The Transport Strategy team, having been involved extensively with the Huntingdonshire Strategic Transport study, acknowledge the remarks made here around existing road infrastructure being unsuitable to deliver the Wyton site. We welcome the comments made about the potential the Wyton site has in the future, and, looking forward, will continue to work with Huntingdonshire District Council should they wish to explore the infrastructure requirements of the site further.

#### **Delivering Infrastructure (4.42-4.48)**

- 2.5 COMMENT: Within the mention of the Huntingdonshire Growth and Infrastructure Investment and Delivery Plan 2017 (GIIDP) it may have some value to add evidence from the LTP3 which is likely to enforce many schemes with a good evidence base. It may also add some value to explicitly state the County Council's Long Term Transport Strategy was developed with the needs of the (then emerging) HDC Local Plan in mind.

#### **Sustainable Travel**

- 2.6 SUPPORT: The Transport Strategy team welcomes Policy LP15. The policy recommends a number of thoughtful concepts such as encouraging sustainable methods, use of transport assessments/travel plans and safe physical access. It may add value to acknowledge the limitations of some of those ambitious (e.g. short-term funding of bus service). Many points raised within the '*Reasoning*' section that follows indicate good forethought such as:
- Understanding the rural setting and car usage levels
  - Support of sustainable travel methods in line with LTTS, MTTs and Huntingdonshire Design Guide SPD
  - Suggesting proposals providing opportunities for use of public transport
  - Requirements for understanding a developments impact on the transport network
  - Useful supporting documentation
  - Management of AQMAs and their impact

#### **Parking Provision**

- 2.7 SUPPORT: The Transport Strategy team welcomes the inclusion of Policy LP16. It is understood that car usage/modal share will be higher in Huntingdonshire than is expected at a national level at the present time, however would the plan not anticipate that this demand falls if Policy LP 15 is successfully applied. The rationale behind this includes utilising major infrastructure projects (the Busway and further extensions, A14 changes, A428 changes, additional cycling infrastructure, additional K/P&R sites), population density increases from new major developments, the high growth targets will make substantially increased car traffic (mostly single occupancy vehicles (SOV)) unmanageable on the

transport network. The document provides a very impressive level of forethought within the '*Reasoning*' section.

### **Conserving and Enhancing the Environment**

- 2.8 SUPPORT: Efforts to protect and conserve the environment are fully supported, it is understood that significant damage is generated from vehicles (and related pollution), with particular focus on air quality and wildlife.

### **Spatial Planning Areas**

- 2.9 COMMENT: Subject to acceptable mitigation measures, detailed planning and various forms of impact assessment, there is no reason to site objections to any site listed.

### **Key Service Centres FS**

- 2.10 COMMENT: With the Northstowe development adding a significant number of homes to the Fenstanton area, the addition service centres will be welcomed, however the timing of the listed developments (FS1 to FS3) will require the initial infrastructure improvements to be underway to account for further developments.
- 2.11 COMMENT: A very helpful chart would be area totals, by site, possibly as an appendix. This can give a high level summary of expected population, dwelling, business, jobs and anticipated number to work out expected traffic.

### **Huntingdon Strategic Transport Study – Baseline Report**

- 2.12 SUPPORT: Report produced in conjunction with CCC and we are happy to support its conclusions and recommendations.

### **Huntingdon Strategic Transport Study – Development Scenario Comparative Assessment**

- 2.13 SUPPORT Report produced in conjunction with CCC and we are happy to support its conclusions and recommendations.

### **Infrastructure Delivery Plan**

- 2.14 COMMENT: (Reference note) Although costings and budget information cannot be removed, a factor of consideration should be made that both the A14 and A428 schemes (accounting for £2bn investment) are national schemes and not intended to be local schemes as this represents a vast amount of funding.
- 2.15 COMMENT: As time progresses it is very likely the costs will grow, this can be factored in with risk funds and adjustments which do not appear to be accounted for.

## **3. ENERGY**

- 3.1 **OBJECTION:** Cambridgeshire County Council, Energy Investment Unit, objects to policy LP36, Renewable and Low Carbon Energy, Huntingdonshire's Local Plan to 2036: Consultation Draft 2017, section 8, Conserving and Enhancing the Environment.
- 3.2 Policy LP36 below identifies that no planning permissions will be supported for any wind development across the district.

### **Renewable and Low Carbon Energy**

A proposal for wind energy development of a scale that would require planning permission will not be supported.

A proposal for a renewable or low carbon energy generating scheme, other than wind energy, will be supported where it is demonstrated that all potential adverse impacts including cumulative impacts are or can be made acceptable.

When identifying and considering the acceptability of potential adverse planning impacts their significance and level of harm will be weighed against the public benefits of the proposal.

When identifying and considering impacts on heritage assets and/ or their settings special regard will be had to the desirability of sustaining and enhancing the significance of such assets.

When identifying and considering landscape impacts regard will be had to the [Huntingdonshire Landscape and Townscape Assessment SPD \(2007\)](#) or successor documents.

Having identified potential adverse impacts the proposal must seek to address them all firstly by seeking to avoid the impact, then to minimise the impact. The acceptability of impacts on the significance of heritage assets will be considered at this point, for all other impacts alternative enhancement and/ or compensatory measures should be assessed and included in order to make the impact acceptable. All reasonable efforts to avoid, minimise and, where appropriate, compensate will be essential for significant adverse impacts to be considered fully addressed. Sufficient evidence will need to have been provided to demonstrate that adverse impacts on designated sites can be adequately mitigated. Where relevant this will include sufficient information to inform a Habitats Regulations Assessment.

Provision will be made for the removal of apparatus and reinstatement of the site to an acceptable condition, should the scheme become redundant or at the end of the permitted period for time limited planning permissions.

- 3.3 The policy will result in no new wind energy proposals coming forward across the whole of Huntingdonshire until after 2036. This will limit the ability of Huntingdonshire's communities to generate renewable energy from wind to help manage their future energy

costs (BEIS Industrial Strategy, consultation, January 2017) and limit their ability to become more energy self-sufficient through helping to balance supply and demand for energy locally. The resilience of the local energy infrastructure will be compromised if wind is excluded as other fuels will be required to bridge the energy gap.

- 3.4 Preventing local businesses and communities to bring forward local wind energy projects is not supportive of the transition to a low carbon economy described by Government in its Industrial Strategy (Consultation undertaken by BEIS, January 2017) and goes against government's policy to drive forward decentralised, community energy schemes (Community Energy Strategy update, March 2015). It is Government's ambition to establish local energy markets to buy and sell energy locally, keeping energy spend in the local economy to help secure more affordable energy. Preventing wind developments will limit the ability of our communities to develop projects to supply energy to local customers.
- 3.5 The Cambridgeshire Renewables Infrastructure Framework (CRIF, 2012) identifies that if Cambridgeshire wants to generate 28% of its energy locally from renewables and low carbon sources, all types of renewables will be required to help deliver this level of energy self-sufficiency. Precluding wind, one of the more abundant renewables will limit Cambridgeshire's (including Huntingdonshire's) ability to be more energy self-sufficient and will in the long term impact energy costs. It is now cheaper to generate 1 MW of wind power than 1MW of nuclear power.
- 3.6 Cambridgeshire County Council recently approved its Corporate Energy Strategy (March 2017). The strategy promotes the development of renewable energy on its assets, for example, wind turbines along the guided busway, as this will provide the opportunity to generate and sell energy locally to benefit Cambridgeshire's residents and the services it delivers. Policy LP 36 will reduce the Council's capacity to develop renewable energy schemes to build local energy security, help manage energy costs and generate income for its services.
- 3.7 On-shore wind energy is the cheapest energy to generate for customers. See BEIS table below. Communities are concerned about the affordability of energy – stopping any wind development will only add to communities energy costs.

**Table 2: Levelised Cost Estimates for NOAK Projects Commissioning in 2020, Technology-specific Hurdle Rates, £/MWh**

	CCGT H Class	OCGT 600MW (500hrs)	Biomass Conversion	Offshore Wind Round 3	Large Scale Solar PV	Onshore Wind >5MW UK
Pre Development Costs	0	5	2	5	6	4
Construction Costs	7	63	5	73	52	44
Fixed O&M	2	17	6	24	9	10
Variable O&M	3	3	1	3	0	5
Fuel Costs	35	52	72	0	0	0
Carbon Costs	19	28	0	0	0	0
Total	66	166	87	106	67	63

- 3.8 There is insufficient evidence to support the proposed LP36 policy excluding wind developments.

### **Wind Turbine Development in Huntingdonshire 2005**

- 3.9 This comprehensive study commissioned by HDC assessed the nine different Huntingdonshire landscapes and their ability to accommodate wind turbines. The outcomes from this study identified that for all landscape areas there was capacity for wind turbines.

**Table 14.1: Summary of Landscape Capacity for Wind Turbine Development**

<b>Landscape Character Area</b>	<b>Single Turbine (1 turbine)</b>	<b>Small Scale Group (2 - 3 turbines)</b>	<b>Small Scale Group (4 - 12 turbines)</b>	<b>Medium Scale Group (13 - 24 turbines)</b>	<b>Large Scale Group (25+ turbines)</b>
1: The Fens	High	High	High	Moderate (lower end of scale e.g. 13 – 15 turbines)	Low
2: Fen Margin	High	High	High	Moderate (lower end of scale e.g. 13 – 15 turbines)	Low
3: Central Claylands	High	High	High	Moderate	Low
4: Ouse Valley	High	Moderate	Low	Low	Low
5: South East Claylands	High	High	High	Moderate	Low
6: Northern Wolds	High	High	Low	Low	Low
7: Grafham Water	High	Moderate	Low	Low	Low
8: Southern Wolds	High	High	High	Low	Low
9: Nene Valley	Moderate	Low	Low	Low	Low

### **Wind Energy Development in Huntingdonshire, Supplementary Planning Guidance, 2014**

- 3.10 This SPD recognises and supports Huntingdonshire's capacity for wind development as detailed above, whilst ensuring that proposals are guided to the most appropriate locations, safeguarding the key features and values of Huntingdonshire's landscapes. This guidance is a positive planning tool to support sensitive wind development and does not uphold a total ban on wind turbines.

### **Huntingdonshire Local Plan to 2036: Wind Energy Developments**

- 3.11 This study was commissioned to identify how Greg Clarke's written statement (18th June 2015) informs local plan policies. Five scenarios were reviewed including:
- Option 1: whole district is accessible
  - Option 2: whole district minus the Great Fen
  - Option 3: landscape character areas not suitable
  - Option 4: whole district not suitable
  - Additional option A: small turbines are suitable
- 3.12 Policy LP36 is based on option 4: Whole district is not suitable for wind development. However, the study does not conclude this is the best option as it identifies that option 4 prevents wind energy developments, does nothing to contribute to reducing CO<sub>2</sub> emissions

or to tackling climate change and would not allow local rural businesses to diversify their energy procurement through wind energy. On the other hand, option 1 or option 2 if applied to LP36 would maximise the opportunity to contribute to the reduction of CO<sub>2</sub> thereby tackling climate change, provide energy security, and provide benefits to rural businesses.

3.13 It is worth noting that Greg Clarke's statement on local planning for wind turbines, 18<sup>th</sup> June 2015 did not stop all wind development, it identified that when determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if:

- The development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and
- Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.
- In applying these new considerations, suitable areas for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan.

3.14 It is recommended to update policy LP 36 to the following:

#### **Renewable and Low Carbon Energy**

A proposal for renewable or low carbon energy generating schemes, will be supported where it is demonstrated that all potential adverse impacts including cumulative impacts are or can be made acceptable.

When identifying and considering the acceptability of potential adverse planning impacts their significance and level of harm will be weighed against the public benefits of the proposal.

When identifying and considering impacts on heritage assets and/ or their settings special regard will be had to the desirability of sustaining and enhancing the significance of such assets.

When identifying and considering landscape impacts regard will be had to the [Huntingdonshire Landscape and Townscape Assessment SPD \(2007\)](#) or Supplementary Planning Guidance for wind developments 2014, or successor documents.

Having identified potential adverse impacts the proposal must seek to address them all firstly by seeking to avoid the impact, then to minimise the impact. The acceptability of impacts on the significance of heritage assets will be considered at this point, for all other impacts alternative enhancement and/ or compensatory measures should be assessed and included in order to make the impact acceptable. All reasonable efforts to avoid, minimise and, where appropriate, compensate will be essential for significant adverse

impacts to be considered fully addressed. Sufficient evidence will need to have been provided to demonstrate that adverse impacts on designated sites can be adequately mitigated. Where relevant this will include sufficient information to inform a Habitats Regulations Assessment.

Provision will be made for the removal of apparatus and reinstatement of the site to an acceptable condition, should the scheme become redundant or at the end of the permitted period for time limited planning permissions.

#### **4. EDUCATION**

##### **Strategic Expansion Allocations**

- 4.1 COMMENT: Additional dwellings to the proposed allocations at Alconbury Weald (pg125) and St Neots Eastern Expansion (pg172) would pose particular difficulty with regard to the provision of education infrastructure. For example, with regard to secondary school provision the County Council would need to future proof secondary school sites in order to be able to respond to the need for additional school places if the number of dwellings exceeds that already indicated in the Plan.
- 4.2 COMMENT: The site secured for the secondary school at Alconbury Weald has been negotiated on the basis of an 8 form entry (FE)/1200 place school and is effectively land locked in terms of master planning so the scope to build a bigger school, if necessary, is limited. This is particularly relevant when we consider the likelihood of an increase in dwellings on the site.
- 4.3 OBJECTION: The proposed development of RAF Alconbury (SEL 1.2 P129) will require a primary school, as identified in the plan, and also a significant number of secondary places. The proximity of the development to the new secondary school on Alconbury Weald would suggest that places should be provided at the new secondary school. The school site in negotiation is not of sufficient size for both developments and should the school be land locked it may not be possible to provide sufficient school places at Alconbury Weald. The County Council therefore requests that the plan is amended to ensure that the long term needs for secondary provision at Alconbury can be adequately addressed in a sustainable manner.
- 4.4 COMMENT: The delivery of 1680 homes at RAF Alconbury will require additional primary places as is noted in the Plan, however there is no reference to the need for additional secondary school places. A development of this size will not yield numbers of secondary age children to support a separate secondary school on this development.
- 4.5 COMMENT: As the development of RAF Alconbury and Alconbury Weald is to be considered as one community, secondary school places should be provided on the



Alconbury Weald site, however the agreed secondary school site does not have capacity for the number of secondary school places which the combined developments will require.

- 4.6 COMMENT: The site requirement should state that Successful development of the site will require' provision of primary, secondary and early years education facilities, in agreement with Cambridgeshire County Council'.
- 4.7 SUPPORT: We note that reference to school site sizes has been withdrawn from the plan. We support this as the correct site size can then be negotiated with the developer.

#### **Development proposals on Unallocated Sites**

- 4.8 COMMENT: Page 47 LP5 point 3. Development of unallocated sites can pose difficulties for the County Council particularly in the catchments of schools on constrained sites which cannot easily be expanded. The County Council would respond to planning applications and would highlight the deliverability of these new developments.

#### **Other Uses**

- 4.9 SUPPORT: The County Council supports this point in policy LP5 and the additional childcare provision. One of the barriers to ensuring sufficient childcare is the identification of suitable venues in areas central to the community.
- 4.10 COMMENT: Page 48 describes some of the conditions under which D1 and D2 use will be considered. It would be beneficial if D1 use were also considered when a venue is required for childcare use to meet the needs of the local community.

#### **Strengthening Communities**

- 4.11 COMMENT: This section of the Local Plan does not take into consideration the vital role played by education establishments, including the capacity of the local primary schools and the ability to expand the school to meet the needs of the groups.
- 4.12 COMMENT: LP23 Affordable Housing Provision. We recognise the importance of affordable housing. However affordable housing yields more children of school age than other types of housing. It is, therefore, essential that this is recognised by the District and that the County Council is correspondingly supported in the delivery of school places to meet this demand otherwise there is a high risk of insufficient school places across Huntingdonshire.
- 4.13 SUPPORT: LP 26 Gypsies, Travellers and Travelling Showpeople. We welcome point 'a', which recognizes the importance of placing sites in close proximity to education facilities.
- 4.14 COMMENT: We suggest that a criteria such as; a proposal for the location of new Gypsy and Traveller pitches and for Travelling Showpeople will be supported where; if required, sufficient additional early years, primary and secondary school provision can be made to mitigate the impact of the development.

## **Requiring Good Design**

- 4.15 SUPPORT: *Sustainable Transport* - We welcome the frequent references throughout the document to developing communities with good cycle infrastructure which encourages children and families to walk and cycle to school.

## **Building a Strong, Competitive Economy**

- 4.16 COMMENT: Large part of this section focuses on employment opportunities. It should be noted that for working parents childcare is essential. However no reference is made within this section to ensuring access to childcare provision. We recommend that where possible reference is made in support of the development of childcare for parents who wish to work or train.

## **Huntingdon Spatial Planning Area**

### Former Alconbury Airfield and Grange Farm (Alconbury Weald)

- 4.17 COMMENT: The designation of an enterprise zone (EZ) at Alconbury Weald will bring 8000 jobs by 2036. These numbers of employees are likely to include a large number of parents. The need to support working parents should be considered and reflected in the plan by including the requirement for at least one full day care setting within the Enterprise Zone.

### HU1 Ermine Street Huntingdon

- 4.18 Summary of key issues arising from this allocation:

#### *Access*

- 4.19 COMMENT: Page 133(d) makes reference to the requirement for provision of sustainable transport network for vehicles, public transport, cyclists and pedestrians incorporating links to the surrounding area including the nearby right of way.
- 4.20 Safe links will also be required to provide access between the north and south sections of the Ermine Street development. As the primary school for the development is in the south section but will also serve the north section of the development, it is essential that there is a safe walking route for children and families in the north to access the school in the south.
- 4.21 Access between the north and south of the site is also relevant to point 9.37 in order to maximize the potential for children to walk to school

#### *Phasing*

- 4.22 COMMENT: This sustainable transport network is welcomed but it is essential that such cyclist and pedestrian safe off- road routes are in place from the outset of the development to allow secondary aged children to safely access their catchment secondary school, St Peter's Academy, in Huntingdon town.

- 4.23 COMMENT: The approach to masterplaning and phasing is also critical; primary provision will only work if the part of the development where the school is to be sited is delivered first.

*Childcare*

- 4.24 SUPPORT: We welcome the inclusion in point 9.37 that additional land will be required for childcare

HU2 Hinchingsbrooke Health Campus, Huntingdon

- 4.25 OBJECTION: We note that 230 additional dwellings for family housing and other has been incorporated to the plan. However the proposed allocation makes no reference to education provision in a part of the town where the District Council has already acknowledged that there are constraints on expansion of primary education facilities.

**St Neots Spatial Planning Area**

- 4.26 COMMENT: Page 173 q. makes the following reference:

*“Successful development of the site will require:*

*q. assessment of noise impacts for the site, particularly from the East Coast Main Line Railway and appropriate acoustic treatments to address any adverse impacts.”*

- 4.27 The County Council has raised strong concerns about the proximity of both primary schools to the East Coast Main Line Railway. We welcome suggestions schools will be located away from the railway line, however should a school be located near the Main Line the County Council will need assurances that additional costs will be met by the developer in full on the primary school buildings which are close to the railway line and which may require additional design features to mitigate the impact of the noise, in line with Department for Education building bulletin guidance, Additionally, there may be impacts on the design of the school which may hinder the urban design aspirations for the area and this is to be acknowledged at this stage. The County Council is currently working with the applicant on the location of both primary school away from the railway line.

SN 2 Loves Farm Reserved Site, St Neots

- 4.28 COMMENT: This site is located on the edge of the Loves Farm development where there are currently significant issues relating to the availability of primary school places. This allocation makes no reference to education. However the development will yield primary aged children who will wish to attend their catchment school. The following statement should be included ‘Successful development of the site will require....provision of primary, early years and secondary education facilities, in agreement with Cambridgeshire County’.
- 4.29 This allocation should be treated as part of the St Neots Eastern Expansion

## **Ramsey Spatial Planning Area**

### RA7 Former RAF Upwood and Upwood Hill House, Ramsey

- 4.30 COMMENT: The proposed allocation of this site to include approximately 450 homes is significantly greater than the 160 dwellings suggested in 2013. This poses particular difficulty with regard to the provision of primary education and pre-school infrastructure. No reference is made to education within this allocation.
- 4.31 A number of key concerns relating to education arise from this allocation:
- Lack of capacity in existing local primary schools to accommodate children from the new development
  - Potential demand for full day care provision associated with the proposed employment
  - Pressure upon existing Children's Centre services
  - Requirement of a safe walking route to the school identified by the Council as the catchment school for the proposed development
- 4.32 Two primary schools are located within the two mile statutory walking distance of the development site; Bury Church of England Aided Primary School and Upwood Primary School. Both schools are currently operating at, or close to, their capacity and both schools are located on constrained sites which will restrict the extension of accommodation unless additional land were made available.
- 4.33 The proposed development at RAF Upwood would require a 1 form entry extension (210 places) of whichever local primary school was to become the designated catchment school for the development. Upwood Primary would require at least an additional 0.5 ha of land to in order to expand and at least an additional 1ha of land would be required on the Bury school site to accommodate the necessary expansion. In order to achieve this, the County Council would seek from the developer additional land adjoining the development.
- 4.34 This development would require additional childcare provision either as part of the school expansion or as a D1 site identified by the developer.

## **Warboys**

- 4.35 COMMENT: Expansion of existing childcare provision will be required to meet the demand arising from the additional homes on the various proposed allocations in the village.