

County Council comments on Draft Huntingdonshire Local Plan

The consultation comprises a number of draft documents on which to comment. The County Council's response will follow the same format and provides comments to each of the draft documents. The response includes input from a range of County Council services and teams including: CYPS Infrastructure Service (Schools Planning); Adult Social Care; Highways Development Control; Libraries, Archives and Information; Networking and Partnerships; Rights of Way; Transport Infrastructure, Policy and Funding; Growth and Economy (incorporating Historic Environment Team; Ecology; Minerals and Waste Planning) and Public Health.

1 Draft Strategic Options and Policies Document

Key Issues

We wish to emphasise the critical importance of:

- Ensuring that infrastructure provision is adequate to keep pace with additional developments.
- Acknowledging and assessing the impact of growth on existing community infrastructure.

In terms of school place planning, there is limited available spare capacity across Huntingdonshire. Current and long-term pressures exist in Huntingdon, longer term in St Neots, and current pressures in the primary sector in St Ives. This situation is mirrored in the early years sector. In terms of pupil forecasting, all we can do at this stage, as an initial high level exercise, is apply the general multipliers across the total housing figures in each of the three growth options set out in the consultation.

The focus of development on market towns in previous planning strategies, which is set to continue, together with rising birth rates, mean that the County Council is already having to expand provision in St Neots (Love's Farm), Huntingdon and St Ives. There is no spare capacity in Huntingdon or St Ives and only limited spare capacity currently in St Neots. Continued growth in these areas, whether low, medium or high, will require investment in new school infrastructure (sites and buildings).

Development has been constrained in the north of the District in previous and future development plans. As a consequence, any surplus school capacity that does exist is located in the Ramsey/Sawtry area. Housing growth in these areas could make good use of existing infrastructure and contribute to the overall viability of development. However, it is appreciated that decisions on the spatial strategy for the District take into account a whole range of factors and cannot be determined simply on the basis of the availability of school places.

There are issues beyond housing development that will have an impact on the need for the future Local Plan to make provision for the expansion of school provision. Indications are, at present, that the recent rise in the birth rate may

be sustained and there are policy changes, such as the raising of the participation age, which will contribute to increase the pressure upon existing capacity.

Any proposed employment sites will have implications for demand for day care/nursery provision, particularly in Huntingdon and St Neots where there is already a very close match between places and demand and scope for expansion and options for setting up new provision is currently limited.

In terms of library provision, we believe it is important to consider not only the impact of new developments - in terms of pressures resulting from increased demand and usage - but also the impact and benefits of library provision in meeting the needs of the residents of new developments. Comments in relation to library provision throughout the County's response, and answers to the consultation questions, reflect these related and inter-dependent effects.

Question: Are there any other issues you think should be considered in the plan?

An issue that we consider to be particularly important is for the early consideration of social infrastructure when planning new communities. This is an area that can be overlooked but we consider this aspect to be as important as the physical infrastructure to ensure the health and wellbeing of new and existing communities. The importance and rationale for this has been set out in the [JSNA for New Communities \(2011\)](#) in the chapter dedicated to the social environment.

Vision and Objectives

The overarching vision and objectives are supported. In particular we welcome the requirement for new infrastructure and public transport services to ensure that the District functions effectively. However the statement only refers to roads and public transport - walking and cycling should also be referenced as they are important mode choices for shorter journeys and can help to reduce the impact of a development on the highway network. The vision and objectives should also make specific reference to the need for good levels of accessibility to services, particularly given the rural nature of much of the district.

The Local Plan should reflect the policies of the Cambridgeshire Local Transport Plan as well as Market Town Transport Strategies (MTTS) for St Neots, St Ives, Ramsey, and Huntingdon and Godmanchester. The County Council is reviewing the MTTSs to reflect planned growth set out in the Local Plan. Alconbury Weald and other major developments identified through the Local Plan will need to be considered as an integral part of the review of the relevant Market Town Transport Strategy.

New infrastructure will include waste management infrastructure which will take a variety of forms, including temporary inert waste recycling facilities on major sites (especially previously developed sites); waste processing facilities and Household Recycling Centres (either new or extension to existing).

We wish to emphasise here the importance of libraries to the quality of life, well being, social, economic and cultural development of communities – by meeting their information, learning, reading and cultural needs. This is recognised both nationally and locally. Therefore, it will be important to include access to a range of library facilities to meet the needs of the residents of the new developments for information, learning and reading resources in connection with their work, learning, personal development, personal interests and leisure.

We endorse the key objectives proposed, especially those focusing on enabling job opportunities and a strong local economy; on supporting communities to achieve their aspirations; on protecting and enhancing the market towns; and on securing the infrastructure needed to ensure sustainable development. The Library Service has a key role to play in helping to achieve key elements of these objectives, especially by:

- Enabling individuals, families, communities and businesses to access information relevant to their needs: to develop their skills, knowledge and interests, as well as for people to improve their literacy, numeracy, IT or other basic skills to help them enter or return to the job market. In this context, the information resources and learning facilities at the market town libraries in Huntingdonshire and the provision at workplace or home of free access to high quality subscription-based information resources online via the internet are key community assets made available by the library service.
- Providing attractive, welcoming, inclusive and safe social spaces where communities can come together and can access a range of services. The market town libraries, as well as providing library services to meet the needs of the local communities, also provide accommodation for many partners to deliver their services - particularly information and advice services, e.g. the Adult Careers Advice Service. This is in keeping with the latest County Council policy for the delivery of a 21st Century Library Service, which envisages developing community hubs where library services can be provided in shared buildings in partnership with other services, creating a trusted environment with expert staff, a natural place where people will go to seek information, advice and support and to carry out transactions.

NPPF paragraph 126 states that '*Local Planning Authorities should set out in their local plan a positive strategy for the conservation and enjoyment of the historic environment*'. In addition to the development management policies, we would welcome a commitment from Huntingdonshire District Council, through strategic policy, to proactively manage heritage assets to promote opportunities for leisure and tourism, and promote the contribution of the historic environment to the character of a place.

Question: Do you agree that the Draft Spatial Planning Vision for Huntingdonshire to 2036 satisfactorily describes the type of place that Huntingdonshire should be in 2036, or do you have suggestions for amending it?

Following on from the issues identified above, we suggest the vision statement could be strengthened by adding 'social' environment and also 'facilities' to the text as below:

In 2036 Huntingdonshire will be a highly sustainable and economically vibrant place with thriving market towns and villages, a high quality built, social and natural environment, successful neighbourhoods, and a range of well designed homes and facilities for all sectors of the community.

Question: Do you agree that the Draft Local Plan Strategy Aim and Objectives form an appropriate basis for the policies in the Local Plan, or do you have suggestions for amending them?

In line with the recently endorsed [Health and Wellbeing Strategy for Cambridgeshire 2012- 2017](#), we suggest the health and wellbeing element of the objectives could be strengthened by amending bullet 3 to read: To promote well designed, safe, sustainable developments that *promote health & well being, including mental well-being.*

What Will We Need to Plan For?

Under the '*Infrastructure*' heading we wish to see libraries mentioned specifically in list of the types of new infrastructure required to ensure that the district functions effectively - alongside "*road and public transport improvements, energy and power distribution, water and waste facilities, schools and education facilities, health-centres, community and leisure facilities, green infrastructure and communications infrastructure such as broadband*".

Although we realise that the list of services included there is not exhaustive, we believe library services should be included as a specific area of infrastructure because of the need to fund the statutory responsibility for providing a library service to all communities, including new communities, and because:

- It represents multi-purpose provision which contributes to several of the areas already included in the list: education (including lifelong learning); community and leisure facilities and communications infrastructure.
- We will need to rely on this policy document in future negotiations with developers and possibly also at public inquiries.

Growth Options

The plan identifies three different growth scenarios. The location of future growth and employment is critically important to ensure the opportunity to travel using sustainable modes is maximised and need to travel is reduced where possible. Similarly the different levels of growth are likely to trigger a need for different transport solutions. Further work will be required to understand the impact of the different growth scenarios on the transport network and identify the infrastructure that would be required to support the growth scenario. It may be useful to utilise the Cambridge Sub-Regional Model to test the growth options and identify the transport impacts of these

options. We would be happy to work with the District Council if this work is required.

At this stage in the process there are no strategic transport objections in principle to the growth locations identified in the plan, as all locations except Alconbury and RAF Wyton (which will be expected to provide suitable transport links to and from the sites) are within existing settlements with existing transport infrastructure. However, as greater detail emerges, further assessments will be required which may well identify other transport issues and constraints that have not yet been identified at this early stage.

The Local Plan will need to take into account the government's proposal for the A14 trunk road as this has particular implications for the Huntingdon Spatial Planning Area. The Local Plan will also need to give consideration to the rest of the strategic transport network e.g. the A428 and the capacity of the rail network.

All new developments should be designed to integrate with the existing sustainable travel network and provide new sustainable infrastructure to reduce the need to travel and help promote travel behaviour change away from the private car. In addition, as part of all new developments, the County Council wishes to see all new roads adopted. This should ensure that roads are built to the appropriate standard and are adequately lit and drained which should benefit all future users.

The sustainability assessment includes a number of sustainability appraisal questions related to transport, however these questions only focus on reducing the need to travel; the development options should also be considered with regards to access to sustainable transport infrastructure which would assist in reducing the impact of the development on the highway network.

Low Economic Growth Option

The job decrease forecast of 1400 for the Low Growth Option over the period 2011 to 2036 seems unduly pessimistic based on a scale of housing growth of 16,000+ for the district over this period. Even given the job losses in the district as a result of the recession between 2008 - 2011 (2500 in the EEFM model), redundancies still to work through at businesses like Dairy Crest and Huntingdon Life Sciences and very little growth up to 2018, it is difficult not to see this decline reversed and job growth occurring after this period, hopefully relatively continuously through to 2036. Contributing majorly to this distortion is the exclusion of jobs created at the Alconbury Enterprise Zone (EZ), which has the target of bringing 8000 jobs to the EZ over this period. It is odd that each of the Growth Options show varying levels of housing growth at Alconbury Weald but exclude the job growth created on the adjacent Enterprise Zone. While we understand that the evidence in relation to job growth at the EZ is evolving, it may have been helpful to refer to the circa 8000 mentioned in the EZ bid for context here.

When looking at the Low Economic Growth option, the implications for access to library services and infrastructure include:

- The impact of development at RAF Wyton: this may require an enhancement of the existing mobile library service or possibly the establishment of a micro-library providing a very small self-service collection of mainly popular, broad appeal books together with computers to provide access to information, resources and services online in a shared community building within the development area - in conjunction with additional books and facilities in the current market town library at St Ives. This complementary pattern of provision would be targeted at meeting day-to-day needs locally, particularly of families with young children, elderly people and other members of the community who are less mobile and/or do not have resources to travel into St Ives on a regular basis, whilst also ensuring that new residents will benefit from the wider, more specialised range of books, information services and community facilities available at the larger library in the centre of St Ives.
- The impact of the Alconbury Weald development: and the need for new library provision to meet the day-to-day needs of the new residents has been fully recognised in the Outline Planning Application
- The impact of the major increase in scale of additional housing at St Neots: consideration will need to be given to the best way of meeting the needs of the East Urban Extension – via local provision and/or enhanced provision at existing market town library
- The impact of the increase in additional housing at Huntingdon, Brampton and Godmanchester: enhanced provision of resources will be needed at the existing market town library in Huntingdon
- Developer contributions will be needed to enhance existing resource provision in relation to other smaller developments in the key service centres and small developments elsewhere. These contributions will need to be assessed on a case by case basis and, where necessary, secured via the Community Infrastructure Levy (CIL).

Medium Economic Growth Option

If the 8000 EZ jobs are added to the picture, the Medium Growth Option looks a more realistic and sustainable option with a better balance of housing and job growth over the period and job growth averaging around 500pa, although with the majority of this growth probably occurring in the last 15 years of the period. This rate of job growth is less than that achieved in the decade 1995 to 2005.

The implications for library provision will be broadly similar to those outlined above. The differences will be in the scale of contribution required to enhance existing provision in specific cases.

High Economic Growth Option

Beyond the implications outlined above, the following additional implications would result from this option:

- the increased scale of development at RAF Wyton would raise the population above the threshold for a Level 1 community library – based

on the County Council's Service Levels Policy for library service provision

- the additional housing at Brampton would require an increased contribution to enhance provision at Huntingdon Library

Employment

The potential importance of the Alconbury EZ is recognised here, both in terms of its opportunities and its risks to other employment areas in the District through possible displacement. The potential new employment sites are considered realistic and give a reasonably good spread across the District, when compared to the main areas of proposed housing growth. We support the intention to review the Core Strategy's proposed employment growth to the north west of Huntingdon in the light of the Alconbury EZ designation. One slight query is why the former RAF Upwood has not been included in the employment development policy opportunities for Ramsey.

Scale of Development Policies

With regard to development in the spatial planning areas, key settlements and other areas – the Minerals and Waste Plan designates a number of safeguarding and consultation areas across Huntingdonshire. These are aimed at ensuring that the mineral resource in the area is not sterilised, and seek to safeguard key mineral and waste management infrastructure including waste water treatment works which will serve new and exiting development. It would be helpful if the Local Plan could make reference to these in the Development Guidance section of the Spatial Planning Area policies so that developers are aware and take them into account when making proposals. Advice on each site is provided separately.

These draft policies follow the strategic aim established in the adopted Huntingdonshire Core Strategy of concentrating sustainable development in the larger settlements that offer the best levels of services and facilities and of seeking to protect the character and scale of smaller settlements and the countryside. We strongly support this approach which corresponds with the County Council's Service Levels Policy for library service provision which is similarly based on a hierarchy of provision linked to population catchment sizes, with increasing access and ranges of services available at the larger centres.

In relation to library provision, a strategic appraisal may need to be carried out depending on the decisions made on the options adopted for future development. The appraisal will assess the impact of proposed developments on the existing library services and how the additional demand on them can be addressed. It will be based on the principles that:

- Additional resources and facilities (stock and IT provision) will be necessary in all cases to meet the information, learning and reading needs of the new residents because current levels of provision are linked to the existing population levels and demographics of the catchment areas.
- Beyond that, the need for the modification or extension of existing accommodation or the provision of new accommodation to make those

additional resources and facilities available will be determined by the scale of the new developments and the physical capacity and/or location of existing facilities. Therefore, both the location and the size of the existing library buildings will need to be assessed.

- The County Council's Service Levels Policy for the provision of library services for communities of different sizes across the County will determine the extent of the provision needed. Current service levels specify access to a static library within 2 miles for communities of 3000 or more population, whilst communities numbering between 1000 – 3000 people may require access via a mobile library stop or 'micro library'. Communities with populations below 1,000 will be served by a mobile library stop where 4 or more individuals wish to make use of the service.
- The latest County Council policy for the delivery of a 21st Century Library Service recognises the importance of developing community hubs where library services can be provided in shared buildings in partnership with other services. The starting assumption, therefore, is that the needs of the residents of new housing developments for local library, information and lifelong learning facilities and services should be met as part of a community hub.

Huntingdon Spatial Planning Area – Draft Policy 1

In relation to Secondary school provision in market towns, the proposed development of Alconbury Airfield, leading to the three secondary school option in Huntingdon town, make it easier for the Council to respond to differing levels of growth (low, medium and high) in this area than in others.

Additional growth in Huntingdon beyond existing commitments would put particular pressure on secondary school places and on early years and childcare. Council officers have specific concerns about potential site HU15 at Huntingdon Forensic Science Laboratory, Christie Drive for residential development of approximately 55 homes. This site is next to Cromwell Park, an area of the town which already has pressures on primary and early years places and where there is limited scope for expanding existing provision or creating new provision. However, were the site to be allocated for non-residential uses it could provide potential for siting much needed new childcare provision.

A further potential 60 homes at Godmanchester would pose problems for the County Council in meeting its statutory duty to provide sufficient and suitable primary school places unless we have the guarantee from the developers of the Bearscroft site for a site large enough for a 2 form entry school (plus early years provision). Secondary places at Hinchingsbrooke School, the designated catchment school for Godmanchester pupils, are already under pressure from the existing commitments to growth in Brampton and Godmanchester.

In relation to Alconbury Weald, the low and medium growth options are acceptable from a school planning perspective. Either would mean a viable secondary school population to serve the proposed development, and scope to increase the proposed size of the secondary school if timing is such that it

allows secondary pupils from Ermine Street to attend there also, rather than investing in increasing the size of existing secondary provision.

Under the high growth option, the County Council has significant concerns regarding school places arising from the potential additional dwellings at Alconbury Weald. For a development of 7220 dwellings, the Council would need to plan for a fourth primary school rather than merely a third.

At the high end of the child yield range a development of this size would be on the borderline for what the Council currently considers acceptable for a single secondary school (12FE/1800 places). It would also leave no scope, given the forecast pressures on the existing two Huntingdon secondary schools, Hinchbrook and St Peter's, to review secondary school catchment areas for Huntingdon and the surrounding villages and rationalise where pupils attend to reflect changes/increases in population. The alternative would be 2 smaller secondary schools, which, with the impending changes in school funding formulae may not be viable. Two schools would also require more land than a single school site.

Whichever growth option prevails, the Council's policy is that new schools should be sited as centrally as possible to the communities which they will serve and should be open for the first residents as schools have a key role to play in early community development and cohesion.

The County Council has similar concerns regarding school places arising from the potential additional dwellings proposed under the high growth option at Brampton. Brampton is served by a 2FE (420 place) primary school. It has already been identified for expansion to 3FE (630 places) in response to planned changes at RAF Brampton, in particular, the proposed 400 dwelling development on the site. Further expansion of Brampton Village Primary School beyond 3FE would be neither possible, given the size and constraints of the school site, nor desirable. If the site to the south of RAF Brampton were to be allocated for development it would create a very difficult scenario with regard to the provision of primary school places as 300 homes would be insufficient to justify investment in a second primary school. The only alternative option would be to maintain Brampton Primary at its current size and establish a second school on a site to be provided by the developers within the RAF Brampton development to meet the needs of children from both this and the proposed 300 dwelling development to the south.

A site for day nursery provision in this development would need to be identified under this option. Equally, given its catchment pressures and forecast pressures from existing growth commitments, Hinchbrook School, the designated catchment school for Brampton would not be able to accommodate the additional secondary pupils (0.5 and 0.7FE) which this option could yield.

We strongly support the importance of sustaining the viability and vitality of Huntingdon town centre. We will seek contributions to enhance the resources and facilities available in the town centre library to meet the needs of the residents of the larger potential developments at Bearscoft Farm, Godmanchester, North and South of Ermine Street and at Brampton, and to

ensure that provision there continues to satisfy the more specialised, detailed or wide ranging information, learning, study and reading needs of the catchment area.

St Neots Spatial Planning Area – Draft Policy 2

In St Neots, where a two secondary school model exists and both are to be expanded to their maximum capacity in response to the levels of housing development proposed in the current Core Strategy, there is limited flexibility to respond to further or additional housing development. Equally, with regard to early years provision, there are already significant pressures and limited solutions to expand provision at Loves Farm and further housing planned will exacerbate the situation. Decisions taken as part of this consultation on issues and options will need, as a matter of urgency, to feed into the current discussions on the planning applications for the extension to Love's Farm and Wintringham Park.

We strongly support the importance of sustaining the viability and vitality of St Neots town centre *“to ensure that it is attractive to the growing population”* and to *“promote St Neots as a focal point for service provision and the town”*.

We note that the Draft Policy gives the flexibility to consider the need for additional library provision appropriate to the scale of proposed development within the town. This may include provision in the proposed St Neots East Urban Extension District Centre in order to meet the meet day-to-day needs of the residents - e.g. a micro-library – in addition to enhancement of services at town centre library. Local provision would complement, not compete with provision at town centre library.

Contributions to enhance resources and facilities at existing St Neots town centre library would also need to be sought in respect of smaller developments within the Spatial Planning Area.

St Ives Spatial Planning Area – Draft Policy 3

We strongly support the importance of sustaining the viability and vitality of St Ives town centre. In relation to the scale of development envisaged in St Ives West, we will seek a developer contribution to enhance the resources and facilities available at the existing town centre library to meet the needs of the new residents.

Ramsey Spatial Planning Area – Draft policy 4

The proposed development at RAF Upwood will require an extension of 2 or 3 classrooms at Upwood Primary School, plus additional space at the school to deliver Children's Centre out-reach services to the residents of the proposed development. 0.5ha of additional land would be required from the developers in order to accommodate the extension and meet playing field requirements.

We agree that the approach proposed will help to maintain and promote Ramsey as a focal point for service provision and the town centre as a primary destination. In this respect the new library and community hub is making an important contribution to the availability of services and

sustainability of the town and ensuring that *“the area is allowed to improve and redevelop over time, making the best use of existing buildings and other resources”*.

In relation to the scale of housing developments envisaged, we will be seeking contributions to enhance the resources and facilities available at the existing town centre library to meet the needs of the new residents.

Key Service Centres - Draft Policy 5

The combination of existing catchment pressures and under-sized classrooms in Fenstanton mean it would not be possible to accommodate additional primary school pupils arising from any proposed additional dwellings in this village within the current primary school accommodation.

We agree with this policy in addition to Draft Policy 6 relating to small settlements. They correspond with the County Council Service Levels Policy in relation to library provision which is also hierarchical in its approach, as explained in our earlier comments.

Given the level of housing development currently proposed, no major changes to the current scale of library provision in terms of new buildings or extensions to existing ones are envisaged. However, enhancement will be needed to the level of books and other resources, including IT provision, through existing static and mobile libraries, in order to respond to increased demand and meet the needs of the new resident population.

We wish this to be acknowledged in the *Draft Huntingdonshire Environmental Capacity Study* for each of the villages where housing development is proposed - under the heading dealing with Infrastructure and delivery issues. The possible need for a contribution via CIL is already noted in the Sawtry and Yaxley sections of the *Environmental Capacity Study*; a similar potential requirement needs to be noted in relation to the other villages along the lines of this one:

“Infrastructure and delivery issues

To ensure development areas are sustainable, adequate infrastructure is required to accompany them. Infrastructure constraints may limit the capacity of individual or multiple sites in a settlement. Infrastructure requirements in Sawtry are likely to be met through an apportionment of the community infrastructure levy. Necessary contributions to pre-school, primary and secondary school education could amount to around £1.1million. Additional allotments, play space, and sports and recreation facilities are expected to cost in the region of £225,000. Contributions may also be needed to police services, primary care and libraries.”

In relation to one of the villages defined as a small settlement - Wyton-on-the-Hill - there is an option to increase its size to help meet growth needs given the large area of land which could become available at RAF Wyton if it is not needed for defence purposes. This could result in Wyton-on-the-Hill developing to become a more sustainable settlement and more cohesive community and attain the status of a Key Service Centre.

As noted earlier, depending on the size of the development proposed at Wyton-on-the-Hill, this may need either the provision of a micro-library or a community library to meet day-to-day needs, with more extensive and specialist needs being met through the wider range of resources available at St Ives Libraries. We welcome the requirement for a public master planning exercise, including the need to address *“the mixture of uses to be incorporated, including social and community facilities to meet the needs arising from development”* and we wish to be involved actively in that exercise as a key service provider / stakeholder.

Finally in relation to the Key Service Centres, we note that no consideration is given to the potential impact on services and facilities in Yaxley of the major development at Great Haddon in the adjoining area of Peterborough City. We remain concerned about the short term and longer term impact on the existing Yaxley Library if a developer contribution is not sought by Peterborough City Council for timely library provision within the Great Haddon development.

Small Settlements

Wyton-on-the-Hill is served by a 1FE (210 place) primary school. The County Council has identified the need to replace the school on a new site in response to the school's condition and needs and the constraints of the site which prohibit further expansion. The low and medium economic growth options involve significant additional dwellings at Wyton, with a likely increase in demand in catchment of 1FE i.e. doubling the size of the current primary school.

A new build of the existing primary school on a new site is already required. If the low growth option prevailed, multipliers indicate that a single new primary school of 2FE to serve both the existing and new communities might be sufficient. Significant development at Wyton, unlike development in existing communities and market towns, will also require the provision of a range of children's services, including early years and childcare, children's centre services, support for families and more general community facilities. Consideration cannot be restricted to the provision of extra school places alone.

The Local Plan will need to identify the sites needed to make the required level of education provision in this area as the Wyton Primary School site does not meet current Department for Education (DfE) guidance.

With regard to the impact on secondary school places, this option would indicate the need for an additional 1 to 1.5FE secondary provision. The designated secondary school for Wyton is St Peter's which would require expansion to accommodate the additional pupils.

Under the high growth option, the County Council has significant concerns regarding school places arising from the potential additional dwellings proposed at Wyton-on-the-Hill. At more than double the proposed number of additional dwellings than under the medium growth option, this would be much more difficult to accommodate in terms of primary school provision, as it may require 3+ FE to serve both the new and existing communities which

would be larger than any existing primary school in Cambridgeshire. The alternative, two smaller schools each of 2FE would require a second site and be more costly.

The level of expansion of the existing designated catchment secondary school - St Peter's - required to meet the demand for secondary places that this option would create (2.1 to 2.9 FE), could not be met on the site. A full scale review of secondary school provision in Huntingdon and north Huntingdonshire would be required.

Smaller sites proposed in Ramsey, Warboys, Somersham would be manageable and in many cases welcome given the numbers in the relevant primary and secondary catchments (Abbey College and Sawtry Community College forecasts are on the low side).

The Countryside - Draft Policy 7

We suggest that under '*Employment development*' the expansion of existing businesses is made acceptable both within their existing site *and on adjacent land where appropriate*.

The reference to compliance with the adopted Minerals and Waste Plan is welcomed. It is suggested that this reference is amended to 'the Cambridgeshire and Peterborough Minerals and Waste Plan'. Also, it is suggested that the policy should refer to proposals being in compliance with the Huntingdonshire Local Plan **and** the Cambridgeshire and Peterborough Minerals and Waste Plan (rather than 'or', as both are part of the development plan and will apply simultaneously to development proposals).

Strategic Green Space – Draft Policy 8

The inclusion of a strategic green space policy is welcomed and provides an opportunity to provide green infrastructure functions through Huntingdonshire, including protection and enhancement for nature conservation. It will be important for the Strategic Green Spaces to provide bigger, better quality and better connected wildlife sites to create a coherent ecological network that is resilient to current and future pressures, in accordance with paragraph 109 of NPPF.

Question: Do you think that the suggested potential areas of strategic green space identified are sufficient to protect the countryside, important nature conservation areas, and open areas around and between settlements?

The suggested potential areas of strategic green space are not considered sufficient to protect the important nature conservation areas within Huntingdonshire. The Strategic Green Space Areas has been drafted in the context of the [Cambridgeshire Green Infrastructure Strategy](#). While this document is useful to put Huntingdonshire in the context of the wider landscape, more detailed analysis must be undertaken to identify the appropriate district-level green infrastructure features. This should include protecting, buffering and linking of designated wildlife site (including County

Wildlife Sites) and other areas of importance for wildlife, e.g. the cluster of ancient woodlands located around Monk's Wood National Nature Reserve.

There has been very little consideration of integrating the Green Space Areas and green corridors into areas of green infrastructure/wildlife corridors adopted (or proposed) as part of local plans or identified in Green Infrastructure Strategies by neighbouring authorities, e.g. the Ouse Washes and the River Nene. It is also important that the scheme helps facilitate the work of the ['Fens for the Future Partnership'](#) to create and enhance an ecological network for Fenland, which includes areas of Huntingdonshire and neighbouring authorities. The partnership comprises public and voluntary sector organisations and has recently produced a draft enhanced ecological network map, which shows a number of landscape corridors traversing Huntingdonshire.

It is also important that a comprehensive assessment is undertaken to ensure that a coherent ecological network resilient to change can be achieved as part of the local plan.

Question: Do you have any further suggestions for areas that should be protected as strategic green space?

We suggest that ancient woodland, particularly clusters around Monk's Wood and within the south of the District, and other wildlife designations should be protected as strategic green space. Further detailed analysis should include buffer zones around wildlife sites and connectivity between the sites. This would help develop a robust, coherent ecological network, as part of the Strategic Green Space Areas.

It would also be beneficial to provide linkages to adjacent neighbouring authorities, including Northamptonshire (e.g. ancient woodlands and River Nene), East Cambridgeshire (e.g. Bedford Levels) and South Cambridgeshire (e.g. ancient woodlands).

Disappointingly the Huntingdonshire Local Plan documents do not acknowledge the presence of a section of a Nature Improvement Area (NIA) within the county, namely Nene Valley NIA located within the Stibbington area. The Local Plan should identify the NIA and consider specifying the types of development that may be appropriate in the NIA (in accordance with paragraph 117 of the NPPF) - this should be set out within the Development Management policies (e.g. policy DM 24).

Furthermore, the components of the local ecological networks, including NIAs, should be mapped (in accordance with paragraph 117 of the NPPF) and would provide an excellent evidence base for the creation of the Strategic Green Spaces map. This should include hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation.

Mineral extraction has historically taken place in the Ouse Valley and other areas of Huntingdonshire, and has made a significant contribution to the

creation of habitat and green spaces which are now highly valued, such as Paxton Pits. There will be opportunities for this in the future as new habitat will be created following mineral extraction, which could potentially contribute to the strategic green spaces suggested in the Local Plan. Some of these areas such as the Ouse Fen being created by the Needingworth Quarry workings cross into neighbouring districts and link to wider initiatives such as the Great Ouse Wetland. The suggested Strategic Green space area to the east of St Ives should be extended to take the creation of the Ouse Fen into account.

Following confirmation that improvements will be made to the A14 it is anticipated that the borrowpit sites identified in the adopted Cambridgeshire and Peterborough Minerals and Waste Plan will come forward to provide the sand and gravel and engineering clay necessary for this scheme. The Cambridgeshire and Peterborough Site Specific Proposals Plan (February 2012) sets out a site profile for each of the potential borrowpits, and identifies appropriate afteruses including restoration to biodiversity afteruse with public access. In Huntingdonshire these are in the Brampton / Fenstanton and Hemingford Grey areas and could potentially contribute to strategic areas or to the green corridors which link them.

Sustainability Appraisal

For the reasons indicated in our comments on the Local Plan Vision and Objectives above, we wish to emphasise the positive contribution which library provision can make across several of the areas covered by the *Sustainability Appraisal*, particularly:

- Improving the choice and availability of cultural or social facilities
- Concentrating development into the fewest possible locations (especially the market towns and key service centres) maximises the opportunity to improve viable cultural or social facilities.
- Helping to reduce poverty and social exclusion for the areas most affected
- Supporting the selection of options to ensure access to basic services as any option that did not achieve this would be unsustainable
- Helping to improve the availability of training and education opportunities

The sustainability appraisal asks if development is directed away from areas of search in the adopted Minerals and Waste Plan for waste management purposes. This information is clarified below:

Alconbury Weald is a site which falls within the Alconbury Airfield Area of Search for waste management, and the site profile in the [Minerals and Waste Site Specific Proposals Plan](#) (Policy W1B, pages 138-140) identifies potential waste management uses. This site will also need to be considered under Core Strategy policies CS7 Recycled and Secondary Aggregates and CS28 Waste Minimisation, Re-use, and Resource Recovery. These require major development sites (particularly of previously developed land) to accommodate temporary recycling facilities to maximise production of secondary aggregates and the recycling and re-use of inert waste, including construction and demolition waste. It is anticipated that a considerable amount of recycled aggregates would arise from the development of the Alconbury airfield site;

this could contribute to the aggregate supply in the area for major projects such as the improvement of the A14. Recycling facilities for construction/demolition waste must be in place throughout the construction phases of the development.

Wyton as a site which has previously developed would also be considered under Core Strategy policies CS28 and CS7, in the same way as Alconbury Weald, as outline above.

Land South of Brampton is allocated as an Area of Search for a sand and gravel borrowpit for the purposes of supplying material for A14 improvements only; it is not allocated for waste management purposes as suggested in the SA summary table.

Question: Do you agree with the draft sustainability appraisal?

In relation to the question 'will it help reduce poverty and social exclusion for areas most affected?' - The ++ rating given here for the high economic growth scenario appears to be at odds with a later conclusion where it is anticipated that in this scenario the population will exceed the number of jobs. This has implications for both the new population and neighbouring communities where there are existing issues related to poverty and social exclusion. The determinants of poverty and social exclusion are complex and without a more detailed understanding of future proposals, it is not possible to give a fair assessment of the impact of applying these different models for economic growth. There needs to be recognition of the limitations of the assessment within the commentary.

In relation to Gypsies and Travellers, we are aware that there is countywide Gypsy and Traveller partnership (with County Council representation) with a strategy and action plan and we would suggest that this group is well placed to comment on the questions relating to the approach for identifying sites.

Question: Are there issues or factors that you think should be taken into account when completing the sustainability appraisal process?

A key factor to take into account is whether a planning proposal will help to tackle health inequalities and improve the health of the worst off fastest? This is a principle in the new [Cambridgeshire Health and Wellbeing Strategy 2012 – 2017](#).

2 Draft Development Management Policies Document

We support a Development Management Policies document which will help ensure development within the District is managed.

Safeguarding local employment opportunities - Draft Policy DM 1

This makes reference to the travel options. The location of employment areas can significantly impact the operation of the local highway network within the vicinity of the site and therefore it is vital that suitable transport options exist, or can readily be developed, to ensure access to the site is available by all modes.

It is important that established and new employment sites, particularly for B2, are retained for this use. These sites can be suitable for waste management uses which are essential in supporting existing and new communities and local businesses in Huntingdonshire. The form of waste management uses suitable for employment areas can vary considerably from waste processing to recycling of electronic goods and computer parts. However, in recent months when considering proposals in employment areas it has become apparent that a “grey area” exists for facilities dealing with the treatment of waste, and whether they fall within a B2 use class or a sui generis use class when based on the processes they utilise. We would recommend that the District Council takes this opportunity to support the retention of employment areas for employment uses, and confirm in supporting text that proposals which include waste processes (i.e. all facilities that take waste in as part of their process regardless of the fact that the end product may not be deemed as waste), will be regarded as *sui generis* and will be dealt with by the County Council as Waste Planning Authority.

Ensuring town centre vitality and viability - Draft Policy DM 2

We would wish to see libraries specifically mentioned among the facilities which help to reinforce the market towns as destinations for access to services.

Sustainable Travel - Draft Policy DM 5

This policy is welcomed as it is vital that transport infrastructure is assessed as part of any development to ensure that any impact is identified and mitigated.

The opening paragraph of this section states *‘the council will therefore give support to solutions....but will also support patterns of development which facilitates the use of sustainable modes of transport’*; this should be amended to *‘the council will therefore give support to solutions....but will also support patterns of development which facilitates and encourages the use of sustainable modes of transport’*. The recommended amendment reflects the reality that although infrastructure is often delivered as part of new developments, it needs to be an attractive alternative to the private car to encourage residents/employees to use it.

The policy wording does not make a reference to public transport (although it is referenced in the reasoning section). Public transport can play an important role in reducing the impact of a development on the highways network and is an attractive alternative, particularly in rural areas and for journeys for which walking and cycling may not be feasible, therefore an amendment to the policy wording to reflect the role of public transport would be welcomed.

The reference to the requirement of a transport statement/transport assessment for all proposed developments is welcomed. The scope of these documents will also need to be agreed with Cambridgeshire County Council as the local highway authority in addition to the district council. Should the site potentially have an impact on the Trunk Road network then engagement with the Highways Agency will be essential. The reference to the requirement for a Travel Plan for large developments and all residential developments above 60 dwellings is also welcomed. Developments below the threshold should also be encouraged to participate in travel planning activities such as promotion of local walking, cycling and public transport routes. The County Council would be pleased to be involved in further discussions on this policy area (and any subsequent reviews of policy in this area).

The reasoning section of policy DM5 states *'The availability of safe, coherent and easy to use footpaths and cycle routes will have a significant impact on people's choice of transport mode. More than half of all trips in Huntingdonshire are less than two miles in length: for many people walking or cycling are a feasible alternative to using the car for such journeys. Development proposals should therefore give priority to high quality walking and cycling provision'*. This wording is welcomed as walking and cycling trips can reduce the impact of a new development on the highway and also encourage more trips short in length to be undertaken by foot or by cycle.

The reasoning of policy DM5 also refers to the internal design for new developments and is welcomed. The internal layout of a development can significantly impact the transport choices and sustainability of new communities.

From a Rights of Way perspective, the District Council should continue with the policy of the 'twin-track' use of Section 106 agreements and the Community Infrastructure Levy to fund, for example, the local play spaces, non-car based routes for local movement, access to the countryside through public rights of way, large areas for informal recreation and the network of accessible greenspace and routes identified above. This is often the only way that significant improvements can be made to the infrastructure for the long term benefit of existing and future communities, and is therefore an extremely important mechanism.

Early involvement of the rights of way team in site-specific applications is key to the successful public access schemes in addressing the needs of communities in new settlements/urban extensions integration with existing built settlements, and to avoid costly problems for developers where Public Rights of Way are affected. The County Council is happy to advise the District Council and developers at the scoping stages. There are many good practice

examples that incorporate these principles which can be quoted, e.g. the Cambourne development Masterplan.

Reference should be made to current policy in relation to Rights of Way which is contained within paragraph 75 of the NPPF; the [Rights of Way Circular 1/09](#), the County Council's statutory [Rights of Way Improvement Plan](#), the County Council's draft Health and well-being strategy and current government health advice; and the County Council's [Local Transport Plan and Market Town Transport Strategies](#).

We agree with the statement in the supporting text that, “*New technologies have a role in helping to reduce the need to travel*” and point to the contribution of public access IT facilities (including Wi-Fi) in libraries across Huntingdonshire. We suggest that this statement could be incorporated into Draft Policy itself.

In addition, since the wider range of library, information and learning resources is concentrated in the four market towns, sustainable transport links are critical in ensuring library service access, use, impact and benefits. There is a well-established common link between library visits and shopping trips or trips for other purposes to the market towns. Experience locally and nationally also underlines the importance of the physical location of libraries in relation to public transport and cycle routes and pedestrian flows in ensuring access, use and benefits.

From a public health perspective, we are pleased to see the emphasis on sustainable travel and the important contribution that ‘travel planning’ can make e.g. through the expertise of the Travel for Work Partnership.

Within the *Reasoning* section of the policy we suggest that the important contribution that active travel makes to health and wellbeing and contributing to tackling health inequalities could be included. See [Sustrans Information Sheet FH 12](#) for further information.

Following on from the points above, we suggest that bullet point a. is amended to read: *opportunities are maximised for the use of sustainable travel modes including public transport* and, that bullet point e. is strengthened by removing ‘*where appropriate*’ to emphasise the importance placed on this sustainable infrastructure.

A further issue that is important is the timing of the sustainable infrastructure in order to ensure and support a model shift in travel patterns. Peoples’ behaviour and culture is established early on and for that reason it is important to have the infrastructure (including support for business and residential travel planning) in place for the first occupants. If car dependency is established early on, this behaviour can be more difficult to change later on.

Parking provision - Draft Policy DM 6

We support the inclusion of policies to clarify these matters. The different characteristics of the District will require different car parking standards with possible higher provision in the rural areas where there may be more reliance

on the private car. The principle that all development should provide appropriate evidence to identify the likely demand and support the level of parking provision to ensure an overspill on to the local highway network does not occur is supported. Policy DM6 should encourage the provision of electric vehicle charging and other low emission vehicle infrastructure particularly at employment sites, leisure facilities and car parks.

Broadband – Draft Policy DM 7

The Council welcomes the Local Plan's support of improved broadband connections through the Connecting Cambridgeshire campaign. The provision of a high-speed communications network can help reduce the need to travel and therefore lessen the impact of new development on the transport network. We view as positive the inclusion of both residential and employment developments within this policy. Access to broadband is an important equality issue and in addition will help to provide and improve access to health services through assisted technology and telecare.

In this context we wish to see community hub/service provision buildings included in the policy statement that new developments should *“provide access to next generation broadband in urban and rural areas by ensuring that all residential and employment developments provide on-site infrastructure, including ducting to industry standards, to enable the premises to be directly served by fibre based broadband technology”*.

Housing Choice – Draft Policy DM 8¹

The importance of 'lifetime homes' and designing homes to be adaptive to meet flexible needs is referenced in the [JSNA for New Communities \(2011\)](#). We are pleased to see that compliance with Lifetime Homes standards is set out in the draft policy DM8.

In line with national trends, Cambridgeshire will experience a significant rise in its older population over the next 10 years and beyond. National and local policy places an ongoing emphasis on enabling people to live in their own homes as long as possible. This would suggest that homes should be more easily adaptable to meet the needs of people as they grow older - so called life time homes - thus ensuring their independence but also ensuring they can remain connected to their local communities. New housing should also consider the direct application to care delivery through the use of assistive technology into home, e.g. remote health monitoring for people with long term conditions.

With people living longer and wanting to live in their own homes longer, there will be less dependence on residential and nursing care, which is likely to focus more on those older people reaching the end of their lives. Sheltered and extra sheltered housing schemes are likely to remain a feature of the housing landscape for older people but what this looks like and how this is integrated into community settings may alter.

¹ These comments could be attributed to more than one policy within the 'Delivering a wide choice of high quality homes section.

A key consideration for future housing policy to address is the fact that social isolation for older people is the biggest single factor that contributes to poor health and wellbeing. Overall the plan needs to consider more strongly the needs of the aging population and the emphasis towards ensuring people can live in their homes longer. Also the over 65 population will become a significant part of the total population and are likely to be more demanding about the standard of housing, the built environment and the communities they live in including access to jobs, leisure and learning opportunities.

Affordable Housing Provision – Draft Policy DM 9

We suggest that reference is made to the links between housing and health and health inequalities. These are well documented and summarised in the [Cambridgeshire JSNA for Prevention of ill health in adults of working age \(2011\)](#). Access to decent housing is a reflection of affordability. Affordability of housing has an impact on health. It also creates inequalities with housing becoming unaffordable for low income households and vulnerable groups, increasing their risk of homelessness. In addition, low income households and vulnerable groups are the most likely to occupy poor standard homes with issues of overcrowding, fuel poverty, disrepair and damp and mould.

We note that there is specific policy covering Travellers and Gypsies but how will housing be provided for the range of vulnerable client groups? These include: the single homeless; homeless families; rough sleepers; ex-offenders and those at risk of offending; physical and sensory disability; domestic violence; alcohol and drug problems; mental health problems; teenage parents; older people; young people at risk/leaving care; HIV and AIDS; learning difficulties; migrant workers, refugees and asylum seekers?

Gypsies, travellers and travelling showpeople² – Draft Policy DM 12

The Gypsy and Traveller communities suffer some of the worst health outcomes of any community in Cambridgeshire. Accommodation, environmental issues and access to services are strongly linked to health outcomes and it is important that there is robust policy to ensure that plans meet the same high standards that would be expected in the settled community such as the aspects set out in DM14.

The policy could be strengthened in the following ways:

- The location has good (rather than reasonable) access to local health services and schools
- There is good provision for safe play
- Direct reference to compliance with DLG guidance (2012) and good practice guide (DLG May 2008).

Draft Policy DM 13 – Good design and sustainability

We agree with the draft policy requirement for “*high quality design and sustainability*” and more specifically the draft policy in relation to Non-

² Note - Point of accuracy. Travellers should be written with upper case T.

residential development. The standard briefs developed by the Library Service for new and refurbished buildings currently specify that they must conform to the BREEAM “Very Good” standard.

Draft Policy DM 14 – Quality of development

We agree with the draft policy requirement that *“a high standard of amenity is provided for existing and future users of both the proposed development and its surroundings”*. The standard briefs developed by the Library Service for new and refurbished buildings stress the importance of creating attractive, welcoming, inclusive public spaces in encouraging use and therefore delivering impact and benefits for communities - through social spaces where people of all ages, backgrounds and abilities can come together and can access a range of services.

Draft Policy DM 16 - Protecting local services and facilities

We strongly welcome this draft policy. In particular, we welcome the flexibility to re-locate a facility to a more visible location well-sited in relation to sustainable transport links and people flows so that it is at the heart of the community.

We wish to see library service provision included specifically in the statement contained in this policy that, *“For the purposes of this policy local services and facilities include shops, public houses, places of worship, education facilities, filling stations, public halls and health care facilities”*. Although we realise that the list of services included there is not exhaustive, we believe library services should be included because of the need to fund the statutory responsibility for providing a library service to all communities, including new communities, and because:

- Library services represent multi-purpose community provision
- we will need to rely on this policy document in future negotiations with developers and possibly also at public inquiries

We would also like to see consideration of the possibility of combining service provision through the establishment of community hubs as a way of underpinning viability and achieving efficiencies for a range of local community services by sharing accommodation and other resources. This is in line with the latest County Council policy for the delivery of a 21st Century Library Service which recognises the importance of developing community hubs where library services can be provided in shared buildings in partnership with other services. These can include other Council and voluntary sector information and advice services, health services, adult learning services and children’s centres, for example, and commercial partners such as the Post Office. This pattern of provision provides the best opportunity to deliver a wide range of complementary services and facilities, including community meeting spaces, to meet the needs of the growing communities.

Protection of open space – Draft Policy DM 17

New developments/communities need access, for the health and well being of their residents, to the countryside around the development for walking, cycling and horse-riding through a network of public rights of way.

New developments/communities need access (including by non-car based means), for the health and well being of their residents, to a large, strategic area where informal recreation including walking, cycling and horse-riding is actively encouraged.

Existing communities should not have a reduction in the quality of their means of access (e.g. public rights of way) and areas for access (e.g. country parks) through increased pressure of numbers created by new developments/communities.

New developments/communities need access, for the health and well being of their residents, to areas within the development for informal recreation as well as sports pitches and sports centres e.g. the provision of local play spaces.

When considering children's play needs in order to develop and maintain healthy lives, it is to be expected that they will play in a variety of locations including informal and formal green spaces, gardens, streets, pavements and natural spaces such as woodland. There is growing awareness of the importance of outdoor play, contact with nature, and walking and cycling to children's healthy growth and development. Children playing outside are a sign of a safe, happy and healthy community. In light of this the following recommendations have been made.

The Local Plan to 2036 needs to demonstrate a clear commitment and direction to the development of generous and exciting play provision which reflects current national thinking. Play provision needs to be thoughtfully designed in order for communities to gain maximum benefit. They are often formulaic and are not grounded in what children actually like to do when they go out to play. There has been in the past an overemphasis on brightly coloured equipment, an over-preoccupation with safety and more consideration is required to make play spaces playful, interesting places that adults will want to spend time in, as well as children.

In September 2012 the HSE released a statement entitled '[Children's play and leisure: 'promoting a balanced approach'](#)'. It recognises the benefits of allowing children and young people of all ages and abilities to have challenging play opportunities. New housing areas that provide play areas often are off the peg and have become known as 'KFC' playground (Kit Carpet and Fence). Un-necessary wet pour surfacing is expensive and can take up as much as 40% of a total spend on a playground. Fences are also not always necessary. Creative design should allow for funds to be prioritised on play opportunities. [Managing Risk in Play Provision: Implementation guide – Play England](#) and [Design for Play - A guide to creating successful play spaces](#) give guidance in relation to the development of spaces that are more creative and offer natural features.

Green Infrastructure - Draft Policy DM26

Needingworth Quarry is being restored to a wetland afteruse, the Ouse Fen. It is not a water filled pit. Future mineral extraction could give rise to additional green infrastructure (see comments under strategic green infrastructure).

The District Council should use the Cambridgeshire Green Infrastructure Strategy as the strategic framework for the delivery of a network of accessible greenspace and routes within the District and as the framework for its co-operation with neighbouring authorities. Recognition should also be made as to the valuable cross over between biodiversity and rights of way as green lungs for both wildlife and humans.

A welcome addition to this policy would be an acknowledgement of the wide benefits to health of Green Infrastructure. '*Supporting healthy living and well-being*' is one of the four key objectives of the [Green Infrastructure Strategy](#).

In addition to making links to the Green Infrastructure Strategy, it would be helpful to make reference to the newly formed *Greater Cambridgeshire and Peterborough Local Nature Partnership*. The Partnership will work to achieve a high quality natural environment in Cambridgeshire & Peterborough and will provide strategic leadership, coordinating partners to deliver projects and activity that will meet the Partnership's vision and aims. Its role will be to act as an independent, objective voice for the natural environment acting as a conduit to local and central government and other stakeholders.

The section on reasoning for this policy could be strengthened by expanding on the benefits for health. The importance and evidence base for green spaces is set out in the [JSNA for New Communities \(2011\)](#) and more recently by [Natural England](#).

Heritage assets and their setting - Draft Policy DM27

We have significant concerns that the Draft Development Management Policies Document would not provide appropriate protection for heritage assets with archaeological significance, in accordance with the NPPF.

There are currently 82 Scheduled Monuments in Huntingdonshire, which benefit from protection under the 1979 Ancient Monuments and Archaeological Areas Act. However, this accounts for only a proportion of heritage assets with archaeological significance within the District, with over 2,600 undesignated monuments recorded on the Historic Environment Record maintained by the County Council. Furthermore, this represents only a proportion of the archaeological assets in the District with newly discovered sites added to the HER as and when they are discovered. The Local Plan should recognise the broad range of archaeological assets throughout the District and the contribution of these undesignated assets to our understanding and appreciation of the District's historic environment.

It is also important to note that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to

scheduled monuments, should be considered subject to the policies for designated heritage assets (NPPF paragraph 139).

We would recommend that the following alterations are made to the policy to enable the appropriate treatment of all heritage assets.

- The purpose of the Draft Policy should refer to designated assets (listed buildings, conservation areas, scheduled monuments, registered parks and gardens) and undesignated assets (locally listed buildings, heritage assets with archaeological significance).
- The Draft Policy uses the term sustainable inappropriately. A development proposal which does not give adequate consideration to the historic environment should not be considered sustainable.
- The Draft Policy should include a requirement to appropriately assess, evaluate and mitigate the impact of development on heritage assets with archaeological significance.
- Reasoning should refer to heritage assets with archaeological significance and not archaeological remains. This section should also be expanded to include reference to the important contribution archaeology can make to our understanding of the historic villages, towns and landscapes of the District and its contribution to the character of existing settlements and emerging new communities.
- Reasoning should also refer to the importance of using appropriate expertise in determining the likely impact of development proposals and reference should be made to the Historic Environment Record, managed by Cambridgeshire County Council.
- Guidance should be sought from Cambridgeshire County Council's Historic Environment Team on the scale and nature of information required where undesignated heritage assets are likely to be affected. English Heritage can provide advice on designated assets.

Developer contributions – Draft Policy DM28

This policy is welcomed. Provision of adequate infrastructure to mitigate the impact of development and create sustainable communities is vital. The Community Infrastructure Levy will play an important role in ensuring that funding can be secured from developers towards the infrastructure requirements of the Local Plan. However CIL is unlikely to cover the full costs of all infrastructure requirements. Therefore it will be important to identify strategic infrastructure dependencies and requirements and identify priorities for funding with partners such as ourselves early to help ensure clarity over implementation and funding.

It would helpful if reference was made in the supporting text to the adopted [RECAP \(Recycling for Cambridgeshire and Peterborough\) Waste Management Guide](#) which needs to be taken into account by new

development (industrial and commercial). This includes advice on developer contributions for Household Recycling Centre.

We wish to emphasise the following key points:

- The importance of securing developer contributions towards local infrastructure, facilities and services from sustainable development proposals, predominantly through the Community Infrastructure Levy and Section 106 agreements.
- Provision may be required on or off site
- The timing of provision of infrastructure and facilities will be carefully considered

Building on our comments earlier in this response, the approach to seeking developer contributions towards library service provision will begin with the likely impact upon existing libraries within the area – the extent to which the needs of the future residents of proposed developments for access to information, learning, reading resources and community and cultural facilities will impact upon existing service provision. This is in the context of:

- The statutory responsibility for providing a library service to everyone who lives, works or studies in the area, including residents of new communities;
- The County Council's policy on the levels of service to be delivered to communities of similar sizes across Cambridgeshire;
- National guidelines from the Museums, Libraries and Archives Council on the impact of new development on public library services; and
- The important contribution of libraries to sustaining the quality of life, well being, social, economic and cultural development of communities.

Explaining this in more detail, a consistent methodology for assessing the contribution to be sought from developers towards library provision is being applied in Cambridgeshire. The County Council would be happy to discuss the policies and guidelines relied on in relation to this.

We are pleased to see reference to meeting social requirements in this draft policy although more clarity may need to be sought about the process of financial contributions towards this revenue stream. We are also pleased to see reference to the importance of early phasing of the provision of infrastructure to ensure this is in place before first occupancy.

3 Potential Development Sites: Huntingdon Spatial Planning Area Document

HU 29: Alconbury Weald

Previous comments in this response relating to Alconbury Weald refer to the Growth Options considered; these comments are specific to the development.

Transport

Uncertainties over the exact physical alignment, junction arrangements, and tolling regime for the proposed A14 improvement, mean that there is lack of clarity on future traffic flows in the local area. It is therefore accepted that it is difficult for a developer to accurately consider what highway mitigation measures might be required beyond the first phase to accompany an 'end-state' Alconbury Weald. We understand that the Transport Assessment (TA) which accompanies a current outline planning application for this site does, however, set out a comprehensive range of proposed non-highway measures including public transport, walking and cycling initiatives that would accompany the full development, together with estimates of 'full development' traffic flows which have been fed into the wider Environmental Impact Assessment. We support this approach to any future development on the site.

There are a number of detailed issues that will require further exploration. Specifically, we draw attention to the detailed review of the performance of those links and junctions that are predicted to operate in excess of capacity (some of these show queuing even in the absence of the development proposed at this site) including the south facing merge/diverge slip roads at the Spittals interchange, the A14 junctions at Brampton Hut and Spittals itself, the Rusts Lane interchange, and the A141 /A1123 / B1514 roundabout. Further review of the proposed engineering measures at these locations would be needed together with consideration of the potential incremental impact of traffic associated with later phases of the proposed development and what this might mean in terms of further improvement works.

Education

The County Council understands that as part of the current outline planning application for this site, the proposed location of a new secondary school is the south east corner of the site. We are concerned about this proposed location and the impact it may have on St Peter's School. It is important to consider carefully the capacity of the proposed new school in the early days in order to avoid attracting pupils from existing schools. A new school may be considered a more attractive option.

We note an alternative proposal to locate the secondary school in the north west corner of the site. We are concerned that this would have implications for Sawtry Community School which attracts pupils from Peterborough. The impact of a new school at Alconbury in addition to planned new schools in Peterborough would particularly affect Sawtry Community School.

We support the provision of more than one proposed secondary school location either as an amendment to this current application or within any relevant future applications for this site. As part of any comprehensive public masterplanning exercise, the District Council should cooperate with the County Council regarding the location of the proposed secondary school.

We reiterate that the Council's policy is that new schools should be sited as centrally as possible to the communities which they will serve and should be open for the first residents as schools have a key role to play in early community development and cohesion. This position was endorsed by Cabinet in September 2007 and continues to be the case.

Flood Risk Management

We wish to highlight the need for any development at this site to refer to the County Council's responsibility for flood risk management. Hence there will be a need to cooperate with the County Council in relation to such matters.