

## **HUNTINGDONSHIRE'S LOCAL PLAN TO 2036: TARGETED CONSULTATION 2015**

### **SUMMARY OF KEY ISSUES**

The following comments have been made by Officers on behalf of the County Council. The Economy and Environment Committee will be asked to consider and endorse the County Council's response to the Huntingdonshire District Council Local Plan Strategy and Policy Consultation. Therefore this response is subject to the agreement of elected members and may change after submission once elected members have discussed it on the 21<sup>st</sup> April.

The County Council supports the overarching vision and objectives and welcomes the requirement for new infrastructure proposed in the Local Plan. The County Council will continue to work closely with the District Council and other stakeholders to ensure that impacts of new development are properly assessed and evaluated and infrastructure planning appropriately addresses these impacts.

Please find below the key issues regarding the Plan:

- HDC has tested the viability of the Local Plan and as a result the requirement for affordable housing in new developments has been reduced to 35%. This should have a positive impact on contributions sought towards County Infrastructure.
- There is a heavy reliance on the Alconbury Enterprise Zone to provide the employment growth with 150ha allocated for employment compared to 55ha across the remainder of the District. None of the site specific proposals however contain any detail on the type of business units to be constructed that might be preferred by Hunts DC, e.g. to provide provision for start-ups or micro businesses or how this might be encouraged.
- The EZ will bring 8,000 jobs by 2036. These numbers of employees are likely to include a large number of parents requiring childcare. 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 EZ.
- It is important that if new developments are to be as sustainable as possible that high quality broadband provision is required (as a minimum superfast broadband speed of 30Mbps should be a requirement). This key element of necessary infrastructure needs to be strengthened considerably in the Local Plan.
- The Local Plan includes a brief reference to the implications of the forthcoming withdrawal of the USAF from Alconbury and Molesworth. The MOD is currently undertaking a review of the UK defence estate, assessing both their future defence and commercial uses. Whilst this review will not report until January 2016 it is important that the local authorities' proposals for the two sites (should they be released by the MOD) are fed into this process. Ideally this needs to take place in the next 3 months before any preliminary defence preferences are expressed by the MOD.
- The main areas of concern regarding education infrastructure relate to the potential for some allocations to generate more dwellings than is currently reflected in the Plan and the

lack of reference to the impact of smaller housing developments on the availability of existing school places, e.g. Gas Depot Mill Common, California Road or Brampton Park. There is a risk that some school sites are not large enough to accommodate increased pupil numbers arising from development.

- With regard to the strategic expansion allocations at Alconbury Weald and Wyton on the Hill, the County Council will need to future proof secondary school sites in order to respond to additional demand for school places should dwelling numbers exceeds that already indicated in the Plan.
- The scale and location of the proposed allocation at Wyton alongside other development in the Huntingdon / St Ives area will place significant additional demand on the transport network and infrastructure. It will be necessary for the development to address these impacts. Mitigation should include appropriate improvements to the local and strategic road network and measures to promote sustainable transport links. This should identify the most sustainable package of transport options to meet the transport demand of development and set out how this can be aligned with the LTTS for Cambridgeshire.
- The County Council supports the inclusion of a Flood and Water Supplementary Planning Document (SPD) as a material consideration for the determination of planning applications within Huntingdonshire. Currently Cambridgeshire County Council, in partnership with the Cambridgeshire local planning authorities (including Huntingdonshire) and other stakeholders, is producing a countywide flood and water SPD. This will provide more detailed guidance developers within Huntingdonshire (as well as other districts within Cambridgeshire). It will also provide Huntingdonshire with a robust mechanism for addressing all key matters related to flood and water. Without the inclusion of such a document, the County Council considers that greater detail within the local plan policies will be necessary.
- The terminology to describe the Strategic Expansion Location at Wyton is used inconsistently between Wyton on the Hill and Wyton Airfield which is confusing. The District Council should provide further clarification and amend as appropriate.

Note that all comments below have been submitted electronically to the Huntingdonshire District Website and some wording may have changed in order to adapt it to the consultation portal format.

## **1. MINERALS AND WASTE**

### **Comments on general text and policies:**

- 1.1 We welcome reference to the need for this document to be read 'in conjunction with other relevant policies' which includes 'policies set out in Cambridgeshire County Council's Waste and Minerals Plan' as indicated within the 'Important Note' box on page 3 of the document, and that paragraph 1.20 states 'reference should also be made to the Waste and Minerals Plans prepared by Cambridgeshire County Council, which are part of the development plan for Huntingdonshire' (which includes a link to our webpage). However, at present there are currently a number of inconsistencies that exist within this document to reference our plan work e.g. 'Waste and Minerals Plans prepared by Cambridgeshire County Council', 'Minerals

and Waste Plan', 'Cambridgeshire and Peterborough Waste and Minerals Development Plan' and 'Cambridgeshire and Peterborough Local Development Framework'. As such, unless reference is being made to a specific document such as the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011), we would recommend that all references state the 'Cambridgeshire and Peterborough Minerals and Waste Development Plan' and acknowledge that the documents were prepared jointly by Cambridgeshire County Council and Peterborough City Council to avoid any confusion;

- 1.2 Paragraph 2.2 which covers the main characteristics and locational context states 'Cambridgeshire County Council is the local highways authority and also provides education, social services and minerals and waste planning'. However, reference to our role as the waste disposal authority (WDA) has not been acknowledged. This should be updated to distinguish between the role of the authority as the waste planning authority (WPA) and the WDA;
- 1.3 Paragraph 3.43 discusses the '*Huntingdonshire Employment Land Study (ELS) (2014) which focused on 'traditional' employment land use classes; B1 (Business, offices / light industrial); B2 (general industrial); B8 (storage and distribution); and appropriate sui generis uses including recycling and the environmental industry*'. We welcome acknowledgement of recycling and the environmental industry being considered as appropriate sui generis uses in line with the Cambridgeshire and Peterborough Minerals and Waste Plan adopted policies;
- 1.4 Paragraph 3.47 states the ELS made 3 particular recommendations to encourage and deliver growth in Huntingdonshire. The third states that specific sectors should be targeted which includes 'waste and remediation'. Again we welcome the acknowledgment that specialised waste and remediation technologies are important to the economic mix of an area;
- 1.5 Paragraph 4.46 acknowledges that some development in the countryside is unavoidable such as gravel extraction which is guided by the Cambridgeshire and Peterborough Minerals and Waste Plan. We strongly support this reference and to the linked uses that may go with such development. However, consideration should also be given to identifying that some waste uses are also associated with countryside activities, such as anaerobic digesters linked to agriculture;
- 1.6 Paragraph 6.1 lists examples of infrastructure. Bullet point 1 of this list states 'utility services such as electricity, gas, water, sewerage, waste disposal and telecommunications'. We assume that the reference to 'waste disposal' includes Household Recycling Centres (HRCs) and the strategic waste service provided by Cambridgeshire County Council? This needs to be clarified within the text, alongside a reference to the fact that Cambridgeshire County Council has already invested in the new HRC at St Neots to take account of strategic growth. Therefore strategic growth sites need to repay this investment through the CIL fund, for which development around the St Neots area is seen to pay a significant role in helping to deliver the 21,000 new homes required by 2036;
- 1.7 Paragraph 7.3 within the 'Requiring Good Design' section acknowledges that 'to improve sustainability it will be beneficial for new development to minimise waste during construction and maximise opportunities for recycling by future occupiers'. This is strongly supported in line with adopted waste planning policy and guidance contained within the RECAP Waste Management Design Guide Supplementary Planning Document (SPD);

- 1.8 We also welcome the acknowledgement in Paragraph 7.19 that ‘new buildings need to be designed to help residents and users to reduce waste generation and recycle more, such as by providing convenient space for storage of recyclates and green waste awaiting collection’, which is again consistent with the guidance contained in the RECAP Waste Management Design Guide SPD;
- 1.9 Policy LP 21 seeks to ensure that all ‘non-residential development’ meets BREEAM standards of ‘Excellent’ for major scale development and ‘Good or higher’ for small scale development, with all ‘non-residential development built after April 2019’ to be ‘Zero Carbon’. However, as ‘new non-residential development’ would include future mineral and waste applications, where operations can be designed without the need for a building, we would question whether a minimum standard of BREEAM excellent, or for smaller applications BREEAM good or above, is relevant in these circumstances? As such we would recommend that this policy is reworded to make reference to non-residential built development in the form of offices and industrial units etc. which excludes mineral and waste uses. In the case of mineral and waste applications it would be better to seek a high environmental application which will deliver the standards required without using BREEAM which is not considered appropriate. This is already sought through adopted policy in the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (particularly Policies CS22 Climate Change and CS24 Design of Sustainable Minerals and Waste Management Facilities) and the two adopted Waste Management Design Guides (The Location and Design of Waste Management Facilities 2011, and the RECAP Waste Management Design Guide 2012);
- 1.10 Policy LP 25 for ‘Established Employment Areas’ seeks to protect and support existing employment areas for class ‘B’ type uses, as well as set out criterion for alternative uses to class ‘B’ development. As many waste uses are seen to be akin with industrial processes covered by ‘B’ type use classes we would broadly support this approach and protection of such areas. However, in light of allocations made within the Cambridgeshire and Peterborough Minerals and Waste Plan we would ask that the support for business development (class B) add that ‘sui generis uses that are akin to ‘B’ classes’ will also be supported and an amendment to point (a) for alternative proposals to include a demonstration that it will not ‘jeopardise existing uses’ for the site, which would strengthen the criterion for this policy. This can be justified within the following paragraphs that can make reference to adopted waste planning policy, as at present the reference to ‘the ‘important note’ following paragraph 1.8 at the bottom of the page when considering development proposals in light of this policy’ is unclear and could easily be missed;
- 1.11 Policy LP 26 for ‘Rural Economy’ includes a section on ‘countryside compatible development’ which states ‘A proposal will be supported where it is ... k. for essential operational development for allocated mineral extraction or a waste management facility, infrastructure provision or national defence; or l. in accordance with policies of the Cambridgeshire and Peterborough Waste and Minerals Development Plan’. This approach is fully supported. However, as raised above it may be useful to expand on waste uses linked with agriculture also being appropriate in this setting;
- 1.12 Paragraph 9.43 states ‘Cambridgeshire Renewables Infrastructure Framework (CRIF) has demonstrated significant potential for renewable energy generation in Huntingdonshire, especially from biomass (including waste), wind and solar sources’. Policy LP 36 on ‘Renewable and Low Carbon Energy’ is to ‘encourage appropriate schemes whilst ensuring

the risk of adverse impacts is minimised'. Acknowledgement of the potential renewable energy generation from biomass (including waste) is welcomed.

### **Comments on Section D - Allocations:**

- 1.13 We welcome the acknowledgement within D.8 on Page 142 that 'A number of the allocations made within this document are affected by policies contained within the Mineral and Waste Core Strategy and Site Specific Proposal Plan jointly prepared by Cambridgeshire County Council and Peterborough City Council (2011/12) and supporting SPD. Reference should be had to policies within these documents and the Waste Minimisation, Re-use and Resource Recovery (RECAP) Waste Management Design Guide SPD'. Whilst this acknowledgement is appreciated, alongside references to Minerals and Waste policies in the 'development guidance' sections of allocations, where appropriate, we would point out that the correct reference for the SPD guidance is the 'Recycling Cambridgeshire and Peterborough (RECAP) Waste Management Design Guide SPD'. Although this document does look at waste minimisation, re-use and resource recovery as part of the guidance this is not in the title and is not related to the RECAP reference. To avoid confusion this should be amended;
- 1.14 We support point 't' in Strategic Expansion Location 2 (SEL2) for St Neots which states 'production and implementation of a waste minimisation, re-use and recovery strategy' will be required. This is strengthened by Paragraph 10.35 that states 'reference should be made to the Cambridgeshire and Peterborough Minerals and Waste Core Strategy regarding requirements to ensure that waste is appropriately managed and dealt with'. This approach is fully supported. However, we would like reference to be specifically made to a 'waste audit and strategy' and justification as to why this requirement has not been listed for SEL1 (Alconbury Weald) or SEL3 (Wyton on the Hill)? We would expect all strategic allocations to demonstrate this waste management in line with adopted waste policy and would recommend that these points are added to both SEL1 and SEL3 accordingly;
- 1.15 HU 19 (Brampton Park) states in the development guidance section under Paragraph 11.127 that 'the site contains mineral resources that should be protected in accordance with Cambridgeshire and Peterborough Core Strategy Policies CS26 and CS27, A waste strategy and audit will be required in conformity with Cambridgeshire and Peterborough Core Strategy Policies CS7, CS16 and CS28'. This acknowledgement and related requirements are fully supported;
- 1.16 HU 20 (Park View Garage, Brampton) states in the development guidance section under Paragraph 11.134 that 'the site falls within the Station Farm / Buckden Landfill Waste Consultation Area (Policy W8AX). Any proposals would therefore have to demonstrate compatibility with the nearby waste management uses protected through the waste consultation area'. This acknowledgement and requirement is fully supported;
- 1.17 SN 7 (Cromwell Road Car Park, St Neots) states in the development guidance section under Paragraph 12.36 that 'the site falls within a waste consultation area for the Marston Road Household Recycling Centre and Biffa Depot as set out in the Cambridgeshire and Peterborough Minerals and Waste Local Development Framework. Given the nearby residential activities residential development on this site will not prejudice the continued operation of the waste facility'. Whilst we welcome the acknowledgement of the waste consultation area for the two waste facilities, and in principle agree with some of the conclusions of the nearby activities, it is for the proposal to demonstrate compatibility with the

nearby waste management uses protected through the waste consultation area'. The text should be changed to say 'the site falls within a waste consultation area for the Marston Road Household Recycling Centre and Biffa Depot as set out in the Cambridgeshire and Peterborough Minerals and Waste Local Development Plan Framework. Given the nearby residential activities residential development on this site will not be unlikely to prejudice the continued operation of the waste facilities. However, Any proposals would therefore have to demonstrate compatibility with the nearby waste management uses protected through the waste consultation area';

- 1.18 SI 4 (Former Car Showroom, London Road, St Ives) states in the development guidance section under Paragraph 13.24 that 'approximately half of this site falls within the Sand and Gravel Minerals Safeguarding Area. However, given the proximity to other uses, including residential, it is unlikely to be a commercial resource. In the event that mineral is extracted as part of any future development it must be put to a sustainable use either on or off site. Any development proposal must address this issue with reference to the Cambridgeshire Waste and Minerals Core Strategy Policy CS26'. Other than the document title needing to be amended to show 'Cambridgeshire and Peterborough' and 'Minerals and Waste', this acknowledgement and requirement is fully supported;
- 1.19 RA 7 (Former RAF Upwood and Upwood Hill House, Ramsey) states in the development guidance section under Paragraph 14.43 that 'A waste strategy and audit will be required in conformity with Cambridgeshire and Peterborough Core Strategy Policies CS7, CS16 and CS28'. This acknowledgement and related requirements are fully supported;
- 1.20 FS 2 (Cambridge Road, Fenstanton) states in the development guidance section under Paragraph 15.17 that 'the site is situated within a Sand and Gravel Mineral Safeguarding Area in the Cambridgeshire and Peterborough Minerals and Waste Local Development Framework. Cambridgeshire County Council has in this case confirmed that due to the small size and proposed policy restrictions for the site, that mineral extraction is not expected'. Whilst we welcome the acknowledgement of the Mineral Safeguarding Area, and agree with the conclusion, for consistency the text needs to include the sustainable use of materials if extraction does take place. As such, the text should be changed to say 'the site is situated within a Sand and Gravel Mineral Safeguarding Area in the Cambridgeshire and Peterborough Minerals and Waste Local Development Plan Framework. Cambridgeshire County Council has in this case confirmed that due to the small size and proposed policy restrictions for the site, that mineral extraction is not expected. However, in the event that mineral is extracted as part of any future development it must be put to a sustainable use either on or off site. Any development proposal must address this issue with reference to the Cambridgeshire and Peterborough Minerals and Waste Core Strategy Policy CS26';
- 1.21 KB 1 (West of Station Road, Kimbolton) states in the development guidance section under Paragraph 15.28 that 'the site lies wholly within a Cambridgeshire and Peterborough Sand and Gravel Mineral Safeguarding Area. Given the size of the site and its proximity to residential development, it is unlikely to be worked as an economic reserve. However, in the event that mineral is extracted as part of any future development it must be put to a sustainable use either on or off site in accordance with Cambridgeshire and Peterborough Minerals and Waste Core Strategy Policy CS26'. This acknowledgement and requirement is fully supported.

## **2. TRANSPORT**

- 2.1 The overarching vision and objectives are supported. In particular the County Council welcomes the requirement for new infrastructure and public transport services to ensure that the district functions effectively. In addition, we welcome the reference to walking and cycling as they are important mode choices for shorter journeys and can help to reduce the impact of a development on the highway network as well as helping to improve the health and well-being of residents.
- 2.2 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. With new developments providing good non-car based routes for local movement within the development and also to surrounding communities, facilities provided should include footpaths and segregated cycle tracks to locations such as places of employment and education.
- 2.3 The County Council welcomes the inclusion of the Cambridgeshire Local Transport Plan as well as Market Town Transport Strategies (MTTS) for St Neots, St Ives, Ramsey, and Huntingdon and Godmanchester.
- 2.4 The County Council's Economy & Environment Committee adopted the Long Term Transport Strategy for Cambridgeshire (LTTS) on 25 November 2014. The LTTS was written in consultation with HDC and contains an action plan of high-level measures in Huntingdonshire which the County Council believes will be necessary to support the delivery of the growth in the Local Plan. Extracts from the LTTS detailing the interventions needed in the Huntingdon and St Ives area are included below.
- 2.5 The LTTS recognises that traffic conditions around Huntingdon and St Ives can be very congested at peak periods, particularly at times when the A14 is busy or when incidents occur, with particular issues on the A141, A1123 and A1096. In this context, the proposed implementation of the A14 Cambridge to Huntingdon scheme will be a critical intervention that should release transport capacity on the local road network around Huntingdonshire and help provide capacity for development's travel demand. However, it is also considered necessary to safeguard a possible new alignment for the A141 around the north of Huntingdon, should further capacity be needed in future. Works on the current A141 and on the A1096 are also identified, as is major investment in public transport links and walking and cycling infrastructure. Despite these improvements there will still be a need for individual developments to mitigate the impact of their trips. With specific reference to the proposed Wyton Airfield development, the LTTS identifies the following:

### **Wyton Airfield Access**

- 2.6. Further measures (to be determined by additional study work) to identify the most sustainable way to provide for the anticipated transport demand from the development of Wyton Airfield, and mitigate impacts on St Ives and Huntingdon.
- 2.7 On 16 December 2014, the County Council agreed the following motion:

*...this Council resolves to:*

- *continue to encourage and support development that benefits the local community and economy*
- *continue to provide advice to the district councils developing their Local Plans on:*
  - *the potential traffic and transport implications of proposed developments; and*
  - *potential feasible, affordable and sustainable solutions to mitigate impacts with an assessment of the residual impacts*
- *object to proposals in draft Local Plans if CCC assessments indicate that potential interventions are not deliverable or the residual cumulative impacts of development will be severe*
- *advise district councils that they, or the promoter of sites being put forward for development, should submit their own traffic and transport assessment to the County Council for comment if county council officers are not confident potential solutions are deliverable (including considering potential funding limitations) and won't have severe environmental consequences.*

2.8 In the context of both the LTTS and the 16 December 2016 motion, the County Council has identified that further work is needed to consider the impacts of growth in the Huntingdon and St Ives area holistically and identify in more detail a suitable package of interventions to facilitate and mitigate the impacts of future planned growth.

2.9 In particular, the County Council considers that work to develop the package of transport interventions needed to address the impacts of development at Wyton Airfield is needed, and that further, this would allow the potential environmental impacts of such interventions to be assessed.

2.10 This work would meet the requirements set out in the LTTS Table 4.3 “Wyton Airfield Access” noted above, and would support and build upon the work undertaken to develop the LTTS measures in Huntingdonshire that could facilitate growth and mitigate its impacts. The County Council will work with the District Council and developers to scope and to support the production of the necessary traffic and transport assessment work to support development in the District.

**Extract from Figure 4.3 of the LTTS detailing interventions required to mitigate development in Huntingdonshire**

<b>Scheme / programme</b>	<b>Delivery timescale</b>	<b>Indicative cost</b>
<b>Huntingdon, St Ives, Alconbury Weald and Wyton Airfield, Huntingdonshire</b>		
<b>A14 Cambridge to Huntingdon improvement.</b>	By 2019	Up to £1,500M
<b>High Quality Bus Network Infrastructure, St Ives (Busway) to Wyton Airfield and Alconbury Weald.</b> A high quality bus corridor providing quick and reliable journeys between the end of the Busway at Station Road St Ives and the Enterprise Zone at Alconbury.	To be determined	Directly funded by developer
<b>High Quality Bus Network Infrastructure, St Ives (Busway) to Huntingdon.</b> A high quality bus corridor providing quick and reliable	To be determined	To be determined - funding



Scheme / programme	Delivery timescale	Indicative cost
journeys between the end of the Busway at St Ives and Huntingdon town centre / station.		from various sources
<b>High Quality Bus Network Infrastructure, Alconbury Weald to Huntingdon.</b> A high quality bus corridor providing quick and reliable journeys between the Enterprise Zone at Alconbury and Huntingdon town centre / station.	To be determined	
<b>Alconbury Weald station.</b> A new station at Alconbury Weald on the East Coast Main Line (this would be one of the two transport hubs for Alconbury Weald noted above).	To be determined	Rail industry / developer funded
<b>Alconbury Weald Transport Interchange.</b> A second transport interchange to the west / centre of the Alconbury Weald / Enterprise Zone site to serve the new development.	To be determined	Directly funded by developer
<b>Wyton Airfield Transport Interchange.</b> A transport interchange in the centre of the new settlement at Wyton Airfield.	To be determined	Directly funded by developer
<b>Hartford Transport Interchange.</b> A transport interchange to intercept car trips and provide access to the St Ives to Wyton Airfield and Alconbury and St Ives to Huntingdon High Quality Bus Network routes..	To be determined	To be determined
<b>A141 capacity enhancements around Huntingdon.</b> Junction capacity enhancements on the A141 Huntingdon northern bypass at the following locations. <ul style="list-style-type: none"> <li>• Ermine Street.</li> <li>• Washingley Road.</li> <li>• St Peter's Road.</li> <li>• A1123 Huntingdon Road / B1514 Main Street.</li> <li>• B1090 Sawtry Way.</li> </ul>	To be determined	To be determined – funding from various sources
<b>A141 Alconbury Weald / Enterprise Zone southern access.</b> A new access junction for Alconbury Weald on the A141 to the west of the bridge over the East Coast Main Line.	To be determined	Directly funded by developer
<b>A141 future Huntingdon Bypass alignment.</b> The safeguarding of an alignment for the possible future re-routing of the A141 Huntingdon northern bypass. This route would separate the strategic and local functions of the current route, and provide capacity for further growth. It would only be delivered if conditions on the network required it, or if it were needed to support growth.	Late 2020s / early 2030s if needed	To be determined
<b>Wyton Airfield Access.</b> Further measures (to be determined by additional study work) to identify the most sustainable way to provide for the anticipated transport demand from the development of Wyton	Late 2020s / early 2030s if needed	To be determined

Scheme / programme	Delivery timescale	Indicative cost
Airfield, and mitigate impacts on St Ives and Huntingdon.		
<b>A141 capacity improvements between the B1090 Sawtry Way junction and the A141 future Huntingdon Bypass alignment if needed.</b> Capacity upgrades on the existing A141 alignment between Huntingdon and Wyton Airfield if needed, in concert with the A141 future Huntingdon bypass (see above).	Mid 2020s	To be determined
<b>A1096 capacity enhancements around St Ives.</b> Junction capacity enhancements on the A1096 around St Ives at the following locations. <ul style="list-style-type: none"> <li>• Low Road.</li> <li>• Busway.</li> <li>• Meadow Lane.</li> <li>• Compass Point.</li> </ul>	To be determined	To be determined
<b>B1090 traffic management.</b> Measures to manage speed and capacity of traffic on the B1090 Sawtry Way. Precise details of measures to be undertaken to be considered in tandem with the development of detailed proposals for Wyton Airfield site access in the context of the interventions noted above.	To be determined	To be determined
<b>Wider Huntingdon / St Ives area pedestrian / cycle network.</b> A comprehensive network of high quality pedestrian / cycle routes linking the new town with key destinations in Huntingdon, St Ives, Alconbury Weald, Wyton Airfield and the surrounding ring of villages.	To be determined	To be determined
<b>Wintringham Park and Love's Farm, St Neots, Huntingdonshire</b>		
<b>A428 / A1198 Caxton Gibbet junction improvements.</b> (see also Bourn Airfield / West Cambourne above). Scheme to be identified, informed by Highways Agency's Midlands to Felixstowe Route Based Strategy. May be delivered as part of the 'A428 Caxton Gibbet to Black Cat dualling scheme' detailed in Figure 4.2	To be determined	To be determined

- 2.11 We would also like to draw attention to the Measure of Enjoyment of the Natural Environment (MENE) data which Natural England publishes. The latest MENE results show the highest number of people making visits to the outdoors since the survey started 5 years ago;
- 96% of people agree or strongly agree that having green spaces close to where they live is important;
  - Visiting the natural environment for health or exercise accounted for an estimated 1.3 billion visits to the natural environment between March 2013 and February 2014;

- Respondents to the survey also agreed that being outdoors made them feel ‘calm and relaxed’ and the proportion agreeing that a visit was ‘refreshing and revitalising’ was at its highest in the most recent survey.

The results of the survey are available on the following web page:

<https://www.gov.uk/government/statistics/monitor-of-engagement-with-the-natural-environment-2013-to-2014>

## **Specific Comments**

- 2.12 Page 71 LP7 Green Infrastructure This policy needs to refer to maintaining and where appropriate enhancing the rights of way network throughout the District.
- 2.13 Page 101 LP 18 Quality of Design. We would like to see the inclusion of references to Rights of Way in this policy which states that a proposal for a new development will need to be designed to a high standard based on a thorough understanding of the site and its context. Public Rights of Way are a key part of the context of a site.
- 2.14 Page 109 LP22 Sustainable Travel This policy mentions the provision of safe and convenient pedestrian and cycle routes including links to new and existing services, footpaths, bridleways and the countryside to be provided where appropriate and if possible formalised as rights of way. It is noted that it is only in this section of the Plan that bridleways are mentioned. We would like to see bridleways being given more consideration as a way to provide access and links for pedestrians, cyclists and equestrians.
- 2.15 This Policy also needs to refer to the Local Transport Notes (LTN) on Cycle Infrastructure Design LTN 2/08) and the Shared use routes for pedestrian and cyclist (LTN 1/12) and Sustrans Handbook for Cycle Friendly Design 2014.
- 2.17 Paragraph 7.43, this should be amended as follows; The need for a Transport Assessment or Transport Statement depends on the ~~amount of likely traffic generated by~~ size and location of a particular proposal. Further information on what is required is included in the Council's planning application validation requirements. The requirements set out in the NPPF and the National Planning Practice Guidance will guide the consideration of these.
- 2.18 Paragraph 7.44 refers to “Cambridgeshire Travel for Work Partnership”, this should now be amended to “Travel for Cambridgeshire”.

## **Page 111 LP23 Parking Provision**

- 2.19 Huntingdon and Cambridgeshire design guides implies that no more than the maximum parking allocation should be provided. The policy goes on to say that that car ownership within Huntingdonshire is higher than the national average.

- 2.20 Whilst the move to more sustainable modes of transport especially for journeys in the peak hours is supported, it should be considered that whilst some people will use non-car modes for regular journeys such as to work or education, they may still wish to own a car for longer journeys and therefore residential developments should provide sufficient parking so that ownership of a car is possible but through the use of such things as parking constraint at trip attractors such as places of education or work the use of sustainable modes of transport is encouraged for these journeys. Therefore, parking standards should be suitable for the area in question with an evidence based need for parking using such things as the local level of car ownership and the availability of alternative modes of transport. This should include the use of parking surveys undertaken within the area around a proposed development to ensure that the appropriate level of parking is achieved in each development.
- 2.21 Any garage provision should be adequate to cater for today's vehicles and be able to be used easily; otherwise garages will only be used for storage.

### **Page 125 LP30 Tourism and Recreation**

- 2.22 The County Council would like to see the inclusion of references to Rights of Way. The policy states that a proposal for tourism sport and leisure development will be supported where safe physical access from the public highway network can be achieved. This access could in many cases be achieved by creating new public rights of way.

## **STRATEGIC EXPANSION LOCATIONS**

### **SEL 1 Alconbury Weald**

- 2.23 Bullet point f. needs to be amended to state the following: "satisfactory resolution of any additional traffic impact on the current A14 and A141 surrounding road network arising from detailed transport assessment of each key phase of development"

In addition the list of requirements needs to include "the provision of quality pedestrian and cycle improvements to the town centre and surrounding villages".

### **Development Guidance**

- 2.24 Paragraph 10.14 should be amended to read;  
A transport assessment (in accordance with Policy LP22) and travel plan is required for each key phase of development in order to assess the transport impact of each phase on the local road network, including the existing A14. The outline planning permission for the site includes the provision of a southern access to the A141 to serve the development and provide connection to Huntingdon and thereby avoiding additional traffic on C339 through nearby settlements. The outline consent includes the need to provide an extensive range of travel modes to both Huntingdon and its town centre, as well as to further destinations, particularly by an extensive range of public transport services, and these will be vital to the success of the development and to minimise the effects of car-based impact on the local network. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

### **SEL 2 St Neots East**

2.25 The list of requirements needs to include the following:

- the provision of quality pedestrian and cycle improvements to the town centre, and
- satisfactory resolution of the impact of additional traffic on the local highway network having regard to the transport assessment and travel plan for the proposed development.

In Addition the following needs to be included in the Development Guidance section;  
A transport assessment (in accordance with Policy LP22) and Travel Plan is required for each phase of development in order to assess the transport impact on the local road network. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

### **SEL 3 Wyton on the Hill**

2.26 The following needs to be included in the Development Guidance Section;  
A transport assessment (in accordance with Policy LP22) and Travel Plan is required for each phase of development in order to assess the transport impact on the local road network. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

## **HUNTINGDON SPATIAL PLANNING AREA**

### **HU 1 Ermine Street Huntingdon**

2.27 Bullet Point b needs to be amended as set out below;  
“satisfactory resolution of any impact caused by traffic generated from the allocation on the ~~A141 and Ermine Street~~ surrounding local road network having regard to a transport assessment and travel plan.”  
The following additional point is required:

- *provision of suitable and safe pedestrian and cycle connectivity into Huntingdon town centre from the site.*

In Addition the following needs to be included in the Development Guidance section;  
A transport assessment (in accordance with Policy LP22) and Travel Plan is required for each phase of development in order to assess the transport impact on the local road network. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

### **HU 2 Forensic Science Laboratory Huntingdon**

2.28 Within the policy the following additional point is required “provision of suitable and safe pedestrian connectivity from the site to the surrounding area”.

Paragraph 11.13 should be amended to read;  
Development proposals should provide clear visual and physical links through to surrounding development to facilitate integration. A transport assessment (in accordance with Policy LP22) and accompanying travel plan will be required which includes consideration of the impact of

additional traffic generation on the local road network with particular focus on Hinchingsbrooke Park Road and enhanced pedestrian and cycleway facilities. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

### **HU3 Hinchingsbrooke Health Campus**

- 2.29 Paragraph 11.22 should be amended to read;  
A transport assessment (in accordance with Policy LP22) will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23. and The proposed access on to Hinchingsbrooke Park Road should be designed in accordance with current standards. Enhanced pedestrian and cycle facilities will also be required along with appropriate linkage to public transport. Significant engineering works may be required given the location next to a busy signalised intersection. An accompanying travel plan should ensure provision of adequate parking facilities and promote sustainable travel modes

### **HU4 West of railway Brampton Road Huntingdon**

- 2.30 Paragraph 11.27 should be amended to read;  
“This site is currently partly vacant land and partly a temporary car park. The approach from Brampton Road is dominated by the A14 viaduct and scope for redevelopment is highly constrained until this is removed. A disused water tower and reservoir are on the site. Planning permission has been granted for the conversion and extension of the water tower to an office building. A transport assessment (in accordance with Policy LP22) will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23. Access to the site should be gained from Brampton Road with appropriate connections made into the public footpath to the west of the site. The footpath along the northern side of Brampton Road is heavily used and also incorporates a cycle path; the design of any access should ensure a safe pedestrian and cycle crossing is incorporated.

### **HU5 South of Fern Court, Stukeley Road Huntingdon**

- 2.31 Paragraph 11.35 should be amended to read;  
A suitable transport assessment (in accordance with Policy LP22) will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23. An appropriate access point will need to be provided for the anticipated volume of traffic. Development proposals should promote ease of access for pedestrians and cyclists through to Stukeley Meadows to encourage non-car access for local trips.

### **HU6 Ermine Street Edison Bell Way Huntingdon**

- 2.32 In addition the following needs to be included in the Development Guidance section;  
Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

### **HU7 North of Edison Bell Way Huntingdon**

- 2.33 Paragraph 11.49 should be amended to read;  
The site is located on the northwest corner between Ermine Street and Edison Bell Way. It was part of a mixed use allocation made in the Huntingdon West Area Action Plan adopted by the Council in 2011. The uses allocated for this site reflect a consents granted 1301837OUT for

the western part of the site and 1301836OUT for the eastern part of the site. A design brief should be prepared for the site due to its prominent location. The traffic impacts of this site are set out in the agreed Transport Assessment and Travel Plan for the proposed land uses.

#### **HU8 South of Edison Bell Way Huntingdon**

- 2.34 Paragraph 11.57 should be amended to read;  
The site is located to the southeast of Edison Bell Way. It was part of a mixed use allocation made in the Huntingdon West Area Action Plan adopted by the Council in 2011. The residential use allocated for this site reflects the planning permission 1301836OUT. It is expected that the dwellings will be a mix of terraced properties and apartments. A design brief should be prepared for the site given its prominent location. The traffic impacts of this site are set out in the agreed Transport Assessment and Travel Plan for the proposed land uses.

#### **HU9 Ferrars Road Huntingdon**

- 2.35 Paragraph 11.64 should be amended to read;  
This site is located between Edison Bell Way and Ferrars Road. It was part of a mixed use allocation made in the Huntingdon West Area Action Plan adopted by the Council in 2011. The proposed development will help contribute to the need for specialist supported housing within an accessible location. A design brief should be prepared for the site given its prominent location. The traffic impacts of this site are set out in the agreed Transport Assessment and Travel Plan for the proposed land uses.

#### **HU10 West of Edison Bell Way Huntingdon**

- 2.36 The following needs to be included in the Development Guidance Section;  
A transport assessment (in accordance with Policy LP22) is required for the development in order to assess the transport impact on the local road network.

#### **HU11 George Street Huntingdon**

- 2.37 Paragraph 11.82 should be amended to read;  
Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) and Travel Plan will be required to demonstrate how vehicular access and parking arrangements will be provided and utilised and how appropriate pedestrian and cycle connections made. An air quality assessment will be necessary both due to the site's proximity to the Huntingdon air quality management area and the development's potential impact on air quality. A noise assessment will also be required due to the site's proximity to the East Coast mainline railway and other town centre uses and the potential for noise arising from the proposed development.

#### **HU12 George Street Edison Bell Way Huntingdon**

- 2.38 In addition the following needs to be included in the Development Guidance section;  
Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

#### **HU13 Chequers Court Huntingdon**

- 2.39 Paragraph 11.94 should be amended to read;  
Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) and Travel Plan will be required to demonstrate how access and parking arrangements can be re-configured and appropriate pedestrian and cycle connections made. An air quality assessment will be necessary as the site lies within the Huntingdon air quality management area. A noise assessment will also be required due to its proximity to the ring road and other town centre uses and the potential for noise arising from the proposed development. Given the variety of previous uses of the site a contamination assessment is also required.

#### **HU14 Gas Depot, Mill Common Huntingdon**

- 2.40 In addition the following needs to be included in the Development Guidance section;  
Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

#### **HU15 California Road Huntingdon**

- 2.41 In addition the following needs to be included in the Development Guidance section;  
Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

#### **HU16 Main Street Huntingdon**

- 2.42 In addition the following needs to be included in the Development Guidance section;  
Details of a suitably designed safe access onto the existing highway network should be provided and agreed. It is important to note that there is a need to avoid the right turn feature of Owl Way which may limit the location of the access and or prohibit exit from site during peak flows. It is possible that considerable alteration to existing road layout may be required which may make the allocation unviable. Access onto Old Houghton Road would be preferable and therefore it suggested that the allocation is amended to allow access on to Old Houghton Road.

#### **HU17 Hinchingsbrooke Country Park Extension Huntingdon**

- 2.43 In addition the following needs to be included in the Development Guidance section;  
The development will need to ensure adequate parking is provided so that the surrounding highway network is not adversely affected.  
The development will also need to ensure that a suitably designed safe access or accesses onto existing highway is provided.

#### **HU18 Huntingdon Race Course**

- 2.44 In addition the following needs to be included in the Development Guidance section;  
Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) and Travel Plan will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.



The development will also need to provide pedestrian access to Brampton improvements.

### **HU19 Brampton Park**

- 2.45 Bullet Point a. needs to be amended as follows;  
satisfactory resolution of any additional traffic impact on ~~A14 and local roads~~ the surrounding road network having regard to the agreed transport assessment and travel plan for the Proposed development.
- 2.46 Paragraph 11.121 should be amended to read;  
The site offers the opportunity to develop a new mixed use neighbourhood for Brampton and integrate both itself and the adjoining former RAF housing better with the village of Brampton. A transport assessment and travel plan was submitted and agreed in support of the recent planning application on this site. ~~will be required to~~ The approved TA indicated the ability of the surrounding highway network to accommodate the anticipated levels of traffic generation. The creation and enhancement of pedestrian and cycle links to the village centre will be necessary to provide safe routes to services and facilities. Although any development scheme is expected to be residential led it should also incorporate a significant amount of employment land to promote sustainable local employment opportunities. An Urban Design Framework for the redevelopment of the site was approved in 2011 and should be taken into account as a material consideration.

### **HU20 Park View Garage Brampton**

- 2.47 In addition the following needs to be included in the Development Guidance section;
- Details of a suitably designed safe access onto the existing highway network should be provided and agreed.
- The Development will also need to set out how the site will be connected in to the surrounding pedestrian and cycle facilities.

### **HU21 Tyrell's Marina, Godmanchester**

- 2.48 In Addition the following needs to be included in the Development Guidance section;  
Details of a suitably designed safe access onto the existing highway network should be provided and agreed. It is important to note that this access should be achieved from the Avenue as access from the Bridge would be unacceptable.

### **HU22 RGE Engineering, Godmanchester**

- 2.49 In Addition the following needs to be included in the Development Guidance section;  
Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

### **HU23 Corpus Christie Lane Godmanchester**

- 2.50 In Addition the following needs to be included in the Development Guidance section;

Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

#### **HU24 Wigmore Farm Buildings, Godmanchester**

- 2.51 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

#### **HU25 Bearscroft Farm Godmanchester**

- 2.52 Paragraph 11.158 should be amended to read;  
Application 1200685OUT covers the site and was approved ~~subject to the resolution of a Section 106 agreement~~ in July 2013. (the site now has a signed S106) the Transport Impacts of this development are set out in the approved transport assessment and travel plan

### **ST NEOTS SPATIAL PLANNING AREA**

#### **SN1 Eaton Court St Neots**

- 2.53 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

#### **SN2 Huntingdon Street St Neots**

- 2.54 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

#### **SN3 Former Youth Centre St Neots**

- 2.55 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

#### **SN4 St Marys Urban Village St Neots**

- 2.56 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

#### **SN5 Loves Farm Reserved site St Neots**

- 2.57 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

## **SN6 Cromwell Road North St Neots**

- 2.58 In Addition the following needs to be included in the Development Guidance section; Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

## **SN7 Cromwell Road Car Park St Neots**

- 2.59 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

## **SN8 Nelson Road, St Neots**

- 2.60 In Addition the following needs to be included in the Development Guidance section; Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

## **ST IVES SPATIAL PLANNING AREA**

### **SI 1 St Ives West**

- 2.61 Paragraph 13.8 should be amended to read;  
Vehicular access is to be taken from the Houghton Road/ Garner Drive junction, which serves the Slepe Meadow housing, and from Knights Way in the Green Acres development. A transport assessment (in accordance with Policy LP22) and Travel Plan will be required in order to assess the transport impact of the development and appropriate infrastructure improvements incorporated to mitigate impacts and promote sustainable travel options.

### **SI 2 St Ives Football Club**

- 2.62 In Addition the following needs to be included in the Development Guidance section; Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) and travel plan will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

### **SI 3 Giffords Farm St Ives**

- 2.63 In Addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.  
The Development will also need to set out how the site will be connected in to the surrounding pedestrian and cycle facilities to the south of the site.

### **SI 4 Former Car Showroom London Road St Ives**

- 2.64 In Addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

#### **SI 5 Former Vindis Car Showroom, St Ives**

- 2.65 In Addition the following needs to be included in the Development Guidance section; Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23. The development will also need to detail how pedestrian connectivity improvement into St Ives centre is to be achieved.

### **RAMSEY SPATIAL PLANNING AREA**

#### **RA1 Ramsey Gateway (High Lode)**

- 2.66 Paragraph 14.6 should be amended to read;  
The site should be accessed via the existing roundabout on St Mary's Road, with suitable transport assessment (in accordance with Policy LP22) and Travel Plan will be required ~~provision~~ to demonstrate the highway network is suitable. A new pedestrian and cycleway bridge would be required to ensure linkages are improved between the two parcels either side of High Lode.

#### **RA2 Ramsey Gateway**

- 2.67 In Addition the following needs to be included in the Development Guidance section; Access to the site is via the roundabout previously constructed as part of the Tesco development, with suitable safety audits being undertaken

#### **RA3 West Station Yard and Northern Mill**

- 2.68 Access to the site looks to be restrictive and will need to achieve a minimum of a 5m access with 1.8m footways with visibility required at this location would be 2.4mx 43m if these minimum requirements cannot be met then the site would not be considered for adoption. Possible connection with site RA2 could overcome the access issues. This should be discussed with the agents to secure a better development.

#### **RA4 Field Road Ramsey**

- 2.69 In Addition the following needs to be included in the Development Guidance section; Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) and Travel Plan will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

## **RA5 Whytefield Road Ramsey**

- 2.70 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

## **RA6 Great Whyte, Ramsey**

- 2.71 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

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

- 2.72 In addition the following needs to be included in the Development Guidance section; Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

## **SERVICE CENTRES**

### **BUCKDEN**

#### **BU 1 East of Silver Street Buckden**

- 2.73 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed. The site access should not be located opposite Lincoln Close.

### **FENSTANTON**

#### **FS1 Former Dairy Crest Factory, Fenstanton**

- 2.74 In addition the following needs to be included in the Development Guidance section; Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23. Minimal vehicular access onto High Street will be allowed however, pedestrian access should be provided to Village centre.

#### **FS2 Cambridge Road Fenstanton**

- 2.75 In addition the following needs to be included in the Development Guidance section; Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

### **FS3 Ivy Nursery, Fenstanton**

- 2.76 In addition the following needs to be included in the Development Guidance section; Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

### **KIMBOLTON**

#### **KB1 West of Station Road Kimbolton**

- 2.77 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

#### **KB2 South of Bicton Industrial Estate**

- 2.78 In addition the following needs to be included in the Development Guidance section; Access onto the existing highway will need to be assessed to show that the junction is adequate to cater for the movements of the existing site and the proposed site.

### **SAWTRY**

#### **SY1 East of Glebe Farm Sawtry**

- 2.79 In addition the following needs to be included in the Development Guidance section; Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

#### **SY2 West of St Andrews Way, Sawtry**

- 2.80 Paragraph 15.39 should be amended to read the following; Access could potentially be formed with the elevated section of St Andrews Way, one of the main links out of the village and providing access onto the A1. A transport assessment (in accordance with Policy LP22) would be required, indicating surrounding network adequacy with required improvements to infrastructure and details of any road improvements. A change in character of the current interchange/link road to indicate a residential environment may be appropriate.

### **SOMERSHAM**

#### **SM1 Newlands, St Ives Road Somersham**

- 2.81 In addition the following needs to be included in the Development Guidance section;

Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

### **SM2 The Pasture, Somersham**

- 2.82 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed. Access should be via the Pastures only as rectory lane is narrow in its nature.

### **SM3 Somersham Town Football Club**

- 2.83 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

### **SM4 North of the Bank, Somersham**

- 2.84 In addition the following needs to be included in the Development Guidance section; Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

## **WARBOYS**

### **WB1 West of Station Road Warboys**

- 2.85 Paragraph 15.60 should be amended to read;  
Outline planning permission was agreed in June 2014 subject to completion of a S106 agreement. Detailed development proposals for this site should maximise the opportunities to facilitate integration between the residential area west of Station Road and the main part of Warboys village. A transport assessment (in accordance with Policy LP22) and accompanying travel plan will be required to ensure appropriate, safe access is established from Station Road, complemented by footpaths and cycleways to improve sustainable connections to services and facilities in the village centre.

### **WB2 West of Ramsey Road Warboys**

- 2.86 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

### **WB3 Manor Farm Building, Warboys**

- 2.87 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

Frontage onto the adopted road network does not look to be wide enough to cater for the development proposed which would require minimum visibility of 2.4m x 43m and minimum access width of 5m wide, this excludes any pedestrian connectivity.

#### **WB4 Rear of 64 High Street, Warboys**

- 2.88 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

#### **WB5 South of Farriers Way, Warboys**

- 2.89 Paragraph 15.74 should be amended to read;  
Vehicular access to the site will need to be provided via an extension of Farrier's Way. Pedestrian access should be provided through the site to Farrier's Way, as well as to Bencroft Lane by way of links to 'Fenton Field Farm, Warboys' and to the footpath through the area of open space between the site and Farrier's Way to aid integration of the site into the village and maximise accessibility for pedestrians. A transport assessment (in accordance with Policy LP22) and accompanying travel plan will be required.

#### **WB6 Fenton Field Farm Warboys**

- 2.90 This site was formally part of WB5 with access via Fentons Way. The County Council does not support the intensification of use of Bencroft Lane and therefore if this site were to remain as a separate allocation then access should only be through allocation site WB5 as Bencroft Lane is not suitable in relation to its inadequate width, lack of pedestrian facilities and the poor vehicle to vehicle visibility at its junction with Fenton Road.

### **YAXLEY**

#### **YX1 Askew's Lane Yaxley**

- 2.91 In addition the following needs to be included in the Development Guidance section; Details of a suitably designed safe access onto the existing highway network should be provided and agreed.

#### **YX2 Former Snowcap Mushrooms and adjoining land, Yaxley**

- 2.92 In addition the following needs to be included in the Development Guidance section; Development proposals will need to provide information on how the impacts of the development will be accommodated and mitigated where appropriate. A transport assessment (in accordance with Policy LP22) and Travel Plan will be required. The development also needs to ensure that sufficient parking is provided on the site in line with policy LP23.

#### **YX3 Yax Pax, Yaxley**

- 2.93 In addition the following needs to be included in the Development Guidance section;



Details of a suitably designed safe access onto the existing highway network should be provided and agreed. For information the present access from Broadway is unsuitable for further intensification of use and therefore, access should be sought from adjacent Eagle Park.

### **3. ECONOMIC DEVELOPMENT**

- 3.1 There is still a heavy reliance on the Alconbury Enterprise Zone to provide the employment growth with 150ha allocated for employment compared to 55ha across the remainder of the District. None of the site specific proposals however contain any detail on the type of business units to be constructed that might be preferred by Hunts DC, e.g. to provide provision for start-ups or micro businesses or how this might be encouraged.
- 3.2 Further technical work will be needed to assess the transport implications of the different employments scenarios on the EZ.
- 3.3 It is important that if new developments are to be as sustainable as possible that high quality broadband provision is required (as a minimum superfast broadband speed of 30Mbps should be a requirement). This key element of necessary infrastructure needs to be strengthened considerably in the Local Plan.
- 3.4 The Local Plan includes a brief reference to the implications of the forthcoming withdrawal of the USAF from Alconbury and Molesworth. The MOD is currently undertaking a review of the UK defence estate, assessing both their future defence and commercial uses. Whilst this review will not report until January 2016 it is important that the local authorities' proposals for the two sites (should they be released by the MOD) are fed into this process. Ideally this needs to take place in the next 3 months before any preliminary defence preferences are expressed by the MOD, even though release of the sites by the MOD is unlikely before 2020/21. A preferred option for Alconbury is likely to be integration with the adjacent Alconbury Weald development as the USAF accommodation such as the medical block, could provide useful facilities for the new community. The future use for Molesworth for non MOD purposes is less obvious but it is still important that possible options for the site are fed in early to the MOD bases review.

### **4. CHILDREN FAMILIES AND ADULTS**

- 4.1 LP4 'Service Centres' states that *Service Centres offer a range of services and facilities to meet the general day to day needs of their residents and to some extent the residents of small settlements nearby. Services and facilities available will include at least a public hall.* We suggest changing this to suitable community facilities to maintain flexibility. A public hall suggests 1 large room; however, a community will require flexible space that is adaptable to the changing community needs. The community may need space for children and young people's groups, adult learning course, smaller space for private meetings (for example, a group of adults suffering from mental health difficulties who want to meet together in private),

or possibly space to deliver statutory services such as children's centre outreach work. Changing in wording allows the community to be engaged in determining the type of community facilities they require rather than restricting them to one type of facility.

- 4.2 The County Council supports LP 8 'Sustainable Development Principles'; a community may not require someone else to *provide* for its needs it may just need support to provide it for itself. We also suggest the addition of *health, social and cultural wellbeing* to further enhance the importance of the planning system's social role as detailed in the NPPF and highlight the importance of overall wellbeing of its residents in the success of a sustainable development.
- 4.3 The County Council suggests incorporating another bullet point to LP10, *a proposal for large scale development, defined in the 'Glossary', should demonstrate how it will contribute to improving the health and well-being of the community and helping to deliver healthy lifestyles through: e) delivering actions to develop cohesive and connected communities. As recognised in the Cambridgeshire Health and Wellbeing Strategy, actions to develop cohesive and connected communities have an important role in promoting good mental and physical health and wellbeing.* Therefore, it is essential that this policy has direct reference to the role of cohesive and connected communities in order to facilitate safe, healthy and inclusive communities.
- 4.4 Paragraph 5.24, page 81 states that HDC will seek to promote health and well-being by supporting the provision of health, social, cultural and community support and facilities. Improving the health of the population is a shared responsibility across a range of partner organisations working together as part of the Huntingdonshire Strategic Partnership including this Council, Cambridgeshire County Council, Cambridgeshire NHS, Cambridgeshire Police, local businesses and voluntary sector organisations. These work together to provide services such as health care, community safety, education, environmental protection, recreation and leisure which all contribute to people's quality of life.

Promotion of health requires more than just facilities, people will require support outside of buildings to ensure they are healthy and well. A new community will require additional support to help build resilience and social capital which is associated with better levels of health, better educational attainment, better chances of employment and lower crime rates.

- 4.5 Paragraph 5.26, page 81. Accessible facilities play an important role in ensuring people have the opportunity to lead active lifestyles and participate in community activities, which can have positive outcomes for physical and mental health and social cohesion. Planning for integrated and multi-functional services, including health facilities, in accessible locations with necessary support in place, can have a direct positive effect on people's health and wellbeing by enabling them to access a range of services. For some people accessibility is not the only barrier to accessing facilities and participating in community activities etc. Some people will require additional support to help them engage with their community. For example, about a quarter of the population will experience some kind of mental health problem in the course of a year, depression and anxiety are the most common mental disorder in the UK (Mental Health Foundation). In addition, new developments bring with them a new community of people many of whom are starting a new chapter in their lives and are more vulnerable to mental health problems (such as new mums for example). The accessibility of facilities will not make them seek out support, they will require support to enable them to participate in community activities and lead active lifestyles which in turn will improve their health and support them back to independence. If this support is not available they are less likely to access services and

activities and be vulnerable to being socially isolated and suffering from the further negative health consequences that brings.

4.6 LP 15, page 92 states that **Contributing to Infrastructure Delivery Community Infrastructure Levy**

Applicable developments will be liable to pay the Community Infrastructure Levy (CIL) as set out in the Huntingdonshire Community Infrastructure Levy Charging Schedule (2012) or subsequent revisions.

**Planning Obligations**

In addition to the CIL, contributions towards the provision of infrastructure, and of meeting economic, social and environmental requirements may be necessary to make a proposal acceptable in planning terms. Such contributions will be calculated as set out in the Developer Contributions Supplementary Planning Document

(2011) (SPD) or successor documents and will be sought through a planning obligation. The nature and scale of planning obligations sought will depend on the form of development and the impact it is considered to have upon the surrounding area on the basis of documentary evidence. Requirements may be provided on or off site as set out in the SPD. The timing of provision will be carefully considered in order to ensure that adequate infrastructure, support and facilities are in place before development is occupied or comes into use.

The timing of other economic, social and environmental requirements as well as the timing of infrastructure and facilities is important for sustainable development.

4.6 Paragraph 6.13, page 92 states that

Infrastructure includes roads and transport, footpaths and open space and social and community infrastructure such as education, recreation, public halls and electronic communications networks. Development can place additional demands upon infrastructure, and the environment and the social sustainability of a community. Adequate infrastructure and other provision to meet the economic, social and environmental requirements is essential to mitigate the impact of development and enable growing communities to be as sustainable as possible.

Additional support as well as infrastructure and facilities is required to meet economic, social and environment requirements to mitigate the impact of a new development. For example, S106 are regularly used to fund community development workers which are necessary for social sustainability.

4.7 The policy and reasoning for **LP 20** does not include any reference to lifetime homes (although there is some mention of this in later chapters). As this section notes, the need for housing for older people will increase significantly and there is emphasis provision of assistance to enable people to remain in their own homes. Therefore a commitment to lifetime homes that are adaptable to the changing needs of people would be appropriate.

4.8 Paragraph 10.17 Alconbury Weald will be home to a substantial new community, albeit one benefiting from good access to the services and facilities available in Huntingdon. To help develop a successful and cohesive community and encourage sustainable lifestyles social and community facilities and support are ~~should be~~ integral to this development. Locations to facilitate the development of community spirit such as public meeting spaces, places of worship and education facilities should be incorporated in accessible positions; multi-purpose use should be promoted to aid the viability and efficient use of such facilities. To accommodate the need for school places that will arise from the scale of development proposed a new secondary school is to be incorporated, along with at least three primary schools. Appropriate

early years/ day care nursery provision should also be included which may be a mixture of public and private provision. See reasoning for 5.24 and 5.36 above. It take more than facilities to build a cohesive community especially on a new development where it is not possible to organically form social capital over time, community cohesion is essential to the mental and physical health (see reasoning for LP 10) of the entire community therefore must be supported early on to ensure the development of a sustainable community. Very supportive of multi-purpose use and co-location of services.

- 4.9 Paragraph 10.29 St Neots East will form a substantial increase to the newly established community at Loves Farm and will require social and community services and facilities to supplement those accessible elsewhere within St Neots. To help develop a successful and cohesive community and encourage sustainable lifestyles social and community facilities and support are ~~should~~ be integral to this development. Locations to facilitate the development of community spirit such as public meeting spaces, places of worship and education facilities should be incorporated in accessible positions; multi-purpose use should be promoted to aid the viability and efficient use of such facilities. To accommodate the need for school places that will arise from the scale of development proposed three primary schools should be provided. Appropriate early years/ day care nursery provision should also be included which may be a mixture of public and private provision.
- 4.10 Paragraph 10.45 Retail development should be limited to that which is necessary to serve day to day needs with residents expected to look to the town centres of Huntingdon and St Ives to meet their main retail needs. Other social and community facilities and support will be required to meet the needs of the population and develop a sustainable cohesive community. A single local centre should be established to give a focal point for retail and community facilities and help integrate the existing and expanded communities. The County Council is concerned that there is no focused paragraph in the development guidelines as there is for the other strategic location on the importance of forming a cohesive community. The schools will not be able to provide all the facilities required for the community so the local centre will be very important and as stated above support will be required to achieve a cohesive community which is essential for a socially sustainable development.

## **5. LIBRARIES AND LIFELONG LEARNING**

- 5.1 To be consistent with the information given about other services centres, the County Council would like that add that “volunteer run library access point supported by the County Council be added to the description of Somersham” (Page 26, paragraph 2.32).
- 5.2 The County Council supports policy LP29 Services and Facilities; however Libraries will need to be added to the list of these facilities.

## **6.0 EDUCATION**

- 6.1 The main areas of concern for the provision of education infrastructure and school place planning arising from the proposed allocations within the draft Local Plan relate to:
- Potential of some areas of development to result in more dwellings than currently reflected in the Plan.

- There is a lack of reference to the impact of the smaller housing developments on the availability of available school places.
- The development of the Forensic Science Laboratory has increased in size since the previous Plan, which will necessitate the need for land to enable development of school places.
- There is no reference to access between the school on the south side of the site of Ermine St development from the development on the north side.
- Some school site allocations have been based on a previous version of the Plan. As a result there is a risk that some sites are not large enough to accommodate pupils resulting from the increased dwellings.

### **Chapter 3 – Hunts in 2036**

- 6.2 In the Spatial Vision and Objectives set out on page 53 it states; *By 2036 Huntingdonshire will be made up of vibrant and inclusive communities with access to education, community and social facilities that provide opportunities for a high quality of community life for all residents.*
- 6.3 We would like to add childcare to this list so that the objective reads; *By 2036 Huntingdonshire will be made up of vibrant and inclusive communities with access to education, childcare, community and social facilities that provide opportunities for a high quality of community life for all residents.*

### **Strategic Expansion Allocations**

- 6.4 Pg 48 – *Allocations at Alconbury Weald and Wyton on the Hill may have potential for more dwellings not reflected in the 22,795 proposed new homes*
- 6.5 This poses 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.
- 6.6 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.
- 6.7 In order to avoid a similar position at Wyton on the Hill we propose provision of a 12.3ha site rather than the 8.68ha that is currently recommended in the Plan. This would be large enough for a 12FE/1800 place secondary school (the maximum size which the Council would consider) and would accommodate additional need resulting from increased number of dwellings. If the total site is not required excess land could be re-allocated for housing.

### **Chapter 4 – The Development Strategy**

#### **Unallocated sites**

- 6.8 Pg 60.(Parap 4.180 *In addition to the allocations some growth will come from small sites and those which the Council was not aware of at the time of writing this plan.*
- 6.9 Such scenarios can pose difficulties for the County Council particularly in schools on constrained sites which cannot easily be expanded. The County Council would not rule out objecting to new developments in these circumstances.

### **Pg 67 – Strategy for Unallocated Sites**

- 6.10 The criterion for supporting sites not allocated in the Plan does not make any reference to availability of services such as access to primary school provision.
- 6.11 We suggest that further criteria under *Residential Development* should be added along the following lines: *a proposal for housing development will be supported if, where appropriate, additional primary school provision can be made to mitigate the impact of the development.*

### **Other Uses**

- 6.12 One of the barriers to ensuring sufficient childcare is the identification of suitable venues in areas central to the community.
- 6.13 Page 67 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.
- 6.14 Previous paragraph is also relevant to 8.12 page 117, *Some areas may support ancillary additional uses which are not traditionally found within a business park or industrial estate, such as a café or a childcare nursery. Such uses may help to make the area more sustainable by providing for the needs of business workers as well as others. In such areas, it may be that non-business uses are proposed because the area is demonstrably no longer viable as a location for business given other available land and buildings.*

### **Chapter 5 – Strong Communities**

- 6.15 This following criterion may present an issue, as it does not take into consideration the capacity of the local primary school and the ability to expand the school to meet the needs of the groups.
- 6.16 LP 13, pg 86 *The Council will support proposals which contribute to the delivery of Gypsy and Traveller pitches and Travelling Showpeople where it is considered that; the location has reasonable access to local health and primary services.*
- 6.17 Should it not be possible to develop additional places for students this would be a significant barrier to the aforementioned groups accessing education.
- 6.18 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 primary and secondary school provision can be made to mitigate the impact of the development.*

## **Chapter 7 - Requiring Good Design**

- 6.19 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.

## **Chapter 10 - Strategic Expansion Locations**

### **Alconbury Weald**

- 6.20 The designation of an enterprise zone (EZ) at Alconbury Weald will bring 8000 jobs to 2036.
- 6.21 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 EZ.
- 6.22 The inclusion of childcare on site is likely to make the EZ a more attractive place for parents to work as is recognised within the Plan on page 117 8.12,( Should it not be possible to develop additional places for students this would be a significant barrier to the aforementioned groups accessing education.) this inclusion will also support the Spatial Vision and Objectives set out on page 53, *By 2036 Huntingdonshire will be made up of vibrant and inclusive communities with access to education, childcare, community and social facilities that provide opportunities for a high quality of community life for all residents.*

### **St Neots East**

- 6.23 Pg 150 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*  
*r. appropriate acoustic treatments to address any adverse impacts.*
- 6.24 The County Council has raised strong concerns about the proximity of both primary schools to the East Coast Main Line Railway. The County Council will need assurances 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 DfE building bulletin guidance, that additional costs will be met by the developer in full. 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.

### **Wyton on the Hill**

- 6.26 Pg 154 (c) We endorse the requirement that the new development be integrated with the existing Wyton on the Hill community and in particular (Pg 155 para 10.43) that *social integration between this allocation and the existing homes at Wyton on the Hill should be facilitated in the first phase of development by provision of a primary school.*

- 6.27 Pg 154, para 10.44; The County Council welcomes the undertaking to reserve an 8.68ha site for the secondary school *to give potential for a secondary school of 8FE as the maximum expected need.*
- 6.28 However, given the comment on Pg 48 that *Wyton on the Hill may have potential for more dwellings not reflected in the 22,795 proposed new homes* the Service stresses the need to reserve a larger site of 12.3ha in order to future proof secondary school provision for the development.
- 6.29 This larger site could accommodate a 12FE/1800 place secondary school (the maximum size which the Council would consider) and would accommodate additional need resulting from increased number of dwellings. If the total site is not required excess land could be re-allocated for housing (See para 2.4) which is a principle already set out in the Plan at pg 155 para10.44

## **Chapter 11 – Huntingdon Spatial Planning Area**

### **HU1 Ermine Street Huntingdon**

- 6.30 Summary of key issues arising from this allocation:

- Access
- Phasing
- Site size
- Childcare

#### **Access**

- 6.31 Pg 159 (d) makes reference to the requirement for *provision of sustainable transport network for vehicles, public transport, cyclists and pedestrians incorporating safe off-road routes connecting to Huntingdon and the Stukeleys.*
- 6.32 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 sector but will also serve the north sector 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.

#### **Phasing**

- 6.33 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.
- 6.34 The approach to 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.

#### **Site Size**



- 6.8.6 The County Council has already raised (in June 2013) that the primary school site will need to be 3ha in order to accommodate the number of children likely to arise from a development of this size. We are seeking reassurance that this is acknowledged.

### **Childcare**

- 6.35 Pg 159 – no reference is made to the need for day care/nursery provision which will be required for a 1450 home development. In addition to 2 classes in the primary school a development of this size will require 2 new preschools and a full day care setting.
- 6.36 Although some of this childcare provision could be provided on the school site, we would also look to secure two D1 sites identified by the developer.

### **HU2 Former Forensic Laboratory, Huntingdon**

- 6.37 The proposed allocation for this site is now approximately 90 homes, as opposed to the 55 referred to in the previous version of the draft Plan.
- 6.38 The current primary school, Cromwell Academy which adjoins the site is unable to expand due to the constrained nature of the site which would restrict the extension of accommodation.
- 6.39 It is imperative that the County Council secures part of the Forensic site for education purposes to facilitate the expansion of the primary school.

### **HU3 Hinchingsbrooke Health Campus, Huntingdon**

- 6.40 In light of the comment relating to HU2 above, the proposed allocation of approximately 45 dwellings and 250 apartments makes the allocation of part of HU2 site for education even more pressing.

## **Chapter 14 – Ramsey Spatial Planning Area**

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

- 6.41 The proposed allocation of this site to include approximately 450 homes is significantly greater than the 160 dwellings mooted in the previous version of the Plan. This poses particular difficulty with regard to the provision of primary education and pre-school infrastructure.
- 6.42 Summary of key issues arising from this allocation:
- Lack of capacity in existing local primary schools to accommodate children from the new development
  - Potential demand for day care 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
- 6.43 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.

- 6.44 Both schools are currently operating at, or close to, their capacity and both schools are located on constrained sites which would restrict the extension of accommodation unless additional land were made available.
- 6.45 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.
- 6.46 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 additional land adjoining the development.
- 6.47 This development would require additional childcare provision either as part of the school expansion or as a D1 site identified by the developer.

### **Warboys**

- 6.48 The proposed allocation of these sites to include approximately 278 homes is significantly greater than the 139 dwellings stated in the previous Plan.
- 6.49 The proposed developments at Warboys would require a 0.5 form entry extension (105 places) at the primary school to accommodate the children resulting from the additional development.
- 6.50 The additional dwellings would also result in the need for 67 additional EY places resulting in the need for an additional pre-school.

### **Other**

- 6.51 Throughout the plan there are details of small developments where requirement for school places are not mentioned, e.g; HU14 Gas Depot Mill Common pg 186, HU15 California Road pg 188, HU16 Main Street pg 190, HU19 Brampton Park pg 195 etc.
- 6.52 As the development of infrastructure, including school places is identified as an *Essential* to support successful delivery of sustainable growth pg 90, 6.3 we would like a criterion to be included in the detail relating to all proposed small developments.
- 6.53 The criterial should be included in the text box relating to each development and in the list that follows *Successful development of the site will require*; and should state that; Confirmation that school provision can be made to mitigate the impact of the development

## **7. 0 ARCHAEOLGY**

- 7.1 Section 9.33 would benefit from expansion to include reference to undesignated heritage assets of archaeological interest.
- 7.2 Policy LP 35 – Part f. concerning the provision of supporting information We would recommend it is altered to read: *the provision for archaeological assessment and where necessary field evaluation of the heritage asset.*

- 7.3 9.39 - We are concerned that this paragraph may encourage the inappropriate or unnecessary use of desk based assessments. NPPF paragraph 128 states that *Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.* If desk based assessment is unlikely to add significant new information beyond that held in the County's Historic Environment Record, it may be more appropriate to proceed directly to field evaluation. We would recommend that the text is changed to refer to *an appropriate desk-based assessment and, if necessary, a field evaluation.*
- 7.4 9.40 – We would suggest the following addition: *When a non-designated heritage asset of archaeological interest cannot be retained, the development will be required to undertake a programme of archaeological investigation, including post excavation analysis, publication and preparation of archive and make the information publically available.*
- 7.5 We would also strongly recommend that reference is made in the document to the County Council's Historic Environment Record. The HET is the main source of information on non-designated heritage assets and archaeological fieldwork within Huntingdonshire.

## 8. FLOODS AND WATER

- 8.2 LP16 -Surface water. We support the use of SuDS on new proposals however we would recommend that this is further enhanced by including priority for managing surface water as close to its source as possible and on the surface where reasonably practical. Additionally opportunities are taken to integrate SuDS within developments to improve amenity and biodiversity. There should also be further emphasis on using SuDS for pollution control with the level of treatment trains reflecting the type and source of pollution.
- 8.3 The County Council supports the inclusion of a Flood and Water Supplementary Planning Document (SPD) as a material consideration for the determination of planning applications within Huntingdonshire. Currently Cambridgeshire County Council, in partnership with the Cambridgeshire local planning authorities (including Huntingdonshire) and other stakeholders, is producing a countywide flood and water SPD. This will provide more detailed guidance developers within Huntingdonshire (as well as other districts within Cambridgeshire). It will also provide Huntingdonshire with a robust mechanism for addressing all key matters related to flood and water. Without the inclusion of such a document, the County Council considers that greater detail within the local plan policies will be necessary.

The reference to Cambridgeshire County Council's SuDS Handbook needs to be removed as this document does not exist.

- 8.4 We note the approach to include sources which will be assessed in relation to flood risk and surface water matters however this fails to include other key sources such as the Environment Agency flood maps therefore we question the usefulness of this approach without prescribing all relevant sources.

## 10. SPORTS

- 10.1 The County Council notes there is a lack of reference to sports, arts or museums facilities/ infrastructure.
- 10.2 Whilst the document does mention providing a place for residents to enjoy living in a healthy environment it does not mention the three key areas where this aspiration could be assisted. The County Council would like this to be added where we see comments about archaeological searches/investigations and Health Assessment checks. The County Council would also like to see an acknowledgement that arts and sports strategies should be created with partners in all development sites and definitely within the bigger sites.

## 11.0 HEALTH

- 11.1 The majority of the local plan is sound from a public health point of view. The inclusion of a requirement for health impact assessments is welcomed, however, there is a concern that the proposed threshold in the policy requiring Health Impact Assessment has been set too high and it is suggested that an alternative phased approach to Health Impact Assessment should be adopted. This would capture a larger number of developments without placing undue burdens on developers/applicants.
- 11.2 'LP10 – Health and Wellbeing' A proposal for ~~large scale major development, defined in the 'Glossary'~~, should demonstrate how it will contribute to improving the health and well-being of the community and helping to deliver healthy lifestyles through:
- a. Planning applications for developments of 20 or more dwellings or 1,000 m<sup>2</sup> or more floorspace shall provide providing a Health Impact Assessment to demonstrate how the proposal will maximise positive impacts on health and healthy living within the development and adjoining areas;
  1. For developments of 100 or more dwellings or 5,000 m<sup>2</sup> or more floorspace a full Health Impact Assessment will be required;
  2. For developments between 20 to 100 dwellings or 1,000 to 5,000 m<sup>2</sup> or more floorspace the Health Impact Assessment will take the form of an extended screening/scoping report or rapid Health Impact Assessment.
  - b. incorporating a layout that promotes active living which encourages walking and cycling and offers opportunities for social interaction and recreation;
  - c. improving education and skills training and encouraging life-long learning;
  - d. delivering initiatives to reduce crime and anti-social behaviour
- 11.3 There are concerns that the policy/policies requiring open space (formal, informal and play) are unclear within the proposed local plan. Currently the proposed local plan states: *"includes sufficient open/green space in accordance with the Council's Developer Contributions Supplementary Planning Document (2011) (SPD), or successor documents;"* Developer Contributions SPD 2011 as referenced it states: *"The District Council will continue to seek to secure appropriate open space and sports facilities on development sites in accordance with the Adopted Core Strategy, the*

*Development Management DPD: Proposed Submission 2010, the Open Space, Sports and Recreational Needs Assessment and Audit 2006, the Sports Facilities Strategy for Huntingdonshire (2009) or successor documents as appropriate.”*

- 11.4 If all the referenced documents listed above are followed it appears there is no policy requirement for open space as the documents listed have either been superseded or didn't contain specific requirements in the first place.
1. Assuming the proposed local plan will repeal the Adopted Core strategy the policy contained therein will fall.
  2. The Development Management DPD: Proposed Submission 2010 as referenced doesn't appear to exist (it is not listed on the Council's website).
  3. The Open Space, Sports and Recreational Needs Assessment doesn't give a specific policy requirement for open space – it is a needs assessment only.
  4. The Sports Facilities Strategy for Huntingdonshire (2009) (the document is actually titled “Sports Facilities Standards Report 2007 – 2020” doesn't give a specific policy requirement for open space – it is a needs assessment only.

Therefore there doesn't appear to be a specific policy which will be in force when the proposed local plan is adopted.