

Local Plan Alteration
Public Local Inquiry: Report of the Inspector

March 2002

Huntingdonshire
DISTRICT COUNCIL

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Head of Planning Services

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The Inspector's report was received by the Council on 28 February 2002. The Council is required to publish the report within eight weeks of receipt, but is making it available at the earliest opportunity. It should be noted that the report is being checked by the Council for any errors, omissions or statements where there is a crucial lack of clarity. Any amendments or additions to the report resulting from these checks will be published as an addendum. The Council will consider its response to the Inspector's recommendations at a special meeting of Full Council on 12 June 2002.



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Your Ref:

Our Ref: H0520/429

Date

Dear Mr Monks

1. I have the honour to report that on 52 days between Tuesday 7 March 2000 and 4 May 2001, I held a public inquiry at the Council Chamber, Meeting Room 1 and Room 3.5, Pathfinder House, the Women's Institute Centre Walden Road and the Methodist Church Hall, all at Huntingdon, into objections to the Deposit Draft of the Huntingdonshire Local Plan Alteration, Housing Land and Planning Obligations. A pre-inquiry meeting was held on Tuesday, 27 July 1999 to make necessary procedural arrangements. At the time of that meeting it was envisaged that the inquiry would commence on 9 November 1999; however, its start had to be delayed due to the resignation of the first Programme Officer and because the background material required from the Council for the Round Table sessions would not have been available in time for a November start. Prior to the inquiry, I made a familiarisation tour of the District and during and after the inquiry, I visited objection sites on 22 days. 2 colleagues, David Fenton BA (Hons) MSc DipTP MRTPI and Jonathan King BA (Hons) Dip TP MRTPI were appointed to assist me with the completion of my report.
2. The Alteration was prepared by the Huntingdonshire District Council under section 36 of the Town and Country Planning Act 1990 as amended by schedule 4 to the Planning and Compensation Act 1991. It will alter the settlement strategy, housing, affordable housing and planning obligations provisions of the Local Plan adopted in 1995.
3. The Alteration was placed on deposit between 3 December 1998 and 22 January 1999. The Council accepted 1,882 duly made objections; the Alteration also attracted 111 supporting representations. In response to the objections and to changes in circumstances since the Alteration was drafted and to correct minor errors, the Council advertised 201 proposed changes to the Alteration in May 1999. As a result of these changes, 31 objections were withdrawn unconditionally. The proposed changes would also satisfy 258 objections and these are conditionally withdrawn; the proposed changes provoked 234 counter-objections. During the course of the inquiry the Council proposed further changes to the Alteration. Also during the course of the inquiry, 47 objections and 18 counter-objections were unconditionally withdrawn.
4. The unconditionally withdrawn objections and the unconditionally withdrawn counter-objections are no longer before me and I do not deal with them in this report. The Council

has asked me to consider all of the outstanding counter-objections. At the close of the inquiry therefore, 1,804 objections and 217 counter-objections were outstanding and it is these objections and counter-objections which are the subject of my report.

5. Unless otherwise stated references to PPGs and Circulars relate to the versions which were extant at the close of the inquiry. However I have taken into account PPG25, together with other guidance issued to date. The Council will wish to take into account any subsequent revisions to Government policy which are issued prior to the adoption of the Alteration. RPG for East Anglia, which was published in draft form shortly after the inquiry commenced, was published in its final form in November 2000 and I have taken it into account in my recommendations.
6. Unless otherwise stated all references in my report to the Structure Plan are to the Cambridgeshire Structure Plan adopted in December 1995.

Main Issues

7. The main policy issues in my report concern: the settlement hierarchy; the amount and distribution of the land allocated for housing; targets and policies relating to the provision of affordable housing and provisions relating to planning obligations.

The settlement hierarchy

8. I reject objectors' arguments that the settlement strategy of the adopted Local Plan should be maintained at least until a full review of the Local Plan is carried out. I have endorsed the revised housing settlement strategy set out in the Alteration and recommend relatively minor modifications to the provisions of the Settlement Strategy Chapter.

The amount and distribution of housing land

9. The great majority of Council's proposals to renew allocations made in the adopted Local Plan are not endorsed. The West of Ramsey allocation, like the proposed new allocation at RAF Upwood, would not contribute positively to the achievement of a pattern of sustainable development and would fail to achieve the objective of proposing major development at Ramsey. These allocations would not be justified by the road improvements currently on offer. The renewed allocations in villages, like those which objectors seek at rural settlements, would be contrary to the revised settlement strategy and would prejudice the achievement of a more sustainable pattern of development.
10. The Council's proposed changes which would delete the contentious proposed allocations at Priory Hill, St Neots and Harrison Way, St Ives are supported as are the proposed changes allocations East of the Railway at St Neots and St Ives golf course.
11. Those council allocations that I have endorsed would not be sufficient to ensure that the Structure Plan requirement for housing in the district is satisfied. To cater for this, additional land should be allocated, over and above those allocations which I have endorsed, for about a further 1,500 dwellings. Additional allocations are recommended, primarily at Huntingdon and St Neots. These additional allocations accord with the advice in PPG3 and the Alteration's settlement strategy. All bar three are within or adjoin the main settlements, the remainder being proposed because of exceptional circumstances.

Affordable housing

12. The Council's definition of affordable housing is not in accordance with national guidance and therefore, although the Housing Needs Survey adopted a methodology broadly in line

with current best practice, its conclusions and the provisions based upon it, are not convincing. A considerable amount of work would be needed to rectify these deficiencies. Rather than delaying the adoption of the Alteration, modifications to the provisions of the Affordable Housing Chapter, which should assist in securing the provision of affordable housing in the district pending the full Review of the Local Plan, are recommended.

Planning obligations

13. The Council's approach to planning obligations either exceeds the requirements which can reasonably be sought in accordance with the advice in Circular 1/97 or is unclear. Modifications which would delete the majority of the policies in the Planning Obligations Chapter are recommended.
14. I must record my appreciation of the help given to me by everyone who took part in the inquiry. Particular thanks are due to the Council's advocate, Mr Robert Jameson and to all of the Council's witnesses. I also owe thanks to Nick Ward, a Planning Assistant with the Inspectorate, who helped me in numerous routine professional duties associated with the inquiry and proved a very able colleague.
15. Finally, I owe thanks to Mrs Pam Perceval-Maxwell, the Programme Officer. Through what at times proved to be difficult circumstances, she did her very best to ensure that the inquiry proceeded as smoothly and efficiently as possible and her well known flair and professional expertise shone throughout. She, and I, were very ably assisted by Mrs Angela Storey who succeeded in juggling between the closing stages of the Local Plan inquiry and the Alconbury inquiry.

Yours sincerely

Miss R M Whittaker

INSPECTOR

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Huntingdonshire Local Plan Alteration
Housing Land and Planning Obligations
Inspector's Report

Miss R M Whittaker BA(Hons) MA MRTPI
Public Local Inquiry 7 March 2000 to 4 May 2001

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Appendix 1 - Objections to land supply calculations

Appendix 2 - Objections to north of Priory Hill Road, St Neots

VOLUME 2

- 1 List of core documents
- 2 Appearances
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INTRODUCTORY COMMENTS

INSP.1 My report follows the same order as the deposited Alteration. I have included references to the revised Policy and paragraph references contained in the Proposed Changes version of the Alteration where appropriate.

INSP.2 In the interest of brevity I have not reported the cases made by objectors or the Council in my report and I have made extensive use of cross references where arguments on which parties are relying are considered in detail in other parts of the report.

INSP.3 I have used the following abbreviations in the report:

ALP	Adopted Local Plan
CCC	Cambridgeshire County Council
CD	Core Document
DLP	Deposited Alteration to the Local Plan
dph	dwellings per hectare
EA	Environment Agency
GPG	Good Practice Guide
ha	hectare
HBF	House Builders Federation
HNS	Housing Needs Survey Report (CD60)
km	kilometre
MAFF	Ministry of Agriculture, Fisheries and Food
PPG	Planning Policy Guidance (PPG) Note
PRCV	The deposited Proposed Changes version of the Alteration
PCN	Proposed Change Number
RPG	Regional Planning Guidance
RSL	Registered Social Landlord
RTS	Round Table Session
SPG	Supplementary Planning Guidance

INTRODUCTION TO THE ALTERATION

Objections

0546/002 Prowting Projects (2)

0547/005 Trustees of Lord De Ramsey's 1963 Settlement

IN.1 The objectors seek a review of the environmental limits to villages established in the adopted Local Plan.

IN.2 The scope of the Alteration is a matter for the Council to determine and I am satisfied that sufficient land can be identified for housing without such a review. Moreover, the review which the objectors seek would be likely to lead predominantly to the inclusion within the limits of more greenfield land; such a review would therefore be contrary to the primary aim of PPG3 to achieve a sustainable pattern of development by focusing on the urban areas and maximising the re-use of previously developed land.

RECOMMENDATION

IN.3 No modification in response to these objections.

.....

CHAPTER 1 SETTLEMENT STRATEGY

1.1 INTRODUCTION

1.1.1 Objections to the Council's proposed settlement strategy are considered in later sections of this Chapter under the appropriate policy or paragraph heading. However, before considering the individual objections, many of which are similar in their intentions, it is helpful to establish some matters of principle and thereby to avoid unnecessary repetition in the later sections. My conclusions in the next section take account of the principal points made in the objections to the Alteration and of the Council's response to them.

1.1.2 The current version of PPG3, which represents a fundamental review of planning guidance for housing, was issued on the day on which the inquiry opened. The great majority of the guidance it contains, however, had been disseminated in the Draft for Consultation of the PPG published in March 1999, though the general thrust towards achieving greater sustainability in housing growth was widely trailed before this. The PPG, in particular the search sequence which is at its heart, underpinned the Council's approach at the inquiry to sites put forward by objectors for allocation. The importance of this approach to the Alteration cannot be over-stated.

1.1.3 The next section of my report deals with matters of principle under the headings: role and purpose of the settlement strategy; the need to alter the settlement strategy in this Alteration; the relationship of the settlement strategy to the aims of the Structure Plan including reducing the need to travel; the justification for identifying separately the villages which are functionally related to the market towns; the re-use of previously developed land; the deletion of the LRGV category of settlements; the effect of the settlement strategy on the vitality and viability of village services and facilities and the equal treatment of the market towns¹.

¹ For ease of cross-referencing, the next section is sub-divided under these headings.

1.2 MATTERS OF PRINCIPLE RELATING TO THE SETTLEMENT STRATEGY

1.2.1 Issue: does the settlement strategy fulfil an appropriate role and purpose?

1.2.1.1 In my view the purpose of a settlement strategy is twofold: first, to guide allocations for housing and secondly, in development control, to guide the scale and location of windfall development.

1.2.1.2 The settlement strategy proposed in the Alteration sets out a hierarchy of settlements within the district. It concentrates housing growth in and around the market towns and the one RGV of Yaxley and designates villages either for group development or for infilling. By strictly limiting growth in villages it represents a significant change from the approach of the adopted Local Plan which the Council have described as "limited dispersed housing growth". This change is reflected only in the new allocations; the "renewed" allocations are predominantly at the villages now designated as GVs¹.

1.2.1.3 The rationale for the change is that the market towns and Yaxley offer the highest level of services and facilities and so afford the possibility of fostering a more sustainable pattern of development. This approach is in accordance with PPG3 which, in setting out Government objectives for housing, states that "to promote more sustainable patterns of development ...the focus for additional housing should be existing towns..."². Similarly, the strategy is in line with paragraph 30 of PPG3, which sets out a sequential approach for identifying potential housing sites for allocation in local plans. It also accords with the development strategy set out in RPG, which says that "In villages large scale residential development will not normally be sustainable, but very small-scale sites within them are likely to come forward for development in the context of local plans"³.

1.2.1.4 It could be argued that the ranking of settlements within the hierarchy should be based on a wider assessment of settlements, including existing and potential employment and a wider range of facilities and services than the Council have used. However, the primary centres for employment and other services and facilities are the market towns upon which the strategy is focussed and it is unlikely that a wider assessment would have produced a different outcome.

1.2.1.5 Given this context it would not be appropriate to widen the categories of group and infill villages to encompass more villages or, without compelling reason, to upgrade a settlement within the hierarchy. I accept the Council's judgement on the classification of individual settlements; an element of subjectivity in classifying settlements is inevitable and it is right that it is essentially a matter for the Council given their detailed knowledge of the district. Notwithstanding the flaws in the Council's survey of settlements and the lack of evidence of a systematic re-evaluation of settlements in the light of it, in general I consider that the Council has struck the right balance. I accept that there is only a very fine distinction between some of the settlements classed in the Alteration as infill villages and others classed as group village. However, to upgrade the status of any of the settlements classed as group or infill villages would undermine the purpose of the settlement strategy to secure a more sustainable pattern of development and raise expectations of levels of development in dispersed village locations contrary to PPG3 guidance at paragraph 30.

1.2.1.6 The settlement strategy provides a rational basis for the allocation of housing sites and is a suitable vehicle for guidance for development control purposes in the plan period.

¹ Section 2.4.4 refers

² Paragraph 1

³ Paragraph 4.5

1.2.2 Issue: is it right to alter the settlement strategy in this Alteration?

1.2.2.1 The Alteration is, and can only be, concerned with policies and proposals up to 2006. It has been deemed to be in general conformity with the approved Structure Plan.

1.2.2.2 The fact that the settlement strategy of the adopted Local Plan has been in place for some time does not justify its retention. PPG3 heralds significant changes to national guidance on housing. Paragraph 37 makes clear that local plans should be kept up to date and be revised to take account of the policies of the PPG, "as quickly as possible". Paragraph 38 reinforces this point saying that PPG3 policy is a material consideration "which may supersede the policies in [the adopted] plan". It is clear from this that the Government does not envisage a gradual change of emphasis in the location of development; rather it expects local authorities to incorporate the necessary changes quickly and completely. Not to do so would undermine the objectives of Government policy.

1.2.2.3 I do not consider, therefore, that the settlement strategy of the Alteration represents an unduly abrupt or unnecessary shift of emphasis, or that this shift should be phased in over a longer period. To wait until the Review of the Structure, and Local, Plans have been brought forward to introduce these changes would, contrary to the Government's objectives, only serve to delay the achievement of a more sustainable pattern of development.

1.2.2.4 The Review of the Structure, and Local, Plans will consider issues post 2006 in the light of national and regional guidance as it exists at that time. I recognise the importance of ensuring that the settlement strategy (and the housing proposals) of the Alteration do not prejudice options for the longer term. However, whilst the details of the strategy might need to be amended in the future, it is reasonable to assume that the search for more sustainable patterns of development will persist. Given the emphasis of RPG on sustainable development, it is also reasonable to assume that the shift away from a dispersed strategy is likely to be maintained.

1.2.2.5 The Alteration is the right vehicle to bring forward a revised settlement strategy; delay in doing so would be unacceptable.

1.2.3 Issue: does the settlement strategy proposed in the Alteration accord with the aims of RPG and the structure plan to secure a sustainable pattern of development and reduce the need to travel?

1.2.3.1 The operative Structure Plan, at the time the adopted Local Plan was being prepared, was approved in 1989. The current Structure Plan was approved in 1995.

1.2.3.2 The strategy of the Alteration does not materially conflict with that of the approved Structure Plan. First, there is no objection from the County Council on these grounds and a Statement of Conformity was issued for the deposited draft Alteration. Secondly, whilst I accept that the Structure Plan, which predates the publication of new PPG3, outlines a hierarchy of settlements which includes the LRGV category that the Council now proposes to delete, the proposed strategy of the Alteration follows the same underlying form of hierarchy and principles as the Structure Plan.

1.2.3.3 Therefore, whilst the strategy of the Alteration clearly has its roots in the principles and policies of the adopted Structure Plan it also appropriately reflects changes in emphasis in national guidance that has been published since that Plan was approved. This accords with Policy SP/1 of the

Structure Plan which explicitly acknowledges that sustainable development is an evolving concept, the implications of which are material in the formulation of local plan policies.

1.2.3.4 Regional Planning Guidance for East Anglia (RPG6) that was in force when the Alteration was developed was published in 1991. This guidance, whilst seeking to focus development along major transport routes, pursued a more dispersed pattern of development than proposed in the Alteration. However, new RPG6¹, published in November 2000, should also be taken into account. Its guidance on the development strategy for the region² at bullet point 3 states the intention to “concentrate development in the main cities and larger towns in preference to smaller towns and villages and within built-up areas in preference to previously undeveloped land. In rural areas development should be focussed on market towns which have access to good public transport where this would contribute to greater self-containment”. This clear locational focus for development is reflected in the settlement strategy of the Alteration.

1.2.3.5 The settlement hierarchy of the Alteration would focus the majority of development in locations with higher levels of public transport, i.e. the market towns and Yaxley. It would also reinforce the higher order commercial centres in the district and afford the potential for journeys to work and trips to retail and leisure facilities to be undertaken by means other than the private car. Limiting the amount of development taking place away from the major settlements would similarly limit the necessity for car borne trips and increase the possibility of walking and cycling trips.

1.2.3.6 The settlement strategy fully accords with the aims of RPG and the Structure Plan to reduce the need to travel and produce a more sustainable pattern of housing development.

1.2.4 Issue: is there justification for identifying the villages of Brampton and Little Paxton separately from the market towns to which they are functionally related and should Hemingford Grey/Fenstanton be classified as part of St Ives?

1.2.4.1 In line with the provisions of the Structure Plan when the adopted Local Plan was being prepared, the settlement strategy of the adopted Local Plan links some villages, which are closely functionally related to market towns and only a short distance from them, to the related market towns in settlement strategy terms; examples are the linking of Brampton to Huntingdon and Little Paxton to St Neots. The current Structure Plan has abandoned this approach and, with the exception of linking Ramsey and Bury, so has the Alteration. The close functional and physical relationship between Ramsey and Bury is not in dispute.

1.2.4.2 The clear functional relationship between Huntingdon and Brampton and between St Neots and Little Paxton in terms of jobs, leisure activities and shopping facilities remains; the distances between them are relatively short and there are better public transport links between these villages and the “parent” towns than elsewhere. Nevertheless there is clear physical and visual separation between these villages and the towns and therefore the villages cannot be considered to be parts of urban areas in terms of the search sequence or in terms of development control. To maintain the policy link between these towns and villages would unreasonably raise expectations of development prospects. However,

¹ CD112

² Paragraph 4.2

under the criteria that the Council set out¹ it may be to these villages that I must look in the event of my finding it is necessary to go beyond the urban areas to satisfy the housing land requirement.

1.2.4.3 Hemingford Grey/Fenstanton, whilst being close as the crow flies to St Ives, is separated from the town by the River Great Ouse and possesses limited road links to the centre of the town. The settlement seems to have developed more by an accident of history than by design and to class it as part of St Ives would be to grant it a status and create an expectation for development that it does not warrant. There is no evidence that circumstances have changed significantly since the matter was considered when the now adopted Local Plan was at inquiry to lead me to conclude that the village should be classified as anything other than an infill village.

1.2.5 Issue: does the strategy maximise the use of previously developed land as opposed to greenfield land?

1.2.5.1 The search sequence for identifying sites to be allocated for housing, set out in paragraph 30 of PPG3, starts with the re-use of previously developed land in urban areas. The re-use of previously developed land is also emphasised in paragraph 32 of that guidance which sets out a presumption that previously developed sites will be used before greenfield sites. RPG sets a target of 50% of all new housing on previously developed land².

1.2.5.2 The Council has undertaken a capacity study and has identified opportunities for the re-use of sites within the urban areas. Save for some concern that the strategy will put undue pressure on commercial areas in town centres which in my opinion is unfounded, there is no criticism of the Council's approach to the urban areas themselves. The amount of previously developed land proposed in the Alteration and as varied by my recommendations is significantly below the regional target. This reflects the nature of the district.

1.2.5.3 The District includes a number of large brownfield sites, in particular some former MOD sites which, in theory, could assist in meeting this target and these sites are the subjects of objections on the grounds that they should be allocated³. However, paragraph 32 of PPG3, also makes clear that if a previously developed site performs very poorly against the criteria set out in paragraph 31 the presumption should not apply. For a number of these sites, the accessibility and other problems, and comparison with other sites, mean they may not be suitable for housing development in the plan period.

1.2.5.4 In addition, the District was not extensively industrialised in the past and therefore does not have a significant supply of previously developed land from traditional industries. Subject to my conclusions on the previously developed sites which are proposed for allocation or are brought forward by objections, it seems that the Alteration does all that it reasonably can to maximise the use of previously developed land and so maximise the use of existing physical and social infrastructure. It is therefore inevitable that greenfield land on the edge of urban areas will have to be used to meet the Structure Plan housing requirement.

1.2.6 Issue: is omission of the LRGV category from the settlement hierarchy justified and should the RGV category be widened to include villages in addition to Yaxley?

¹ Annex 3 to the Council's position paper for the Reconvened RTS on Settlement Strategy and Housing Need and Supply

² Paragraph 4.5

³ Section 2.4.7 refers

1.2.6.1 The LRGV category of the hierarchy and the criteria for selection of appropriate settlements are set out in Structure Plan Policy SP3/3. However, there is no requirement in the Structure Plan to identify any settlements within that category; rather it is a matter left to the local planning authorities. Not to do so is a matter for the Council to decide.

1.2.6.2 The villages in the district vary considerably in size and in the range of facilities and services which they offer. Many of them suggested by objectors as LRGV would satisfy most or all of the Structure Plan criteria for selection as LRGV and many could accommodate additional housing without significant harm to their character; however these are not compelling arguments for the retention of this category. In addition to the fact that there is no Structure Plan requirement for the retention of this category, the deletion of the LRGV category is in accordance with the aims of PPG3 and RPG to concentrate development in and around the larger settlements in order to secure a more sustainable pattern of development. No part of the district is remote from a market town and therefore none of them would qualify as a local service centre in the terms of PPG13¹. To retain the LRGV category would raise expectations of a continuation of a level and pattern of development that would be inconsistent with current national and regional guidance.

1.2.6.3 Moreover, paragraph 30 of PPG3 states that local authorities should only seek to identify sufficient land to meet the housing requirement; they need not extend the search further than that required to provide sufficient capacity to meet that housing requirement. Given my conclusions and recommendations in relation to the Council's proposed allocations, windfall expectations and objectors' proposed sites, with one exception, sufficient sites for housing can be identified within the proposed settlement strategy to satisfy the Structure Plan housing requirement to 2006 without the need for an LRGV category. I also consider that the Alteration contains sufficient explanation of the reasoning behind the proposed change to the settlement strategy.

1.2.6.4 In the adopted Local Plan three villages – Yaxley, Sawtry and Warboys – are accorded RGV status; in the Alteration only Yaxley is identified as a RGV. Other settlements have been advocated as warranting inclusion in that category, in particular, Sawtry, Warboys, Brampton, Little Paxton, Somersham, Fenstanton, Buckden and Kimbolton. The Council accepts that a number of these settlements satisfy all or some of the Structure Plan requirements² for RGV classification but argue that this is no reason to do so when they can meet the Structure Plan housing target by focussing growth, in the plan period, in the largest settlements. As I have set out³ the Council's approach accords with PPG3, RPG and the fundamentals of the adopted Structure Plan.

1.2.6.5 Yaxley is by far the largest village outside of the market towns in terms of population, services and facilities. It is close to Peterborough which has a far greater range of facilities and services than any of the market towns in the district. There is good public transport provision between Yaxley and Peterborough. The size of the village and its proximity to Peterborough gives Yaxley significant advantages, in terms of sustainability and the potential for limiting travel by car, over other villages in the district. It warrants classification as the sole RGV for the remainder of the Plan period. There is no evidence that the non-categorisation of other villages as RGV will harm their vitality and viability.

1.2.6.6 The limiting of the RGV and removal of the LRGV categories of the settlement hierarchy will result in allocations being both concentrated in a limited number of locations and substantially larger than many of the allocations in the adopted Local Plan. This approach is in

¹ Paragraph 41

² Policy SP3/2 refers

³ Section 1.2.3 refers

accordance with PPG3¹, which highlights the need to build communities to support new physical and social infrastructure and to provide sufficient development to sustain appropriate local services and facilities. Inevitably this means some polarisation of new housing provision but, provided this is achieved in appropriate locations, an adequate choice of sustainable sites will remain and I am satisfied as to the deliverability within the plan period of the sites that I recommend for allocation².

1.2.6.7 Objectors argue that it is inconsistent to make changes to the LRGV and RGV categories of the hierarchy without at the same time reviewing the environmental limits of the villages which are in these categories in the adopted Local Plan. I find no such inconsistency. The settlement strategy would not be so restrictive as to preclude further housing development in villages. A limited supply will still come forward through windfalls and through rural exception schemes for affordable housing. This is supported by the Rural White Paper³ which encourages "rural housing to be increasingly concentrated around market towns, but with some small developments in villages where there is a particular need for affordable dwellings".

1.2.6.8 The LRGV and RGV categories of the settlement hierarchy should not be reinstated.

1.2.7 Issue: would the effect of the proposed settlement strategy on the vitality and viability of village services and facilities be acceptable?

1.2.7.1 PPG7⁴ is aimed at facilitating an adequate supply of affordable and market housing to strengthen rural communities. The proposed settlement strategy would allow for affordable housing to be built in villages and, in the light of the Rural White Paper, this may be at higher levels than historically has been the case. In relation to the supply of market housing, PPG7 must be read in conjunction with the more recent guidance in paragraph 69 of PPG3 which emphasises that, in terms of total provision, only a limited amount of housing can be expected to be accommodated in expanded villages.

1.2.7.2 The settlement strategy will allow for market housing in villages, albeit at lower levels than in the past and probably at lower levels than the market would like. However, to adopt the settlement strategy sought by objectors would result in levels of market housing in villages that would be totally contrary to government policy and the principles of sustainable development. It would also be contrary to the strategy of RPG⁵, which states that [housing] "sites should be identified exceptionally, and on a small scale, in villages where there is a reasonable balance between jobs, services and housing and where there are frequent and convenient bus or rail services to a nearby town or city". In the Cambridge sub-region⁶, the requirement is that there is good public transport access to Cambridge and the growth in car commuting can be minimised. No village in Huntingdonshire can realistically claim to satisfy these requirements or to represent a node in a good public transport corridor and thereby to fall into the search sequence for site selection set out in paragraph 30 of PPG3.

1.2.7.3 PPG3⁷ sets out the circumstances in which villages will be suitable locations for accommodating significant additional housing. This will only be where, in addition to housing being needed to meet local needs and development being in keeping with the character of the village, "it can

¹ Paragraph 31

² Section 2.4.9 refers

³ 'Our Countryside: The Future', paragraph 9.24, bullet point 2

⁴ Paragraph 2.8

⁵ 5th bullet point, Policy 4

⁶ Policy 22

⁷ Paragraph 70

be demonstrated that additional housing will support local services that would otherwise become non-viable."

1.2.7.4 From their surveys of the relationship between residential development and changes in village facilities¹, the Council concludes that there is no relationship between residential growth and retention of village facilities; no village had an increase in facilities over the survey period and some villages had significant losses of services despite major housing development taking place within them. In reaching its conclusions the Council rely upon a simple numerical count of retail units.

1.2.7.5 I support the concerns expressed by objectors that the methodology employed in the survey is flawed. It does not take into account factors that may offset a simple numerical decline in units such as the expansion of existing units or changes in working practice/opening hours. Nor does it take into account facilities such as petrol filling stations, which increasingly can provide a significant source for 'top-up' shopping. In addition, I disagree in principle with the Council over whether housing can support shops. It is clear from national guidance² that it can do so. The Council's survey does nothing to convince me that either this is not the case in general or, more particularly, that circumstances in Huntingdonshire warrant a different approach.

1.2.7.6 However, paragraph 70 of PPG3 requires that support for the retention of local services be demonstrated. No convincing evidence was presented to the Inquiry to show that further significant housing allocations would support local services either in villages in general or in any specific settlements. In particular, there was no indication of what level of additional housing would be necessary to provide the required level of support. The general assertion, that if more housing were built in a village this would increase the potential customer base for a shop, does not amount to adequate demonstration.

1.2.7.7 The Rural White Paper states that the decline in village shops has slowed since the 1970's; between 1991 and 1997 the number of parishes with a permanent shop fell by 1% to 58%³. However, the White Paper recognises that local services and village shops need support and proposes specific measures⁴ to achieve this. However, it does not advocate further allocations for housing as a means to this end. Rather, it argues for financial and community based initiatives; approaches currently being employed in Huntingdonshire. In the absence of any compelling evidence showing how local services would be supported as required by paragraph 70 of PPG3, I am unable to recommend a general approach that would undermine the aim of achieving sustainable development. Limiting the amount of development in villages will not result in an unacceptable impact on the vitality and viability of village facilities.

1.2.8 Issue: should the market towns be treated as 'equals' in terms of their position within the revised hierarchy?

1.2.8.1 The Structure Plan does not distinguish between the market towns. But RPG⁵ does distinguish between them and makes clear that the strategy is designed to "concentrate development in the main cities and larger towns in preference to the smaller towns and villages. In rural areas development should be focussed on market towns which have access to good quality public transport where this would contribute to greater self containment".

¹ Appendix 3 of CD33

² Paragraph 2.10 of PPG7 and paragraph 70 of PPG3

³ Our countryside: the future. Section 3.2.1, bullet point 1

⁴ Page 23, Summary of measures

⁵ Paragraph 4.2 CD112

1.2.8.2 The towns in the district have different characteristics and vary in the level of their self-containment and public transport provision. In the context of RPG, only Huntingdon and St Neots can be regarded as major centres for employment and only they possess rail links and can be classed as being in public transport corridors. Furthermore, evidence given to the RTS on settlement strategy¹ shows that, as of 1991, Huntingdon, whilst being smaller in population terms than both St Neots and St Ives, had the greatest degree of self-containment, with a positive balance of jobs to workers. St Neots is the largest in population terms and second in terms of self-containment. For both towns, non-car use is high. In contrast, Ramsey and St Ives have higher levels of car use, reflecting the higher percentage of out-commuting and thus lower degree of self-containment and, in the case of Ramsey, the town's relative geographical isolation. Huntingdon and St Neots are thus better placed in sustainability terms than either Ramsey or St Ives, which do not have the same characteristics.

1.2.8.3 Part of the district, including the towns of Huntingdon, St Ives and St Neots, is within the Cambridge sub-region set out in RPG, within which there are particular development pressures. Policy 22 of RPG, in setting out the order of preference for locations for housing in the sub-region, makes clear that development in or at market towns is subject to the caveat that growth in car commuting can be minimised. Policy 4, which relates to the remainder of the District including Ramsey/Bury, highlights the needs for development to contribute to a greater degree of self-containment and to be in towns with good public transport accessibility. This guidance, allied with that in paragraphs 30 and 31 of PPG3 on accessibility by public transport and the emphasis in the Alteration on the principles of sustainable development, is a strong argument for preference for new development to be given to Huntingdon and St Neots before Ramsey and St Ives.

1.2.8.4 In addition, the Structure Plan² distinguishes Ramsey from the other market towns, by requiring that no further permissions for estate scale growth are permitted before significant improvements to the B1040 between Ramsey and the Fen Link Road have been secured and provision made for a Ramsey relief road. This is a strong caveat that the Council proposes to carry forward into the Alteration as Policy HL4. Whilst Ramsey and St Ives undoubtedly are market towns in terms of size and retail facilities, they are less sustainable locations for growth than Huntingdon and St Neots given their lack of rail facilities and more limited degree of self containment and, in the case of Ramsey, the additional problem of poor road links.

1.2.8.5 However, I see no need for there to be explicit ranking of the market towns in Policy STR3. Notwithstanding the accessibility issue, Ramsey, St Ives and Godmanchester are more sustainable locations for development than villages and could absorb higher levels of housing than just that generated by local needs. To achieve more balanced development across the District all the market towns should absorb growth in the remainder of the plan period. To differentiate, in policy terms, between Huntingdon and St Neots and the other market towns listed in policy STR3 would introduce another level in the hierarchy and so, unnecessarily, complicate the Plan. Each has a role to play in the Alteration's strategy to meet housing needs and, on balance, I am content that the policy does not differentiate their roles.

1.2.8.6 However, when it comes to the alteration determining the location of housing allocations, it would be reasonable to place some weight on the relative sustainability of Huntingdon and St Neots over the other 3 market towns identified in policy STR3. Accordingly, the supporting text to

¹ Cambridgeshire and Peterborough Joint Research Programme (attached to Beazer Strategic Land Position Paper, Inquiry document ref: 1004.8a/Site 12)

² Footnote 1 to Policy SP3/1

Policy STR3 should be modified to reflect the relative sustainability of development at the different market towns.

1.3 GOAL

Objections

0547/004	Trustees of Lord De Ramsey's 1963 Settlement	0583/006	Boots Pensions Limited
1007/001	Gallagher Estates Ltd		

Issue: should the period covered by the Alteration be extended?

1.3.1 Objections 0547/001 and 0583/006 seek to extend the plan period to 2016 to provide long term certainty and clarity. They also consider that the Alteration fails to address the needs of rural settlements. By definition, an Alteration can only cover the same period as the adopted Local Plan – that is to 2006. The Review of the Local Plan will be the appropriate vehicle to address the longer term. For the reasons I set out¹, I consider that the Alteration deals adequately with the needs of rural settlements.

Issue: does the Alteration adequately reflect the principles of sustainable development?

1.3.2 Objection 1007/001 finds little evidence that the goal expressed in paragraph 1.1 is achieved. I have considered the principles of sustainable development and the way in which they are reflected in the Alteration². This objection would be satisfied by the revised settlement strategy and the housing allocations as I recommend they be modified³.

RECOMMENDATION

1.3.3 No modifications in response to objections 0547/001 and 0583/006.

¹ Section 1.2.6 refers

² Section 1.2.3 refers

³ The remainder of this chapter and chapter 2 refer.

REVISED HOUSING SETTLEMENT STRATEGY

1.4.1 INTRODUCTION

PARAGRAPH 1.2

Objections

0148/001	Trustees of the Noel Thornhill Settlement		
0264/001	Webster Mr P M	0406/004	Mustill Mr C
0407/003	Christmas Mr T	0408/003	Handley Mr P Council
0409/006	Janes Mrs S	0410/003	Bluff Messrs N & B
0411/003	Kidman Mr G C	0412/003	King Messrs P N & L M
0413/002	Reynolds Mrs E A	0445/001	Thornhill Mr E G W
0489/005	Good Messrs S J & R N & Leck Mr S	0544/003	Dale Mr & Mrs P L
0545/003	Dodson Mr C	0546/001	Prowting Projects (2)
0547/001	Trustees of Lord De Ramsey's 1963 Settlement		
0555/006	Juggins Mr D R	0572/002	P B Moore & Sons
0589/002	Defence Estates (East) (Omnivale Ltd)	0962/008	Westbury Homes (Holdings)
1007/002	Gallagher Estates Ltd	1007/005	Gallagher Estates Ltd
1047/002	Elton Estate Company Limited	1086/001	Rural Development Commission

Issue: should the Alteration distinguish between the market towns so as to identify those where urban extensions would be most sustainable?

1.4.1.1 Objections 1007/002 and /005 seek a distinction, based on the nature of public transport facilities available, between on the one hand Huntingdon and St Neots which are served by the railway and on the other St Ives and Ramsey which are not. In the light of my earlier findings¹, I support these objections and propose to recommend modifications to the supporting text of the Alteration, which should satisfy these objections².

Issue: does the settlement strategy of the Alteration represent an unduly and unwarranted shift in emphasis away from the rural settlements which is contrary to the Structure Plan and will adversely affect those settlements?

1.4.1.2 Objections 0264/001, 0406/004, 0407/003, 0408/003, 0409/006, 0410/003, 0411/003, 0412/003, 0413/002, 0489/005, 0544/003, 0545/003, 0546/001, 0547/001, 0555/006, 0572/002 and 1086/001 argue that the settlement strategy of the Alteration represents too abrupt a change from that of the adopted Local Plan; they seek greater provision for development in the rural areas. In similar vein, objections 0148/001 and 0445/001 argue that the revised settlement strategy, with its significant reduction in the number of villages where growth is planned, will create an imbalance. For the reasons I have set out³, I consider that shift in emphasis is urgent; the needs of the rural areas and the amenities of villages should not be unreasonably affected and the Local Plan will remain in general conformity with the Structure Plan. Moreover some development opportunities, albeit limited, will remain in the rural areas.

¹ Section 1.2.8 refers

² Recommendation at section 1.4.5

³ Section 1.2.2 refers

Issue: will the larger allocations deliver the expected number of dwellings?

1.4.1.3 I share the concern of objections 0489/005, 0544/003 and 0572/002 that the Alteration should be realistic in its expectations as to the number of dwellings that will be achieved on the allocated sites. I have considered the realism of the Council's assumptions on yield¹ and I am satisfied that the sites which I recommend are allocated should deliver the yield expected from them.

Issue: will the Alteration provide a reasonable variety and choice of housing sites?

1.4.1.4 Objection 1047/002 accepts the need to focus new development on the urban areas but seeks a greater variety and choice of sites. Providing wider opportunity and choice and a better mix in the size type and location of housing than is currently available is one of the Government's objectives for housing²; however, achievement of that objective cannot be at the expense of a pattern of sustainable development. I am satisfied that the allocations that I recommend will provide an appropriate amount of variety and choice.

Issue: will the revised settlement strategy unreasonably prejudice growth and settlement strategies post 2006?

1.4.1.5 Contrary to the view of objection 0445/001, I see no reason why the revised settlement strategy should prejudice longer-term decisions. The Alteration will persist only to 2006 and the allocations that I recommend are capable of being substantially completed in the plan period. The Review of the Structure Plan will be based upon national and regional guidance as it exists at that time. There should be no difficulty for the Council in responding appropriately to this guidance in the Review of the Local Plan.

1.4.1.6 To avoid prejudicing future options and especially given its limited timescale and scope, it would be wrong for this Alteration, to include any reference to growth requirements beyond the plan period. I have taken RPG into account in my conclusions but I do not consider it would be appropriate to refer to it, or to the timetable for the Review of the Structure Plan which is a matter for the County Council, in this part of the Alteration. For these reasons I do not support objection 0589/002.

RECOMMENDATION

1.4.1.7 No modification in response to objections 0148/001, 0264/001, 0406/004, 0407/003, 0408/003, 0409/006, 0410/003, 0411/003, 0412/003, 0413/002, 430/002, 0445/001 0489/005, 0544/003, 0545/003, 0546/001, 0547/001, 0555/006, 0572/002, 0589/002 1047/002 or 1086/001.

PARAGRAPH 1.3

Objections			
0086/001	Hemingford Grey Parish Council	0519/018	Manor Developments (UK) PLC
1086/008	Rural Development Commission		

¹ Chapter 2 refers

² Paragraph 2 of PPG3

Issue: should reference be made to the avoidance of development on the flood plain and on Areas of flood flow?

1.4.1.8 The aim of objection 0086/001 is fully in accordance with emerging national guidance set out in draft PPG25. As the Council point out, the constraint which protection of flood plains represents is reflected in Policy CS9 of the adopted Local Plan; however, there are also Policies in the adopted Local Plan which seek to constrain development in the countryside and to protect key natural assets – the factors which are the subject of the second bullet of paragraph 1.3. In addition, since Policy CS9 and the Alteration were drafted, awareness of the need for restraint on development in flood plains has heightened and there can be no dispute that flood risk is of considerable local significance in the District. I agree therefore with the objector that it would be appropriate to include reference to this constraint.

Issue: should more extensive reference be made to national guidance, in particular the need for a choice of sites?

1.4.1.9 The reference which objection 0519/018 seeks is already included in paragraph 2.4 of the Alteration, which sets out the principles that have guided the allocations. There is no need for a similar reference in this Chapter.

Issue: is the second bullet point sufficiently clear and precise?

1.4.1.10 Objection 1086/008 seeks the removal of the word “and” and definition of the countryside. It seems to me that while the conjunction is necessary the word “to” is redundant. “Countryside” is defined in the adopted Local Plan by reference to village environmental limits and the built form of towns; there is no need to repeat that definition in the Alteration.

RECOMMENDATIONS

1.4.1.11 Modify paragraph 1.3 of the supporting text by:

1. introducing a new bullet point to refer to the avoidance of development on flood plains; and
2. in the second bullet point deleting the word “to”.

1.4.1.12 No modification in response to objection 0519/018.

1.4.2 SETTLEMENT HIERARCHY

PARAGRAPH 1.5

Objections

0539/025 Taywood Homes Limited

0998/006

City & St James Property

Issue: should the references in the 5th and 6th bullets to infrastructure and accessibility be given greater definition?

1.4.2.1 For the reasons I have set out¹, I agree with the objectors that expanding these references would be helpful; the emphasis of these on these considerations would then more closely reflect the emphasis of national guidance.

RECOMMENDATION

1.4.2.2 Modify paragraph 1.5 of the supporting text by:

1. in the 5th bullet after "infrastructure" introducing reference to public transport, in particular railway facilities"²; and
- 2 In the 6th bullet deleting "General accessibility" and substituting "Accessibility by means of travel other than by the private car".

1.4.3 POLICY STR1

Objections

0409/005	Janes Mrs S	0445/004	Thornhill Mr E G W
0481/001	Seabrook Farms Ltd	0484/001	Markhelp Ltd
0488/001	Huntingdonshire Association of Small Builders	0488/002	Huntingdonshire Association of Small Builders
0519/001	Manor Developments (UK) PLC	0532/001	P J Hamilton & Associates
0539/001	Taywood Homes	0539/026	Taywood Homes
0587/001	Landowners West of Warboys	0945/001	Hallam Land Management Limited
0972/001	Merrill D & Chignell Mrs C	0976/001	T W Lumley Ltd
0978/001	Ayres Mr & Mrs Justification		
0981/001	Westbury Homes(Holdings) Ltd & Cala Homes(South)Ltd		
0982/003	George Wimpey plc	1007/003	Gallagher Estates Ltd
1016/011	Clients (various) of Campbell Mead Ltd	1019/002	Everdell, Scott, Wadsworth & Burgess
1026/003	Lafarge Redland Aggregates	1038/001	Wass Mr A
1058/001	CIN La Salle Investment Management Ltd		

Issue: should the settlement hierarchy of the adopted Local Plan be retained?

1.4.3.1 For the reasons I have set out³, I do not support the view of objections 0409/005, 0445/004, 0481/001, 0484/001, 0488/0014, 0488/002, 0519/001, 0532/001, 0539/001, 0539/026, 0587/001, 0945/001, 0972/001, 0976/001, 0978/001, 0981/001, 0982/003, 1016/011, 1026/003 that the settlement hierarchy of the adopted Local Plan should be retained.

Issue: should the Alteration make a distinction between the market towns in terms of their sustainability?

1.4.3.2 For the reasons I have set out⁴ I agree with objection 1007/003 that the Alteration should reflect the different levels of sustainability of the market towns though I conclude this is best contained in the supporting text to Policy STR3. Given that the Local Plan is designed to be read as a whole it would serve no purpose to duplicate such a reference in Policy STR1.

¹ Sections 1.2 and 1.4 refer

² Recommendation relating to Policy STR3, section 1.4.5 also refers.

³ Section 1.2.2 refers

⁴ Section 1.2.8 refers

Issue: should the scale of development acceptable in group villages be greater than that proposed in Policy STR1?

1.4.3.3 For the reasons I set out¹ I do not support objections 0488/002, 1019/002, 1038/001, 1058/001 which seek to expand the scale of development which might be permitted in group villages.

Issue: is Policy STR1 too prescriptive?

1.4.3.4 For the reasons I set out² I do not support the view of objection 1058/001 that Policy STR1 is too prescriptive in determining the scale of development through the settlement hierarchy.

Other matters

1.4.3.5 It seems to me that Policy STR1 contains unnecessary text in that it sets out the scale of development that would constitute a housing group and infill. This pre-empts the purpose of STR2 and is unnecessary. There is also a need to clarify the Policy, in particular to remove the word "normal" which contributes nothing to its meaning.

Issue: would the sequential approach put unnecessary pressure on town centre commercial sites and fail to maximise the use of existing physical/social infrastructure?

1.4.3.6 For the reasons I set out³, I do not support the views of objections 0982/003 and 1016/011 that unnecessary or unreasonable pressure would be placed on town centre commercial sites by the application of the sequential approach or that the Policy is unsustainable in that it would fail to maximise the existing physical/social infrastructure.

RECOMMENDATIONS

1.4.3.7 Modify STR1 by deleting the text of the second bullet point and substituting:

"Group villages where housing groups and infilling will be allowed and infill villages where only infilling will be allowed."

1.4.3.8 No modification in response to objections 0409/005, 0445/004, 0481/001, 0484/001, 0484/004, 0488/002, 0519/001, 0532/001, 0539/001, 0539/026, 0587/001, 0945/001, 0972/001, 0976/001, 0978/001, 0981/001, 0982/003, 1016/011, 1019/002, 1026/003, 1038/001 and 1058/001.

1.4.4 POLICY STR2

Objection

1008/026 Diocese of Ely

PCN 7

Objection (Provisionally Withdrawn)

0539/032 Taywood Homes

Counter-Objections

1130/002 Cambridgeshire County Council, Environment & Transport

1151/007 Merrill D & Chignell Mrs C

1152/007 Mailler, Bakesef, Goulty & Mayes Messrs

1153/007 T W Lumley Ltd

1156/007 Clark Mr P

¹ Section 1.2.7 refers

² Section 1.2 refers

³ Section 1.2.refers

1157/007 Brooker Mr R
1158/007 Bedfordia Developments & Bedfordshire Pilgrims H A
1159/007 Bedfordia Developments Ltd 1160/007 Ayres Mr & Mrs J
1061/007 Van Leuven Mr P

Issue: are the numerical limits for group and estate scale development reasonable, justified and logical?

1.4.4.1 The Council's approach reflects the approved Structure Plan where a housing group is defined as up to 8 dwellings, with an exceptional limit of 15 dwellings where the housing group is contained within the village environmental framework. These figures were considered at the last PLI. No compelling evidence has been presented to justify a view that different, higher figures should be adopted on the grounds of support for local services or other sustainability grounds.

1.4.4.2 The Deposit Draft version of the Alteration retained the categories of large and small housing estates in addition to those of group and infill. In response to objections that these were unnecessary given the proposed deletion of the LRGV category of the settlement strategy, the Council put forward PCN 7 that reduced the two housing estate categories to one and lowered the threshold for the remaining estate category to 15 dwellings. Following counter objections to the proposed change, the Council put forward FPRC 202 which would lower the threshold for estates to 9 dwellings. This would have the effect of bringing the estate category starting point into sequence with the upper limit of the housing group category.

1.4.4.3 The Council's proposed change and further proposed change seek solely to ensure that the various categories of scale of housing growth logically reflect the proposed deletion of the LRGV category and that the numerical limits of the different categories flow seamlessly into each other. The changes would make the Policy consistent with Policy STR1 of the deposited Alteration and are worthy of support.

1.4.4.4 I do not, therefore, support objection 1008/026 or counter-objections 1151/007, 1152/007, 1153/007, 1156/007, 1157/007, 1158/007, 1159/007, 1160/007 and 1161/007. The modifications which I recommend should satisfy objection 0539/032 and counter-objection 1130/003.

Other matters

1.4.4.5 In the light of my recommendation relating to Policy STR1, it is necessary to define within the Policy the circumstances in which an exception to group scale may be permitted. There is also some inconsistency between these circumstances as they are defined in Note 1 to the Policy and paragraph 1.12 of the supporting text; in my view the consideration set out in that paragraph should also be included in the Policy. In addition, to protect the character and appearance of the countryside infilling should be restricted to sites within environmental limits of villages.

RECOMMENDATIONS

1.4.4.6 Modify Policy STR2 by deleting the existing text and substituting:

“The scale of housing developments referred to in the Alteration Policies are defined as follows:

Housing Estate	Development entailing the construction of more than 9 dwellings
Housing Group	Up to 8 dwellings forming a planned entity using either an existing frontage or grouped around a short cul-de-sac. Exceptionally, where: <ul style="list-style-type: none">•the site is within the environmental limits of the village;•the development would make the best use of the land; and•the overall benefits of estate scale development are particularly strong up to 15 dwellings may be permitted.
Infilling	The filling of an undeveloped plot in an otherwise built-up frontage

1.4.4.7 Modify the notes to Policy STR2 by:

1. deleting note 1
2. deleting the word "normally" in Note 2.

1.4.5 POLICY STR3

Objections

0539/002	Taywood Homes	0589/003	Defence Estates (East) (Omnivale Ltd)
0982/004	George Wimpey plc	1005/001	David Wilson Estates
1016/016	Clients (various) of Campbell Mead Ltd		
1016/017	Clients (various) of Campbell Mead Ltd		
1016/020	Clients (various) of Campbell Mead Ltd		
1026/004	Lafarge Redland Aggregates	1050/004	RMC Properties Ltd

Issue: should Brampton be identified as part of Huntingdon, should Little Paxton be identified as part of St Neots and should Hemingford Grey/Fenstanton be identified as part of St Ives?

1.4.5.1 For the reasons I set out¹ I do not support objections 0589/003, 1005/001, 0982/004, 1016/020, 1050/004, 0539/002, 1016/016, 1016/017, 1026/024 that seek to see Brampton identified as part of Huntingdon, Hemingford Grey/Fenstanton as part of St Ives and Little Paxton as part of St Neots.

RECOMMENDATION

1.4.5.2 No modification in response to objections 0589/003, 1005/001, 0982/004, 1016/020, 1050/004, 0539/002, 1016/016, 1016/017 and 1026/024

¹ Section 1.2.4 refers

PARAGRAPH 1.08

1.4.5.3 In line with my earlier conclusions¹, this paragraph should be modified.

RECOMMENDATION

1.4.5.4 Modify paragraph 1.8 after "... principally concentrated" by inserting a new sentence to read:

"However, within the market towns, Huntingdon and St Neots, by virtue of their rail links and higher degree of self-containment, are better able to accommodate development in a sustainable manner than St Ives, Godmanchester or Ramsey. Accordingly, preference will be given to Huntingdon and St Neots in making major new housing allocations."

PARAGRAPH 1.09

Objection
1005/002 David Wilson Estates

Issue: is it appropriate not to identify Brampton as a market town in its own right and alternatively not to treat it as part of the Huntingdon urban area?

1.4.5.5 The market towns in the district are identified in the Structure Plan and, as the objectors acknowledge, although it has expanded significantly in recent years Brampton is no more than a village.

1.4.5.6 For the reasons I have set out², I do not support the objectors' view that for Policy purposes Brampton should be treated as part of Huntingdon. However it seems to me that the supporting text set out in paragraph 1.09, by giving priority to the absence of need for additional provision, does not do justice to the arguments for discontinuing the treatment of Brampton in the adopted Local Plan. Reference should be made to the greater contribution which development at the market towns themselves can make to the achievement of a pattern of sustainable development.

RECOMMENDATION

1.4.5.7 Modify paragraph in line with the above conclusions.

1.4.6 POLICY STR4

- Objections
- | | | | |
|----------|--|----------|----------------------------|
| 0376/002 | Robinson Mrs E, Shepperson Mrs M & Shepperson Mr J | | |
| 0398/002 | Stokes J D & B R | 0485/002 | Topham Mr P |
| 0539/003 | Taywood Homes | 0540/002 | Osborn Mr N |
| 0583/005 | Boots Pensions Limited | 0587/007 | Landowners West of Warboys |
| 0981/002 | Westbury Homes(Holdings)Ltd & Cala Homes(South)Ltd | | |
| 0982/005 | George Wimpey plc | 0982/025 | George Wimpey plc |
| 1008/025 | Diocese of Ely | 1009/001 | BAS Ltd & Mr M Hunting |
| 1016/013 | Clients (various) of Campbell Mead Ltd | | |

¹ Section 1.4.3 refers
² Section 1.2.4 refers

1016/018 Clients (various) of Campbell Mead Ltd
 1016/019 Clients (various) of Campbell Mead Ltd
 1019/003 Everdell, Scott, Wadsworth & Burgess
 1026/005 Lafarge Redland Aggregates 1043/00 Roverex Ltd
 1050/002 RMC Properties Ltd

Issue: should the RGV category be widened?

1.4.6.1 Objections 0376/002, 0398/002, 0485/002, 0539/003, 0540/002, 0583/005, 0587/007, 0981/002, 0982/005, 0982/025, 1008/025, 1009/001, 1016/013, 1016/018, 1016/019, 1019/003, 1026/005, 1043/001, 1050/002 seek the reinstatement of the category of RGV. The objectors make specific reference to the villages of Hilton, Hemingford Grey, Needingworth, Sawtry, Brampton, Warboys, Little Paxton, Somersham, Sawtry, Fenstanton, Buckden, Kimbolton and Bluntisham

1.4.6.2 There is no dispute than many of these villages would satisfy the criteria of Structure Plan Policy SP3/2 for classification as RGV or that they could accommodate development without harm to their character. However for the reasons I have set out¹, elevation of villages to a level where they could be expected to accommodate significant amounts of development would be counter-productive in the search for a more sustainable pattern of development.

RECOMMENDATION

1.4.6.3 No modification in response to objections 0376/002, 0398/002, 0485/002, 0539/003, 0540/002, 0583/005, 0587/007, 0981/002, 0982/005, 0982/025, 1008/025, 1009/001, 1016/013, 1016/018, 1016/019, 1019/003, 1026/005, 1043/001 or 1050/002.

1.4.7 POLICY STR5

Objections

0042/002	Clarke Mr R M	0376/001	Robinson Mrs E, Shepperson Mrs M & Shepperson Mr J
0398/003	Stokes J D & B R	0406/001	Mustill Mr C
0409/001	Janes Mrs S	0415/001	Trustees of J P Strong OBE (1989) Settlement
0445/007	Thornhill Mr E G W	0485/001	Topham Mr P
0518/001	Crown Estate Commissioners	0519/002	Manor Developments (UK) PLC
0532/002	P J Hamilton & Associates	0540/001	Osborn Mr N
0543/003	Mykriil Country Properties	0550/003	St Andrew's Estate
0551/003	Jewson Ltd	0554/003	Lincol Properties Ltd
0571/003	Ramply Mr A W T	0587/006	Landowners West of Warboys
0588/003	Yelcon Homes Limited	0945/002	Hallam Land Management Limited
0961/001	Harvey Mr S A C	0972/002	Merrill D & Chignell Mrs C
0976/002	T W Lumley Ltd	0976/013	T W Lumley Ltd
0978/002	Ayres Mr & Mrs J		
0981/005	Westbury Homes(Holdings Ltd & Cala Homes(South)Ltd		
0982/006	George Wimpey plc	0982/029	George Wimpey plc
1003/018	Homes by Marshall	1005/003	David Wilson Estates
1009/002	BAS Ltd & Mr M Hunting	1012/001	Blackman Messrs
1016/021	Clients (various) of Campbell Mead Ltd		
1016/023	Clients (various) of Campbell Mead Ltd		

¹ Sections 1.2.2 and 1.2.6 refer

1019/004 Everdell, Scott, Wadsworth & Burgess
1020/002 Scotney Mr A 1024/003 Braybrook Messrs J D & L W
1025/001 Greene King plc & Mr Boddington
1026/006 Lafarge Redland Aggregates 1043/001 Roverex Ltd
1050/001 RMC Properties Ltd 1089/002 Wistow Parish Council

Issue: is the reclassification of villages reasonable and justified?

1.4.7.1 Objection 0945/002 questions in principle the revision of the settlement strategy, in particular the removal of the RGV and LRGV categories. For the reasons I have set out¹, the reclassification of villages is reasonable and justified.

Issue: should the LRGV category be reinstated?

1.4.7.2 Objections 0532/002, 0982/006, 1016/023, 0376/001, 0398/003, 1043/001, 0485/001, 1009/002, 0540/001, 0961/001, 0976/002 and 0945/002 seek the reinstatement of the category of LRGV included in the adopted Local Plan and the inclusion within the category of the villages of Bluntisham, Buckden, Folksworth, Great Gidding, Great Gransden, Needingworth, Ramsey St Mary's, Spaldwick, Holme, Stilton, Somesham and Offord D'Arcy. For the reasons I have set out², I do not support these objections.

Issue: should Brampton and Little Paxton be reclassified as part of Huntingdon and St Neots respectively?

1.4.7.3 I refer to my earlier conclusions on this issue³.

Issue: should Ellington and Wistow be reclassified from Group Villages to Infill Villages?

1.4.7.4 In support of their arguments that the villages are too highly classified the objectors point to the lack of facilities available. No evidence of a systematic appraisal of villages by the Council is before me. I acknowledge that both of these villages have very limited facilities and are no larger than some of the villages designated as Infill Villages. The distinction between them and some Infill Villages is therefore very fine. However size and facilities are not the only considerations which should determine the scale of development appropriate within settlements. As the supporting text indicates⁴, there is scope within the built form of these villages for more than infilling and I have no reason to doubt that such development could be accommodated without harm to village character. In addition, there is a need for affordable housing in the Ellington area⁵

1.4.7.5 There is inevitably an element of subjectivity in classifying settlements⁶. In the absence of compelling evidence that the classification proposed by the Council would cause harm I consider that the Council's decisions, based on their intimate knowledge of the district, should be supported.

Issue: should the group village category be widened?

1.4.7.6 Objections 1025/001, 0550/003, 1016/021, 0543/003, 0554/003, 1020/002, 1024/003, 0551/003, 0406/001, 0571/003, 0415/001 seek the reclassification of a number of villages, accorded infill village status in the Alteration, as group villages. The villages referred to are Abbotsley,

¹ Section 1.2, especially sections 1.2.1, 1.2.2 and 1.2.6 refer

² Section 1.2.6 refers

³ Section 1.4.5 refers

⁴ Paragraph 1.14

⁵ CD60

⁶ Section 1.2.1 refers

Alwalton, Great Stukeley, Hemingford Abbots, Hemingford Grey/Fensstanton, Pidley, Southoe, and Tilbrook.

1.4.7.7 As I have indicated¹, that an element of subjectivity in classifying settlements is inevitable and that it is essentially a matter for the Council to make this determination given their more intimate knowledge of the locality. Notwithstanding the flaws in the Council's survey of settlements and the lack of evidence of a systematic re-evaluation of settlements in the light of it, in general I consider that the Council has struck the right balance. I accept that there is only a very fine distinction between some of the settlements classed in the Alteration as infill villages and others classed as group villages but in the absence of compelling evidence it would not be appropriate to 'up-grade' their status. To do so would undermine the purpose of the settlement strategy to secure a more sustainable pattern of development.

Issue: are Warboys and Sawtry correctly classed as Group villages?

1.4.7.8 I refer to my earlier conclusions on this issue². For the reasons I have set out³ I do not support objection 0587/006 which seeks the reclassification of Warboys and Sawtry.

RECOMMENDATION

1.4.7.9 No modification in response to objections 0042/002, 0376/001, 0398/003, 0406/001, 0409/001, 0415/001, 0445/007, 0485/001, 0518/001, 0519/002, 0532/002, 0540/001, 0543/003, 0550/003, 0551/003, 0554/003, 0571/003, 0587/006, 0588/003, 0945/002, 0961/001, 0972/002, 0976/002, 0976/013, 0978/002, 0981/005, 0982/006, 0982/029, 1003/018, 1005/003, 1009/002, 1012/001, 1016/021, 1016/023, 1019/004, 1020/002, 1024/003, 1025/001, 1026/006, 1043/001, 1050/001 and 1089/002

1.4.8 POLICY STR6

Objections

0148/002	Trustees of the Noel Thornhill Settlement	
0406/002	Mustill Mr C	
0415/003	Trustees of J P Strong OBE (1989) Settlement	
0543/002	Mykrii Country Properties	
0547/003	Trustees of Lord De Ramsey's 1963 Settlement	
0550/002	St Andrew's Estate	0551/002 Jewson Ltd
0554/002	Lincol Properties Ltd	0571/002 Ramply Mr A W T
0982/007	George Wimpey plc	1008/027 Diocese of Ely
1016/015	Clients (various) of Campbell Mead Ltd	
1016/022	Clients (various) of Campbell Mead Ltd	
1020/003	Scotney Mr A	1024/001 Braybrook Messrs J D & L W
1051/001	Trustees of R P Smith (deceased)	1089/003 Wistow Parish Council

Issue: should the Group Village category be widened to include some villages designated as Infill Villages?

¹ Section 1.2.1 refers

² Section 1.4.6 refers

³ Section 1.2.1 refers

1.4.8.1 Objections 0550/002, 1016/022, 1051/001, 0543/002, 0554/002, 0551/002, 1020/003, 1024/001, 0406/002, 0571/002, 0415/003, and 0982/007 seek the reclassification of Alwalton, Great Stukeley, Hemingford Abbots, Hemingford Grey/Fenstanton, Pidley, Southoe and Tilbrook. These objections are the same as some of those made against Policy STR5 and I refer to my conclusions on the objections to that Policy¹. For the reasons I have set out, I do not support these objections.

1.4.8.2 Objection 1008/027 seeks the reclassification of Keyston from Infill Village to Group Village. The same arguments apply to this village as to those listed in the previous paragraph and therefore I do not support the objection.

Issue: should Hemingford Grey/Fenstanton be identified as part of St Ives?

1.4.8.3 I refer to my earlier conclusions on this issue². For the reasons I have set out I do not support objection 1016/015.

Issue: should Diddington and Wennington be classed as infill villages?

1.4.8.4 Objections 0148/002 and 0547/003 argue that Diddington and Wennington should be reclassified from that of hamlets to infill villages.

1.4.8.5 Diddington and Wennington are small, relatively isolated settlements lacking in services and facilities. There is no evidence that circumstances have materially changed since arguments that these villages merited Infill Village status were considered at the adopted Local Plan Inquiry. The Inspector for that inquiry concluded that Diddington was no more than an isolated group of buildings in the open countryside and that the attractive, open character of Wennington militated against development by infilling. Neither village has adequate facilities. I concur with those views and therefore I support the inclusion of these villages, in paragraph 1.15 of the supporting text, as hamlets.

Issue: should Wistow be reclassified as an infill village?

1.4.8.6 I refer to my earlier conclusions on this issue³. For the reasons I have set out, I consider that Wistow is appropriately classified as a Group Village and therefore I do not support objection 1089/003.

RECOMMENDATION

1.4.8.7 No modification in response to objections 0550/002, 1016/022, 1051/001, 0543/002, 0554/002, 0551/002, 1024/001, 0406/002, 0571/002, 0415/003, 0982/007, 1008/027, 1020/003, 1016/015, 1089/003, 0547/003 and 1089/003.

PARAGRAPH 1.12

Objections
0442/004 Holywell-cum-Needingworth Parish Council

¹ Section 1.4.7 refers

² Section 1.2.4 refers

³ Section 1.4.7 refers

0539/027 Taywood Homes

Issue: would estate scale development be precluded in group/infill villages in appropriate circumstances?

1.4.8.8 Objection 0539/027 should be satisfied by the modification which I recommend to Policy STR2¹ which would allow more than group scale development in villages in exceptional circumstances.

1.4.8.9 Objection 0442/004 argues that this provision should only apply in Needingworth and not in Holywell. Policy STR2 as I recommend it be modified would apply district-wide and only if the rigorous requirements of Policy STR2, and all other relevant provisions of the adopted Local Plan, were satisfied, would development of more than group scale be permitted. These provisions will be sufficient to prevent development which would cause demonstrable harm and therefore I do not consider it is necessary to make an exception to exclude Holywell.

RECOMMENDATION

1.4.8.10 No modification in response to objection 0442/004.

PARAGRAPH 1.13

Objections

0539/028 Taywood Homes

0982/008 George Wimpey plc

1016/012 Clients (various) of Campbell Mead Ltd

Issue: is the settlement hierarchy based on the location of proposed allocations rather than on the size and level of facilities of settlements?

1.4.8.11 For the reasons I have set out² I do not support objection 0539/028 which argues that the settlement hierarchy is allocation-based rather than a reflection of size/facilities and that it would be more appropriate to retain the hierarchy of the adopted Local Plan until a full Review of the Local Plan is carried out.

1.4.8.12 Objection 0539/028 argues that the revised settlement strategy is inconsistent in its classification of settlements. As I have already acknowledged³, the levels of services and facilities are not the only consideration in determining the appropriate level of any settlement and there is inevitably an element of subjectivity in classifying them. Notwithstanding the flaws⁴ in the Council's survey of settlements and the lack of evidence of a systematic re-evaluation of settlements in the light of it, in general I consider that the Council have struck the right balance to enable the revised settlement strategy

¹ Section 1.4.4 refers

² Sections 1.2.1, 1.2.2 and 1.2.6 refer

³ Section 1.2.1 refers

⁴ Sections 1.2.1 and 1.2.7 refer.

to fulfil its purposes¹. In particular it will focus the great majority of development on the market towns and Yaxley and thereby advance the achievement of a pattern of sustainable development.

Issue: will the revised settlement strategy unreasonably prevent the re-use of derelict, underused or vacant sites in villages?

1.4.8.13 As objections 0982/008 and 1016/012 point out, there may be derelict, underused or vacant sites in villages which should be developed. The development of any such sites would be subject to the provisions of Policy STR2 which, as I recommend it be modified, would permit re-use of land within the environmental limits of the villages. That provision is necessarily subject to a limit of 15 dwellings so as to prevent unduly large concentrations of development in rural locations. For the same reason, the existence of any such sites would not justify the reinstatement of the RGV or LRGV categories of the settlement strategy of the adopted Local Plan.

Issue: has there been a realistic attempt at reassessing unimplemented planning permissions and allocations?

1.4.8.14 In response to the arguments of objections 0982/008 and 1016/012 that the Council have not effectively re-appraised planning permissions and outstanding allocations, the Council say that all unimplemented allocations have been scrutinised and found to be appropriate for re-allocation. I deal with the renewed allocations in detail elsewhere² and I support the tenor of the objection. If unimplemented permissions come before the Council for renewal, I have no reason to doubt that, with the emphasis they place upon achieving a more sustainable pattern of development the Council will have regard to national guidance³. This guidance clearly states that planning permissions should not be renewed where they do not satisfy current guidance. For the avoidance of doubt paragraph 1.17 of the supporting text should be modified accordingly. My recommendations should satisfy this objection.

RECOMMENDATION

1.4.8.15 No modification to paragraph 1.13 in response to objections 0539/028, 0982/008 and 1016/002.

PARAGRAPH 1.14

Objection
0042/001 Clarke Mr R M

Issue: should Ellington be reclassified as an infill village?

1.4.8.16 I refer to my earlier conclusions on this issue⁴. For the reasons I have set out I do not support this objection.

RECOMMENDATION

1.4.8.17 No modification to paragraph 1.14 in response to objection 0042/001.

¹ Section 1.2.1 refers

² Sections 1.4.10 and 2.4.4

³ Paragraph 40 PPG3

⁴ Section 1.4.7 refers

PARAGRAPH 1.15

Objection
0148/003 Trustees of the Noel Thornhill Settlement

Issue: should the Alteration allow infilling development in hamlets?

1.4.8.18 Contrary to the view of the objectors, Policy H21 of the adopted Local Plan is unaffected by the Alteration and, subject to the caveats contained in the Policy, development by infilling may still take place.

RECOMMENDATION

1.4.8.19 No modification in response to objection 0148/003.

1.4.9 SCALE AND LOCATION OF GROWTH

Objection
0519/003 Manor Developments (UK) PLC

Issue: should the Alteration pursue a more dispersed pattern of growth?

1.4.9.1 The objectors argue that the settlement pattern of the district would permit the achievement of a sustainable pattern of development with a more dispersed pattern of growth. In my view there is nothing exceptional about the existing pattern of development in the district which would warrant the significant departure from national guidance¹ which the objector seeks; a more dispersed pattern of growth would prejudice that aim. For that reason and for the reasons I have already set out², I do not support objection 0519/003.

RECOMMENDATION

1.4.9.2 No modification in response to objection 0519/003.

1.4.10 COMPLETIONS AND OUTSTANDING COMMITMENTS

1.4.10.1 In the light of my earlier conclusions³, this paragraph should be modified to make clear that the revised settlement strategy will apply not just to new allocations but to all allocations and to any planning permissions which come forward for renewal.

RECOMMENDATION

1.4.10.2 Modify paragraph 1.17 of the supporting text by deleting the second sentence and substituting:

¹ PPG3

² Section 1.2.1 refers

³ Sections 1.2.2 and 1.4.8 refer

“The Alteration enables the Council to re-direct the strategy by applying the new hierarchy’s controls on site scale and location to the allocation of land for housing and to any planning permissions which come before the Council for renewal.”

1.4.11 RENEWED ALLOCATIONS: PARAGRAPH 1.18

Objections

0519/004 Manor Developments (UK)

0539/004 Taywood Homes PLC

Issue: are the renewed allocations consistent with achieving a more sustainable pattern of development?

1.4.11.1 For the reasons I have set out¹, I support the view of objections 0519/004 and 0539/004 that the renewed allocations are inconsistent with achieving a more sustainable pattern of development. I recommend that these allocations should be deleted.

1.4.11.2 Both objection 0539/004 and the text of paragraph 1.18 of the Alteration refer to the Government’s support for taking a long-term approach to introducing more sustainable development. However this does not mean that changes of emphasis are intended to be introduced gradually. As national guidance² makes clear, local planning authorities should revise their plans as quickly as possible. In that context the reference to a long-term approach is potentially misleading.

RECOMMENDATION

1.4.11.3 Modify paragraph 1.18 of the supporting text by deleting the existing text and substituting:

“The sites allocated in the 1995 Local Plan without the benefit of valid, extant planning permissions have been re-assessed. Those which do not satisfy the requirements of the revised settlement strategy and would prejudice the achievement of a more sustainable pattern of development are not renewed.”

1.4.12 PROCESS FOR NEW SITE SELECTION

PARAGRAPH 1.19

Objections

0517/013 Ramsey Town Council

0519/005 Manor Developments (UK) PLC

Issue: should the market towns be treated as being equally suitable for development, in particular is Ramsey is a suitable location for housing growth in the Plan period?

1.4.12.1 I share the view of objection 0517/013 that the market towns are not all the same³. They should not be treated as equals in decisions as to the best locations for major development in the remainder of the plan period. To that extent I support objection 0517/013 and my recommendation to modify paragraph 1.8 of the supporting text⁴ echoes those views. However Ramsey, despite its relatively poor communications, has the services and facilities to support some growth and development

¹ Sections 2.5.2 and 2.5.4 refer

² Paragraph 37 PPG3

³ Section 1.2.8 refers

⁴ Section 1.4.3 refers

there would be far more sustainable than in rural settlements. It would therefore not be appropriate to exclude the possibility of an appropriate scale of development at Ramsey during the remainder of the plan period.

Issue: would the process for site selection explicitly recognise the existence of employment opportunities in villages?

1.4.12.2 There are significant variations in the range of employment opportunities in the villages in the district and I am aware that some villages attract people who travel to them to work. However, no village has been drawn to my attention as having an existing or potential level of employment in excess of the potential labour supply from its resident population. Attaching weight to the existence of employment or prospects for it in selecting sites for allocation would therefore be likely to serve only to increase journey distances to work in the market towns where employment opportunities are far more numerous and varied. Moreover, it would be contrary to the search sequence of PPG3. For these reasons, I do not support objection 0519/005.

RECOMMENDATION

1.4.12.3 No modification to paragraph 1.19 in response to objections 0517/013 and 0519/005.

PARAGRAPH 1.20

Objections

0589/004 Defence Estates (East) (Omnivale Ltd) 1007/007 Gallagher Estates Ltd

Issue: should there be an additional locational focus for development in the district?

1.4.12.4 Objection 0589/004 seeks the inclusion of an additional locational focus – other “brownfield” sites capable of being developed in a sustainable manner”. National guidance gives priority to the re-use of previously developed land; however contrary, to the objectors’ views, the inclusion of the factor which they suggest would not be in accordance with the search sequence in PPG3 the first step of which relates to previously developed land **within** (my emphasis) urban areas. In addition paragraph 32 of that guidance emphasises that not all previously developed land is suitable for re-use. Neither would the focus which the objectors seek be in accordance with the criterion established in RPG¹ for the development of a new settlement in the Cambridge sub-region which stresses proximity to Cambridge. For these reasons and for the reasons I have already set out² the inclusion of the focus suggested by the objectors would be inappropriate.

Issue: have the Council appraised RAF Upwood on sustainability grounds for suitability for housing?

1.4.12.5 The Council accept, in theory at least, the view of objection 1007/007 that it might be that greenfield land adjacent to urban areas would prove more sustainable than previously developed land within them. In this context the objectors refer to RAF Upwood – a site which in my view is not

¹ Policy 22 CD112

² Section 1.2.5 refers

within the urban area of Ramsey but close to it. The Council's environmental appraisal records¹ refer to a site "North West RAF Upwood". Whilst that description does not match the site shown on the Proposals Map for the proposed allocation and there is scope for argument as to the conclusions which the Council draw in their appraisal, I have no reason to believe that the Council would have reached different views on the sustainability of the site shown on the Proposals Map. My conclusions on the merits of the proposed allocation are set out in Chapter 2²; no modification is necessary to paragraph 1.20.

RECOMMENDATION

1.4.12.6 No modification to paragraph 1.20 in response to objections 0589/004 and 1007/007.

PARAGRAPH 1.23

Objection

0445/008 Thornhill Mr EG W
PCN 13

Counter-Objections

1124/001 Houghton and Wyton Parish Council
1144/001 Swan Hill Homes Limited 1151/006 Merrill D & Chignell Mrs C
1152/006 Mailler, Bakecef, Goulty & Mayes Messrs
1153/006 T W Lumley Ltd 1156/006 Clark Mr P
1157/006 Brooker Mr R
1158/006 Bedfordia Developments & Bedfordshire Pilgrims H A
1159/006 Bedfordia Developments Ltd 1160/006 Ayres Mr & Mrs J
1161/006 Van Leeuwen Mr P.

Issue: does the Alteration adequately consider development opportunities across the district?

1.4.12.7 Consideration of opportunities in or adjacent to villages would be contrary to national guidance³ and to the settlement strategy of the Alteration; it would undermine the search for a sustainable pattern of development⁴. Taking account of the Changes which they proposed to the deposited Alteration, I consider that the Council adequately considered development opportunities. I do not support objection 0445/008 therefore.

Issue: is the text misleading in relation to Houghton Grange?

1.4.12.8 PCN 13 seeks to explain the choice of edge of settlement sites in the Alteration; it specifically identifies the allocation at Houghton Grange as an exception. Although it is separate from St Ives, contrary to the view of counter-objection 1124/001, it is also separate from Houghton and Wyton. The wording of this part of PCN 13 is not misleading.

Issue: should reference also be made to Yaxley?

¹ CD7, CD11

² Section 2.4.2

³ Paragraph 30 PPG3

⁴ Sections 1.2.1 and 1.2.3 refer

1.4.12.9 I endorse the Council's proposed allocation at the RGV of Yaxley and recommend that additional sites should be allocated there¹. Therefore I agree with objection 1144/001 that reference should be made to Yaxley in this paragraph.

Issue: does the Alteration adequately explain the rationale for the changes to the settlement strategy?

1.4.12.10 Like the Local Plan, the Alteration is designed to be read as a whole. I acknowledge that the layout of the Alteration is unusual in separating the justification for the allocation of sites from the Policy which makes the allocations and in the brevity of the supporting text for the allocations. Nevertheless, I appreciate the efforts which the Council has made to ensure that the Alteration is concise. I consider that the rationale for the revisions to the settlement strategy of the adopted Local Plan is adequately explained in this Chapter. It would be unnecessary and repetitive to repeat those reasons in paragraph 1.23. The changes to the allocations will be adequately set out in the text of paragraphs 1.19 to 1.28 of the Alteration as it is proposed by the Council to be changed and subject to my conclusions and recommendations relating to the remainder of this Chapter, together with my recommendation relating to paragraph 1.18 of the deposited Alteration². Therefore I do not support objections 1151/006, 1152/006, 1153/006, 1156/006, 1157/006, 1158/006, 1159/006, 1160/006, 1161/006.

Other matters

1.4.12.11 In the light of their responses to my conclusions and recommendations on the Council's proposed allocations, proposed changes allocations and on objectors' sites, as they proceed through the stages leading to the formal adoption of the Alteration the Council will wish to ensure that all references to sites in this paragraph, and in this part of Chapter 1 generally, are consistent with the list of sites allocated under Policy HL2. My recommendations below are therefore confined to the matters brought before me in the objection and counter-objections listed above.

RECOMMENDATION

1.4.12.12 Modify paragraph 1.23:

1. in accordance with PCN 13; and
2. by adding at the end of the paragraph as it is proposed to be amended:

“ In addition, sites are allocated at the Rural Growth Village, Yaxley.”

PARAGRAPH 1.24 (PRCV PARAGRAPH 1.24)

PCN 14, PCN 15

Counter-Objections

1140/001 Taywood Homes

1151/009 Merrill D & Chignell Mrs C

1152/009 Mailler, Bakesef, Goultly & Mayes Messrs

1153/009 T W Lumley Ltd

1156/009 Clark Mr P

¹ Sections 2.4.9 refers

² Section 1.4.11 refers

1157/009 Brooker Mr R
1158/009 Bedfordia Developments & Bedfordshire Pilgrims H A
1159/009 Bedfordia Developments Ltd 1160/009 Ayres Mr & Mrs J
1161/009 Van Leeuwen Mr P.

Issue: does the text demonstrate the unsuitability of Crosshall Manor for residential development?

1.4.12.13 The proposed changes would replace the text in paragraph 1.24 with new text including reference to the proposed changes allocation at Crosshall Manor. No counter-objections is made to the deletion of the text of deposited paragraph 1.24.

1.4.12.14 For the reasons set out in the second sentence of the new paragraph, (and for the other reasons I have set out elsewhere¹), I agree with counter-objection 1140/001 that argues that the text demonstrates the unsuitability of Crosshall Manor for residential development. Reference to this site should not be included in the Alteration.

Issue: does the Alteration adequately explain the rationale for the changes to the settlement strategy?

1.4.12.15 I refer to my earlier conclusions on this issue². For the reasons I have set out I do not support the view of counter-objections 1151/009, 1152/009, 1153/009, 1156/009, 1157/009, 1158/009, 1159/009, 1160/009 and 1161/009.

RECOMMENDATION

1.4.12.16 Modify paragraph 1.24 by deleting the existing text and substituting:

“The Kings Ripton Road site does not compromise perceived boundaries to Huntingdon.”

Inspector's Note

1.4.12.17 PCN 16 which would introduce a new paragraph (PRCV paragraph 1.25) relating to the proposed changes allocations at St Ives logically precedes paragraph 1.25 of the deposited Alteration (PRCV paragraph 1.26). It is therefore appropriate to deal with counter-objections to that proposed change before considering deposited paragraph 1.25.

PRCV PARAGRAPH 1.25

PCN 16

Counter-Objections

1117/001 Biotechnology & Biological Sciences Research Council
1117/002 Biotechnology & Biological Sciences Research Council
1151/010 Merrill D & Chignell Mrs C
1152/010 Mailler, Bakefef, Goultly & Mayes Messrs
1153/010 T W Lumley Ltd

¹ Section 2.4.5 refers

² Paragraph 1.4.12.10 refers

1156/010	Clark Mr P	1157/010	Brooker Mr R
1158/010	Bedfordia Developments & Bedfordshire Pilgrims H A		
1159/010	Bedfordia Developments Ltd	1160/010	Ayres Mr & Mrs Justification
1161/010	Van Leeuwen Mr P.	1162/006	St Ives Town Council

Issue: does the Alteration adequately explain the rationale for the changes to the settlement strategy?

1.4.12.18 I refer to my earlier conclusions on this issue¹. For the reasons I have set out I do not support counter-objections 1151/010, 1152/010, 1153/010, 1156/010, 1157/010, 1158/010, 1159/010, 1160/010 and 1161/010.

Issue: is it reasonable and feasible to seek comprehensive development of the Houghton Grange and Golf Course sites, including the provision of additional recreation facilities on the intervening land?

1.4.12.19 The references to “comprehensive” development and a “comprehensive development brief” imply that the Council will require these two sites to be developed jointly. The allocations are physically separated by open land, including by land which would remain part of the golf course as well as by an open field held by a third party; this party supports the allocations and is prepared to work in conjunction with the site owners.

1.4.12.20 However, maintenance of the gap between the two sites in a manner which would avoid harm to the separate identity of St Ives and Houghton would remain in the control of the Council regardless of whether the sites are developed jointly or separately; in these circumstances any reference to comprehensive development of the two sites seems to do no more than run the risk that progress, or lack of it, on one of the sites could unnecessarily prejudice the development of the other. Moreover, as objection 1117/002 says in the context of the reference to additional recreational facilities in the gap (and the Council have pointed out in relation to employment uses), the allocation of land for any purpose other than housing is beyond the scope of the Alteration. The Council say that the reference to the provision of recreation facilities in the intervening gap does not amount to a requirement. Nevertheless, because the supporting text is part of the statutory plan and for the avoidance of uncertainty, notwithstanding that the provision of these facilities might well be desirable, reference to them is inappropriate.

1.4.12.21 For these reasons I do not support counter-objection 1162/006 which seeks the inclusion of reference to a comprehensive brief for both sites.

Other matters

1.4.12.22 FPRC 205 in the first line of the new paragraph would substitute “physical” for “urban”. This change is worthy of support but in the interest of clarity it is necessary to add after “physical framework”, the words “of St Ives”.

RECOMMENDATION

1.4.12.23 Modify the supporting text by introducing a new paragraph 1.25 as follows:

¹ Paragraph 1.4.12.10 refers

“The St Ives Golf Course (part) site is well related to the existing physical framework of St Ives, accessible and contained on three sides by existing residential areas and school playing fields offering the prospect of sustainable development. Houghton Grange nearby is as accessible to St Ives town centre as part of north St Ives. Maintenance of the gap between the two sites is vital to the separate physical identity of St Ives and Houghton. Development of the sites will be guided by development briefs.”

PARAGRAPH 1.25 (PRCV PARAGRAPH 1.26)

Objection

0539/008 Taywood Homes

PCN 18

Counter-Objections

1151/011 Merrill D & Chignell Mrs Council

1152/011 Mailler, Bakesef, Goulty & Mayes Messrs

1153/011 T W Lumley Ltd 1156/011 Clark Mr P

1157/011 Brooker Mr R

1158/011 Bedfordia Developments & Bedfordshire Pilgrims H A

1159/011 Bedfordia Developments Ltd

1160/011 Ayres Mr & Mrs J 1161/011 Van Leeuwen Mr P.

Issue: does the Alteration place too much reliance on large sites?

1.4.12.24 For the reasons I have set out¹ I do not support the objectors' views that the Alteration places too much reliance on large sites. However, in accordance with the view of the objectors, I support the proposed change to Policy HL2 which would delete the allocation of site 10 - North of Priory Hill Rd, St Neots². I also endorse the proposed changes allocation East of the Railway, St Neots³. Therefore I endorse the part of PCN 20 which would substitute reference in paragraph 1.26 of the PRCV to the East of the Railway site for the site at Priory Hill.

1.4.12.25 As to market choice, although I do endorse the objectors' view that this can only be satisfied by a more dispersed pattern of allocations, I find that the Council's justification for concentrating development, as they describe it "beyond the natural physical framework", on only one settlement is unfounded. There are opportunities for a major allocation at Huntingdon which should be pursued in the interests not only of market choice but which will also make a significant contribution to the achievement of a pattern of sustainable development⁴.

1.4.12.26 In reaching the view that an additional large site should be allocated at Huntingdon, there are no compelling arguments in support of the bullet points of paragraph 1.25. Concentrating on one town is not in my view likely to make proposals more implementable or better able to yield infrastructure or community benefits; on the contrary the reverse is more likely to be true. The allocation which I recommend at Huntingdon would not compromise long-term development options. I have also taken into account the constraints there to which paragraph 1.26 of the deposited Alteration refers; the allocation which I recommend at Huntingdon would not be affected by the flood plain and I see no reason why the issue of secondary school provision could not be resolved.

¹ Section 1.2.6 refers

² Section 2.4.2 refers

³ Section 2.4.5 refers

⁴ Sections 2.4.7 and 2.4.9 refer

Issue: does the Alteration adequately explain the rationale for the changes to the settlement strategy?

1.4.12.27 I refer to my earlier conclusions on this issue¹. PCN 18 would strengthen the supporting text and is worthy of support. For these reasons I do not support counter-objections 1151/011, 1152/011, 1153/011, 1156/011, 1157/011, 1158/011, 1159/011, 1160/011 and 1161/011

Other matters

1.4.12.28 FPRCs 206, 207, 208 and 209 would make minor textual amendments and are worthy of support. The words "the Council considered" are unnecessary; and, because as the deposited Alteration referred to land beyond the railway line at St Neots, it would be accurate to substitute the word "natural" in the context of physical framework with "existing".

RECOMMENDATION

1.4.12.29 Modify paragraph 1.25 (PRCV paragraph 1.26) by deleting the existing text and substituting:

"The allocation of these sites has not, however, precluded the requirement to break out again in a more substantial way beyond the clearly defined physical framework of the market towns. Such substantial development beyond the existing physical boundaries of the market towns is proposed at Huntingdon and St Neots."

PARAGRAPH 1.26 (PRCV PARAGRAPH 1.27)

Objections

0010/002	Brown Ms V	0108/002	Glover Dr P A
0127/002	Davies Mr P	0173/002	Pope Councillor M R
0173/003	Pope Councillor M R	0539/009	Taywood Homes
0998/001	City & St James Property Ltd	1067/002	Fovargue Mr A J
1067/003	Fovargue Mr A J		

PCN 20

Counter-Objections

1151/012	Merrill D & Chignell Mrs C		
1152/012	Mailler, Bakesef, Goultly & Mayes Messrs	1153/012	T W Lumley Ltd
1156/012	Clark Mr P	1157/012	Brooker Mr R
1158/012	Bedfordia Developments & Bedfordshire Pilgrims H A		
1159/012	Bedfordia Developments Ltd	1160/012	Ayres Mr & Mrs J
1161/012	Van Leeuwen Mr P.		

Issue: would development on the site north of Priory Hill Road, St Neots be more sustainable than land on the edges of Huntingdon and St Ives?

¹ Paragraph 1.4.12.10 refers

1.4.12.30 Objections 0108/002, 0173/002, 0539/009 and 1067/002 should be satisfied by the parts of PCN 20 which would delete the reference to the site North of Priory Hill, St Neots and substitute reference to "East of the Railway, North of Cambridge Road" St Neots and delete the final bullet point in this paragraph. I endorse the deletion of this allocation¹.

1.4.12.31 Objection 0010/002 argues that St Neots does not have the capacity to accommodate additional development without exacerbating existing problems of overcrowding and traffic congestion; the proposals at St Neots will, however, provide opportunities to improve services and amenities and existing traffic problems in the town are being addressed through a local study. I do not support this objection

Issue: is Meadow Lane, St Ives a sustainable location for development?

1.4.12.32 For the reasons I set out², I do not support the view of objection 0998/001 that Objector Site 22 - Meadow Lane, St Ives is in a sustainable location and would minimise any potential ecological, landscape or hydrological effects.

Issue: is appropriate account taken of secondary school capacity?

1.4.12.33 The Ernulf School at St Neots has adequate capacity at present and scope for expansion to accommodate secondary schooling requirements arising from the development proposed at St Neots. At Huntingdon, the local education authority say that there is capacity at St Peter's School for pupils from an extra 825 dwellings³. As they advise, "it takes some time for new housing to generate significant numbers of secondary school pupils, then only significant amounts of new housing (over 2,000 dwellings) feeding pupils into a school would be a problem"⁴. On this basis I am satisfied that the proposals of the Alteration as I recommend they be modified would not give rise to insurmountable difficulties in secondary school provision.

1.4.12.34 Two other factors have influenced my conclusion on this matter. First, the provision of secondary schooling is only one of a number of considerations in deciding where new development should be located and it would be wrong to allow this consideration alone to dictate that opportunities to achieve a more sustainable pattern of development should not be pursued. Secondly, the total requirement for housing in the district derives from the Structure Plan for which the local planning authority is the same as the local education authority and I have no reason to doubt that appropriate account was taken of education matters in determining provision in the Structure Plan.

1.4.12.35 I do not therefore support objections 0127/002, 1067/003, 0173/003, 0539/009.

Issue: is Ramsey a sustainable location for the scale of growth proposed in the Alteration?

1.4.12.36 For the reasons I have set out⁵ I support the view of objection 0539/009 that Ramsey is not an appropriate location for development of the scale proposed in the plan period. Among other arguments against the allocation West of Ramsey, because there is no prospect that the development

¹ Section 2.4.2 also refers

² Section 2.4.7 refers

³ Appendix 2 CD117

⁴ CD117

⁵ Sections 1.2.8 and 2.4.2 refer

proposed there could be completed in the plan period, I share the view of the objector that this allocation would prejudice decisions post 2006. I recommend that this allocation and that at RAF Upwood are deleted. I am satisfied that substantial allocations which I recommend at East of the Railway, St Neots and Ermine Street, Huntingdon will not compromise long term development options and therefore, except in relation to its reference to the site North of Priory Hill, St Neots, I do not endorse the part of PCN 29 which would delete the final bullet point of this paragraph.

Issue: is Huntingdon better placed to absorb growth than St Neots?

1.4.12.37 Objection 0108/002 argues that Huntingdon, with its ring road and available land, should be given greater priority than St Neots. In my view, however those are not the most important considerations. As I have set out¹, in the interests of achieving a more sustainable pattern of development, priority should be given to levels of self-containment and the range of public transport provision. In this context I find that Huntingdon and St Neots are equally suitable to absorb major growth and should be distinguished from Ramsey and St Ives. I deal with issues relating to congestion in considering the sites at these towns².

Issue: does the Alteration adequately explain the rationale for the changes to the settlement strategy?

1.4.12.38 I refer to my earlier conclusions on this issue³. Paragraph 1.26 (PRCV paragraph 1.27) as I recommend it is modified will adequately explain the selection of sites at Huntingdon and St Neots for substantial development. For these reasons I do not support counter-objections 1151/012, 1152/012, 1153/012, 1155/012, 1156/012, 1157/012, 1158/012, 1159/012, 1160/012 and 1161/012.

RECOMMENDATION

1.4.12.39 Modify paragraph 1.26 (PRCV paragraph 1.27) by deleting the existing text and substituting:

“Developments East of the Railway, St Neots and at Ermine Street, Huntingdon were chosen in preference to development at other towns because:

- Development at these towns offers the greatest prospect of reducing the need to travel and travel by more sustainable modes
- Developments on the edge of St Ives were considered less desirable from an environmental perspective. The selected sites for substantial development avoid areas of best landscape
- Ramsey, with its poor employment prospects, poor public transport and poor accessibility was not considered an appropriate location for substantial development. Market demand is restricted and substantial allocations would be unlikely to yield house completions in the plan period

¹ Section 1.2.8 refers

² Sections 2.4.2 and 2.4.7 refer

³ Paragraph 1.4.12.10 refers

- Development on the scale proposed at St Neots would be able to take advantage of the ability of the town's secondary schools to expand. There is sufficient secondary schooling capacity available at Huntingdon."

PARAGRAPH 1.27 (PRCV PARAGRAPH 1.28)

PCN 22

Counter-Objections

1140/002	Taywood Homes	1151/013	Merrill D & Chignell Mrs C
1152/013	Mailler, Bakecef, Goulty & Mayes Messrs		
1153/013	T W Lumley Ltd	1156/013	Clark Mr P
1157/013	Brooker Mr R		
1158/013	Bedfordia Developments & Bedfordshire Pilgrims H A		
1159/013	Bedfordia Developments Ltd	1160/013	Ayres Mr & Mrs J
1161/013	Van Leeuwen Mr P.		

Issue: does the Alteration adequately explain the rationale for the changes to the settlement strategy?

1.4.12.40 PCN 22 would amend the text of the paragraph so as to add explanation for the choice of edge of town allocations. I refer to my earlier conclusions on this issue¹.

1.4.12.41 Contrary to objection 1140/002, I am satisfied that the proposal East of the Railway, St Neots is neither premature nor likely to prejudice long-term development options. As the objector recognises mixed use issues are beyond the scope of the Alteration; nevertheless there is no reason why the development of this site cannot be carried out in a manner which would facilitate the introduction of mixed uses².

1.4.12.42 I do not endorse the counter-objections and, subject to the other matters referred to below, I consider that the PCN is worthy of support.

Other matters

1.4.12.43 Modifications should be made to this paragraph to reflect my recommendation that paragraph 1.26 should include reference to the proposal at Ermine Street, Huntingdon³.

RECOMMENDATION

1.4.12.44 Modify paragraph 1.27 (PRCV paragraph 1.28) by deleting the existing text and substituting:

The key determinants of these locations have been accessibility and sustainability factors. The key determinant of the size of the proposals is the need to meet the housing shortfall. At St Neots the provision of a community large enough to be self sufficient with its own Primary School and local facilities will not compromise any long-term development options to 2016. The proposals at Huntingdon and Godmanchester

¹ Paragraph 1.4.12.10 refers

² Section 2.4.5 refers

³ Paragraph 1.4.12.39 refers

reflect the size and status of these settlements and take into account the environmental and infrastructural constraints.

PARAGRAPH 1.28

Objection
1007/008 Gallagher Estates Ltd
PCN 23

Issue: does the environmental appraisal adequately address sustainability principles?

1.4.12.45 As the Council acknowledge¹, PPG12 requires local planning authorities to carry out a basic environmental appraisal of plans, policies and proposals. Whilst there is scope for disagreement on the extent to which and the manner in which the Council examined various aspects of the appraisal and on the conclusions which they draw, the appraisal matrix which they used matches the one set out in CD54.

1.4.12.46 However, in practice, the Council confined their appraisal of the proposals of the Alteration to potential new site allocations at the market towns; there is no appraisal of the renewed allocations in either towns or villages. I note that paragraph 2.29 of the supporting text states that the “renewed allocations have not been subject to environmental appraisal given Government guidance that reviews of allocation should be subject to realism alone.” However that advice pre-dates the current advice in PPG3² which urges the revision of plans to take account of the guidance in that Note. In addition, given the significant changes which the Alteration makes to the settlement strategy, it would have been reasonable for the Council to review the unimplemented allocations for consistency with it. Moreover, I noted with some concern at the inquiry that the weight which the Council attached to the results of the appraisals varied according to which site was under consideration and in least one instance, contrary to the advice in the Good Practice Guide³ that appraisal is an iterative process, the Council’s appraisal was described as being no more than “preliminary results”. The environmental appraisal carried out by the Council⁴ should therefore have been more comprehensive and more rigorous and to that extent I support the objection.

1.4.12.47 PCN 23 proposes the deletion of paragraph 1.28. This change is described as an “editorial change” and as a “Correction. Environmental appraisals for St Ives Golf Course & Crosshall Manor have now been completed & confirm their suitability for allocation”. I find this reasoning obscure. I am satisfied that either through the appraisal carried out by the Council, or in the case of objector sites that I recommend for allocation through the examination of their environmental effects as part of the inquiry process, all of the sites content that I recommend for allocation will have been adequately appraised. There is therefore no reason for me to endorse PCN 23 and paragraph 1.28 should remain in the Alteration.

RECOMMENDATION

1.4.12.48 No modification to paragraph 1.28 of the deposited Alteration.

¹ Paragraph 1.2 CD7

² Paragraph 37

³ Paragraph 2.4 CD54

⁴ CDs 7, 11 and 12

1.4.13 OBJECTORS' SUGGESTED NEW POLICIES

Objections

0985/002	Smith Ms B	
0409/004	Janes Mrs S	0445/006 Thornhill Mr E G W
0518/004	Crown Estate Commissioners	0519/019 Manor Developments (UK) PLC
0588/001	Yelcon Homes Limited	
0945/003	Hallam Land Management Ltd	
0981/003	Westbury Homes(Holdings)Ltd & Cala Homes(South)Ltd	
0982/009	George Wimpey plc	1003/006 Homes by Marshall
1012/002	Blackman Messrs	1016/014 Clients (various) of Campbell Mead Ltd

Issue: should a new Policy be inserted to highlight the avoidance of development on the flood plain?

1.4.13.1 The constraint which protection of flood plains represents is reflected in Policy CS9 of the adopted Local Plan; this provision remains in force and will do so after the Alteration is adopted. I am confident that the Council will review this Policy in the light of the emerging national guidance set out in draft PPG25 when they review the Local Plan as a whole. I therefore consider that there is any need for a new Policy relating to the flood plain in the Alteration. In addition I do not accept the view of objection 0985/002 that the criteria for assessing any housing development on the flood plain should relate primarily to the effects on existing housing rather than proposed new housing; both are important material considerations

1.4.13.2 My recommendation in response to objection 0086/001¹ that a new bullet point be added to paragraph 1.3 referring to the avoidance of development on flood plains should be of some comfort to the objector. Moreover I am satisfied that the allocations which I recommend will not have a harmful effect on flood water management.

Issue: is a new policy needed to identify villages as LRGVs?

1.4.13.3 For the reasons I have set out², I do not support the view of objections 0409/004, 0445/006, 0518/004, 0519/019, 0588/001, 0945/003, 0981/003, 0982/009, 1003/006, 1012/002 and 1016/014 that a new policy should be inserted identifying a number of villages as LRGVs.

RECOMMENDATION

1.4.13.4 No modification in response to objection 0409/004, 0445/006, 0518/004, 0519/019, 0588/001, 0945/003, 0981/003, 0982/009, 0985/002, 1003/006, 1012/002 and 1016/014.

¹ Section 1.4.1.8 refers

² Section 1.2.6 refers

CHAPTER 2 – HOUSING LAND

2.1 INTRODUCTION – PARAGRAPH 2.4

Objections

0539/005 Taywood Homes

0990/001

McCrae Mr W

Issue: are the objectives sufficiently clear and specific?

2.1.1 Objection 0990/001 seeks greater clarity in the objectives for the housing land allocations, in particular the inclusion of an objective to ensure that population growth does not outstrip the supply of jobs and to minimise commuting. The amount of housing which the Alteration must provide is established in Structure Plan Policy SP4/1; the Alteration cannot ignore this requirement. The concentration of new housing in the market towns, which are also the main centres for employment, is referred to in Structure Plan Policy SP16/1. Both of those Structure Plan Policies are referred to in the 1st bullet of paragraph 2.4.

2.1.2 However, although they are wide ranging and the 4th bullet refers to public transport, the objectives do not include any specific reference to ensuring that new housing does not give rise to an unacceptable increase in the need to travel, in particular commuting by private car. This omission should be rectified by the inclusion of a new objective.

Issue: is the 3rd bullet an appropriate objective?

2.1.3 Objection 0539/005 argues that the 3rd bullet is misconceived on the grounds that in the past the rate of housing development has failed to keep up with the Structure Plan requirement. This objective reflects the Council's concern that the rapid growth of the late 1980's should not be repeated. However, the Council acknowledge that development in the plan period has in fact been in line with the annualised Structure Plan requirement and that a repetition of the late 1980's is unlikely. In these circumstances, and given the now limited life of the Alteration, the emphasis in the 3rd bullet on controlling the rate of development is unnecessary.

2.1.4 The objector is also concerned that simply making land available will not, of itself alone, ensure that sufficient housing is built to meet the Structure Plan requirement. Providing sufficient housing is a key objective of PPG3¹: whilst the rate of development is ultimately in the control of developers and builders, national guidance also emphasises that the operation of the development process should not be prejudiced by unreal expectations of the developability of sites². I have taken the question of the deliverability of sites into account in reaching my conclusions on the allocations proposed by the Council and by objectors³ and I am satisfied that the sites which I recommend for allocation can be developed in the plan period. In the light of these conclusions I consider that the 3rd bullet should be deleted.

¹ Paragraph 2

² Paragraph 34 PPG3

³ Section 2.4 refers

Other matters

a) Densities

2.1.5 In considering the above objections I have noted the references in the 2nd and 4th bullets to housing densities, in particular the emphasis in the 4th bullet on higher densities in "town centres and accessible parts of towns with good public transport". Whilst I acknowledge that this approach is in line with the 3rd bullet of paragraph 58 of PPG3, this part of that national guidance highlights the need for local planning authorities generally to avoid the inefficient use of land. I recommend that Policy HL5 of the Alteration is modified accordingly¹.

2.1.6 The Proposed Change (PCN 25) introduces reference in the 4th bullet to higher densities in parts of towns with existing or planned cycleways or within reasonable walking distance. In principle this change is welcome; however, in the interest of clarity, the term "within reasonable walking distance" should be expanded to refer to jobs, shops and other services.

2.1.7 The reference in the 2nd bullet to site densities is unnecessary and the 4th bullet should be modified to reflect paragraphs 57 and 58 of PPG3.

b) the use of brownfield land

2.1.8 The 7th bullet of paragraph 2.4 relates to maximising the re-use of "brownfield" land. This emphasis is in accordance with national and regional guidance; however it lacks the qualification which paragraph 32 of PPG3 places on the release of previously developed land sites which perform poorly against the criteria which paragraph 31 of that national guidance establishes for allocations and, instead, appears to give carte blanche to the re-use of previously developed land. It is clear from their responses to the former MOD sites suggested for allocations by objectors², that the Council recognise the importance of other factors, including the sequential approach to allocations. The bullet should be modified to reflect the qualification.

RECOMMENDATIONS

2.1.9 Modify paragraph 2.4 of the supporting text by:

1. adding a new objective relating to avoiding the need to travel, especially by private car;
2. Deleting the reference to site densities in the 2nd bullet;
3. Deleting the 3rd bullet;
4. Amending the 4th bullet so as to refer to higher densities generally, and in particular in town centres and places with good public transport or within walking and cycling distances of jobs, shops and other services; and
5. Amending the 7th bullet to reflect the qualification set out in PPG3 on the re-use of previously developed land.

¹ Section 2.5 refers

² Objector sites 144 and 145, section 2.4.7 refers

2.2 HOUSING REQUIREMENT – POLICY HL1

Objections

0577/009 Swan Hill Homes Limited

0935/002

South Cambridgeshire District Council (Planning)

0982/016 George Wimpey plc

Issue: does the Policy provide adequately for housing likely to be required to support employment increase in the District?

2.2.1 Objection 0935/002 argues that the Policy fails to take adequate account of what the objector perceives as substantial employment potential in the District, including at RAF Alconbury, in the remainder of the plan period. The potential employment at RAF Alconbury is not yet determined and it must be wrong, in this Alteration which must be generally in conformity with the approved Structure Plan, to speculate on the effect of employment increases there or elsewhere in the Plan area. These are matters for the Reviews of the Structure, and Local, Plans.

Inspector's Note

2.2.2 The matters raised in objections 0577/009 and 0982/016 relate to the realism of the Council's assumptions about the amount of housing which will be achieved from the various sources of supply and whether the Structure Plan requirement for housing in the plan period will be satisfied without an increase in the new allocations. Issues relating to land supply are considered in the next section of my report and therefore I have carried these objections forward to that section.

RECOMMENDATION

2.2.3 No modifications in response to 0935/002.

2.3 LAND SUPPLY – PARAGRAPHS 2.08 to 2.22

The lists of objections and counter-objections made against these parts of the Alteration are at Appendix 1 PCN 27, 28, 29, 30, 31, 34, 37, 41, 44, 45, 49 and 51

Introduction

2.3.1 The housing requirement set out in Policy HL1 includes affordable housing provision. The requirement is not met until the dwellings are built; the difference between the gross requirement set out in the Structure Plan and the net provision in the Alteration is not likely to be significant. It is also agreed that some allowance should be made for flexibility and uncertainty¹. As I have already indicated – at 4,707 dwellings between mid 1991 and mid 1997 – the rate of housing provision in the early parts of the plan period was in line with the Structure Plan requirement of 12,300 dwellings 1991-2006. Although some objectors voiced reservations about the use of a mid 1997 base date for the Alteration, this date is agreed to be reasonable².

2.3.2 Almost all of the objections seek increased provision for new housing in the Alteration. In addition to the general argument that there is insufficient provision to meet the Structure Plan requirement, the arguments which objectors advance can be summarised under two broad headings:

- the assumptions and calculations made on the supply elements – commitments, windfalls, yield from the renewed allocations and about the likely yield from the new allocations; and
- the size of the allowance to be made for flexibility and uncertainty.

2.3.3 There is no dispute as to the number of dwellings – 4,707 – built between mid-1991 and mid 1997. Table 1 of the Alteration indicates that in addition 2,746 dwellings will be achieved on land with planning permission, that is from commitments. PCN 28 would reduce that number by 125 dwellings to take account of experience in the early years of the plan period of a lapse rate of about 5.6%; it gives 2,621 dwellings as the supply assumed from commitments. The introduction of some discounting of this element of supply is welcomed by the objectors but most of them argue that the allowance is not sufficient large and should be increased to 10%. That argument is in line with the findings of research undertaken for DETR³ and in my view it is worthy of support.

2.3.4 For that reason, I do not consider that the supply assumed from commitments is robust and I do not support PCN 28. The supply assumed to arise from commitments should be reduced to about 2,470 dwellings. On that basis, about 7,177 of the 12,300 Structure Plan dwelling requirement is accounted for, leaving 5,123 dwellings to be accommodated either through windfalls, that is land which unexpectedly becomes available for housing, or allocations.

Issue: are the assumptions made about supply from windfalls robust?

2.3.5 Paragraphs 35 and 36 of PPG3 set out national guidance on windfalls and, in particular, make clear that windfalls comprise previously developed sites and that no allowance should be made for greenfield windfalls. Allowances for windfalls are at best, educated

¹ CD78 paragraph 1.1

² CD78 paragraph 3.1

³ The Roger Tym study

estimates and, in the context of the significant revision of national guidance, far less reliance can be placed upon past trends.

2.3.6 Table 1 makes an allowance for 1,135 dwellings arising from windfalls. Paragraphs 2.17/18 explain that this allowance is based on past rates of the incidence of windfalls, curtailed to taken into account the impact of the revised settlement strategy, the reduced likelihood of large scale windfall development by Housing Associations and the allocation of sites in urban areas that might otherwise have come forward as windfalls. Appendix 1 sets out the detailed assumptions.

2.3.7 PCN 30 would reduce the supply assumed to arise from windfalls to 1,075 dwellings. In accordance with national guidance¹, the Council accept that only previously developed land should contribute to windfall supply; nevertheless they maintain that the assumed supply of 1,075 dwellings from this source is robust.

2.3.8 The assumptions which the Council make are based on separate analyses of large and small sites and, in the former, Housing Association and private sector developments are distinguished. I adopt the same categories.

2.3.9 Dealing first with Housing Association development on large sites, compared with performance between 1994 and 1999 when Housing Associations achieved about 48 dwellings a year, the Council have applied a generous discount in assuming that supply from this source will average only 20 dwellings a year between 1997 and 2006. The logic for this discount is impeccable.

2.3.10 On private sector development, between mid 1994 and mid-1999 the Council permitted just over 250 dwellings² on large sites, in both towns and villages, on previously developed land; that is an average annual rate of about 50 dwellings, of which around 40 came from towns and 10 from villages. That compares with the Council's assumed private sector windfall supply from large sites of 60 dwellings each year. Whilst there is no direct parallel between the rate at which permissions are granted and dwellings are completed, this comparison suggests that the Council's assumption is unduly optimistic. The Council argues that increased densities on such sites would make the achievement of 60 dwellings per year possible. However, the Council's own evidence shows that density levels on such sites already averages above 50 per ha. I consider it unlikely that higher densities would be achieved and see no justification on this basis for adopting a higher assumed density level than has been achieved in the past.

2.3.11 As regards the likelihood of future windfall sites arising, PPG3, paragraph 35 advocates that local authorities should utilise capacity studies to assess likely potential. The Council acknowledge that they have not done this but argue that a future figure of 45 dwellings p.a. from towns is realistic given past trends³. However, to arrive at and justify this figure the Council utilise data from a number of different time periods, which I consider to be unnecessarily confusing. As my conclusions above make clear, I consider the time frame 1994-1999 to be a suitable one, and one which the Council utilise in CD 78A. This time frame does not go too far back in time but is long enough to provide meaningful trend data. However, the 40 dwellings p.a. figure for 1994-1999 was achieved prior to the introduction of capacity studies, which the Council accept has identified some sites for potential allocation that otherwise might

¹ Paragraph 36 PPG3

² Appendix 2 to CD 78A

³ Appendix 5, CD 34 refers

have come forward as windfalls. On this basis I consider the figure of 45 dwellings p.a. to be over optimistic. Whilst, inevitably, the choice of an appropriate figure for future windfall assumptions is, to a degree, a matter of art as opposed to science, I consider that there is little likelihood of more than 35 dwellings p.a. arising from large windfalls in towns.

2.3.12 The Council assume that 15 dwellings p.a. will arise from large private sector windfalls in villages. However, Appendix 2 to CD78A shows that between 1994-1999 only 2 large sites in villages were completed, producing an average of about 9 dwellings p.a. The Alteration has made no changes to the village environmental limits of villages in the district and so it is unlikely that peripheral sites will play a part in windfall generation. As with sites in towns, I consider that the density of such future developments is unlikely to increase significantly. These factors and the emphasis of the settlement strategy upon development in the market towns lead me to conclude that the Council's assumption is overly optimistic and should be reduced to a figure of 10 dwellings p.a. from this source. Taken together, I conclude that the likely level of dwellings that is likely to arise from large windfalls in towns and villages will be 45 p.a.

2.3.13 During the Inquiry the Council revised their assumption for small private sector windfalls. From this source they expect around 72 dwellings p.a. to arise. This is based upon past trends, adjusted to reflect guidance in PPG3. Given the emphasis of the settlement strategy for allocations in market towns and the restrictions upon the size of development acceptable in villages, I consider that the rate of small windfall sites coming forward in villages may well remain quite high. However, tempering this continuing trend would be the maintenance of tightly drawn village environmental limits. Accordingly, I consider that the rate predicted by the Council is reasonable.

2.3.14 As per proposed change 175, the Council recognise that there will be a time lag between the granting of planning permission and the completion of housing on a site and that to avoid the double counting of commitments as windfalls this should be reflected in the assumptions on future windfalls. The Council propose that this gap should be three years in the case of private developers and two years for RSL developments. However, I see no justification for adopting different figures for different developers and consider that the same allowance of three years should be made. Therefore I conclude that three years should be subtracted as from the Alteration base date (i.e. 1997-2000) and so the assumed annual supply of windfalls should be multiplied by 6 years (2000-2006). As a result, I conclude that the total supply of new dwellings that is likely to arise over the Alteration period from windfalls should be amended to a total of 822 dwellings (20 RSL + 45 large windfalls + 72 small windfalls x 6).

2.3.15 In sections 2.4.2 to 2.4.5 I go on to consider the council's allocations and proposed changes allocations. In section 2.4.6 I summarise the supply arising from these allocations and identify the scale of additional allocations that need to be made. In section 2.4.7 I consider the many objectors' sites put forward and finally, in section 2.4.9, I make recommendations on which of the objectors' sites should be included in the Alteration as allocation sites.

2.4.1 LAND ALLOCATIONS

INTRODUCTION

2.4.1.1 This section of the report is divided into several sub-sections. In accordance with the presumption¹ that what the Council propose should be supported unless there is compelling evidence against it, I deal first with the allocations proposed in the deposited Alteration, subdivided between those at the market towns, the allocation at the RGV and the renewed allocations in villages; next I consider the changes proposed by the Council allocations in the deposited proposed changes version of the Alteration. Together those sections lead to a summary of the housing supply likely to result from the Council's proposals as I recommend they be modified.

2.4.1.2 I then turn to the many alternative sites which objectors consider should be allocated, reaching conclusions as to which of these sites merit further consideration; then having considered these sites in effect in competition with each other, I set out my recommendations as to which of the objectors' suggested sites should be allocated.

2.4.1.3 The remaining sub-sections of this part of the report relate to other objections to Policy HL2, Ramsey and Policy HL4 and land allocation targets.

COUNCIL'S PROPOSED ALLOCATIONS AT THE MARKET TOWNS

Site 1 – Brookside, Huntingdon

Objections

0501/001 Lidl UK Ltd

1008/013

Diocese of Ely

1047/007 Elton Estate Company Limited

Issue: would the allocation unreasonably prejudice other desirable uses of the land?

2.4.2.1 Objection 1008/013 argues that the allocation would result in the loss of music and drama facilities and the other objectors are concerned that the allocation would prejudice the use of the site for other redevelopment proposals, including retail use.

2.4.2.2 The site is within the urban area of Huntingdon and is previously developed land. There is housing on the land and therefore I appreciate the Council's concern that a retail use on the allocation site would not be compatible with maintaining the living conditions of the residents of those properties. There are alternative facilities within the urban area for music and drama. For those reasons I do not support the objections.

2.4.2.3 Moreover, the site is within the urban area of Huntingdon; it is previously developed land and has been cleared. Appendix 2 of the Alteration indicates that the site would be suitable for high density (49 dph) development. An allocation here would therefore be in accordance with PPG3 and would contribute to the achievement of a pattern of sustainable development.

¹ Established in Electricity Supply Nominees case

RECOMMENDATION

2.4.2.4 No modifications in response to these objections.

Site 5 – London Road, Godmanchester

Objection
0983/001 Godmanchester Town Council

Issue: would the allocation advance the aim of achieving a sustainable pattern of development?

2.4.2.5 The allocation is about 4 ha of land. The land is allocated for employment in the adopted Local Plan and is the subject of an extant planning permission for that use. The objector would prefer retention of the allocation for employment; however, no progress has been made in implementing that use and there is an adequate supply of land for that purpose in the area. Reallocating the site for housing would therefore be in accordance with national guidance¹

2.4.2.6 The allocation is on the edge of the urban area of Godmanchester and is included within the environmental limits of the settlement defined in the adopted Local Plan. Part of the land has been previously developed; it has naturally regenerated but is in an untidy state and cannot be regarded as having blended into the natural landscape. This part of the allocation, as the objectors accept, therefore qualifies as a priority site for redevelopment for housing².

2.4.2.7 The remaining, larger, part of the site is in agricultural use and is Grade 2 land. This land, however, has no particular landscape or habitat values and, in accordance with revised national policy³, its agricultural value cannot be regarded as an overriding constraint. Moreover, the loss of this land to agriculture has already been accepted in its allocation for employment.

2.4.2.8 The allocation land adjoins existing residential development and is within reasonable walking/cycling distances of a primary school and other local services and facilities. There is a frequent bus service on London Road to the Godmanchester and Huntingdon town centres. I have endorsed the Council's proposal that under the settlement strategy of the Alteration the town of Godmanchester should be designated as a market town in its own right; under the search sequence⁴, it is therefore appropriate that the town should take a share of new housing allocations, albeit at a smaller scale than the larger towns.

2.4.2.9 There is traffic congestion in Godmanchester at peak hours and the objectors point out that in 1986 it was considered that conditions could become intolerable. Strategic concerns are being addressed in the CHUMMS study into the A14⁵ and the objectors argue that no further housing should be permitted in Godmanchester until that study has reported and improvements have been made to the highways network and public transport. However, Godmanchester is not alone in suffering congestion and a balance must be struck between the need to resolve this problem and the need for housing.

2.4.2.10 While there can be no guarantee that development on the site would not generate additional traffic and increase congestion in Godmanchester as the objectors fear, there will be

¹ Paragraph 42 of PPG3

² Paragraphs 30 and 31 of PPG3

³ Paragraph 9.3.4, Rural White Paper (CD113)

⁴ Paragraph 30, PPG3

⁵ CD105

opportunities for residents of the new dwellings to use more sustainable forms of travel. Given these opportunities, it is unlikely that development of the allocation site would have a significant effect on traffic congestion on the A14. Moreover, development of the allocation site might also provide opportunities to improve walking and cycling facilities in the area. I conclude that the allocation advances the aim of achieving a sustainable pattern of development.

Issue: could satisfactory access be secured to the allocation land?

2.4.2.11 The allocation is close to the junction of London Road with the A1198. The County Council as local highway authority say that off-site highway improvements, including facilities for traffic to turn safely into the site and an improved footway and possibly including improvements to the junction, would be required to enable development of the site to proceed. There is however no reason in principle why these matters could not be satisfactorily resolved at the development control stage.

Issue: would development of the allocation site lead to overcrowding of secondary schools or a requirement for additional, general open space?

2.4.2.12 The objectors are concerned that the allocation would lead to overcrowding at the secondary schools in the short-term and a need to change school catchment boundaries. The latter is not an issue for the Local Plan. The County Council, as local education authority, say that whilst the Hinchinbrooke Secondary School is already at maximum size, there is no overall shortfall of places in the Huntingdon area; they are satisfied that needs arising from the proposed allocation could be accommodated².

2.4.2.13 On open space, the objectors suggest that development of the allocation site should include an additional, general open space to replace public open space lost when other development proceeded; however an adequate replacement for that land has now been provided. Recreational needs arising from development of the allocation site could be addressed at the development control stage.

RECOMMENDATION

2.4.2.14 No modification in response to objection 0983/001.

Site 6 – Roman Way, Godmanchester

Objection
0983/002 Godmanchester Town Council
0532/003 PJ Hamilton and Associates

Inspector's Note

2.4.2.15 On traffic generation, the effect on congestion in Godmanchester and on the A14, secondary school facilities, my conclusions on this site are the same as those in relation to the site at London Road, Godmanchester³.

Issue: would the allocation advance the aim of achieving a sustainable pattern of

¹ CD37

² CD117

³ Paragraphs 2.4.2.5 to 14 refer

development?

2.4.2.16 The allocation site, including the access road, is about 1.89 ha. The land was allocated, as an existing commitment, for employment uses in the adopted Local Plan. As with the site at London Road, the objectors would prefer the employment allocation to be retained; however, apart from the start made in implementing the planning permission for employment use many years ago which has left the site in a derelict state, there is little prospect of the land being put to productive use for that purpose. There is an adequate supply of employment land elsewhere in the area.

2.4.2.17 The site is within the environmental limits of Godmanchester defined in the adopted Local Plan and qualifies as previously developed land under the terms of national guidance¹. The site is within easy reach of employment opportunities and a primary school. Godmanchester town centre is about 1 km away but there are frequent bus services available. The allocation site is therefore a priority site for use for housing in accordance with national guidance² and for the reasons I have set out³ Godmanchester is an appropriate location for allocations.

Issue: would development on the allocation site provide a satisfactory and safe environment for the residents of the new dwellings?

2.4.2.18 The site is bounded to the east by the A1198 and to the south-west by a car park to the Roman Way Small Business Centre. To the south-east is a recreation area and to the north-west, housing. There is no reason in principle why the adverse effects – of traffic noise, visual intrusion and intrusions into privacy to and from adjoining uses - could not be dealt with satisfactorily at the development control stage.

2.4.2.19 I share the objector's concern about the safety of the use of Roman Way to serve both the Small Business Centre and the allocation site. However, provided that Roman Way was upgraded, segregated provision made for pedestrians and cyclists and measures taken to prevent traffic associated with the business use intruding into the residential area, these concerns could be overcome. I conclude that a satisfactory and safe environment could be achieved for the residents of the new dwellings. I concur therefore with the finding of the Inspector who determined an appeal for housing on the land⁴.

RECOMMENDATION

2.4.2.20 No modification in response to objection 0983/002.

Site 7 – The Parks, Godmanchester

Objections

0122/004 Burbidge Mr P
0993/004 Ash Mr D F

0992/004
0995/004

Leighton Bromswold Parish Council
Morris Ms A M

¹ Annex C of PPG3

² Paragraphs 30 and 42, PPG3

³ Paragraph 2.4.2.8 refers

⁴ T/APP/H0250/A/99/1034205/P4

Issue: would the allocation lead to unacceptable pressure on local roads or flooding?

2.4.2.21 Objection 0122/004 fears that the allocation will lead to congestion on the local roads and would be in the flood plain. No objection to the proposed allocation was raised by the Environment Agency and the development has been built without undue effect on local roads.

2.4.2.22 The other objections suggest that it would be preferable to develop land at RAF Alconbury. However, having considered that site¹, I do not support those views.

RECOMMENDATION

2.4.2.23 No modification in response to these objections.

Site 10 - North of Priory Hill Road, St Neots

Objections
See list in Appendix
PCN58

Issue: should the site be allocated for housing development within the plan period?

2.4.2.24 The proposal to allocate this site in the deposited draft Alteration provoked 747 objections. In the PRCV, the allocation was deleted. The reasons given for this change are that: a larger site is needed to meet housing need; the land is of high agricultural value (evidenced by an objection from MAFF), and there is a possibility of nuisance arising from the adjacent pig farm and grain drying facility. The Proposed Change would satisfy some of the objections

2.4.2.25 Eighteen objections were withdrawn and the PCN would satisfy 214 objections. The objections that are maintained, 502, seek the preclusion of the use of the site for housing in perpetuity. However, whilst the combination of high quality agricultural land and designation as ABL might suggest the land should be protected, these objections are seeking a guarantee that the development plan system cannot provide, even in green belt. The Alteration is only concerned with matters up to 2006; issues arising after that time must be considered in the light of the circumstances and guidance, both national and strategic, that exist at that time. To make the statement that the objectors seek would be beyond the scope of the Alteration and would carry no weight with future decision-makers. In accordance with PCN58, the site should not be allocated for housing development in the plan period.

RECOMMENDATION

2.4.2.26 Modify Policy HL2, in accordance with PCN58, by deleting "NORTH OF PRIORY HILL ROAD 36.19".

¹ Objector site 144, section 2.4.7 refers.

Site 11 (PRCV site 12) – Windmill Row, St Neots

Objections

0948/003 English Heritage (East Midlands Region)
1008/017 Diocese of Ely

Issue: is it reasonable to expect this site to be available for housing in the plan period?

2.4.2.27 The allocation site is about 0.43 ha (gross) of land in active use as a car repair garage. In March 1999, in rebuttal of doubts from objection 1008/017 that the site would be available for redevelopment during the plan period, the Council said¹, that active steps were being taken by the landowners to secure a suitable redevelopment scheme. By the close of the inquiry, two years later, there was no evidence in terms of an application for planning permission, that those steps had secured any progress. I share the doubts of this objector therefore as to the genuine availability of the site.

Issue: is it appropriate to allocate the land solely for housing?

2.4.2.28 As objection 0948/003 points out, the allocation site is in an extremely sensitive location in the St Neots Conservation Area. It is close to the heart of the town in an area of mixed uses. The Council do not disagree with the objector that mixed use of the allocation site might be preferable to its use solely for housing. Whilst an allocation for mixed use would be beyond the scope of the Alteration an allocation for housing would not preclude the introduction of other uses alongside the housing.

Overall Conclusion

2.4.2.29 There are doubts about whether the allocation site will be available for redevelopment in the plan period; its redevelopment is desirable and a sensitively designed scheme could lead to a significant enhancement of this part of the Conservation Area. The site is only about 0.43 ha and its contribution to the total amount of housing is estimated to be 21 dwellings. Deletion of the allocation on the grounds that its delivery is in doubt would be likely to give the wrong signals as to the desirability of its redevelopment. On balance I conclude that the allocation should be endorsed

RECOMMENDATION

2.4.2.30 No modification in response to these objections.

Site 12 – Harrison Way, St Ives

Objections

See list in Appendix

2.4.2.31 This 6 ha site is listed as an allocation site in the Deposit Draft Alteration. However, after considering objections made to its inclusion, the council proposed change PCN 62 to remove it from the list of plan allocations. The counter objectors seek its re-inclusion within the plan.

¹ CD46 page 218

2.4.2.32 The prime test here is not one of requiring that this site perform better than the other allocations¹. Given the site's original inclusion, and subsequent proposed exclusion I consider that the test is one of determining whether the site, on its own planning merits, deserves to be included as an allocation site.

Issue: would an allocation here be in accordance with the aims of national and strategic guidance and the aims of the settlement strategy of the Alteration to secure a sustainable pattern of development?

2.4.2.33 I have set out my detailed conclusions on the settlement strategy earlier in this report.² Although St Ives has a relatively low degree of self-containment and is less well placed in terms of accessibility it is nonetheless a more sustainable location for development than the villages and could absorb higher levels of housing growth than just that generated by local needs. I have concluded that St Ives should absorb some growth. I am content that some peripheral development of St Ives would be in accord with national, strategic and the Alteration strategies.

2.4.2.34 That said, I do not consider that there should be some form of quota for St Ives as a whole. The figure derived from the capacity study of the town should not be equated with any specific requirement for St Ives that must be met. It is for the merits of individual sites to be considered within the broader strategic framework, set out in my earlier conclusions, that accepts some growth here. Such growth can only be accommodated on peripheral sites.

Issue: Does the fact that the site benefits from an extant planning permission, part of which has been implemented, weigh decisively in favour of now allocating this for residential development?

2.4.2.35 Planning permission was granted in 1988 for a business park. Development of the first part has started. That permission was granted because of what was seen then as a need for additional industrial land. Reflecting this, the adopted plan indicates the land as being a major employment commitment. In 1999, an appeal, seeking residential development of the site, was fought on the basis that the appellants believed that there was no realistic prospect of commercial development of the site in the foreseeable future, a view supported by the appeal Inspector.³ I have no compelling evidence to lead me now to a view other than the further employment development of this site is unlikely in the foreseeable future. In these circumstances its re-allocation for housing would not cause material harm to the employment strategy for the district.

2.4.2.36 The site clearly has been accepted, in the past, as land suitable for development. However, the apparent demise of the underlying employment imperative means that little weight should be given to the extant planning permission. Neither does it mean that it then simply becomes available for a more appropriate use. It is not appropriate to merely consider what is better for this site: employment or housing, as advanced by some of the objectors.

¹ Electricity Supply Nominees Ltd v SSE (1992) JPL 635

² Section 1.2

³ Paragraph 16 Appeal Decision APP/H5020/A/99/1022582

2.4.2.37 Rather, it is right, given the very different circumstances from the original granting of permission for employment development, to now reconsider its suitability for development in the light of the current situation. Whilst its history is clearly material, it is of note that development was proposed to meet a very specific need. It seems that that need no longer exists. The site should now be judged, in the light of the Alteration's strategy, primarily in terms of its relationship to the town and other material factors.

Issue: Does this site relate well to the built-up framework of the town?

2.4.2.38 The site lies to the east of Harrison Way, which acts as the St Ives by-pass. Its physical and visual relationship to the town was examined at the 1999 appeal considering an application for residential development of the site. I find that I have no reason to disagree with that Inspector's conclusions that "...the site has an open countryside character that it is appropriate to take into account the development plan policies that seek to protect the countryside from unnecessary development. The development would be poorly related to the existing pattern of the settlement and intrusive in the open countryside."¹

2.4.2.39 In my view development of this site would be contrary to those strategic policies aimed at protecting the countryside from development. Whilst that may be said for peripheral sites in general, this site physically and visually lies outside the natural limits of the town, as formed by Harrison Way, and lies within the countryside. The development of the site would not relate well to the existing pattern of the town. The site does not have a positive relationship with the existing town. I do not consider that the site can be said to be an urban extension, and thus does not fall within the second stage of PPG3's sequential approach.

2.4.2.40 Because of the site's location on the wrong side of the main road, that road becomes something of a barrier to easy and safe movement into and from the town centre. Whilst I accept that it might be possible to provide some form of pedestrian facility at some point to enable pedestrians and cyclists to cross the road in reasonable safety, it seems that no one option would be ideal and would not, in any event, materially affect the relative isolation of the site. In conclusion I support those objectors who pointed to the isolated nature of the site and the barrier created by the by pass.

Issue: is this site better than those supported by the council?

2.4.2.41 Cambridge Project Management Ltd place some emphasis on the comparative exercise undertaken as part of the environmental appraisal of the plan. That appraisal was carried out in the context of the assumption that commercial development would otherwise occur. The 1999 appeal Inspector acknowledged the importance of that substantial caveat. For that reason the comparative exercise in relation to this site needs to be viewed with a great deal of circumspection. I prefer, in respect of this site, to rely on the merits of the site as advanced by the parties at this inquiry.

2.4.2.42 In terms of comparison with the Houghton Grange site, Allocation 13, I consider that site in detail in the following item. Other "alternative" sites are considered elsewhere in my report. I do not consider that the question here is which one is best. Whilst an up-to-date comparative assessment would have been helpful, its absence does not prevent conclusions being

¹ Paragraph 17, Appeal decision APP/H0502/A/99/1022582

drawn on the suitability of sites around the town. It is not an either-or situation. Each stands or falls on its own merits. In this case I find the Houghton Grange site has advantages that justify its allocation. I cannot say the same for the Harrison Way site. Houghton Grange has a number of distinct advantages over the Harrison Way site, including it being previously developed land. Its development would secure improvements to the site, including restoration of the Grange. It is better related to the town in terms of ease of access.

Issue: are there sustainable flooding objections to the site's development?

2.4.2.43 Many of the original objectors expressed concern about flooding risk. The site lies within the floodplain. I note that a technical solution based upon a 1 in 100 year event is available. However, I do not find this a telling advantage for two reasons. Firstly, I consider that the site fails on its other merits to justify its allocation. Secondly, since the close of the inquiry PPG25, Development and Flood Risk, has been published in its final form. That advances the precautionary principle¹. In a situation where the need for the allocation of this floodplain site is not a pressing one the precautionary principle must prevail. The decision in this case does not turn on whether or not there is a technical solution to potential flooding problems and the weight given to the adoption of a precautionary approach.

Summary

2.4.2.44 The 1999 appeal and Alteration objections have resulted in the council looking at the site afresh. I agree with its conclusions as regards its relative poor relationship with the town. It would not form a natural extension to the town. I do not believe that its history provides telling weight in support of its allocation. None of the other matters, including the suggestion that the development provides for a mixed use of the land, with which I disagree, provides appropriate reason to justify the allocation of this site.

Recommendation

2.4.2.45 The Harrison Way allocation site be deleted from the plan, in accordance with PCN 62.

Site 13 – Houghton Grange, St Ives

PCN 212, PCN 214, PCN 216, PCN 234

Objections See list in Appendix

2.4.2.46 This site is shown in the Deposit Draft Alteration as an allocation, with a gross area of 11.58ha. Appendix 2 shows a net housing area of 5.1 ha with a projected capacity of 100 dwellings. PCN 14 deletes paragraph 1.24 of the Draft, which referred to the opportunity for brownfield land development on this site, with PCN 16 adding a replacement paragraph, 1.25, which refers to the opportunity, with the golf course site, for a comprehensive development that will protect the important gap between Houghton and St Ives and provide additional recreational

¹ Paragraphs 9 to 14

facilities for the area. Subsequently, PCNs 212, 227 and 234 propose the reduction of the gross site area to 9.6 ha, with consequent sub-area adjustments, which bring the net housing area down to 4.4 ha. The council indicates in its Annex 2 to CD102, the latest available figures, that the site has a capacity of 90 dwellings.

Issue: would an allocation here be in accordance with the aims of national and strategic guidance and the aims of the settlement strategy of the alteration to secure a sustainable pattern of development?

2.4.2.47 I have set out my detailed conclusions on the settlement strategy earlier in this report.¹ Although St Ives has a relatively low degree of self-containment and is less well placed in terms of accessibility it is nonetheless a more sustainable location for development than the villages and could absorb higher levels of housing growth than just that generated by local needs. I have concluded that some peripheral development of St Ives would be in accord with national, strategic and the Alteration strategies. I do not, therefore, accept the views put by some objectors that development around St Ives would be contrary to national and local policies

Issue: does this site relate well to the built-up framework of the town?

2.4.2.48 Turning more specifically to the relationship of the site to the existing built-up area of the town, it is clear that the site has no visual or physical connection with it. It is in the countryside. It does not adjoin the town and cannot be considered as an urban extension. As such it is clearly less sustainable than other potential urban extensions. It falls outside the search sequence in paragraph 30 of PPG3. In these terms I support those many objectors who consider that the site is not well related to the built-up area,

Issue: does the site have attributes which justify its allocation in spite of its relatively isolated position?

2.4.2.49 The site is a substantial previously developed one. It is a brownfield site and this factor has led the council to allocate it. Although in the countryside, it enjoys proximity to St Ives and has a good bus service to the town. Unlike the Harrison Way site, the land is not separated from the town by a busy main road. With the reduced area, which I consider below, the site is quite well contained. Thus, although the site does not accord with the sequential approach of PPG3, it does reflect its advice that emphasises the importance of previously developed land. The allocation falls within the third category of the sequential approach advanced by policy 2 of the 2000 RPG6, that is "development on previously developed sites on the edge of or close to urban areas."

2.4.2.50 The deficiencies, in sustainability terms, of the site are not so significant as to outweigh the distinct advantages offered by this previously developed site. The site offers reasonable walking and cycling access to the facilities in the town, along with bus services. It can be argued with some merit that the development would accord with the definition of being a "node in a good public transport corridor"; at the least it adjoins a public transport corridor. On balance, although not an urban extension, it does present a good opportunity for housing development close to the town, on land that has previously been developed. Bearing in mind the

¹ Section 1.2

reduced extent of the site and the council's proposed Development Brief for the wider area, I do not agree that this allocation would be likely to lead to ribbon development or the coalescence of Houghton and St Ives.

2.4.2.51 The 1999 appeal Inspector expressed concern that "residential development on the site would amount to the sort of dispersed development that the development plan is seeking to resist"¹. However, in the context of the emerging Alterations and the need to identify new sites, the weight to be given to the re-use of previously developed land and the other advantages the allocation can bring about I consider that the allocation is justified. In addition, I consider that, on the evidence, the retention of this site for employment use is unrealistic at the current time. In conclusion, I do not support those objections made to the principle of development in this location.

Issue: would the proposals have a beneficial or detrimental effect upon the listed buildings and their setting?

2.4.2.52 It is intended that a residential development would provide the catalyst for the restoration of the Grange. The Grange is on the council's "at risk" register. The restoration of this property represents a considerable advantage to the proposals. The site lies within an Area of Best Landscape with the area around the Grange enjoying a parkland setting. A residential development would secure the removal of the existing intrusive and unsightly buildings which detract from the visual qualities of the area.

2.4.2.53 I do not share the objectors' concerns in respect of the impact of a residential development of the order of 90 dwellings. I am satisfied that it should be possible to develop a housing scheme here which would respect the setting of the Grange and of the wider landscape, secure the improvement of the Grange and remove the unsightly structures. The benefits are significant and outweigh any disadvantages. A new housing development would be less intrusive than a Business Park development.

2.4.2.54 Although the access is likely to remove some of the trees – a position east of the site is far preferable to one that would entail the demolition of the Lodges - most trees will be kept and the existing substantial screen to the site should be retained.

Issue: should the site be reduced in size as proposed by the PCNs?

2.4.2.55 Whilst the background to the further proposed changes coming forward might provide some justification for B&BSRC's concerns, I am considering with the merits of the change now proposed.

2.4.2.56 The council considers that it is important to limit the development to the main portion of the site, where most buildings are concentrated. The further proposed changes achieve this by deleting the "nose" of land to the east side of the site. I accept the reasons why this is desirable. Elsewhere, I have supported the allocation of the Golf Course site.² That site will extend the town westwards. To help retain the gap between the town and Houghton to the west, the limitation of this housing development to within the natural boundary formed by the

¹ Paragraph 22, decision APP/H0520/A/99/1021007

² Paragraphs 2.4.5.48-56

woodland screen is sensible. The eastern "nose" is more open in nature. The existing buildings on that part are not so concentrated as elsewhere. The 1999 appeal Inspector commented upon the nature of the site.¹ In my opinion there is a distinct difference in character between the main body of the site and that part to the east of the woodland belt. To develop the eastern part would serve to close further the open gap between the site and the main body of St Ives. There is no quota for the town that might otherwise support a larger allocation here.

2.4.2.57 I accept the council's view that given the relative unsustainability of the site generally, it is important to limit the development to that part where the justification for going outside the PPG3 search sequence exists, that is the main area, west of the woodland belt. That substantial woodland belt would help to contain the proposed development and in so doing help to maintain an open gap between Houghton and St Ives. The "nose" lies in a distinctly more open landscape that should be left open. Indeed, the opportunity may be available for the council to secure the removal of the existing buildings on that area, through negotiations on the residential development of the main part of the site.

2.4.2.58 Although the "nose" is subject of a 1991 planning and subsequent consents, it seems on balance that there is little real prospect of it coming to fruition. Given this, I do not consider that the extant permission justifies the land being treated as one where the principle of a redevelopment has been accepted, with the only question being employment or housing. Whilst I accept that a housing development would be likely to be less intrusive than an industrial one, I do not accept that this eastern area should be subject to a redevelopment that would replicate or increase the prominence of buildings. The removal of the existing buildings from the "nose" would be a significant improvement over the current position.

2.4.2.59 Nor do I consider that any road access across this land justifies the provision of housing between it and the main site. Such a road could be provided in a manner that achieves a suitable, landscaped setting entrance for the housing beyond. I note the revised sequential approach advocated by the 2000 RPG 6, but do not consider that it undermines the council's reasons for wanting to draw the site back. For all these reasons, I do not support the B&BSRC's objection in relation to the reduction of the allocation site to a net 4.4 ha of residential land.

Issue: does the wording of the supporting text reasonably and properly reflect the Alteration's intentions for this site?

2.4.2.60 I support B&BSRC's objection in relation to the wording of paragraph 1.25, introduced by the proposed changes. The two sites, this one and the golf course site are not physically linked. There is no justification for requiring them to be developed together. What the council appears to be seeking is that they should not compromise the important gap between Houghton and St Ives and that they both should be compatible with the Development Brief.

2.4.2.61 The revised paragraph could be misconstrued as meaning that this site would have to provide recreational facilities. Some clarity is needed to explain that the Development Brief will explore ways of utilising the remaining gap, after the two sites have been developed for housing, for additional recreational facilities for the town and surrounding area. I propose a revised wording for this paragraph.

¹ APP/H0520/A/99/1021007

Summary

2.4.2.62 In summary I support the council's allocation of this site. I note my colleague's conclusions in her appeal decision in 1999. Based upon the evidence presented and my viewing of the site I am satisfied that an allocation here is appropriate. Although not an urban extension site, it is a brownfield site in reasonable proximity to the town. I am also satisfied that, overall, a residential development would improve rather than spoil the area. I note the many detailed points raised by individual objectors and the Parish Council, including traffic, footpaths and wildlife, but find that none of these detract from my overall conclusions. In drawing up a balance between the benefits and potential disbenefits of development on this site I accept the council's latest position that the allocation should be restricted to that part to the west of the substantial landscape screen. Finally, I consider that the supporting text should be redrafted to clarify the position regarding a comprehensive approach to development on this side of St Ives.

RECOMMENDATION

2.4.2.63 Modify policy HL.2 in accordance with PCNs 14, 16, 212, 227 and 234, subject to the rewording of the new paragraph 1.25 to read: "The St Ives Golf Course.....as part of north St Ives. A comprehensive Development Brief will be prepared for this area which will protect the important open gap between St Ives and Houghton; provide a framework for the residential development of these two sites; and provide a guide to the uses, including recreation, which would be suitable within this gap."

Site 14 – Ramsey Road, St Ives

Objections

1008/020 Diocese of Ely

Support

0524/001 Chandler Councillor J

0527/003

Saint Ives Town Council

0559/002 Civic Society of St Ives

0964/001

Permanex Limited

Issue: Are there sound reasons for not allocating this site for development?

2.4.2.64 This small site, 0.32 ha, lies within the built-up area of St Ives. Its development would be in accordance with national and local strategies for encouraging development of previously developed sites within the urban area. The Diocese of Ely considers that the employment/commercial use should be retained. The owners indicate their intention to relocate during the plan period. I have no convincing evidence that it is imperative to retain this site in industrial use. Its development for housing would benefit the amenity of the immediate area and be in accord with current planning policy. As the site involves the re-use of an existing urban site I see no objection in principle in terms of any impact upon flooding in the area

RECOMMENDATION

2.4.2.65 No modification in response to this objection

Site 15 (PRCV site 16)– RAF Upwood, Ramsey and

Site 16 (PRCV site 17) – West of Ramsey

Inspector's Note

2.4.2.66 Many of the arguments in objections relating to the site at RAF Upwood are repeated in objections to the allocation West of Ramsey. Before considering site specific matters relating to the site at RAF Upwood, I deal with the general matters which relate equally to the two sites.

Objections

0122/002	Burbidge Mr P	0491/001	Blackhurst Mr W
0532/007	P J Hamilton & Associates	0538/002	West Ms H
0539/013	Taywood Homes	0586/002	Fellowes Hon A E
0589/001	Defence Estates (East) (Omnivale)	0931/003	Abbots Ripton Parish Council
0937/004	Mailler, Bakefef, Goulty & Mayes Messrs		
0957/003	Bedfordia Developments & Bedfordshire Pilgrims H A		
0962/005	Westbury Homes (Holdings) Ltd	0972/005	Merrill D & Chignell Mrs C
0973/003	Brooker Mr R	0974/003	Clark Mr P
0976/005	T W Lumley Ltd	0978/005	Ayres Mr & Mrs J
0979/003	Bedfordia Developments Ltd		
0981/014	Westbury Homes(Holdings)Ltd & Cala Homes(South)Ltd		
0992/002	Leighton Bromswold Parish Council	0993/002	Ash Mr D F
0993/006	Ash Mr D F	0995/002	Morris Ms A M
1000/008	Redrow Homes Ltd	1004/009	Beazer Strategic Land
1005/012	David Wilson Estates	1007/009	Gallagher Estates Ltd
1008/021	Diocese of Ely	1030/004	Prowting Projects Ltd
1034/002	Barney Mr D	1089/001	Wistow Parish Council
1093/001	Mason Mr L A		
PCN			
FPRC			

Site 16 (PRCV site 17)– West of Ramsey

Objections

0122/003	Burbidge Mr P	0123/002	Burbidge Mr P
0491/002	Blackhurst Mr W	0532/008	P J Hamilton & Associates
0538/003	West Ms H	0539/014	Taywood Homes
0561/001	Murphy Mrs S	0565/001	Murphy Mr J
0586/003	Fellowes Hon A E	0924/001	Pettitt Mr J
0931/004	Abbots Ripton Parish Council	0937/005	Mailler, Bakefef, Goulty & Mayes Messrs
0957/004	Bedfordia Developments & Bedfordshire Pilgrims H A		
0962/006	Westbury Homes (Holdings) Ltd	0972/006	Merrill D & Chignell Mrs C
0973/004	Brooker Mr R	0974/004	Clark Mr P
0976/006	T W Lumley Ltd	0978/006	Ayres Mr & Mrs J
0979/004	Bedfordia Developments Ltd		
0981/015	Westbury Homes(Holdings)Ltd & Cala Homes(South)Ltd		
0992/003	Leighton Bromswold Parish Council	0993/003	Ash Mr D F
0993/007	Ash Mr D F	0995/003	Morris Ms A M
1000/003	Redrow Homes Ltd	1000/009	Redrow Homes Ltd
1001/003	Bailey Mrs P	1002/003	Asplin Sisters (The)
1003/003	Homes by Marshall	1004/003	Beazer Strategic Land
1004/010	Beazer Strategic Land	1005/006	David Wilson Estates
1005/013	David Wilson Estates	1007/010	Gallagher Estates Ltd
1008/022	Diocese of Ely	1030/003	Prowting Projects Ltd
1034/003	Barney Mr D		

Issue: would major allocations at Ramsey contribute to the achievement of a pattern of sustainable development?

2.4.2.67 The allocations at RAF Upwood and West of Ramsey – represent about 46% of the land allocated in the Alteration (43% PRCV) and would, when fully developed, together provide accommodation for nearly 2,000 dwellings, an increase of about 50% in the dwelling stock of Ramsey/Bury. These statistics demonstrate the importance which the Council attach to development at this particular market town above all others – it is a key element in the strategy of the Alteration. The allocations are on the edge of the town and to that extent they satisfy the search sequence of PPG3; however, whilst both sites are within cycling distances of a secondary school, neither of them is within easy reach of the town centre or other facilities at the town. Local services could be included in the developments and both could be served by improved local bus services.

2.4.2.68 The allocation West of Ramsey had its genesis in the 1980's in the 1989 Structure Plan with the underlying aim of promoting economic development at the town through improvements to its highway links with the Fen Link Road, A141; similar improvements to the link to Chatteris have proved successful in this respect. The current, 1995, Structure Plan¹ explains that the strategy of concentrating much of the new development on market towns will “reduce the spread of dormitory development and reinforce the function of the market towns as local service centres.” Whilst that may be true taking market towns as a whole in comparison with a more dispersed pattern of development to rural settlements, objectors express serious concerns as to whether it is applicable at Ramsey. Indeed the Council concede² that the development of the West of Ramsey would act as a dormitory for Huntingdon, Cambridge and Peterborough.

2.4.2.69 Ramsey is a remote town on the edge of the Fens and is poorly served by highways and other transport infrastructure. The route to the A1(M) is tortuous and there is no direct link to this part of the national, trunk road network. The B1095 leading northwards towards Peterborough, is poor in modern highway terms and the route to the south, the B1040, designated as a County Distributor route, is similarly poor. The public transport services to the town are also poor. Its railway stations closed many years ago and there is no prospect of them re-opening; bus services to Huntingdon and Peterborough take about 45 minutes each way.

2.4.2.70 Ramsey has an attractive environment and market house prices are lower than elsewhere in the district. At present, however, only about 28% of the economically active people resident in the town work locally and the ratio of jobs to residents is the lowest of any of the market towns in the district³. An allocation of the adopted Local Plan of land for employment in the town, despite having received planning permission for development of part of it, remains undeveloped. In that light it seems to me that the Council's argument that housing is needed to provide the labour to encourage employment development is not soundly based. There is scope for the re-use of hangars at RAF Upwood for employment uses. However, because of the limited scope of the Alteration, no allocation can be made at this stage; nor is there any evidence before me to suggest that the hangars have the capacity to provide jobs for the residents of anything like the two developments proposed in the Alteration.

¹ CD18 paragraph 16.3

² Cross examination 6 June 2000

³ CD85

2.4.2.71 The town has few facilities for entertainment and leisure and only about half the number of retail units of the towns of Huntingdon and St Neots. Significantly, there is no superstore at Ramsey and the Council acknowledge that its shopping centre is mainly used for convenience shopping.

2.4.2.72 For these reasons major developments at Ramsey would be likely to lead to very significant increases in demand for travel, to work, to shop for main weekly shopping and for most leisure and entertainment facilities. The Council concede that there is scope for improvement in public transport but this is unlikely to be achieved so as to represent attractive public transport services before substantial road improvement have been delivered on the ground. The increased travel is therefore, at least in the short term, most likely by private car.

2.4.2.73 The criteria of Structure Plan Policy, especially seeking to balance the availability of home, jobs and services within each local community and avoiding development which result in traffic growth, would not be met by these allocations. Neither would they be in accordance with the objectives of RPG to minimise the need to travel or the search sequence of Policy 4 of that guidance which seeks to focus development at the smaller towns where it would contribute to greater self containment in demand for travel and on towns with good public transport accessibility providing that growth in car commuting can be minimised. These constant themes of strategic and regional guidance are encapsulated in PPG3 which, in the context of stressing the importance of integrating decisions on planning and transport, states that local planning authorities should seek to exploit opportunities to locate larger housing developments around major nodes along good quality public transport corridors (both existing and with firm proposals for improvement in local transport plans). Ramsey is not on a good quality public transport corridor and whilst it bus services might be improved no firm proposals for improvements to its accessibility by public transport which have been drawn to my attention. These allocations would also conflict with paragraph 67 of PPG3.

2.4.2.74 In reaching the view that these allocations would be contrary to the aim of securing a more sustainable pattern of development, I have taken account of the fact that arguments about the unsustainability of development at Ramsey were presented to the Inspector who heard the section 78 appeal for the development West of Ramsey¹. In his decision letter the Secretary of State said that had the District and County Council's only substantial objection to the appeal proposal (the deficiencies in its highway provision) been resolved, permission could have been granted². However it does not seem to me that the Secretary of State thereby rejected the arguments that Ramsey was not a sustainable location. On the contrary, he specifically said that the appeal process was not the correct forum in which to debate the merits of the allocation West of Ramsey³ and that "the appropriate and only forum for a debate into the merits of the appeal site allocation compared to other sites was the (then) forthcoming inquiry into the Local Plan Alteration." Contrary to the Council's submission, the decision of the Secretary of State does not touch upon the issue which I have addressed here.

¹ APP/H0520/A/99/1022268

² Paragraph 31 CD82

³ Paragraph 29 CD82

Issue: would the prospect of achieving improved highway links currently on offer justify the allocations?

2.4.2.75 There was much debate at the inquiry as to the interpretation of the requirement of Structure Plan Policy SP3/1 that planning permission will not be granted for estates at Ramsey "before significant improvements to the B1040 between Ramsey and the Fen Link Road (A141) have been secured and provision made for a Ramsey Relief Road". That provision is reflected in Policy HL4 of the Alteration which clarifies that the starting point is St Mary's Road at Ramsey and the finishing point the B1040/A141 junction.

2.4.2.76 The prospective developers of the land West of Ramsey are prepared to fund the Western Relief Road for Ramsey, junction improvements within the town and the construction costs of a Southern Link Road from Upwood Road to Wistow toll. These commitments would rectify the failures identified in the appeal proposal. However substantial uncertainty remains about the Southern Link Road. Securing that road will require the preparation of alternative routes, their environmental assessment and the endorsement by the Secretary of State of a CPO; in addition, at the very least, it is unusual for developers to commit themselves to funding unknown costs.

2.4.2.77 In effect, those improvements would secure more direct links to the allocation sites by-passing Ramsey town centre and Bury. Equally significant is the question as to whether or not these improvements on their own would be sufficient. The Council now maintain that the Western Relief Road and Southern Link Road would together satisfy the requirement for road improvements which are the pre-condition of Policy SP3/1. However these improvements relate to only about half of the distance between St Mary's Road Ramsey and the B1040/A141 junction. The B1040 south of Wistow Toll passes through the village of Warboys; to the north of the village in modern highway terms it is of a poor standard and to the south its simple priority junction with the A141 is sub-standard. The alternative route to Huntingdon, the C111 is narrow, poorly aligned and passes through sensitive villages which include Conservation Areas.

2.4.2.78 In considering the arguments as to the extent of improvements necessary, it is vital to take into account the evidence which was before the Inspector and the Secretary of State at the section 78 inquiry. The County Council's rule 6 statement to that inquiry specifically states that the necessary road improvements (referred to Policy SP3/1) include "(from south to north):

- upgrading the junction with the A141 south of Warboys to a roundabout;
- on-line improvements between the A141 and Warboys Western by-pass;
- Warboys Western by-pass; on-line improvements between Warboys Western by-pass and the southern end of the Ramsey Relief Road"¹.

2.4.2.79 The need for those improvements appears not to have been the subject of debate at that inquiry, nor from the material before me does there appear to have been any uncertainty at the inquiry as to the likely implementation of those improvements.

¹ Now described as the Southern Link Road at Wistow Toll

2.4.2.80 Identification of those requirements as pre-requisites is consistent with the line the Council have hitherto adopted. In their Statement of Reasons relating to Modifications proposed to the now adopted Local Plan the Council accept the Inspector's recommendation that "the reliance of the strategic expansion of Ramsey on the improvement of the B1040 and the construction of a Warboys Bypass linking to the A141, as a County Road scheme, be stressed more forcibly in the Local Plan." This acceptance, together with improvements to the B1040/A141 junction, was carried forward into the Proposed Modification to Policy T7 of the adopted Local Plan.

2.4.2.81 Neither the funding nor the timing of these improvements is defined. The Council's position, set out in paragraph 2.39 of the Alteration, that their request that the County Council implement improvements to the B1040 such as the Warboys Western by-pass and junction improvements with the A141 was contradicted in their evidence to the inquiry that the provision of a Warboys Western by-pass would only be likely to arise through private funding. However, development of a sufficient size to secure private funding for a Warboys Western by-pass would be unacceptable in terms of the search sequence of PPG3¹ and the settlement strategy of the Alteration.

2.4.2.82 The evidence from the County Council is that they would, subject to available resources and county-wide priorities fund the Warboys Western by-pass if major developments are permitted at Ramsey, is not the subject of any resolution of the local highway authority; moreover it is inherently uncertain. Nevertheless the County Council concede that improvements to the whole of the route, from St Mary's Road Ramsey up to and including the junction with the A141, would have to be secured before major development could be permitted at Ramsey.

2.4.2.83 In my opinion improvements to the whole of the route are essential. There is no prospect of them being achieved in the plan period; moreover there is no guarantee that they will ever be delivered. Without them all, and thereby the hope of a genuinely seamless route from the Fen Link Road to Ramsey, it must remain doubtful whether Ramsey could become an attractive location for investors and employers and thereby achieve the aim which underpinned the West of Ramsey allocation of an economic revival of the town. Equally important without improvements to the whole of its route there is no way that the B1040 would become so attractive a route as to avoid the allocations leading to unacceptable environmental and amenity effects on the C111; measures could be taken to reduce the attractiveness of the C111 but there could be no guarantee that they reduce the increase in traffic on this road to an acceptable level. Similarly the effects in Warboys – where increased traffic from the allocation sites' development would have to pass through the village centre and on roads where there is significant potential for vehicle/pedestrian conflict and congestion as a result of on-street parking – would be intolerable; the addition of only 600 new dwellings in Ramsey is estimated to lead to an increase of more than 25% in daily vehicle flow through the village.

Issue: would endorsement of the allocations unreasonably pre-empt options for the longer-term?

¹ Paragraph 30

2.4.2.84 Paragraph 2.38 (PRCV paragraph 2.40) of the supporting text acknowledges the need to ensure that proposals do not pre-empt post 2006 development options and states that the allocation areas (at RAF Upwood and West of Ramsey) are restricted to a scale essential to the achievement of necessary infrastructure.

2.4.2.85 As I have indicated, the allocations taken together and when fully developed would accommodate nearly 2000 dwellings. These would be made up by 700 at RAF Upwood and 1270 on the West of Ramsey site. Those estimates do not take into account increased efficiency in the use of the land¹ and the Council ask me to recommend that the allocation sites should be redefined so as to be restrict them to areas necessary to achieve these numbers.

2.4.2.86 The deposited Alteration indicates that only 350 houses would be built at RAF Upwood and only 920 West of Ramsey in the plan period. In the PRCV of the Alteration these numbers are reduced to 275 and 725 respectively. FPRC Nos 229 and 231 , put forward because of the delay in the commencement of the inquiry, reduce the figures to 660 and 250 respectively.

2.4.2.87 At the most optimistic, undertaking the necessary preparatory work to secure the Southern Link Road is likely to take 30 months. That would leave no more than about 18 months for house building and, on the Council's assumptions, would complete only about 46% of the development expected to result from the two allocations when they are fully developed. If both allocations were permitted in full, and that would be likely to be necessary to ensure the delivery of the highway investment, the allocation would leave a commitment of more than 1,000 dwellings for the Review of the Local Plan. That size of commitment is also likely to prove an under-estimate. Demand for housing in Ramsey, reflected in its low house prices compared with other parts of the district, is low. The build rate which the Council assume would be achieved seems unrealistically high both in terms of the willingness of builders, and the capacity of the market demand to absorb it.

Issue: could the sites be satisfactorily serviced by drainage and utilities?

2.4.2.88 The views of objectors that there is uncertainty about drainage and services to the sites and the possibility that the developments could be subject to flooding are not supported by objections from the Environment Agency, Anglian Water Services or the providers of utilities. I have no reason to believe that these matters could not be satisfactorily resolved if the proposals were otherwise acceptable.

The allocation at RAF Upwood

Issue: should the allocation site at RAF Upwood include additional land to the north-west?

2.4.2.89 Objection 0589/001 argues that it is not reasonable to exclude from the allocated site about 7 ha of land – “the objection site” – which is part of the Defence Estate and contains part of the airfield runway.

2.4.2.90 The objectors say that the allocated land has the capacity to accommodate only 500 dwellings, compared with the 700 dwellings total which the Council would expect this site

¹ Paragraphs 57 and 58 PPG3

to yield. However, because the objectors' assessment of yield ignores the imperative to use land more efficiently¹, and it is reasonable to assume that net densities in excess of 30 dph could be achieved, this argument is not convincing.

2.4.2.91 Footnote 2 of Annex C of PPG3 emphasises that the definition of the curtilage is the area attached to a building and using the specific example of an airfield makes clear that, where the footprint of a building occupies only a proportion of the site the remainder of which is open land, the whole of the site should not normally be developed. The Council, however, accept that the objection site is previously developed land which is no different in character from substantial parts of the allocated site. From my inspection, development on the objection site would have no greater effect on the countryside than the allocation West of Ramsey.

2.4.2.92 The line which divides the allocated site from the objection site is therefore arbitrary and its position appears to be founded on the basis that the Western Relief Road would pass through the RAF Upwood site rather than any assessment of the local context, including the effect of development of the objection site on the countryside. Now that it is proposed that the Western Relief Road should pass to the west of the Defence Estate this justification is removed.

2.4.2.93 On balance therefore if I am minded to recommend that the allocation at RAF Upwood should proceed I would recommend the inclusion in the allocation of the objection site.

Issue: does the fact that the RAF site is previously developed land justify endorsement of the allocation and could and should this allocation be allowed to proceed independently of the allocation West of Ramsey?

2.4.2.94 Paragraph 32 of PPG3 states the general presumption that previously developed land, such as that at RAF Upwood, should be developed before greenfield land. This presumption however is not without qualification; the criteria in paragraph 31 of that guidance must also be satisfied.

2.4.2.95 There is potential for re-use of the hangars for employment but in my view this would be unlikely to generate sufficient jobs to prevent development on the site leading to commuting to other towns for work. There is also potential for the provision of local shops and facilities on the site and for local bus services to the site to be improved. However these considerations do not in my opinion outweigh my general finding that major development at Ramsey would not contribute positively to a pattern of sustainable development.

2.4.2.96 In their evidence the Council say that the RAF Upwood site is brought forward in an effort to achieve what could not be delivered by the development West of Ramsey alone; however the developers for the West of Ramsey site now say that they would be willing to fund all of the road infrastructure (the Western Relief Road, the Southern Link Road and small scale improvements in Ramsey) and would not rely upon the RAF Upwood site for either access or a financial contribution. Whilst it would be reasonable to seek contributions from the RAF site towards other road improvements, including measures to reduce the adverse effects of traffic on the C111, it seems that a primary element of the Council's justification for proposing the allocation at RAF Upwood has significantly reduced in importance.

¹ Paragraphs 57 and 58 PPG3

2.4.2.97 Moreover the Council are strongly opposed to development of the RAF site in isolation from the West of Ramsey site. Whilst in their view it would be reasonable to allow development of several hundred houses at Ramsey before the Western Relief Road and Southern Link Road are built, development of the RAF site alone could not ever deliver either the Western Relief Road or the Southern Link Road. The separate development of the RAF site would therefore fail to produce the economic stimulus to the town which the strategy seeks. Allocation of this site would therefore be clearly contrary to the aim and requirement of Policy SP3/1 of the Structure Plan.

2.4.2.98 As to the argument of objection 0589/001 that Policy T8 of the adopted Local Plan should provide for a wider range of transport infrastructure, PCN2 indicates that this Policy is superseded in the Alteration (by Policy HL4) and PCNs 94 and 95 are intended to clarify the road improvements required. I have some sympathy with the view of the objectors; however without any prospect of major improvements to the road infrastructure, traffic from development on the RAF site would be forced to use existing local roads. That traffic could include improved public transport services but, if these are forced to use existing roads, it is doubtful whether they could provide an attractive alternative to the private car for more than very local journeys. Development of the RAF site on its own would therefore be likely to generate significant increases in traffic on the existing roads, in particular on the C111 where increases in traffic flows could be as much as 32%.

Overall conclusions on the allocations

2.4.2.99 The allocations would not contribute positively to the achievement of a pattern of sustainable development and would fail to achieve the objective of proposing major development at Ramsey. The allocations would not be justified by the road improvements currently on offer. Without improvements to the whole route of the B1040 between Ramsey and the A141 traffic generated by the allocations would have unacceptable effect on settlements on the C111 and on Warboys. Endorsement of the allocations would lead to a substantial commitment beyond the plan period which would unreasonably prejudice options for the longer term. This site should not be developed for housing in isolation from a scheme which would assure the delivery of both comprehensive improvements to the B1040 between Ramsey and the Fen Link Road (A141) and a prospect of the town achieving significantly increased self-containment.

2.4.2.100 Notwithstanding that it is previously developed land and that there is scope for employment uses on the adjoining parts of the former RAF station, the allocation at RAF Upwood would not contribute to the achievement of a pattern of sustainable development. This site should not be developed in isolation from development elsewhere in Ramsey which would deliver the benefits referred to in the previous paragraph.

2.4.2.101 I have identified in my report sites for allocation elsewhere in the district which would make an effective contribution to achieving a pattern of sustainable development and which together would satisfy the Structure Plan requirement for housing¹. These alternative sites are capable of delivery and would avoid unacceptable commitments which would pre-empt the review of the Local Plan.

¹ Sections 2.4.7 and 2.4.9 refer

2.4.2.102 For these reasons I support objections against the allocations at RAF Upwood and West of Ramsey and conclude that these allocations and the related supporting text in paragraphs 2.37 and 2.38 (PRCV paragraphs 2.38 to 2.40) should be deleted¹.

RECOMMENDATIONS

2.4.2.103 Modify Policy HL2 by deleting "15 RAF UPWOOD 31.16" and Modify Policy HL2 by deleting "16 WEST OF RAMSEY 95.48" and by deleting Note 5.

Inspectors Note

2.4.2.104 The site of the renewed allocation at Whytefield (site 17, PRCV site 18) is 0.91 ha and is estimated to yield 35 dwellings, that is significantly larger than the minimum for an estate which would be precluded by Policy HL4. No objection is made to this allocation and it would therefore be inappropriate for me to make any recommendation upon it. It will be for the Council to consider whether this allocation should proceed as they move through the stages leading to the formal adoption of the Alteration.

2.4.3 ALLOCATION IN RURAL GROWTH VILLAGE

Site 18 (PRCV site 19)- Co-op Farm, Yaxley

Objection

0981/016 Westbury Homes(Holdings)Ltd & Cala Homes(South)Ltd

Issue: will the allocation contribute to the achievement of a pattern of sustainable development?

2.4.3.1 No reasons are given in support of the objection. Yaxley is designated as a RGV in the settlement strategy and the site is being developed. The Council estimate that the yield from the site will be about 600 dwellings at a net density of 31 dph². For the reasons I have set out³, the allocation will contribute to the achievement of a pattern of sustainable development.

RECOMMENDATION

2.4.3.2 No modification in response to objection 0981/016.

2.4.4 RENEWED ALLOCATIONS IN GROUP VILLAGES

Introduction

2.4.4.1 Before considering objections made to the allocations in the Group Villages, it is relevant to establish some matters of principle, in particular in relation to PPG3 and the settlement strategy of the Alteration.

¹ Recommendations below relate only to Policy HL2.

² Annex 2, Position Paper, Reconvened RTS on Settlement Strategy and Housing Need and Supply,

³ Section 1.2 refers

2.4.4.2 The Alteration states that the renewed allocations have been reassessed¹ and two sites allocated in the adopted Local Plan have been deleted². The text at paragraph 2.14 acknowledges that there are some inconsistencies but states, because in some cases planning permission has been granted and in others negotiations are well advanced, that it "would be unreasonable to de-allocate ... these sites". No details of the reassessment of these sites are before me and I note that, contrary to the advice in PPG12³, these sites are not included in the Council's Environmental Appraisal⁴.

2.4.4.3 Twenty one allocations are proposed to be made in Group Villages. Policy STR2 as I recommend it is modified⁵ will provide that within these villages development should be of up to eight dwellings unless it would be contained within the village environmental limits defined in the adopted Plan and make the best use of the site; if those provisos are satisfied, up to 15 dwellings may exceptionally be permitted.

2.4.4.4 All of these allocations are carried forward from the adopted Local Plan. Some of them have now been developed, are under construction or are the subject of full planning permissions. The table below indicates the state of play on the remaining twelve of these sites. Half of the sites listed are the subject of objections; almost all of them are in villages where, in response to the objectors' arguments that other sites in or adjacent to these settlements should be allocated, the Council has said that such allocations would not be in accordance with the settlement strategy of the Alteration or with the search sequence set out in paragraph 30 of PPG3. I fully accept those arguments.

2.4.4.5 Despite their re-examination of the potential yield of these sites and the welcome move which the Council has made to increase the assumed yield from these sites, the table also shows that on the majority of these sites the density assumed would be below the minimum of 30 dph specified in paragraph 58 of that PPG3. Therefore in addition to being in locations which are recognised as not being sustainable, these allocations represent a profligate use of land.

2.4.4.6 Equally significant is the fact that these renewed allocations, in part an attempt to achieve an efficient use of land, would result in more than group scale growth. In that context I find little comfort for the Council in the fact that these allocations are within the village environmental limits defined in the adopted Local Plan since many of the definitions of these limits seem to rely more on the boundaries of the allocations than on the physical framework of the existing development.

2.4.4.7 Despite the opposition to it from objectors, I have endorsed the revised settlement strategy of the Alteration on the basis that it represents the only effective way of putting PPG3 into practice⁶. The fact that PPG3 emerged in its final form only at the commencement of the inquiry does not justify the retention of these renewed allocations. Paragraph 37 of PPG3 advises local planning authorities to revise their plans to take account of the guidance set out in the PPG and to do so as quickly as possible. Paragraph 38 continues that approach and states that "Where a planning application relates to development of a greenfield site in an adopted local plan ..., it should be assessed, and a decision made on the application, in the light of the policies set out in this guidance." Similar advice relating to the renewal of planning permission is set

¹ Paragraph 2.14

² Policy HL3 and paragraphs 2.31 to 2.35 (paragraphs 2.32 to 2.36 of PRCV) refer.

³ Paragraph 4.17

⁴ CDs 7, 11 and 12

⁵ Section 1.4.4 refers

⁶ Section 1.2 refers

out in paragraph 40 of PPG3.

2.4.4.8 The Council acknowledge¹ the relevance of advice in PPG3; nevertheless they persist in arguing that the retention of these allocations is justified on the grounds that they are not "sufficiently at odds" with national guidance or "could be considered as windfalls". PPG3, however, does not expect permissions for windfalls to be granted on greenfield sites.

2.4.4.9 In addition to being outwith the sequential approach set out in paragraph 30 of PPG3, these sites would fail to satisfy the criterion set out in paragraph 31 of PPG3 relating to location and accessibility to one or more of jobs, shops and services by modes other than the car and are in locations where the potential for improving such accessibility would appear to be minimal. On the Council's own arguments that would also fail to provide sufficient demand to sustain appropriate local services and facilities (another criterion of paragraph 31 and paragraph 70 of PPG3). Very few of these sites would make a contribution to meeting the need for affordable housing. Although there may be a local need for that type of development I am content that the Council's approach to affordable housing provision – to meet needs in rural areas through rural exceptions provisions and to concentrate on providing the great bulk of affordable housing in sustainable, urban locations – is justified.

2.4.4.10 With the Alteration at an advanced stage but not yet adopted when PPG3 was issued, the Council were in an ideal position to take on board all of the implications of the new PPG without delay. Their argument that they are bound to adhere to the policies and proposals of the adopted Local Plan until the Alteration is adopted is without foundation in the light of the advice in the first sentence of paragraph 38 of PPG3.

2.4.4.11 The Council successfully adopted national guidance, from what was then only the Consultation Draft of PPG3, on the implications of the search sequence for the settlement strategy. It is regrettable that they have not taken the same account of other major aspects of this guidance. In consequence, parts of the Alteration are clearly in conflict with the national guidance and with the policies which the Council themselves have established in the Alteration. This inconsistency has undermined significant parts of the Council's responses to objector sites.

2.4.4.12 Insofar as the renewed allocations are not the subject of objections and are therefore not before me, it would be inappropriate for me to make recommendations upon them. Nevertheless I would urge the Council as they move through the stages leading to the formal adoption of the Alteration, to reconsider these sites and to bring the Alteration into more comprehensive compliance with national guidance.

¹ Paragraph 9.1 of their Position Statement to the Reconvened Settlement Strategy and Housing Need and Supply
RTS

Table: Renewed allocations not yet developed or the subject of full planning permission

Village	Site No. (PRCV site No.)	Site location	Gross Site area (ha)	Net developable area	Expected yield and density ¹
Alconbury	19 (20)	Globe Lane	0.38	0.34 ha	16 @ 47 dph
Buckden	21 (22)	High St/Silver Street	1.96	1.51 ha	53 @ 35 dph
Colne	22 (23)	Manor Farm	0.44	0.44 ha	8 @ 24 dph
Gt Gidding	26 (27)	Church Farm/ Main Street	0.83	0.83 ha	8 @ 10 dph
Gt Gidding	28 (28)	North-west of Main Street	0.26	0.26 ha	3 @ 10 dph
Gt Gidding	28 (29)	29 South of Mill Road	0.26	0.26 ha	8 @ 31 dph
Hilton	30 (31)	Scotts Close	0.70	0.7 ha	15 @ 21 dph
Ramsey St Mary's	34 (35)	South of Ashbeach Drove	4.27	3.47 ha	86 @ 25 dph
Spaldwick	35 (36)	Rear of Beech House	0.49	0.47 ha	10 @ 20 dph
Upwood	37 (38)	Townsend Farm	0.41	0.37 ha	10 @ 25 dph
Warboys		39 Adj. Sportsfield off Lancaster Way	0.43	0.43 ha	12 @ 28 dph
Warboys		40 Woodlands	0.57		20 @ 35 dph

Note: areas highlighted indicate conflict with PPG3 on density

Site 19 (PRCV Site 20) - Globe Lane, Alconbury

Objections

0519/008 Manor Developments (UK) PLC

1008/024

Diocese of Ely

Issue: would the allocation contribute to the achievement of a pattern of sustainable

¹ Source: Annex 2 of Council Position Paper for the Reconvened Settlement Strategy and Housing Needs and Supply RTS

development?

2.4.4.13 Alconbury is designated as a Group Village in the Alteration. The site has a net area for housing of about 0.34 ha and, at a density of 47 dph, the Council estimate it would yield 16 dwellings. This is in excess of the amount of development permissible even as an exception in a Group Village under the provisions of Policy STR2 of the Alteration. The site is previously developed land; but no other evidence of exceptional circumstances relating to the site is before me.

2.4.4.14 For these reasons and for the reasons I have set out earlier¹ I would not endorse the allocation. However, full planning permission for the development of this site was granted by the Council during the inquiry and construction work has commenced. Therefore, although the site is not in a location where development would contribute positively to the achievement of a pattern of sustainable development, deletion of the allocation as the objectors suggest would have no effect.

RECOMMENDATION

2.4.4.15 No modification in response to objections 0519/008 and 1008/024.

Site 21 (PRCV Site 22) - High St/Silver St, Buckden

Objection

0981/017 Westbury Homes(Holdings)Ltd & Cala Homes(South)Ltd

Issue: would the allocation contribute to the achievement of a pattern of sustainable development?

2.4.4.16 Buckden is designated as a Group Village in the Alteration. Facilities in the village are restricted and there is very little employment; public transport services are also limited. Development here would therefore be likely to increase car borne travel to the market towns for work, shopping and recreation. It would also be contrary to the search sequence for allocations².

2.4.4.17 The site is adjacent to the A1 and, allowing for landscaping including noise attenuation measures, about 1.51 ha could be developed, including some affordable housing for which there is need in the village. The objectors doubt that the site could accommodate 42 dwellings; however, bearing in mind national guidance on densities³, there is no reason why development should be restricted to below that number and a recent planning application which the Council are minded to approve, subject to a section 106 agreement, provides for 53 dwellings. This amount of development, however, in this location would be contrary to the settlement strategy of the Alteration and, in particular to the provisions of Policy STR2. The allocation would thereby undermine the strength of the strategy and of that Policy. Moreover, on the basis of the arguments which the Council advance against objectors' suggestions for allocations in villages, the need for affordable housing does not justify the allocation.

¹ Paragraphs 2.4.4.1 –12 refer

² Paragraph 30 PPG3

³ Paragraphs 57 & 58, PPG3

2.4.4.18 For these reasons and for the reasons I have set out earlier¹, the allocation would not contribute positively to the achievement of a pattern of sustainable development.

RECOMMENDATION

2.4.4.19 Modify Policy HL2 by deleting "BUCKDEN 22 HIGH STEET/SILVER STREET 1.96".

Site 23 (PRCV Site 24) - Headlands, Fenstanton

Objection
0519/009 Manor Developments (UK) PLC

Issue: would the allocation contribute to the achievement of a pattern of sustainable development?

2.4.4.20 Fenstanton is designated as a Group Village in the Alteration. With a net developable area of about 2.74 ha, if it was to be an efficient use of land², the site would accommodate development far in excess of the scale of a group as it is defined in Policy STR2. The site is on the edge of the village. Facilities and services in the village do not compare with those available in the market towns and notwithstanding that the village has good links to Cambridge and the market towns by non-car modes³ it would be inevitable that development on the allocation site would increase demand for travel, including by private car. The circumstances of this site are very little different from those of the objector's site in the village⁴ against which the Council identify a clear objection in terms of the settlement strategy.

2.4.4.21 The site could provide affordable housing for which there is a need in the village; however this, on the basis of the Council's own arguments, does not justify the allocation.

2.4.4.22 I note that planning permission has been granted for development on the site. However, the allocation is contrary to the settlement strategy of the Alteration and in particular to the provisions of Policy STR2 and its endorsement would undermine their strength.

2.4.4.23 For these reasons and for the reasons I have set out earlier⁵, the allocation should be deleted.

RECOMMENDATION

2.4.4.24 Modify Policy HL2 by deleting "FENSTANTON 23 HEADLANDS 2.52".

Site 26 (PRCV Site 27) – Church Farm/Main Street, Gt Gidding

Objection (recorded against Policy HL2 generally)
0430/015 Milton (Peterborough) Estates Co

¹ Paragraphs 2.4.4.1 –12 refer

² Paragraphs 57 & 58, PPG3

³ Paragraph 9.1 CD102

⁴ Section 2.4.7, objector site 66 refers

⁵ Paragraphs 2.4.4.1 – 12 refer

Issue: would the allocation contribute to the achievement of a pattern of sustainable development?

2.4.4.25 Great Gidding, a small village with few facilities, is designated as a Group Village in the Alteration.

2.4.4.26 The site has a net developable area of about 0.83 ha and, in accordance with the views of the objectors, the Council accept that limiting the development to frontage only as indicated in the footnote to the Policy would be inappropriate; nevertheless the Council still suggest that the land should be developed at the very low density of only 10 dph¹ which, in the terms of national guidance², would represent a profligate use of the land. The steeply sloping site is in a sensitive location; however this does not justify a wasteful use of land. On the other hand, more efficient use of the site would lead to development beyond group scale as it is defined in Policy STR2 and would thereby undermine the strength of that Policy.

2.4.4.27 For these reasons and for the reasons I have set out earlier³, the allocation should be deleted.

RECOMMENDATION

2.4.4.28 Modify Policy HL2 by deleting "GT GIDDING 26 CHURCH FARM/MAIN STREET 0.83"

Site 27 (PRCV Site 28) – North-West of Main Street, Gt Gidding

Objection (recorded against Policy HL2 generally)
0430/016 Milton (Peterborough) Estates Co

Issue: would the allocation contribute to the achievement of a pattern of sustainable development?

2.4.4.29 The same considerations relating to the proposed density apply to this site as to the previous site and, contrary to the view of the Council, I see no reason why a sensitively designed scheme at a density far higher than the 10 dph they propose, could not be achieved without detriment to the character and appearance of the Conservation Area. A more intensive development need not breach group scale as it is defined in Policy STR2. Nevertheless Great Gidding is not a sustainable location for an allocation and for this reason and for the reasons I have set out earlier⁴, the allocation should be deleted.

RECOMMENDATION

2.4.4.30 Modify Policy HL2 by deleting "GT GIDDING 27 NORTH-WEST OF MAIN STREET 0.26"

¹ Annex 2, CD102

² Paragraph 57, PPG3

³ Paragraphs 2.4.4.1 – 12 refer

⁴ Paragraphs 2.4.4.1 – 12 refer

Site 28 (PRCV Site 29) - South of Mill Rd, Gt Gidding

Objections

(recorded against Policy HL2 generally)
0430/017 Milton (Peterborough) Estates Co
(recorded against site)
0519/010 Manor Developments (UK) PLC
PCN73, PCN 85

Issue: would the allocation contribute to the achievement of a pattern of sustainable development?

2.4.4.31 Great Gidding is designated as a Group Village in the Alteration. The site is a long, narrow strip fronting Mull Road and, in accordance with the Proposed Changes, may well be suitable for only linear development. However, it has a net developable area of about 0.26 ha and an efficient use of it¹ would accommodate more than the 4 dwellings which the Council suggest; more intensive development would be compatible with group scale as it is defined in Policy STR2.

2.4.4.32 Nevertheless, and despite the support for the allocation from the Parish Council, for the reasons I have set out earlier², the allocation would not contribute positively to the achievement of a pattern of sustainable development.

RECOMMENDATION

2.4.4.33 Modify Policy HL2 by deleting "GT GIDDING 28 SOUTH OF MILL ROAD^{3/6} 0.26".

Site 32 (PRCV Site 33) - Oilmills Road, Ramsey Mereside

Objection

0539/015 Taywood Homes

Issue: would the allocation contribute to the achievement of a pattern of sustainable development?

2.4.4.34 The small and relatively remote settlement of Ramsey Mereside is designated as a Group Village in the Alteration. Facilities in the village are restricted and I concur with the view of the objectors that development here is not sustainable in the longer term and will serve to encourage people to use less suitable Fen roads for longer distance commuting.

2.4.4.35 The site has a developable area of about 0.23 ha and its efficient development would be of a scale compatible with group scale as it is defined in Policy STR2. Planning permission has been granted for housing on a reduced site and the development has commenced. Whilst an allocation in this location would be contrary to national guidance³ a recommendation to delete the allocation would therefore have no practical effect.

RECOMMENDATION

2.4.4.36 No modification in response to objection 0539/015.

¹ Paragraphs 57 & 58 PPG3

² Paragraphs 2.4.4.1 – 12 refer

³ Paragraph 30 PPG3.

Site 33 - East of Marriotts Close, Ramsey Mereside

Objections

0539/023 Taywood Homes

1047/009

Elton Estate Company Limited

Issue: would the allocation contribute to the achievement of a pattern of sustainable development?

2.4.4.37 For the reasons I have set out earlier¹, I concur with the views of the objectors that this allocation sets an undesirable precedent for making new allocations in Group Villages and would not be sustainable.

2.4.4.38 However planning permission has been granted for development on the site and most of the dwellings are completed. Therefore deletion of the allocation would have no practical effect.

RECOMMENDATION

2.4.4.39 No modification in response to objections 0539/023 and 1047/009.

Site 34 (PRCV Site 35) - South of Ashbeach Drove, Ramsey St Marys

Objection

0539/024 Taywood Homes

PCN 88

Issue: would the allocation contribute to the achievement of a pattern of sustainable development?

2.4.4.40 The small and relatively remote settlement of Ramsey St Marys is designated as a Group Village in the Alteration. The village has few facilities and for the reasons I have set out earlier² I concur with the view of the objectors that development here is not sustainable and would serve to generate long distance commuting on less suitable Fen roads.

2.4.4.41 The site has a net developable area of about 3.47 ha. An efficient³ use of the site would result in development very significantly in excess of the scale of a group as it is defined in Policy STR2; the allocation would thereby seriously undermine the strength of that Policy. Whilst I note that planning permission was granted for development on the land during the inquiry, I do not endorse the allocation or the Proposed Changes which would update the supporting text.

RECOMMENDATION

2.4.4.42 Modify Policy HL2 by deleting 'RAMSEY ST MARYS 34 SOUTH OF ASHBEACH DROVE 4.27'.

¹ Paragraphs 2.4.4.1 – 12 refer

² Paragraphs 2.4.4.1 – 12 refer

³ Paragraphs 57 & 58 PPG3

Site 35 (PRCV Site 36) – Rear of Beech House, Spaldwick

Objections

0519/011 Manor Developments (UK) PLC

Issue: would the allocation contribute to the achievement of a pattern of sustainable development?

2.4.4.43 Contrary to the view of those who support the allocation, the small village of Spaldwick has few facilities. Their arguments that the site is readily available for development and surplus to agricultural requirements could apply to many sites. The village is adjacent to the A14 and therefore in a location where development would be particularly likely to encourage unsustainable car borne commuting and travel to the market towns for leisure and shopping.

2.4.4.44 Contrary to the view of the Council, with a developable area of about 0.47 ha if it was efficiently used¹, the site would accommodate development in excess of group scale as it is defined in Policy STR2. An allocation here would thereby undermine the strength of that Policy. I note that the allocation of the site was supported by the Inspector who conducted the inquiry into objections to the now adopted Local Plan; however the conclusions of that Inspector pre-date the extant version of PPG3 and the search for a more sustainable pattern of development and no weight can now be attached to them in this context.

2.4.4.45 For these reasons and for the reasons I have set out earlier², I do not endorse the allocation.

RECOMMENDATION

2.4.4.46 Modify Policy HL2 by deleting “SPALDWICK 35 REAR OF BEECH HOUSE 0.49”.

Site 37 (PRCV Site 38) - Townsend Farm, Upwood

Objections

0390/001 Yelcon Homes Limited

0519/012

Manor Developments (UK) PLC

Issue: would the allocation contribute to the achievement of a pattern of sustainable development?

2.4.4.47 The small village of Upwood has few facilities and is served only by poor standard roads. Contrary to Policy STR2, the Council propose development in excess of group scale on the site which has a net developable area of about 0.37 ha. The Council rebut the argument of objection 0390/001 that the site is part of a working farm and is not practically available for development. The Council also draw attention to the fact that the allocation was supported by the Inspector who conducted the inquiry into objections to the now adopted Local Plan; however the conclusions of that Inspector pre-date the extant version of PPG3 and the search for a more sustainable pattern of development and no weight can now be attached to them in this context.

2.4.4.48 For the reasons I have set out earlier³, the allocation would not contribute

¹ Paragraphs 57 & 58 PPG3

² Paragraphs 2.4.4.1 – 12 refer

³ Paragraphs 2.4.4.1 – 12 refer

positively to the achievement of a pattern of sustainable development.

Issue: would the allocation have an acceptable effect on the character and appearance of the area?

2.4.4.49 The site is within, but on the edge of, the environmental limits of the village. It is adjacent to the boundary of the village Conservation Area and, as objection 0390/001 points out, it is prominently located. Development on the site would change the setting of the Conservation Area; however, especially bearing in mind that there is development on the opposite side of the High Street, there is no reason why a sensitively designed, high quality development should harm that setting.

Other matters

2.4.4.50 English Nature point out that the site is a habitat for great crested newts which are a protected species. This habitat would need to be safeguarded if the land was developed; however in the absence of an objection from the responsible authority on this ground I have no reason to believe that safeguarding could not be successfully achieved.

Overall conclusion

2.4.4.51 Although it need not have an unacceptable effect on the character and appearance of the area, the arguments against the allocation which I have identified under the first issue are of greater significance. I do not endorse the allocation therefore.

RECOMMENDATION

2.4.4.52 Modify Policy HL2 by deleting "UPWOOD 37 TOWNSEND FARM 0.41".

Site 38 (PRCV Site 39) - Adj Sportsfield, Lancaster Way, Warboys

Objections

0398/004 Stokes J D & B R

0519/013

Manor Developments (UK) PLC

Issue: would the allocation contribute to the achievement of a pattern of sustainable development?

2.4.4.53 The Council's evidence to the Inquiry¹ is that an allocation at Warboys would conflict with the settlement strategy and with the search sequence set out in national guidance². The Council also argue against the objector's site that, because Warboys has poor public transport connections to the market towns and is poorly situated for access to Cambridge, an allocation here would not fall within the search sequence set out in Policy 22 of RPG³. I have no reason to disagree with those views.

2.4.4.54 For these reasons and for the reasons I have set out earlier⁴, the allocation would not contribute positively to the achievement of a pattern of sustainable development.

Issue: would the allocation lead to an unacceptable loss of public open space?

2.4.4.55 The allocation site forms part of an area of playing fields. When I inspected the site, it appeared to be in use for casual recreation; it is not of a size or shape which would

¹ For example Response Proof relating to objection 398/001 objector site 135

² Paragraph 30 PPG3 and Policy 21 of RPG

³ CD112

⁴ Paragraphs 2.4.4.1 – 12 refer

accommodate a formal football pitch. The Council accept that there is significant shortfall in outdoor play space in Warboys for formal, adult and youth recreation but there is no shortfall in provision of casual play space. This position is the same as that which obtained when the inquiry into the now adopted Local Plan was taking place. The Inspector for that inquiry found that the proper use of funds realised from development of the site would provide the opportunity to make significant improvements in the range and quality of facilities which the sports field complex could offer.

2.4.4.56 During the inquiry, doubts were raised about the intention of the Sportsfield Committee to make the allocation site available for development. From subsequent correspondence I am satisfied that this would remain their intention.

2.4.4.57 I do not accept the view of objection 0398/004 that the allocation would lead to an unacceptable loss of playing fields.

Overall conclusion

2.4.4.58 The benefits which could be achieved from the development of the site do not outweigh the arguments against its allocation identified under the first issue.

RECOMMENDATION

2.4.4.59 Modify Policy HL2 by deleting "WARBOYS 38 ADJACENT SPORTSFIELD OFF LANCASTER WAY 0.43".

2.4.5 COUNCIL'S PROPOSED CHANGES ALLOCATIONS

Proposed change site 10 - Crosshall Manor, St Neots and objector site 13

Objection (Provisionally Withdrawn)

0389/001 Constantine Mr V

PCN 57

Counter-Objections

1095/001 St Neots Golf Club	1107/001	Manor Developments (UK) PLC
1135/001 Homes by Marshall	1136/001	Beazer Strategic Land
1137/001 Redrow Homes Ltd	1138/001	David Wilson Estates
1140/013 Taywood Homes	1142/003	City & St James Property Limited
1151/002 Merrill D & Chignell Mrs C	1152/002	Mailler, Bakesef, Gouly & Mayes Messrs
1153/002 T W Lumley Ltd	1155/002	G C Field & Sons
1156/002 Clark Mr P	1157/002	Brooker Mr R
1158/002 Bedfordia Developments & Bedfordshire Pilgrims HA		
1159/002 Bedfordia Developments Ltd	1160/002	Ayres Mr & Mrs J
1161/002 Van Leeuwen Mr P.		
1168/002 Westbury Homes (Holdings) Ltd & Cala Homes (South) Ltd		

Background

2.4.5.1 The site lies on the northern edge of Eaton Ford, a suburb of St Neots. The site wraps around the grade 2* listed building of Crosshall Manor and some of its outbuildings. At the Inquiry, the Council acknowledged that the site plan they had produced included a barn, which comes within the curtilage of Crosshall Manor and which should not be part of the proposed allocation. Therefore, the site area for consideration for allocation is slightly less than the original area of about 2.46 ha.

2.4.5.2 The site was not proposed as an allocation in the Deposit Draft Plan but is put forward through proposed change 57. Objection 0389/001 objecting to the omission of the site

was provisionally withdrawn on this basis. A number of counter-objections to Proposed Change 57 were subsequently made.

Issue: would an allocation at St Neots be in accordance with the aims of national and strategic guidance and the aims of the settlement strategy to secure a sustainable pattern of development?

2.4.5.3 Under the settlement strategy proposed in the Alteration, St Neots is classed a market town. As such, it is a settlement to which new development will principally be directed. Like the other market towns, St Neots is not defined by environmental limits but it is clear that the site lies just outside the currently developed northern edge of the town. Allocation of the site would constitute an urban extension in terms of paragraph 30 of PPG3 and would fall into the second category of the proposed settlement strategy of the Alteration.

2.4.5.4 Objections 1140/013 and 1142/003 argue that the site is poorly related to both the physical structure of St Neots and community, employment and retail facilities and divorced from the residential area on the opposite side of Crosshall Road. In my view, the site is reasonably related to the pattern of existing development in this part of Eaton Ford given the existing development north and south of Crosshall Road and the fact that the road is only single carriageway and crossing does not cause significant problems. The site is bounded to the east by the well-established St Neots golf course and is separated from the wider countryside to the west by the A1 and is therefore well contained on these fronts. However, to the north there is no logical boundary between the site and the ABL designated countryside and I deal with this matter below. The site is within reasonable walking distance of convenience shopping facilities and a primary and junior school and while Longsands secondary school is somewhat further away it is within reasonable cycling distance. Whilst the site is about 1.6 km from the town centre of St Neots, there is a reasonable level of public transport service along Crosshall Road that provide access to the employment opportunities and retail and community facilities in the town. For these reasons I do not support objections 1140/013 and 1142/003.

2.4.5.5 The Council argue that a density of around 12 dph would protect the setting of the listed building and provide land to act as a screen from the A1. Objection 0389/001 argues that such a density would reflect the surrounding area and provide an attractive location for "up-market" housing thereby contributing to the variety and choice of housing. I deal with the likely effect of development on Crosshall Manor below. There is no shortage of 'up-market' housing in the area and no evidence of a need for such housing was presented to the Inquiry. In addition, any land needed for a screen from the A1 would not cause a significant reduction in the overall site area given the topography of the western edge of the site.

2.4.5.6 Objections 1135/001, 1136/001, 1137/001 and 1138/001 argue that the proposed allocation would not make the best use of land given the very low density proposed. Under PPG3 guidance on making the best use of land, the site would be expected to accommodate in the order of 70-100 dwellings. The Council considers this would be unsuitable in this location and I agree with this assessment. However, this does not make the low density proposed by the Council acceptable. PPG3 is clear that densities below 30 dph represent an inefficient use of land and should be avoided¹. For these reasons I support these objections.

2.4.5.7 Objection 1142/003 argues that the site is greenfield and does not constitute previously developed land. The western part of the site was formerly used as a materials depot

¹ Paragraph 58

and a limited amount of hard standing is still evident on the land; however, there are no remains of buildings or other structures visible on the site. The great majority of this part of the site is now overgrown and whilst it is unkempt in appearance, the remains of the former use have blended back into the natural landscape. The Great North Road that runs across the site was not part of the former use, apart from providing access/egress to the site, as it still does, to the existing dwellings on the site. Its continued presence does not warrant the site being classed as previously developed. I conclude that no part of the site constitutes previously developed land under PPG3 guidance¹.

2.4.5.8 Objections 1135/001, 1136/001, 1137/001 and 1138/001 argue that as originally proposed the site would not provide any affordable housing in the area. The Council says that with the revised density they have put forward there is no reason why the site could not yield some affordable housing. I have no reason to doubt this but given the very low density proposed by the Council, any provision would be minimal. At higher densities, there is no reason why higher levels of affordable housing could not be provided.

Issue: would an allocation have an acceptable effect on the character and appearance of the area?

2.4.5.9 Objection 0389/001 argues that housing development would enhance the setting of the listed building. I do not accept this argument. I consider that the site, especially its western part, makes a positive contribution to the attractive, open setting of Crosshall Manor with the views it affords of the wider countryside to the north of the site. Housing on the site, however attractively designed, would inevitably detract from the open setting as it is viewed in approaches from the west. This would be exacerbated by the density of housing that would be needed to accord with PPG3. Moreover, those elements of the current setting - the road signs and the hedges - which do not make a positive contribution to the setting of the building, would be likely to remain in position even if the land was developed. I conclude that an allocation would not preserve or enhance the setting of the listed building, rather it would cause serious harm, contrary to section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2.4.5.10 The site falls within the ABL. Objection 1095/001 argues that it would be inappropriate to extend housing north of Crosshall Road. The Council accepts that development of the western part of the proposed allocation would reduce the openness of that part of the site when viewed from Crosshall Road but argues that these views are unprepossessing. However, the Adopted Local Plan, at paragraph 7.46, recognises that not all land included in ABL designation will itself be 'best' but that such land should be included in the ABL because of the countryside views that can be afforded across it. This site falls into that category, given the long views that are afforded past Crosshall Manor across St Neots golf course and beyond, and merits retention as ABL for that reason. Whilst it is true that views of the site from the south-east and west are neither long distance or particularly attractive, this would not mitigate the damage that would be caused to the openness of the ABL by development on the site. I conclude that an allocation of the site would detract from the openness of the ABL.

Issue: would occupants of housing on the land be at risk from play on the golf course?

2.4.5.11 The site is separated from the golf course by a fence about 1.75 m high. There would be a risk that wayward drives from a tee or long shots from the 9th and 10th holes could

¹ Annex C

cause personal harm to residents on the part of the objection site closest to the course, or damage to their property. These risks could not be overcome by increasing the height of the fencing and any such fencing would harm the setting of Crosshall Manor. I conclude that the allocation would result in an unsafe environment for some of its residents.

Summary

2.4.5.12 The inefficiency of the proposed use of land and the harm that would be caused to the openness of the ABL and the setting of Crosshall Manor outweigh the acceptability of the proposed allocation under the sequential approach. I therefore support the counter-objections and do not support objection 0389/001 and Proposed Change 57.

RECOMMENDATION

2.4.5.13 No modification to Policy HL2 in response to objection 0389/001.

Proposed change site 11 – East of Railway Line, north of Cambridge Road, St Neots

Inspector's Note

2.4.5.14 The Council's proposed change allocation – site 11 – is similar to the site which was the subject of an objection at the deposit stage. To avoid undue repetition in the report, I deal with the objectors' site and the counter-objections to the proposed change allocation in this section. Other objectors' suggested sites east of the railway St Neots are considered in a later section¹.

Objector's Site 14 - East of the railway, north of Cambridge Rd, St Neots

Objection
1007/011 Gallagher Estates Ltd

PRCV Site 11 - East of the railway, north of Cambridge Rd, St Neots

PCN 59, PCN 61, PCN 66, PCN 72, PCN 187, PCN 197, FPRC 213, FPRC 214, FPRC 216, FPRC 235

Counter-Objections

1102/001	The Meeting Lane (Needingworth) Housing Consortium		
1103/002	Railtrack PLC	1107/002	Manor Developments (UK)
1115/001	Yelcon Homes Limited PLC	1123/002	St Neots Town Council
1127/002	The Council for the Protection of Rural England		
1128/001	Abbotsley Parish Council	1129/001	Stokes J D & B R
1134/001	Barney Mr D	1135/002	Homes by Marshall
1136/002	Beazer Strategic Land	1137/002	Redrow Homes Ltd
1138/002	David Wilson Estates	1140/012	Taywood Homes
1142/002	City & St James Property Limited	1144/002	Swan Hill Homes Limited
1145/001	Cambridge Project Management Ltd	1146/001	BAS Ltd & Mr M Hunting
1148/002	Gallagher Estates Ltd	1150/001	Gregory Cllr J
1151/003	Merrill D & Chignell Mrs C	1152/003	Mailler, Bakesef, Goult & Mayes Messrs
1153/003	T W Lumley Ltd	1156/003	Clark Mr P
1157/003	Brooker Mr R		
1158/003	Bedfordia Developments Ltd Bedfordshire Pilgrims H A		
1159/003	Bedfordia Developments Ltd	1160/003	Ayres Mr & Mrs J

¹Section 2.4.7

1161/003 Van Leeuwen Mr P.
1164/001 Huntsnap
1167/001 Connolly Homes PLC & Twigden Homes Ltd
1168/003 Westbury Homes (Holdings) Ltd & Cala Homes (South) Ltd
1170/001 George Wimpey plc
Objections (Provisionally Withdrawn)
1130/001 Cambridgeshire County Council, Environment & Transport

1163/001 Lafarge Redland Aggregates
1166/001 Diocese of Ely

Issue: would an allocation here be in accordance with the aims of national and strategic guidance and the aims of the settlement strategy of the Alteration to secure a sustainable pattern of development?

2.4.5.15 I set out my detailed conclusions in relation to the settlement strategy in chapter 1 of this Report. Suffice it here to say, St Neots is identified as a market town in Policy SP3/1 of the adopted Structure Plan and is intended to be a principle location for new housing, amongst other development. Similarly, the draft Alteration identifies St Neots as a market town where estate scale growth may take place.

2.4.5.16 After Huntingdon, St Neots provides the largest number of employment opportunities in the district and possesses an extensive range and number of retail and service facilities. Government guidance in PPG 13: Transport (1994) advocates that local authorities should, through their development plan, aim to reduce the need to travel, especially by car, and paragraph 3.2, bullet point 1, suggests market towns as an example of larger urban areas where the maximum amount of housing should be directed. To this end, St Neots possesses good rail links and bus services: therefore new housing in the town would be provided with a choice of means of transport to other facilities and settlements in accordance with the aims of PPG13.

2.4.5.17 Objection 1007/011 argues that St Neots represents a more sustainable location for major housing development than Ramsey. The Council accept that St Neots possesses more employment opportunities, amenities and public transport in the form of both bus and rail. Similarly, there can be no dispute that St Neots has better road links, both strategic and local. Whilst these points do not serve to indicate that Ramsey is an unsustainable location for new housing development, there can be no doubt that on a comparative basis St Neots comes out ahead of Ramsey.¹

2.4.5.18 Paragraph 16.3 of the Structure Plan states that the market towns in Huntingdonshire "are approaching their environmental capacity". However, the Structure Plan does not identify what this environmental capacity is and at what stage it will be reached. Furthermore, paragraph 16.5 clearly states that further provision in St Neots will need to be considered to carry provision through to 2006. There is no evidence that significant new housing development would breach the environmental capacity of the town.

2.4.5.19 Objection 1145/001 argues that development should be spread across smaller sites in towns and villages. However, whilst under the Council's own proposed settlement strategy, the market towns should be the preferred locations when considering any new allocations and each site should be considered on its merits, further significant housing development within the existing built form of the market towns, in the remainder of the Plan period, is unlikely given the

¹ See also section 1.2.8

lack of large sites for redevelopment. Similarly, large-scale development of housing in villages would be unsustainable and is the very type of location that the settlement strategy of the Alteration seeks to avoid. Dispersed housing growth, as sought by the objector would not meet the sustainability objectives of national guidance or the settlement strategy. Therefore, I do not support the objection.

2.4.5.20 Whilst development of the objector site would represent a break out from the existing edge of St Neots, under the proposed settlement strategy of the Alteration, extensions to the market towns are likely to be the only realistic sustainable option available for significant housing development in Huntingdonshire. This approach fully accords with advice in PPG3; under the search sequence advocated in paragraph 30 of that guidance, urban extensions should be considered after the re-use of previously developed land within urban areas. Therefore, whilst development on the site would involve the loss of greenfield land, this is almost always going to be the case where it is necessary, as it is in Huntingdonshire, to consider the extension of urban areas. However, whilst the acceptability of urban extensions is firmly established in PPG3 it is necessary to consider whether the proximity to services and facilities and the existing infrastructure of the towns of a particular site would outweigh the likely harm to the countryside that would be caused by development.

2.4.5.21 Counter objection 1150/001 argues that there is no evidence that the objector site is preferable, in environmental terms, to development on the periphery of Huntingdon or St Ives. I make conclusions and recommendations in relation to sites on the edge of Huntingdon and St Ives elsewhere. However, in relation to the relative sustainability of the market towns, as I make clear in the settlement strategy chapter of this report, I consider that because of their size, levels of services and facilities, location and access to rail services, both Huntingdon and St Neots are more sustainable locations for development than St Ives, whether within the towns or on their periphery.

2.4.5.22 For these reasons and the others I set out¹, I conclude that St Neots is a sustainable location for large-scale development within the Alteration period, if suitable sites are brought forward.

Issue: is the objector site suitable for an urban extension?

2.4.5.23 The Council accepts that the objector site is capable of delivering significant housing numbers in the Alteration period and that development would not be delayed through the need to undertake the compulsory purchase of land. The objector site is larger than the proposed allocation site at Priory Hill, St Neots, which the Council propose for deletion. Objection 1150/001 argues that the size of the scheme has not been justified. However, in light of my conclusions and recommendations relating to the unsustainability of a number of proposed allocations, particularly at Ramsey, there is a need to find a significantly greater amount of housing land in the Alteration period. As a result, I consider that it is necessary and justified to consider a site the size of the objector site. It follows that I do not consider that the site would be too large for allocation in the Alteration, nor that its consideration should await a full review of the local plan; the purpose of the Alteration is to allocate sufficient land to meet the district housing target in accordance with national and strategic guidance. This guidance places no

¹ See settlement strategy chapter

restrictions upon the size of site that is suitable for consideration. Therefore I do not support counter objections 1115/001, 1146/001, 1102/001.

2.4.5.24 A number of counter objections argue that the site is poorly related to St Neots and that the railway line forms a defensible boundary to the town, which development of the site would breach. However, the Council have clearly accepted that some break out from existing urban areas will be necessary in the Alteration and accept that land adjacent to the east of St Neots railway station would be a sustainable location in which to do so. There can be no doubt that to some extent the existence of the railway would hinder free and easy access between the site and the town but the objector proposes three links across the railway; one at the north end of the site onto Priory Hill Road using the existing highway access for pedestrians, cycles and public transport, the second to the south of the site onto the A428 Cambridge Road, which would form the main vehicular access to and from the site, and a third pedestrian and cycle link to St Neots railway station. There is no reason to suppose that these links could not be provided and I consider that the level of connection they would provide would be on a par with that achievable on many housing sites, given that access is always limited by the layout of housing. In fact, in this location, the proposed link to the railway station would represent an advantage for the site that other potential housing allocations would not have. For these reasons I do not support counter objection 1150/001 that argues that pedestrian and cycle links have not been addressed.

2.4.5.25 The proposed linkages would allow the potential integration of the development with public transport provision into the town and elsewhere. The objector's travel assessment for St Neots shows the potential for bus provision between the site and the town centre. Whilst the details of provision are matters for any planning application, I see no reason why good bus provision could not be achieved on the site. The travel assessment also shows the potential for pedestrian and cycle access to and from the main and local retail areas of St Neots and local schools. As a result, I consider that there is the potential for development on the site and the occupants of new housing to be properly integrated into the town as opposed to being isolated.

2.4.5.26 There would be significant potential for high levels of rail use by occupants of housing on the site. In this regard I do not support objection 1145/001 that the site would be unsustainable because its location next to the railway station would lead to commuting to London; commuting by this means is considered sustainable and, under government guidance¹, to be encouraged. In addition, the proximity of the site to the railway station would allow a majority of travellers to access services without needing to travel by private car. The importance of proximity to the railway station is clearly recognised by the objector and forms an integral part of the proposed allocation. However, the objector recognises that existing car parking and access facilities, particularly for buses are inadequate and there is a need for improvements. Whilst the details of such arrangements are not matters for the Alteration, there is no reason to suppose that adequate arrangements could not be achieved. Therefore, I do not support counter objection 1150/001 which argues that these matters have not been addressed. I conclude that development of the site for housing would accord with the aim of reducing the need to travel by private car.

2.4.5.27 Counter objection 1145/001 argues that development of the site would pre-empt options for long term development in the area and set a precedent for further development east of

¹ PPG13: Transport

the railway. However, with the addition of land identified as 'parcel A' which I consider below¹, the boundaries to the objector site are reasonably well defined; to the west is the railway, to the south is the A1428 Cambridge road, to the north lies a track to Monks Hardwick, which runs along the highest land in the vicinity of the site. The eastern boundary of the site is clearly marked both by hedgerows and, on its north eastern part, a gravelled farm track. To the north and east the land is designated as ABL. I consider that these boundaries are defensible and, as a result, the site can be considered to be self-contained and would not represent piecemeal development as suggested by counter objection 1127/001. Furthermore, the proximity of the site to the railway station sets the objector site apart from other land east of the railway, and militates against arguments that allocation of the site would set a precedent for future development. I consider that this gives the site an advantage that other land to the east of the railway would not have. Therefore, I consider that whilst development on the objector site would breach the current boundary provided by the railway line, a main justification for doing so could not be applied to other sites east of the railway and so would not pre-empt decisions, either now or in the future, relating to those sites.

2.4.5.28 Counter objections 1126/002, 1166/001 and 1130/001 argue that an allocation of the site should be the first part of comprehensive programme of development east of the railway and that the layout of the site should be capable of integration into further development. Counter objection 1167/001 also argues that a combined scheme north and south of Cambridge Road would enable planning gain to be shared. However, the Alteration is concerned with meeting the need for housing land to 2006; strategic decisions concerning locations for housing post 2006 are not legitimate matters for the Alteration. In my view, land to the south of Cambridge Road is not constrained by any strong defensible boundaries to development, particularly to the south and, potentially, opens a very large area of land for development.

2.4.5.29 I consider that to indicate that an allocation on the objector site should be considered the first part of a wider scheme east of the railway would serve to pre-empt and prejudice future decision making to an unacceptable degree. Whilst I see no reason why development on the objector site could not be integrated into a wider scheme at a later date, if that was deemed the most sustainable way forward, it is not for the Alteration to predetermine that outcome, nor to imply its acceptability. As regards the possibility of sharing planning gain requirements; the need for planning obligations will arise out of the particular impacts of a scheme and must satisfy the tests laid down in Circular 1/97. The possibility that costs could be shared is not material to the issue. Therefore, I do not support the counter objections.

2.4.5.30 Counter objection 1128/001 expresses concern about the lack of information regarding possible effects on education and transport in the village of Abbotsley. The objector site is some distance from the village and given its proximity and links into St Neots and its wide range of facilities the effects on Abbotsley would be likely to be minimal.

2.4.5.31 Counter objection 1144/001 argues that the fact that long-term development options would not be prejudiced would also apply to many other sites in the District, sometimes without breaching the physical framework of settlements. However, the Council makes the point, which I have endorsed in relation to the settlement strategy of the Alteration, that there is a lack of available sites within the market towns and that there is a need to look to urban

¹ Paragraphs 2.4.5.39-42 refer

extensions to meet the identified need for housing in the Alteration period. Large numbers of small sites in villages would not be a sustainable option for development and would conflict with PPG3 guidance at paragraph 30 of PPG3. Therefore I do not support the counter objection.

2.4.5.32 Counter objections 1164/001 and 1145/001 argue that Alconbury Airfield and Harrison Way, St Ives respectively should be considered in preference to this greenfield site. I consider issues in relation to these sites elsewhere in this Report. Suffice it here to say that I do not support the allocation of either for housing in the Alteration period.

2.4.5.33 Objection 1164/001 argues that allocation of the site would conflict with the intentions of the proposed settlement strategy to minimise the need to travel, restricting development in the countryside and maximising the use of existing infrastructure. However for the reasons I have set out, whilst a measure of development of greenfield sites will be inevitable, the site would benefit from access to the railway station enabling commuting by sustainable means and would not require major road building. The site would also be able to take advantage of the existing infrastructure and facilities available in St Neots. Evidence from the Council suggests that development outside of the urban areas could conflict with some existing policies in the adopted Local Plan. They do not give any indication as to what these conflicts might be but presumably they relate to policies that are outside the scope of the Alteration to consider. However, the allocation of land outside of urban areas as urban extensions is entirely in accordance with national guidance, and given that the Council support an allocation for housing in this location, I consider that any conflicts would not be insurmountable. For these reasons I do not support the counter objections.

2.4.5.34 Objection 1164/001 also argues that no provision is made for employment therefore resulting in an increase in out-commuting. The allocation of land for specific employment use is outside the scope of the Alteration and there is a potential conflict with the guidance at paragraph 66 of PPG3 regarding creating a mix of uses in any substantial new housing development. However, the Council carried out an employment land analysis in St Neots (CD96) in May 2000. The findings were that there was more than 38ha of employment land available or under construction in St Neots. The Council is confident that this level of supply is more than adequate to meet the growth envisaged in the Alteration period. The sites are in St Neots and the majority are within a reasonable cycling distance of the objection site. Whilst there can be no guarantee that all of this potential supply will come forward, I consider that there is sufficient employment land in close proximity to the objection site, combined with the potential for sustainable means of transport, to meet the employment needs arising from housing for 1000 dwellings.

2.4.5.35 Counter objection 1167/001 argues that there is a need to safeguard some land for employment purposes within the site. In this regard, in addition to the existing supply of employment land in St Neots, the objector proposes a design scheme for the site layout that would enable supporting uses to be introduced in the future. This "honeycomb" approach could be used to safeguard pockets of land within the site for small-scale employment uses, leisure, social, local shopping and community facilities amounting to some 3ha. The detail of this approach is a matter for detailed master planning but I consider that the approach would accord fully with guidance in paragraph 66 of PPG3 regarding achieving mixed communities, without prejudicing long term strategic decisions relating to employment land allocation, which are outside the scope of the Alteration. For this reason I do not support counter objection 1150/001 which argues that amenity and local shopping facilities have not been dealt with.

2.4.5.36 Counter objections 1144/002 and 1167/001 argue that parts of the site would suffer from negative liveability. The fact that a narrow band of land adjacent to the railway and Cambridge Road would be affected by noise is recognised by the objector. However, there is no evidence to suggest that such constraints could not be overcome by suitable mitigation measures. Therefore I do not support the counter objection. As regards overall density of housing achievable on the site, there is no evidence to show that a density in accordance with PPG3 could not be achieved, notwithstanding the need for land to be utilised for landscaping, planting and other matters.

2.4.5.37 Counter objection 1167/001 argues that the fact that a single developer controls the objector site could delay implementation. However, in evidence, the objector strongly makes the point that they are "town developers" as opposed to house builders. As such, they contend, that their business is to implement large-scale developments through master planning and control and envisage that a number of house builders would operate at the same time on different parts of the site under the overall control of the objectors thus achieving a higher build rate than might otherwise be the case. I consider that in this context, single ownership of the site would be likely to minimise any delays to implementation and therefore I do not support the counter objection.

2.4.5.38 A number of counter objections argue that development of the objector site would represent a substantial incursion into open countryside involving the loss of high value agricultural land and some woodland. The objection site comprises open countryside listed as Grade 2 agricultural land and as such constitutes best and most versatile land. Whilst the loss of such land must not be considered lightly, I note that there is no objection from MAFF on this basis to the proposed allocation. For the reasons I set out above, I consider that to the north west and south, the site is substantially enclosed either by roads or landscape designations that would prevent urban sprawl and not pre-empt future decisions regarding other land to the east of the railway. In addition, the objector proposes significant areas of landscaping and open space reflecting the landscape features on the site and offer the scope to achieve an attractive environment. Whilst these matters would not disguise the fact that countryside would be developed, I consider that taken together with the proximity of the site to the railway station, the harm to the countryside that would be caused by the loss of the land to agriculture would be outweighed by the potential for the site to secure sustainable and limited development.

Issue: should the 8.7 ha of land identified as "parcel A" be added to the proposed allocation?

2.4.5.39 The Council support the addition of the above land, which lies to the north east of the existing proposed change allocation on the grounds that it would enable the boundary of the site to follow defined boundaries and allow for significant structural landscaping. The new boundary would follow the track to Monks Hardwick on the northern edge of the site and then turn south abutting the track that leads to the B1428. There can be no doubt that this boundary would represent a firmer and more defensible line than originally proposed.

2.4.5.40 However, the northern and half of the eastern boundary to the site mark the edge of an ABL designation, which covers an extensive area of land to the north and east. The addition of parcel A would allocate additional land up to the ABL boundary. Counter objection 1167/001 argues that there would be an adverse impact upon the adjacent ABL from development of the site, particularly its northern part running north of the hedgerow that runs

east from Copse A. The counter objector argues that this part of the site, although not defined as ABL, warrants such a designation and so should be excluded from any development. As the objector acknowledges, the Alteration is not the forum for debating issues such as ABL boundaries. However, I note that the counter objector, in his evidence, makes the point that the parcel of land that it is argued should be excluded from development, could be improved through some woodland planting and improvements to the hedgerows. Even though the ABL designation is a 'broad-brush' designation, it is hard to reconcile the deemed need for improvements with the view that the land warrants ABL status as it stands.

2.4.5.41 I make no conclusions regarding the suitability of the land referred to for ABL designation. However, I note that even if the land were to warrant designation as ABL this would not necessarily mean that it would be so designated in any future review. As the adopted local Plan makes clear at Appendix 4, in defining ABL boundaries, the Council has sought to make them "readily definable on the ground by following features such as roads, tracks and field boundaries, the more permanent the better. There will be instances, in exception, where following definable boundaries will exclude land appropriate for inclusion in the ABL designation. Views of and up to ridgelines is an example of such instances. In these circumstances, a line will be drawn which will reflect the broad physical, visual and scenic context of the landscape". In my view, the land in question falls into this category; the boundary shown for the ABL designation, and accepted by both the counter objector and Council, shows a firm and defensible line along the northern boundary of the objection site that runs along the track to Monks Hardwick below the ridge line.

2.4.5.42 However, there is no disagreement between the parties that the land north of Copse A, including the further proposed change land, is more sensitive in landscape terms than the remainder of the objector site. The transition between any development on the objector site and the ABL would need to be designed sensitively. In this regard, the objector argues that there is relatively limited scope for peripheral landscaping where the site abuts the ABL. I do not share this concern. I consider that the northern part of the objector site, with the addition of parcel A, would provide sufficient land to achieve a sensitive transition through planting and structural landscaping from development to the ABL and see no reason why the land should be excluded from any allocation for housing. Whilst the detailed design of such a scheme would be a matter for the planning application stage, evidence from the objector and the Council shows that the need for sensitive design in this location is well understood. Therefore, I do not support the counter objection and support the addition of parcel A.

Issue: should the additional land (parcel F) sought by the objector to the east of the site be added to the allocation?

2.4.5.43 The objector seeks the addition of around 16 ha of land to the east of the proposed change allocation to receive an additional 400 dwellings. A justification given for the addition of parcel F is that if the proposed allocation West of Ramsey were recommended to be deleted, there would be a shortfall of provision against the district wide target that the objector site could help meet. I set out my conclusions in respect of West of Ramsey elsewhere, but suffice it here to say that I do not support allocation of that site. However, it does not follow that east of the railway, St Neots is best placed to absorb additional numbers.

2.4.5.44 The additional land would raise the number of dwellings to be achieved on the site by 2006 to 1400. This would be an extremely challenging target in this time frame. The

objector puts forward a timetable for work leading to the full number of completions by the Alteration end date. However, this timetable assumed a start date for completions of mid 2002. There is no realistic prospect of such a date being achievable and, in reality, the 5 year build period envisaged by the objector will not be achieved. The objector argues that planning permission could be sought before modifications to the Alteration are published and cites paragraph 48 of PPG1 in support. Paragraph 48 suggests that permission may be granted for proposals that accord with draft policies on which an Inspector has recommended favourably. However, in this case parcel A has not been subject to a statutory deposit period and, though publicised by the objectors, the public has not had the opportunity to formally object to the proposed modification. To grant planning permission at this stage would pre-empt consideration of any possible objections and seriously prejudice the outcome of the development plan process.

2.4.5.45 Evidence adduced by the objector predicts that a level of around 300 completions per annum could be achieved on the site. Completions at this rate would exceed anything that has been achieved in St Neots in the past and as the objector acknowledged at the Inquiry was a "very demanding programme". However, even assuming that such a figure is realistically achievable, the objector site would not yield 1400 dwellings in the Alteration period given the length of time available. Whilst the fact that a site may not be built out in a particular plan period and so would straddle plan periods is not in itself a reason for not allocating land, in this case it would remove a significant plank of the objectors argument in favour of the additional land.

2.4.5.46 The Council argue that parcel F should only be included in the allocation if I am not convinced that the proposed change site could not achieve 1000 dwellings due to site constraints and that additional land was needed to achieve that lower figure. However, I see no reason why, notwithstanding the need for landscaping and infrastructure, the proposed allocation site plus parcel A, measuring some 58 ha, could not achieve 1000 dwellings. Therefore, I do not support the addition of parcel F to the proposed allocation.

Recommendation

2.4.5.47 Modify HL.2 in accordance with the proposed changes to include the land east of the railway, north of Cambridge Road, St Neots, including parcel A, as a housing allocation.

Proposed change site 15– St Ives Golf Course (part)

Objections

See list in Appendix

2.4.5.48 In response to a substantial number of objections to the non-allocation of this site, the council proposed PCN 63 which identifies part of the St Ives golf course, some 4.70 ha, as a housing allocation. PCN 189 identifies a net housing area of 3.12 ha, yielding a total of 93 dwellings.

Issue: would an allocation here be in accordance with the aims of national and strategic guidance and the aims of the settlement strategy of the Alteration to secure a sustainable pattern of development?

2.4.5.49 I have set out my detailed conclusions on the settlement strategy earlier in this report.¹ Although St Ives has a relatively low degree of self-containment and is less well placed in terms of accessibility it is nonetheless a more sustainable location for development than the villages and could absorb higher levels of housing growth than that generated by local needs. I have concluded that St Ives should absorb some growth. I am content that some peripheral development of St Ives would be in accord with national, strategic and the Alteration strategies.

2.4.5.50 The site immediately adjoins the built-up edge of St Ives. The site forms an urban extension of St Ives. As such, it accords with the search sequence set out in paragraph 30 of PPG3. I agree with those objectors who point out that the site is close to the town's facilities and is a sustainable location for development. The town can be reached on foot, by cycle and by bus.

Issue: would development of this site have a harmful impact on the appearance and character or other aspects of this area?

2.4.5.51 The site is located on the edge of the Area of Best Landscape. However, its scenic value is tempered by its use as a golf course and the fact that it is bounded by housing on two sides and by playing fields on a third. Concern is expressed by some objectors as to the impact of development upon the gap between Houghton and St Ives. I have commented upon this gap in respect of my conclusions on the Houghton Grange allocation.

2.4.5.52 In my opinion the development of this part of the golf course would not substantially impinge upon that gap. The council proposes a Development Brief for the wider area between Houghton and St Ives, with an express purpose of protecting the gap. I am satisfied that the development of this site, even with the development of the Houghton Grange site, would not unacceptably harm the physical and visual gap between the settlements. Given the council's intention to protect the remaining gap I do not agree with those objectors who see this site creating a precedent for further housing development spreading out along the main road.

2.4.5.53 I am also satisfied that there would be no unacceptable impact in terms of increased traffic and highway safety. It should be quite feasible for an access to be designed which, at worst, has no harmful effect on the free flow and safety of traffic on the main road. There may be some opportunity for improving access arrangements along this stretch of road.

2.4.5.54 Although the golf course would be affected I have no convincing evidence that this would have a harmful effect on the ability of this area to continue to provide recreational facilities for local people.

Summary

2.4.5.55 This is a greenfield site. There is an existing clear edge to the urban area. Nevertheless, the site offers a sustainable opportunity for an urban extension to St Ives which both accords with sustainable development policies and does not cause unacceptable harm to the

¹ Section 1.2 refers

area. There is a need to identify some greenfield sites. St Ives is an appropriate location and I conclude that this is a suitable site.

RECOMMENDATION

2.4.5.56 Modify policy HL.2 in accordance with PCN 63 and 189.

2.4.6 SUMMARY OF HOUSING SUPPLY FROM THE SITES PROPOSED BY THE COUNCIL

2.4.6.1 The table below sets out the assumed housing supply from the Council's proposed allocations that I have endorsed. The total of supply from these allocations is 3,136 dwellings. To avoid the risk of over-supply in preparing this table, I have assumed that the Council persist with the allocations which they propose in Group Villages and which are not the subject of objections. I have used the yield figures which the Council put forward which take into account the need to achieve a more efficient use of land¹.

SITE		ASSUMED YIELD (DWELLINGS)
Site No.		
Deposit Plan Allocations		
1	Brookside, Huntingdon	21
2	Hinchinbrooke Park, Huntingdon	110
3	Off Kings Ripton Road, Huntingdon	211
4	Sapley Road, Huntingdon	41
5	London Road, Godmanchester	131
6	Roman Way, Godmanchester	56
7	The Parks, Godmanchester	25
8	Barford Road, Eynesbury, St Neots	488
9	Church Street, St Neots	5
11	Windmill Row, St Neots	21
13	Houghton Grange, St Ives	90
14	Ramsey Road, St Ives	16
17	Whytefield Road, Ramsey	35
18	Co-op Farm, Yaxley	599
19	Globe Lane, Alconbury	16
20	School Lane, Alconbury	22
22	Manor Farm, Colne	8

¹ Annex 2, CD102

24	Townsend Way, Folksworth	13
25	Manchester Close, Grafham	9
32	Oilmills Road, Ramsey Mereside	2
33	East of Marriotts Close, Ramsey Mereside	29
37	East of Ferriman Road, Spaldwick	43
39	Woodlands, Warboys	20
41	Harris Lane, Wistow	16
Proposed changes allocations		
11	East of the Railway Line, North of Cambridge Road, St Neots	1,000
15	St Ives Golf Course	109
Total		3,136

2.4.6.2 The starting point for land supply is a requirement for a housing supply of 12,300 dwellings to be built between mid-1997 and 2006¹. 4,707 dwellings had been built by 1997, with an outstanding commitment of about 2,470 dwellings, taking into account a non-implementation rate.² That leaves a total of about 5,123 dwellings to be accommodated through windfalls or through allocations in this Alteration. Allowing for an expected windfall contribution of about 822 dwellings, and the provision of about 3,136 dwellings assumed to be accommodated on allocated sites, this leaves a residual of about 1165 dwellings for which additional land has yet to be allocated.

2.4.6.3 However, not all allocations will be fully implemented within the remaining plan period. Some may not be implemented at all. Others may be delayed such that not all the expected units will be available for occupation by 2006. To reflect this, I consider that it would be reasonable to assume a non-implementation allowance for the Alteration's allocations. At the RTS session some objectors promoted an allowance of 10%. In my experience such an allowance is generally accepted and in the absence of any convincing evidence otherwise, I conclude that a 10% non-implementation allowance should be applied to the allocation figure of 3,136: that is 314. Thus, there needs to be additional allocations made in the Alteration to bring forward in the order of 1479 dwellings over and above those of the council's proposed allocation sites that I have endorsed.

2.4.6.4 I would comment at this point that the base date used for these calculations, 1997, is some 5 years ago. Whilst I have used the latest available council predictions regarding the likely development potential of the allocation sites, it is quite probable that these figures and some of my other conclusions have been overtaken by events. If this is the case, then it will be for the council to adjust the figures accordingly.

¹ Section 2.2 refers

² Section 2.3 refers

2.4.6.5 I would also comment that it is quite evident that the council will need to adopt a much better and more robust system of gathering information on housing land supply before it embarks upon the review of the Local Plan. In that way the plan would be supported by comprehensive and up-to-date information.

2.4.6.6 I turn now to consider the many objector sites put forward as possible allocation sites. Finally, in section 2.4.9 I conclude which of these should be brought forward to make good the perceived shortfall in housing supply.
