

Huntingdonshire Local Plan to 2036 Examination

EXAM/47: Representations to the Proposed Main Modifications 2018 Consultation (in Representor Order)

Part 2 of 4 – G to H

Huntingdonshire District Council
February 2018

Comment

Consultee	Yvonne Gauci (1151864)
Address	[REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Yvonne Gauci (1151864)
Comment ID	PMM2018:22
Response Date	15/01/19 14:36
Consultation Point	Proposed Main Modification 32 (View)
Status	Processed
Submission Type	Letter
Version	0.5
Files	Gauci MM32_Redacted.pdf

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Support

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

I would like to support the proposal to remove site SM5 East of Robert Avenue, Somersham from the Huntingdonshire Local Plan to 2036 due to the inaccessibility of the site and the negative impact this development would have on the local environment.

Summary

Supports the removal of SM5 East of Robert Avenue, Somersham.



15 January 2019

Huntingdonshire District Council
Planning Services
The Inspector for Planning Modifications
Pathfinder House
St Mary's Street
Huntingdon
PE29 3TN

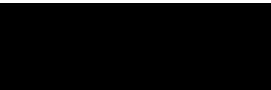
Re:Huntingdonshire Local Plan to 2036
Proposed Main Modifications 2018 for Consultation
Proposed Main Modification 32

Dear Inspector,

I would like to support the proposal to remove site SM5 East of Robert Avenue, Somersham from the Huntingdonshire Local Plan to 2036 due to the inaccessibility of the site and the negative impact this development would have on the local environment.

Thank you.

Yours sincerely,



Yvonne Gauci
ID : 1151864

Family or Company Name: Gladman Developments
Agent: Hourigan, Marc
PMM: MM1

Comment

Agent	Marc Hourigan (1198382)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Gladman Developments (1118265)
Email Address	[REDACTED]
Company / Organisation	Gladman Developments
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Gladman Developments (Gladman Developments - 1118265)
Comment ID	PMM2018:50
Response Date	28/01/19 10:44
Consultation Point	Proposed Main Modification 1 (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	Hourigan for Gladman Developments.pdf

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Object

Do you consider this proposed main modification to be sound? Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification . Justified
is not sound because it is not...

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Please enter your representation here.

POLICY LP – 2 – HOUSING TRAJECTORY 2.1 Main Modification (MM) 1 is concerned with amendments to Policy LP2 and the associated housing trajectory. 2.2 Our submissions on this matter are set out below. PAST COMPLETIONS 2.3 MM1 notes completions between 1 April; 2011 and 31 March 2018 of 4,421 dwellings whereas the Council's Annual Monitoring Report (AMR) published in December 2018 notes a figure of 4,418; this needs to be consistent. 5 YEAR SUPPLY AT 1 APRIL 2018 BASE DATE 2.4 The AMR notes a 5 year supply of 6,466 deliverable dwellings for the 5 year period 1 April 2018 – 31 March 2023. This figure assumes that delivery rates are capped at some of the strategic allocations in line with the Inspector's recommendations. Utilising the Council's annual housing requirement, taking into account the backlog figure of 1,210 dwellings and applying a 20% buffer generates a 5 year requirement of 6,276 dwellings (1,255 annually). Accordingly, the Council claims in the AMR to be able to demonstrate a 5.15 year supply of deliverable dwellings (adopting the capped rates mentioned above). On the Council's approach it has exceeded the minimum 5 year requirement by just 190 dwellings. 2.5 The 6,466 figure mentioned above also includes an allowance for Prior Approvals, small site windfalls and rural exceptions. All of these categories are effectively windfalls. We disputed inclusion of these elements of supply in our further submissions of 4 October 2018 in response to EXAM41; this being the document where these sources of supply were introduced to the Examination. We maintain our previous position that there simply isn't the compelling evidence before the Examination as required by the Framework to justify inclusion of these sources of supply at the rates given and that the approach is unjustified and unsound. 2.6 The AMR notes 160 dwellings in the 5 year supply from small sites windfalls, 70 on rural exception sites and 100 for prior approvals (330 in total). Were these sources removed from the supply as we advocate the position on the Council's requirement would be 4.88 years ($6,466 - 330 = 6,136 / 1,255 = 4.88$). 2.7 Even if the above points are not accepted there are some questionable lead-in times mentioned in the AMR for the St Neots allocation SEL2 where it is stated that 115 dwellings will be delivered in the period 1 April 2019 – 31 March 2020. In that respect it is notable that the outline planning application in respect of the Loves Farm East element of the site is still pending according to the Council's web site. In respect of the Wintringham Park element of the site whilst the hybrid planning application was approved in November 2018 a reserved matters application for housing was submitted to the LPA in December 2018 and remains undetermined. In our view this site will deliver no houses in the 2019/2020 monitoring year. That would necessitate moving the trajectory on by a year resulting in 385 dwellings dropping out of the five year period. This alone would be sufficient for the deliverable supply to drop below the minimum 5 year requirement and to 4.84 years ($6,466 - 385 = 6,081 / 1,255 = 4.84$). Again, the approach adopted by the Council is unjustified and unsound. 2.8 In our view this authority does not have a 5 year supply of deliverable dwellings and additional sites should be identified to make up the shortfall. 5 YEAR SUPPLY AT 1 APRIL 2018 BASE DATE 2.9 In terms of calculating the supply position at the 1 April 2019 base date it is material to note that MM1 anticipates 1,076 completions for 2018/2019 whereas the AMR anticipates 1,034 completions for the same period. In comparison MHCLG Live Tables 253a notes 420 completions for the 6 month period 1 April – 30 September 2018. On that basis it seems unlikely that completions will get anywhere near to the completion rates projected by the Council and consequently the accumulated backlog will grow. SUMMARY 2.10 In summary we object to MM1 and

the associated housing trajectory which should be amended as detailed above together with the identification of further land for housing to ensure a 5 year supply of deliverable dwellings.

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed Yes
by making changes to the proposed main
modification?**

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

In our view this authority does not have a 5 year supply of deliverable dwellings and additional sites should be identified to make up the shortfall.

Summary

Dispute inclusion of an allowance for Prior Approvals, small site windfalls and rural exceptions; without this allowance a 5 year supply could not be demonstrated. Question lead-in times for SEL2; again the approach adopted by the Council is unjustified and unsound. This authority does not have a 5 year supply of deliverable dwellings and additional sites should be identified to make up the shortfall. Object to MM1 and the associated housing trajectory which should be amended as detailed above together with the identification of further land for housing to ensure a 5 year supply of deliverable dwellings.

EXAMINATION OF THE HUNTINGDONSHIRE LOCAL PLAN

PROPOSED MAIN MODIFICATIONS CONSULTATION

RESPONSE ON BEHALF OF GLADMAN DEVELOPMENTS LIMITED

RESPONDENT ID NUMBER: 1118265

28 JANUARY 2019



CONTENTS

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1. INTRODUCTION

- 1.1 This document is submitted on behalf of Gladman Developments Limited (hereafter referred to as Gladman) and responds to Huntingdonshire Council's consultation on Proposed Main Modifications to the Huntingdonshire Local Plan. These representations follow on from Gladman's previous representations and participation in the Local Plan Examination. Hourigan Connolly also appeared at the Local Plan Examination for Gladman to deal with the issue of housing land supply. Accordingly, these representations should be read alongside earlier submissions made on behalf of Gladman.

2. MAIN MODIFICATION 1 - RESPONSE

POLICY LP – 2 – HOUSING TRAJECTORY

- 2.1 Main Modification (MM) 1 is concerned with amendments to Policy LP2 and the associated housing trajectory.
- 2.2 Our submissions on this matter are set out below.

PAST COMPLETIONS

- 2.3 MM1 notes completions between 1 April; 2011 and 31 March 2018 of 4,421 dwellings whereas the Council's Annual Monitoring Report (AMR) published in December 2018 notes a figure of 4,418; this needs to be consistent.

5 YEAR SUPPLY AT 1 APRIL 2018 BASE DATE

- 2.4 The AMR notes a 5 year supply of 6,466 deliverable dwellings for the 5 year period 1 April 2018 – 31 March 2023. This figure assumes that delivery rates are capped at some of the strategic allocations in line with the Inspector's recommendations. Utilising the Council's annual housing requirement, taking into account the backlog figure of 1,210 dwellings and applying a 20% buffer generates a 5 year requirement of 6,276 dwellings (1,255 annually). Accordingly, the Council claims in the AMR to be able to demonstrate a 5.15 year supply of deliverable dwellings (adopting the capped rates mentioned above). On the Council's approach it has exceeded the minimum 5 year requirement by just 190 dwellings.
- 2.5 The 6,466 figure mentioned above also includes an allowance for Prior Approvals, small site windfalls and rural exceptions. All of these categories are effectively windfalls. We disputed inclusion of these elements of supply in our further submissions of 4 October 2018 in response to EXAM41; this being the document where these sources of supply were introduced to the Examination. We maintain our previous position that there simply isn't the compelling evidence before the Examination as required by the Framework to justify inclusion of these sources of supply at the rates given and that the approach is unjustified and unsound.
- 2.6 The AMR notes 160 dwellings in the 5 year supply from small sites windfalls, 70 on rural exception sites and 100 for prior approvals (330 in total). Were these sources removed from the supply as we advocate the position on the Council's requirement would be 4.88 years ($6,466 - 330 = 6,136 / 1255 = 4.88$).
- 2.7 Even if the above points are not accepted there are some questionable lead-in times mentioned in the AMR for the St Neots allocation SEL2 where it is stated that 115 dwellings will be delivered in the period 1 April 2019 – 31 March 2020. In that respect it is notable that the outline planning

application in respect of the Loves Farm East element of the site is still pending according to the Council's web site. In respect of the Wintringham Park element of the site whilst the hybrid planning application was approved in November 2018 a reserved matters application for housing was submitted to the LPA in December 2018 and remains undetermined. In our view this site will deliver no houses in the 2019/2020 monitoring year. That would necessitate moving the trajectory on by a year resulting in 385 dwellings dropping out of the five year period. This alone would be sufficient for the deliverable supply to drop below the minimum 5 year requirement and to 4.84 years ($6,466 - 385 = 6,081 / 1,255 = 4.84$). Again, the approach adopted by the Council is unjustified and unsound.

- 2.8 In our view this authority does not have a 5 year supply of deliverable dwellings and additional sites should be identified to make up the shortfall.

5 YEAR SUPPLY AT 1 APRIL 2018 BASE DATE

- 2.9 In terms of calculating the supply position at the 1 April 2019 base date it is material to note that MM1 anticipates 1,076 completions for 2018/2019 whereas the AMR anticipates 1,034 completions for the same period. In comparison MHCLG Live Tables 253a notes 420 completions for the 6 month period 1 April – 30 September 2018. On that basis it seems unlikely that completions will get anywhere near to the completion rates projected by the Council and consequently the accumulated backlog will grow.

SUMMARY

- 2.10 In summary we object to MM1 and the associated housing trajectory which should be amended as detailed above together with the identification of further land for housing to ensure a 5 year supply of deliverable dwellings.

3. MAIN MODIFICATION 9 – RESPONSE

- 3.1 In line with previous submissions made independently by our client regarding the unnecessarily restrictive nature of Policy LP11 Gladman support the wording change in LP11b) from 'protect' to 'recognise'.

4. MAIN MODIFICATION 15, 16 & 25 – RESPONSE

- 4.1 Whilst Gladman note that these modifications outline that the SEL's will not deliver in full within the Plan period and that some delivery will be beyond this it provides no further details within the Plan of the anticipated delivery rates for these key sites. Gladman recommend that the Council identify within the Plan the anticipated delivery from these sites within the plan period inline with the Inspectors recommendations. This will provide further clarity.

Family or Company Name: Gladman Developments
Agent: Hourigan, Marc
PMM: MM9

Comment

Agent	Marc Hourigan (1198382)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Gladman Developments (1118265)
Email Address	[REDACTED]
Company / Organisation	Gladman Developments
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Gladman Developments (Gladman Developments - 1118265)
Comment ID	PMM2018:52
Response Date	28/01/19 10:58
Consultation Point	Proposed Main Modification 9 (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Hourigan for Gladman Developments.pdf

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Support

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3.1 In line with previous submissions made independently by our client regarding the unnecessarily restrictive nature of Policy LP11 Gladman support the wording change in LP11b) from 'protect' to 'recognise'.

Supporting documents

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[Hourigan for Gladman Developments.pdf](#)

Summary

Support the wording change in LP11b) from 'protect' to 'recognise'.

Family or Company Name: Gladman Developments
Agent: Hourigan, Marc
PMM: MM15

Comment

Agent Marc Hourigan (1198382)
Email Address [REDACTED]
Address [REDACTED]
Consultee Gladman Developments (1118265)
Email Address [REDACTED]
Company / Organisation Gladman Developments
Address [REDACTED]
Event Name Proposed Main Modifications 2018
Comment by Gladman Developments (Gladman Developments - 1118265)
Comment ID PMM2018:53
Response Date 28/01/19 11:01
Consultation Point Proposed Main Modification 15 ([View](#))
Status Processed
Submission Type Email
Version 0.5
Files [Hourigan for Gladman Developments.pdf](#)

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Do you **Object**

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4.1 Whilst Gladman note that these modifications outline that the SEL's will not deliver in full within the Plan period and that some delivery will be beyond this it provides no further details within the Plan of the anticipated delivery rates for these key sites. Gladman recommend that the Council identify within the Plan the anticipated delivery from these sites within the plan period inline with the Inspectors recommendations. This will provide further clarity.

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[Hourigan for Gladman Developments.pdf](#)

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Gladman recommend that the Council identify within the Plan the anticipated delivery from these sites within the plan period inline with the Inspectors recommendations. This will provide further clarity.

Summary

Recommend anticipated delivery is identified within the plan.

Family or Company Name: Gladman Developments
Agent: Hourigan, Marc
PMM: MM16

Comment

Agent Marc Hourigan (1198382)
Email Address [REDACTED]
Address [REDACTED]
Consultee Gladman Developments (1118265)
Email Address [REDACTED]
Company / Organisation Gladman Developments
Address [REDACTED]
Event Name Proposed Main Modifications 2018
Comment by Gladman Developments (Gladman Developments - 1118265)
Comment ID PMM2018:54
Response Date 28/01/19 11:03
Consultation Point Proposed Main Modification 16 ([View](#))
Status Processed
Submission Type Email
Version 0.5
Files [Hourigan for Gladman Developments.pdf](#)

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Do you Object

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[Hourigan for Gladman Developments.pdf](#)

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What changes would address the issue(s) that you have identified?

Gladman recommend that the Council identify within the Plan the anticipated delivery from these sites within the plan period inline with the Inspectors recommendations. This will provide further clarity.

Summary

Recommend anticipated delivery is identified within the plan.

Family or Company Name: Gladman Developments
Agent: Hourigan, Marc
PMM: MM25

Comment

Agent Marc Hourigan (1198382)
Email Address [REDACTED]
Address [REDACTED]
Consultee Gladman Developments (1118265)
Email Address [REDACTED]
Company / Organisation Gladman Developments
Address [REDACTED]
Event Name Proposed Main Modifications 2018
Comment by Gladman Developments (Gladman Developments - 1118265)
Comment ID PMM2018:55
Response Date 28/01/19 11:04
Consultation Point Proposed Main Modification 25 ([View](#))
Status Processed
Submission Type Email
Version 0.4
Files [Hourigan for Gladman Developments.pdf](#)

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[Hourigan for Gladman Developments.pdf](#)

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Gladman recommend that the Council identify within the Plan the anticipated delivery from these sites within the plan period inline with the Inspectors recommendations. This will provide further clarity.

Summary

Recommend anticipated delivery is identified within the plan.

Family or Company Name: Godfrey, Jane
Agent: PlanSurv Ltd (Hendry, Michael)
PMM: MM1

Comment

Agent	Mr Michael Hendry (772729)
Email Address	[REDACTED]
Company / Organisation	PlanSurv Ltd
Address	[REDACTED]
Consultee	Ms Jane Godfrey (1196923)
Address	[REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Ms Jane Godfrey (1196923)
Comment ID	PMM2018:13
Response Date	22/01/19 15:41
Consultation Point	Proposed Main Modification 1 (View)
Status	Processed
Submission Type	Web
Version	0.7
Files	Cage Lane FRA and Drainage Strategy For Submission.pdf Cage Lane Gt Staughton SketchSitePlan-S3-P1.pdf Transport Statement

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Object

Do you consider this proposed main modification Not Sound to be sound?

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Effective

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

Main Modification 1 (MM1) risks the on-going sustainability of the settlements of Alconbury, Bluntisham and Great Staughton through the removal of the Local Service Centres tier from the hierarchy and the opportunity that those residential allocations represent for the continued growth of these settlements, their ability to retain existing and attract new services and maintain a diverse population. Main Modification 1 should not be made as it is unjustified and limits the effectiveness of the Plan. The Local Service Centres tier of the hierarchy should be maintained along with the proposed allocations. If the Inspector feels that the Local Service Centres tier should be removed then the allocations proposed in the settlements of Alconbury, Bluntisham and Great Staughton should be retained within the Small Settlement tier to ensure that the positive impacts that proportionate growth will have on these settlements is not lost. An indicative layout plan, Transport Statement and Flood Risk Assessment accompany the representation to demonstrate the deliverability and sustainability of the Land Between 20 Cage Lane and Averyhill, Great Staughton (Emerging Allocation GS 2).

Supporting documents

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to a website where it is available or give a full reference (including author(s), full title and date of publication) in your comment.

By submitting a supporting document you give permission for the council to use it for the purposes of drawing up planning policy for Huntingdonshire and to reproduce the document for such purposes.

Please note: There is no limit to the size of documents that can be uploaded but please only upload relevant documents and consider the use of extracts for long documents.

To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

Transport Statement

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Main Modification 1 should not be made; however, if the Inspector feels that the Local Service Centres tier should be removed then the allocations proposed in the settlements of Alconbury, Bluntisham and Great Staughton should be retained within the Small Settlement tier to ensure that the positive impacts that proportionate growth will have on these settlements is not lost.

Summary

Object to Main Modification 1. It is considered unjustified and limits the effectiveness of the Plan. The Local Service Centres tier of the hierarchy should be maintained along with the proposed allocations. This ensures that the positive impacts that proportionate growth will have on these settlements is not lost and allows Local Service Centres to retain existing and attract new services. Allocation GS 2 is deliverable and sustainable. An indicative layout plan, Transport Statement and Flood Risk Assessment accompany the representation to demonstrate the deliverability of the site.



SCHEDULE OF ACCOMMODATION

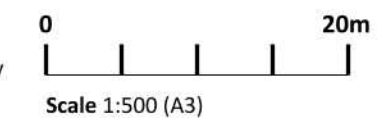
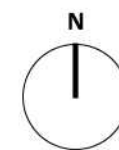
2 bed (75-80sqm) - 4no.
3 bed (90-110sqm) - 5no.
4 bed (120-130sqm) - 3no.

Total 12no. dwellings

Site Area: 0.39ha (subject to survey & land registry)

Subject to:

- Planning
- Highways
- Services
- Tree Survey
- Topographical Survey
- Site Investigation



Transport Statement

January 2019



EAS

**Land Between 20
Cage Lane
Avery Hill**

Great Staughton

Huntingdonshire

Document History

JOB NUMBER: 2026/2019
DOCUMENT REF: Cage Lane Transport Statement Jan 2019
REVISIONS: B – For Submission

Revision	Comments	By	Checked	Authorised	Date
A	Client Draft	EC	SA	SA	15/01/2019
B	For Submission	EC	SA	SA	21/01/2019

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1 Introduction

- 1.1 EAS has been commissioned to prepare a Transport Statement to support the promotion of land between 20 Cage Lane and Avery Hill, Great Staughton, Huntingdonshire. A location plan and red line boundary is included as **Appendix A**.
- 1.2 The red line boundary covers an area of 0.39 hectares. The existing site is undeveloped and is located on the edge of the village of Great Staughton. It is understood the proposed size of development at the site could offer approximately 14 homes as well as the provision of access for pedestrians and vehicles. The initial sketch of a site plan demonstrates 12 dwellings comprising of four 2-bed houses, five 3-bed houses and three 4-bed houses. The initial sketch is contained in **Appendix B**.
- 1.3 This Transport Statement has been commissioned to identify the sustainability of the site and to support the site for promotion through the Local Plan process.
- 1.4 This document includes:
 - Section 2 describes relevant transport policy;
 - Section 3 describes the local area including the existing facilities and transport network;
 - Section 4 describes the proposals including access, parking and servicing;
 - Section 5 describes the site sustainability and impact upon the local network; and
 - Section 6 provides a summary and conclusions.

2 Policy Context

Introduction

- 2.1 This section sets out the policy context. Development and growth are encouraged at National, and local level. How this is made sustainable in the longer term is by encouraging walking, cycling and public transport use.

National Planning Policy Framework (NPPF) 2018

- 2.2 The revised National Planning Policy Framework was published on 24 July 2018 and sets out the government's planning policies for England and how these are expected to be applied. The revised Framework replaces the previous National Planning Policy Framework published in March 2012.
- 2.3 Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.
- 2.4 The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 2.5 In respect of that, Paragraph 10 of the NPPF states:

“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.”

- 2.6 Section 9 of the NPPF relates to Promoting Sustainable Transport and paragraphs 102 to 104 say;

“102. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

a) the potential impacts of development on transport networks can be addressed;

b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

103. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine

choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

104. Planning policies should:

a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;

b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;

c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;

d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);

e) provide for any large-scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and

f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy.”

2.7 Paragraphs 105 and 106 discuss parking standards and say;

105. “If setting local parking standards for residential and non-residential development, policies should take into account:

a) the accessibility of the development;

b) the type, mix and use of development;

c) the availability of and opportunities for public transport;

d) local car ownership levels; and

e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles

106. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.”

2.8 When Considering development proposals, in relation to transport, paragraphs 108 to 111 say;

“108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;**
- b) safe and suitable access to the site can be achieved for all users; and**
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”**

“109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

“110. Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;**
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;**
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;**
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and**
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”**

“111. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.”

Cambridgeshire Design Guide for Streets and the Public Realm (2007)

- 2.9 Section 8 of this document sets out indicative levels of residential car parking provision reflecting the likely variations in density, level of local amenity and availability of alternative modes of transport. Table 2.1 shows the indicative minimum and maximum levels of car parking provision in rural areas.

Number of bedrooms	Allocated minimum	Allocated maximum
1	1	2
2 – 3	1.5	3
4	2	4

Table 2.1: Indicative parking provision in rural areas (Cambs Design Guide Section 8)

- 2.10 The table assumes that spaces are allocated to dwellings. The Guide recommends that where the maximum quantity of parking provision is proposed, it may be appropriate to provide some of the spaces on an unallocated basis to allow flexibility to accommodate casual visitors. Where the minimum quantity is proposed, parking space should also be provided on an unallocated basis to accommodate visitors and spaces for disabled drivers.

The Huntingdonshire LDF Core Strategy (2009)

- 2.11 Policy CS10 on Contributions to Infrastructure Requirements states that development proposals will be expected to provide or contribute towards the cost of providing appropriate infrastructure, and of meeting social and environmental requirements, where these are necessary to make the development acceptable in planning terms and where this complies with the requirements set out in Circular 5/2005 on Planning Obligations or successor documents. Contributions that may be required include transport (including footpaths, bridleways, cycleways, highways, public transport, car parks and travel planning).

Huntingdonshire's Local Plan to 2036 Proposed Submission 2017

- 2.12 This document is still in the process of consultation but may be a material consideration in planning decisions. Policy LP17 on Sustainable Travel states that a proposal will be supported where it is demonstrated that:
- *opportunities are maximised for the use of sustainable travel modes;*
 - *traffic volumes can be accommodated and will not cause significant harm to the character of the surrounding area;*
 - *any adverse effects of traffic movement to, from and within the site including the effect of car parking are minimised;*
 - *a clear network of routes is provided that provides connectivity and enables ease of access, to, around and within the proposal and with the wider settlement for all potential users, including those with impaired mobility; and*
 - *safe and convenient pedestrian and cycle routes, including links to new and existing services, facilities, footpaths, bridleways and the countryside are provided where appropriate and if possible formalised as rights-of-way.*
- 2.13 To demonstrate the likely impacts of a sustainable development proposal, and describe mitigation measures, a Transport Assessment or Transport Statement is likely to be required in accordance with the Council's planning application validation requirements.
- 2.14 Policy LP 18 on Parking Provision states that a proposal will be supported where it incorporates appropriately designed vehicle and cycle parking with a clear justification for the level of provision proposed, having regard to:
- *the potential to increase the use of alternative transport modes including public transport, walking and cycling;*
 - *highway safety;*
 - *servicing requirements;*
 - *the needs of potential users; and*
 - *the amenity of occupiers of nearby properties.*
- 2.15 Parking provision should be considered as an integral part of the design process and its impact on the surrounding landscape minimised. Reference should be made to the *Cambridgeshire Design Guide* and the *Huntingdonshire Design Guide* or successor

documents and to the *Lifetime Homes* standard. Parking facilities may be shared where location and patterns of use permit. Careful consideration will be given to the siting and design of garaging, responding to the character and appearance of the area. Minimum levels of car parking for disabled people as set out in national guidance such as Traffic Advisory Leaflet 05/05 or BS 8300: 2009 *Design of Buildings and their Approaches to Meet the Needs of Disabled People* will be required.

- 2.16 Paragraphs 7.9 and 7.10 acknowledge the high level of car ownership in Huntingdonshire and the limited public transport in many smaller settlements. For residential development adequate car parking is important. A combination of allocated and unallocated spaces can provide flexibility in providing appropriate levels of car parking, as identified in *Residential Car Parking Research* (DCLG, 2007) and *Car Parking: What Works Where*, published by English Partnerships. However, the Local Plan does not specify any levels of parking provision, whether minimum, maximum or recommended.
- 2.17 Paragraph 7.11 states that secure cycle parking is expected with all development to encourage cycling as an alternative for shorter journeys. Applications should identify the location of at least one secure cycle space per bedroom for homes.

The Huntingdonshire Design Guide (2017)

- 2.18 This document does not set out numerical standards for parking provision, focusing instead on design aspects:

“Accommodating enough cars to meet reasonable expectations from the owner / user of the development proposed is an important objective, but the parking debate cannot be exclusively about how much. Whatever the level of car parking, the focus has to be on providing it in convenient locations and making it safe and attractive. This is important for successful place making”.

- 2.19 To encourage cycle use, the document states (page 96) that it will be necessary to provide secured covered cycle parking provision within all new developments. This should be within garages where these are of suitable size but where there is no garage, cycle parking is to be provided by way of a covered and secure structure within the domestic curtilage, such as a garden shed.
- 2.20 With regard to refuse collection, the document states (page 98) that where it is not proposed to provide access to all dwellings' refuse bins individually a collection point will need to be provided but this must not be more than 30 metres from where bins are stored or 20 metres from the edge of the adopted highway.

3 Existing Site Assessment

Site Location and Local Facilities

- 3.1 The existing site is situated on the western side of Cage Lane adjacent to 20 Cage Lane. The site comprises of a total of 0.39 hectares and is currently undeveloped land.
- 3.2 Cage Lane is a residential street with circa 4.8metre wide carriageway width and circa 2metre footway present on the western side. There are residential accesses situated along Cage Lane on both sides of the carriageway for the first 150metres from The Highway with sporadic street lighting up to this point.
- 3.3 Cage Lane as a speed limit of 30mph until just outside the sites boundary where it changes to national speed limit and the aesthetics of the road change from a residential street to a rural road with agricultural fields situated on either side of the carriageway.
- 3.4 The main road that passes through Great Staughton is 'The Highway' and there are traffic calming measures present for vehicles entering from the east along the B645 where the speed limit changes from national speed limit to 30mph.
- 3.5 Within Great Staughton residents have access to a doctor's surgery, Great Staughton Primary School, hair salons, a farm butchers that also sells vegetables, a florist, and two pub/restaurants. A map showing the location of these facilities and the site's location within Great Staughton is contained in **Appendix C**.

Walking

- 3.6 The immediate pedestrian environment outside the site there is a footway present circa 2metre starting outside 20 Cage Lane leading south towards the B645 The Highway where there are footways present circa 2metre on either side of the carriageway in both directions.
- 3.7 In addition to the pedestrian 'on road' facilities there are various other footpaths and bridleways surrounding the site that are illustrated in **Appendix C**.

Cycling

- 3.8 Cambridgeshire County Council cycle routes and maps demonstrates the available cycle routes within Huntingdonshire and the surrounding areas. Cycle route 7 is present through Great Staughton. Cycle route 7 has been illustrated in **Appendix C**.

Bus

- 3.9 There is an existing bus stop located approximately 400metres south west of the site along The Highway for westbound travel. This bus stop is served by routes 150 and 400.
- 3.10 Route 150 provides access to St Neots – Kimbolton - Tillbrook. This service is provided by Traveline and it has 4 services Monday to Friday.
- 3.11 Route 400 provides access to Huntingdon – Spaldwick. This service is provided by Go-Whippet and it has 5 services per day.
- 3.12 The bus maps for the two routes are contained in **Appendix D**.

Accident Data

- 3.13 Accident data was obtained for the five-year period ending in 2017 from the Crashmap website. An overview of the accident data is contained in **Appendix E**.
- 3.14 In close proximity to the site a slight accident was recorded on Saturday the 11th April 2015 at 09:30 involving two vehicles. The accident appeared to be a shunt accident with both vehicles travelling straight along the road. This accident would not indicate any existing recurring accident issue therefore no mitigation measure would be required.

4 The Proposed Development

The Development Proposals

- 4.1 It is understood the proposed size of development at the site could offer approximately 14 homes as well as the provision of access for pedestrians and vehicles. The initial sketch of a site plan demonstrates 12 dwellings comprising of four 2-bed houses, five 3-bed houses and three 4-bed houses. The initial sketch is contained in **Appendix B**.

Pedestrian Facilities

- 4.2 The existing circa 2metre footway would need to be extended to the proposed new access into the site to aid safe passage for potential residents walking to and from the site into the village of Great Staughton.

Vehicle Access

- 4.3 Cage Lane narrows slightly outside the site to circa 3.8metres. It is proposed to widen the carriageway outside the site to 4.8metres which would tie in with the existing carriageway width outside 20 Cage Lane. Access for vehicles will be via Cage Lane in the form of a 5.5metre wide access road with 6metre radii, this has been demonstrated in **Appendix F**.
- 4.4 Visibility splays have been illustrated from the proposed access arrangement. To the south of the site access a visibility splay of 2.4metres X 113metres could be achieved, which is suitable for a design speed of 43mph based on the guidance of the Design Manual for Roads and Bridges (DMRB).
- 4.5 Due to vehicles travelling northbound towards the access would be either within or just exiting the 30mph speed restriction and proceeding towards a bend in the carriageway, the vehicle speeds are likely to be closer to 30mph. As such this splay length is deemed to be acceptable
- 4.6 To the north of the site access a visibility splay of 2.4metres X 133metres can be achieved, which is suitable for a design speed of 43mph based on the guidance of the Design Manual for Roads and Bridges (DMRB).
- 4.7 It is expected that this design speed is likely to be acceptable as southbound are likely to be driving at a lower speed due to the bend in the carriageway north of the site and the narrow carriageway width. An ATC speed survey could be undertaken at a later stage to establish the exact speed of vehicles travelling southbound along Cage Lane.
- 4.8 Some minor removal of vegetation, mostly low grade hedgerow, would be required at the position of the access and to facilitate the visibility splays.
- 4.9 It is noted that the current masterplan also illustrates a single residential access to the south of the main site access. This access would most likely be located just within the 30mph zone and would also have suitable visibility on both direction along Cage Lane.

Car Parking

- 4.10 Huntingdonshire's Local Plan to 2036: Proposed Submission 2017 - Policy LP 18 on Parking Provision states that; a proposal will be supported where it incorporates appropriately designed vehicle and cycle parking with a clear justification for the level of provision proposed.
- 4.11 Parking provision should be considered as an integral part of the design process and its impact on the surrounding landscape minimised. Reference should be made to the *Cambridgeshire Design Guide* and the *Huntingdonshire Design Guide* or successor documents and to the *Lifetime Homes* standard. Parking facilities may be shared where location and patterns of use permit. Careful consideration will be given to the siting and design of garaging, responding to the character and appearance of the area. Minimum levels of car parking for disabled people as set out in national guidance such as Traffic Advisory Leaflet 05/05 or BS 8300: 2009 *Design of Buildings and their Approaches to Meet the Needs of Disabled People* will be required.
- 4.12 Paragraphs 7.9 and 7.10 acknowledge the high level of car ownership in Huntingdonshire and the limited public transport in many smaller settlements. For residential development adequate car parking is important. A combination of allocated and unallocated spaces can provide flexibility in providing appropriate levels of car parking, as identified in *Residential Car Parking Research* (DCLG, 2007) and *Car Parking: What Works Where*, published by English Partnerships. However, the Local Plan does not specify any levels of parking provision, whether minimum, maximum or recommended.
- 4.13 The future car parking provision will take account of the above guidance when setting proposed parking levels.

Cycle Facilities

- 4.14 Huntingdonshire's Local Plan to 2036: Proposed Submission 2017 - Policy LP 18 on Parking Provision states that; parking provision should be considered as an integral part of the design process and its impact on the surrounding landscape minimised. Reference should be made to the *Cambridgeshire Design Guide* and the *Huntingdonshire Design Guide* or successor documents and to the *Lifetime Homes* standard.
- 4.15 Paragraph 7.11 states that secure cycle parking is expected with all development to encourage cycling as an alternative for shorter journeys. Applications should identify the location of at least one secure cycle space per bedroom for homes.
- 4.16 The future cycle parking provision will take account of the above guidance when setting proposed parking levels.

Servicing

- 4.17 It is recommended that a suitable turning head is incorporated into the future design to accommodate a large refuse vehicle.

Summary

- 4.18 The proposed access would be located shortly after the change in the speed restriction and it is proposed the carriageway adjacent to the site access would be widened to tie into the 4.8m carriageway width of Cage Lane to the south of the site.
- 4.19 Pedestrian access to the development will be from Cage Lane and the existing circa 2metre wide footway that would extend to the site leading to an internal shared surface.
- 4.20 A speed survey may be required at a later stage to establish the true vehicle speeds along Cage Lane in order to demonstrate the required visibility splays.
- 4.21 Any proposed development would be required to ensure that vehicle and cycle parking provision is in line with the standards set within the Cambridgeshire Design Guide and the Huntingdonshire's Local Plan to 2036: Proposed Submission 2017.

5 Development Impact

Introduction

- 5.1 For the purpose of this report this section discusses the predicted transport impacts of an approximate of up to 14 dwellings, with the current masterplan illustrating only 12 dwellings.

Trip Generation

- 5.2 To obtain an estimate of the likely vehicle trips associated with the development, a TRICS assessment has been undertaken for the proposed residential element. A summary of the TRICS trip rate generation for the residential element is shown below in table 4.1, and the TRICS datasheets are included in **Appendix G**.

	AM Peak (08:00 – 09:00)		PM Peak (17:00 – 18:00)	
	Arrivals	Departures	Arrivals	Departures
Trip Rate (unit)	0.139	0.392	0.353	0.161

Table 5.1 TRICS Vehicle Trip Rates (Residential)

- 5.3 Based on a development of 14 dwellings for the site the following trips are predicted to be generated from the proposed development:

	AM Peak (08:00 – 09:00)		PM Peak (17:00 – 18:00)	
	Arrivals	Departures	Arrivals	Departures
Trip Rate per dwelling	2	5	5	3

Table 5.2 Development Traffic Movements (residential) from TRICS

- 5.4 Therefore, a proposal of 14 residential properties would generate approximately 7 vehicle trips in the AM peak hour (2 in / 5 out) and 8 vehicle trips in the PM peak hour (5 in / 3 out).
- 5.5 This level of traffic of 1 vehicle trip every 7-8 minutes would have a negligible impact on the local road network and no mitigation measures would be expected to be required to support this level of development, other than the proposed access works.

Multi Modal Trip Rates

- 5.6 In accordance with best practice multi modal trip rates have been considered. There are two ways to readily provide information for multi modal trips, one is to review TRICS sites where multi modal data has been collected and the other is to look at census data to determine the mode of travel to work. Both have pitfalls. The TRICS data is based on surveys of other sites selected because of geographical similarities but there are of course many variables at the detailed level for example proximity to a cycle route or bus route. And the journey to work census data by definition does not include the multitude of other trip purposes taking place throughout the day. In this assessment we have looked at TRICS sites only.

TRICS multi modal data

5.7 TRICS sites have been selected that include multi modal information. The results are:

	All Day Trip Rate (07:00 to 22:00)			All Day Trip Number (14 units)		
	In	Out	Total	In	Out	Total
Rail	0.022	0.032	0.054	0	0	1
Bus	0.077	0.078	0.155	1	1	2
Walk	0.570	0.562	1.132	8	8	16
Cyclist	0.074	0.078	0.152	1	1	2
Total	0.743	0.75	1.493	10	11	21

Table 5.3 TRICS based All Day multi modal trips. (Allowing for rounding).

	AM Peak Trip Rate (08:00 to 09:00)			AM Peak Trip Number (14 units)		
	In	Out	Total	In	Out	Total
Rail	0.000	0.011	0.011	0	0	0
Bus	0.000	0.023	0.023	0	0	0
Walk	0.032	0.117	0.149	0	2	2
Cyclist	0.006	0.012	0.018	0	0	0
Total	0.038	0.163	0.201	1	2	3

Table 5.4 TRICS based AM Peak multi modal trips. (Allowing for rounding).

	PM Peak Trip Rate (17:00 to 18:00)			PM Peak Trip Number (14 units)		
	In	Out	Total	In	Out	Total
Rail	0.008	0.001	0.009	0	0	0
Bus	0.013	0.002	0.015	0	0	0
Walk	0.068	0.042	0.110	1	1	2
Cyclist	0.018	0.010	0.028	0	0	0
Total	0.107	0.055	0.162	1	1	2

Table 5.5 TRICS based PM Day multi modal trips. (Allowing for rounding).

5.8 Based on the TRICS multi modal data, shown in Tables 5.3 to 5.5 above, it is likely that a residential element of the site would generate of the order of 21 non-car trips throughout the course of the day, with 3 in the AM peak period and 2 in the PM peak period; these being walking trips in each of the peak periods.

6 Summary and Conclusions

- 6.1 This Transport Statement has been prepared in support of the promotion of land between 20 Cage Lane and Avery Hill, Great Staughton, Huntingdonshire.
- 6.2 This Transport Statement has been commissioned to identify the sustainability of the site and to support the site for promotion through the Local Plan process.
- 6.3 The existing site is undeveloped land that covers an area of 0.4 hectares located on the edge of the village of Great Staughton. It is understood the proposed size of development at the site could offer approximately 14 homes. An initial sketch of a site plan demonstrates 12 dwellings comprising of four 2-bed houses, five 3-bed houses and three 4-bed houses.
- 6.4 Within Great Staughton residents have access to a doctor's surgery, Great Staughton Primary School, hair salons, a farm butchers that also sells vegetables, a florist, and two pub/restaurants.
- 6.5 There are around 9 buses a day that frequent the bus stop situated approximately 400m south west of the site along The Highway in the village of Great Staughton.
- 6.6 The available pedestrian environment is adequate surrounding the site with a circa 2metre wide footway present on the same side of the carriageway as the site along Cage Lane that leads in to the village. In addition to the 'on road' pedestrian facilities there are various other footpaths and bridleways surrounding the site.
- 6.7 The review of accident data indicated that although there was a slight accident along Cage Lane to the north of the site, this single shunt type accident would not indicate any existing recurring accident issue therefore no mitigation measure would be required.
- 6.8 An access road of 5.5metre wide carriageway and 6metre radii can be accommodated and a speed survey could be undertaken in the future to establish the exact vehicle speeds of those vehicles travelling southbound through the bend in Cage Lane towards the site.
- 6.9 The proposed access would be located shortly after the change in speed restrictions and the existing residential properties, and it is proposed the carriageway adjacent to the site access would be widened to tie into the 4.8m carriageway width of Cage Lane to the south of the site. Pedestrian access will be from Cage Lane with the existing footway being extended into the site access.
- 6.10 Vehicle and cycle parking will need to be in accordance with the standards set within the Cambridgeshire Design Guide and the Huntingdonshire's Local Plan to 2036: Proposed Submission 2017.

Conclusion

- 6.11 The proposed development is compliant with national and local policies; a suitable access arrangement can be demonstrated; and the likely level of traffic generation will have negligible effect on the local highway network. No highways or transportation reasons have been identified why the proposed development should not be considered acceptable for promotion through the Local Plan process.

7 Appendices

- Appendix: A – Red Line Boundary Plan
- Appendix: B – Indicative Site Layout
- Appendix: C – Location and Facilities Plan
- Appendix: D – Bus Services Maps
- Appendix: E – Accident Data
- Appendix: F – Access Arrangement and Visibility Splays
- Appendix: G – TRICS Assessment



Appendix: A – Red Line Boundary Plan



REV	DATE	BY	DESCRIPTION	CHK	APD

DRAWING STATUS:
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Unit 23, The Maltings, Stanstead Abbots, Hertfordshire, SG12 8HG
 Tel: 01920 871777
 www.eastp.co.uk

CLIENT:

ARCHITECT:

PROJECT:
**LAND ADJACENT TO 20 CAGE LANE
 GREAT STAUGHTON**

TITLE:
LOCATION PLAN

SCALE @ A3: **1:10000** DESIGN-DRAWN: **RC** DATE: **08/01/2019**

PROJECT No: **2026** DRAWING No: **FIG02**



Appendix B – Indicative Site Layout



SCHEDULE OF ACCOMMODATION

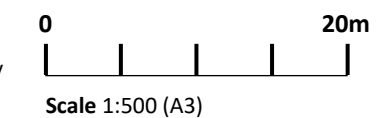
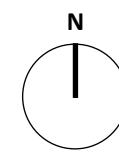
2 bed (75-80sqm) - 4no.
 3 bed (90-110sqm) - 5no.
 4 bed (120-130sqm) - 3no.

Total 12no. dwellings

Site Area: 0.39ha (subject to survey & land registry)

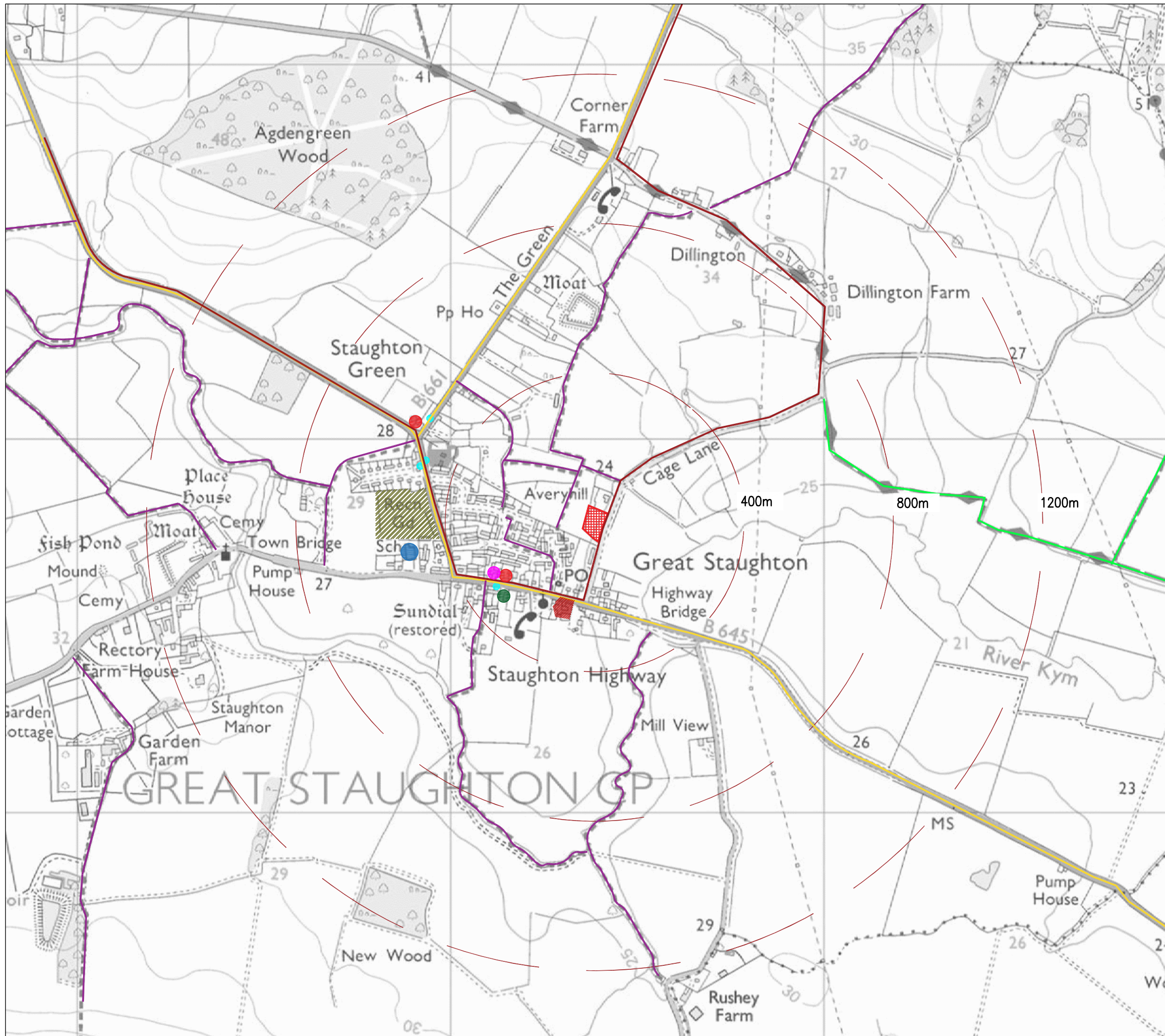
Subject to:

- Planning
- Highways
- Services
- Tree Survey
- Topographical Survey
- Site Investigation





Appendix: C – Location and Facilities Plan



- KEY:**
- SITE LOCATION
 - BUS STOPS
 - GREAT STAUGHTON PRIMARY SCHOOL
 - SNOOTY THE TAVERN / THE WHITE HART
 - RECREATIONAL GROUND
 - HAIR SALON
 - DOCTORS SURGERY
 - BUTCHERS / HAIR SALON / FLORISTS
 - HIGHWAY / FOOTPATHS
 - RESTRICTED BYWAYS / FOOTPATH
 - BRIDLEWAY
 - HUNTINGDONSHIRE (7) CYCLE RIDES. ROUTE FOLLOWS BUSY ROAD, TAKE EXTRA CARE

REV	DATE	BY	DESCRIPTION	CHK	APD

DRAWING STATUS:

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EAS

Unit 23, The Maltings, Stanstead Abbots, Hertfordshire, SG12 8HG
Tel: 01920 871777
www.eastp.co.uk

CLIENT:

ARCHITECT:

PROJECT:

**LAND ADJACENT TO 20 CAGE LANE
GREAT STAUGHTON**

TITLE:

LOCATION AND FACILITIES PLAN

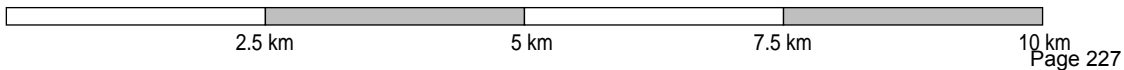
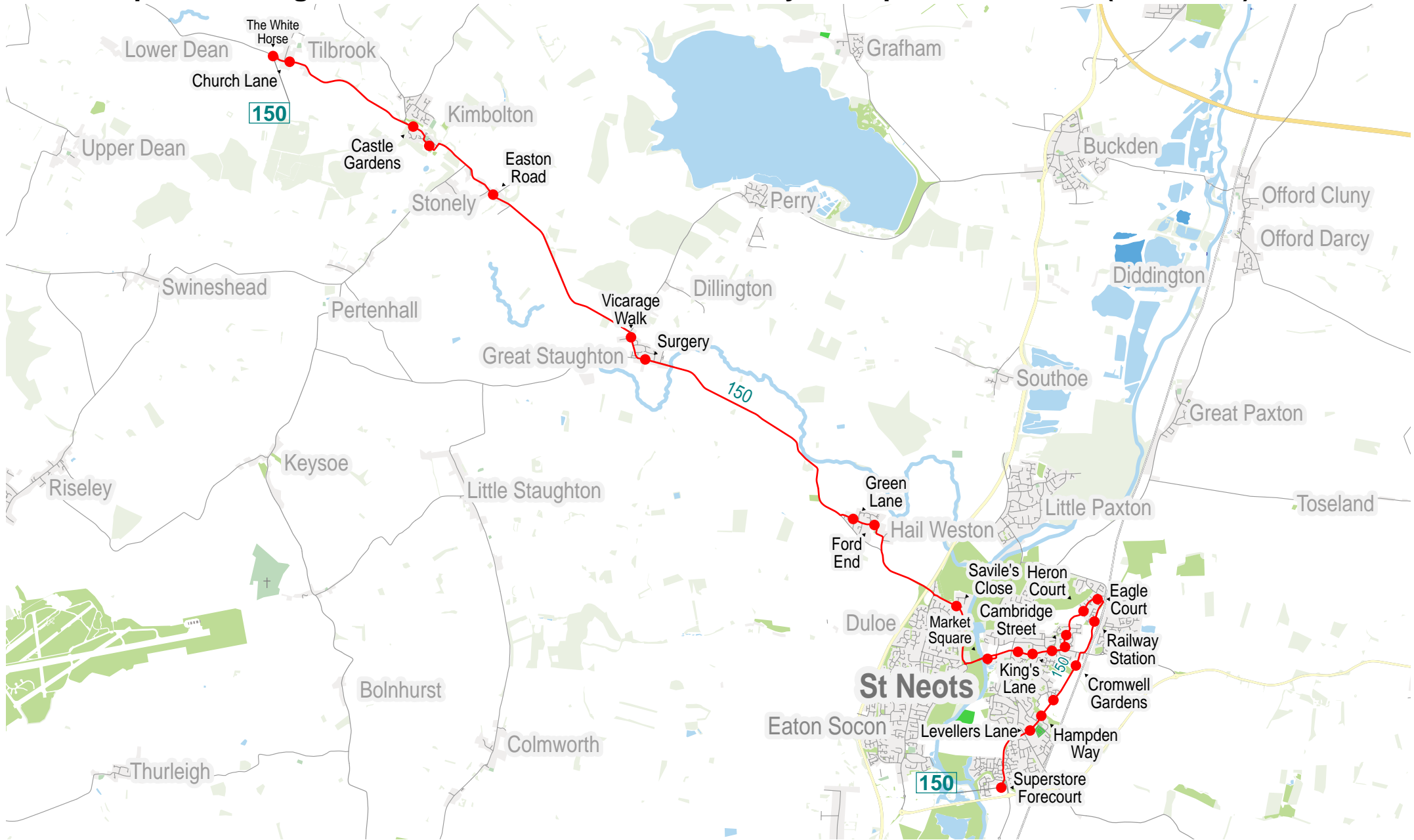
SCALE @ A3: 1:10000	DESIGN-DRAWN: EC	DATE: 04/01/2019
-------------------------------	----------------------------	----------------------------

PROJECT No: 2026	DRAWING No: FIG01
----------------------------	-----------------------------

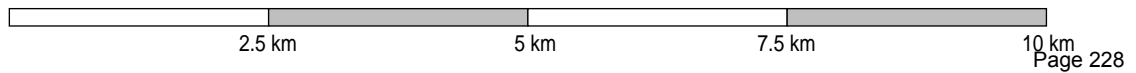
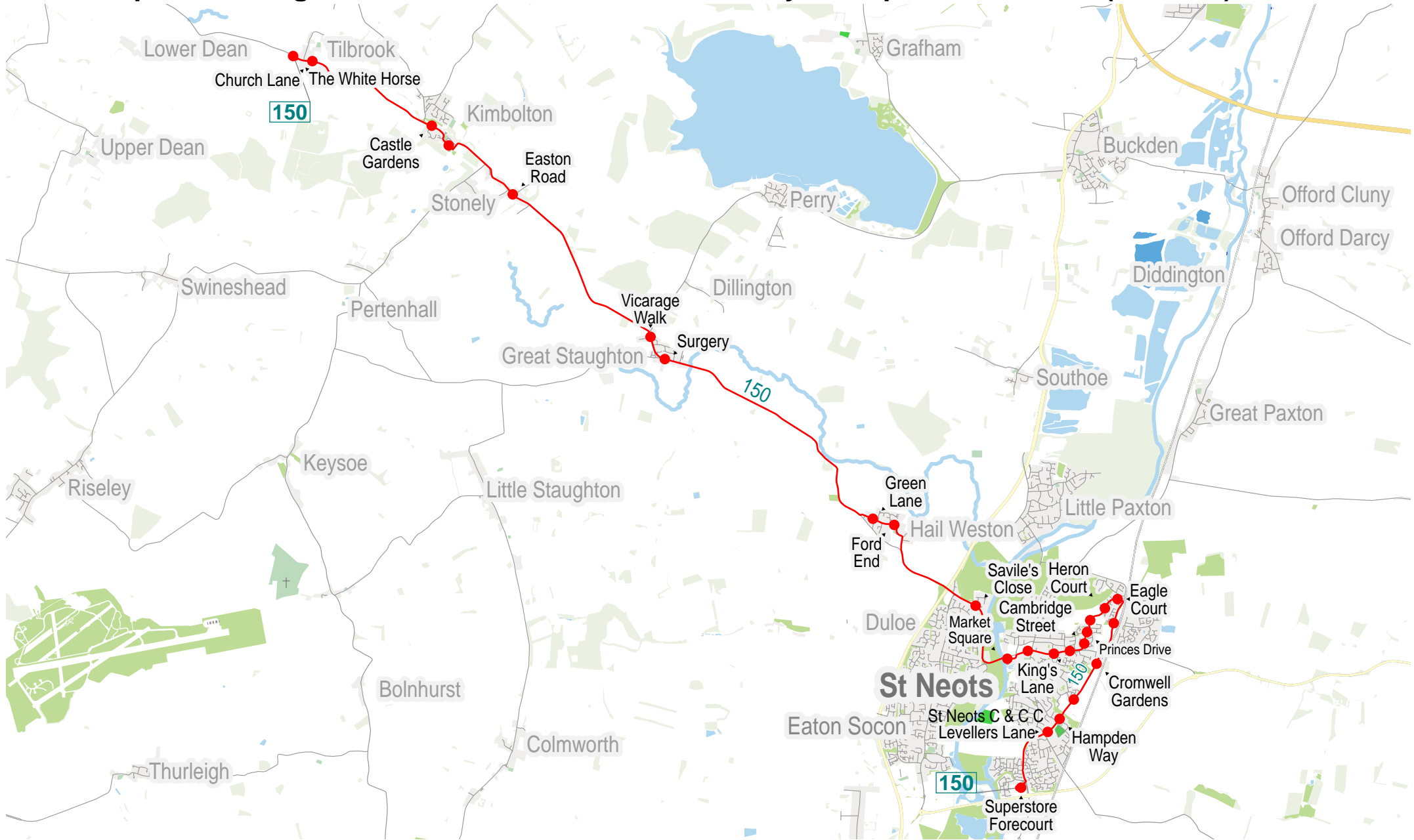


Appendix: D – Bus Services Maps

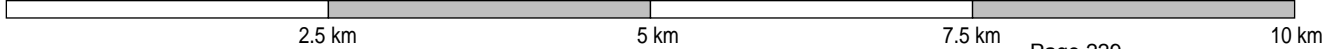
Route map for Huntingdonshire Association for Community Transport service 150 (outbound)



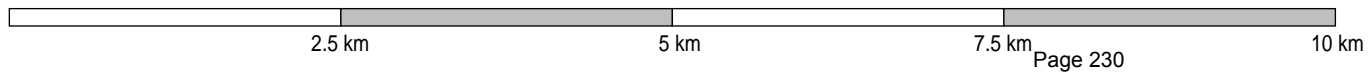
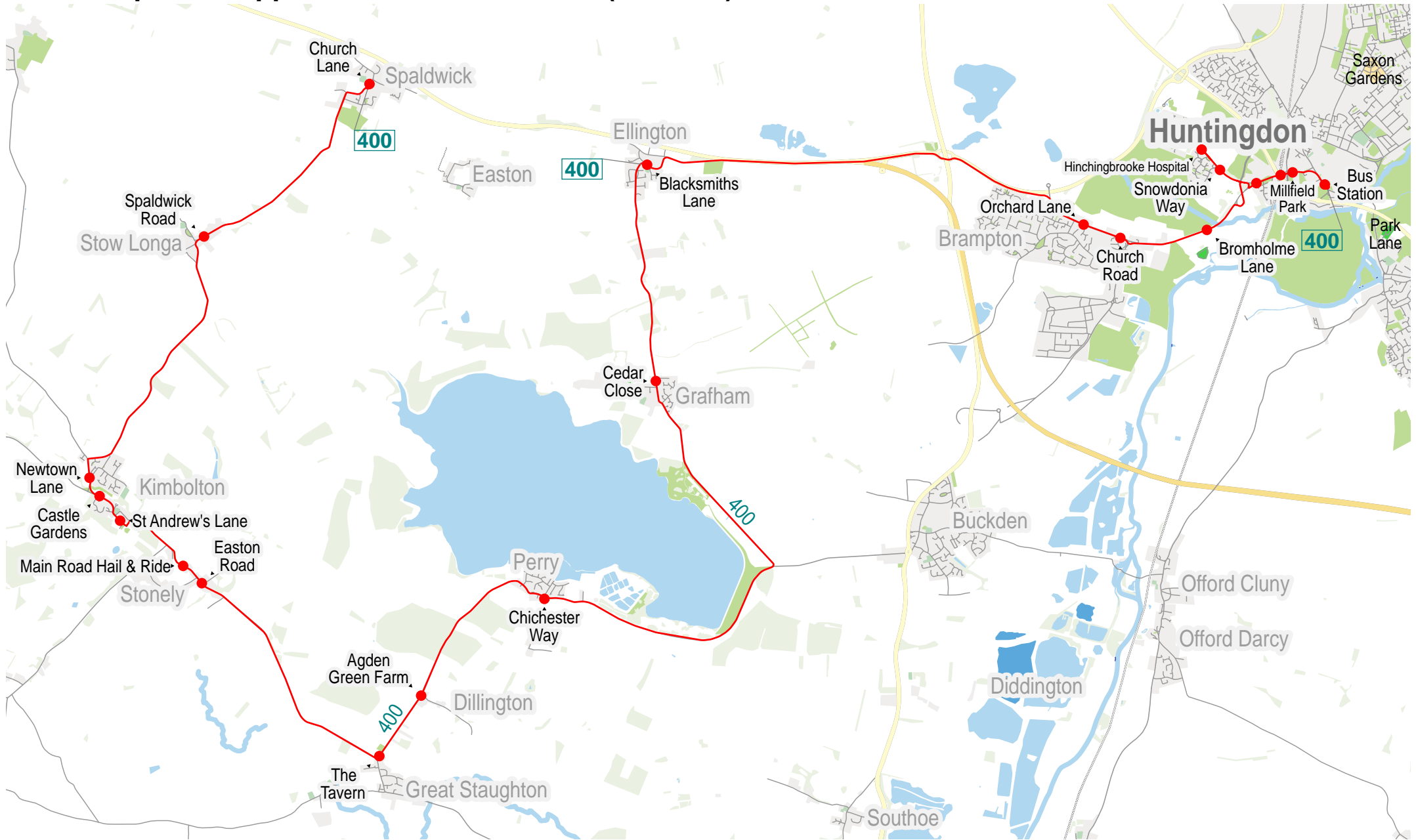
Route map for Huntingdonshire Association for Community Transport service 150 (inbound)



Route map for Whippet Coaches service 400 (outbound)



Route map for Whippet Coaches service 400 (inbound)





Appendix: E – Accident Data

Map Satellite

Incident Severity

- Slight
- Serious
- Fatal

7 results found

Location: pe19 5db

Years: 5 of 19 years selected

Severity: Fatal, Serious, Slight

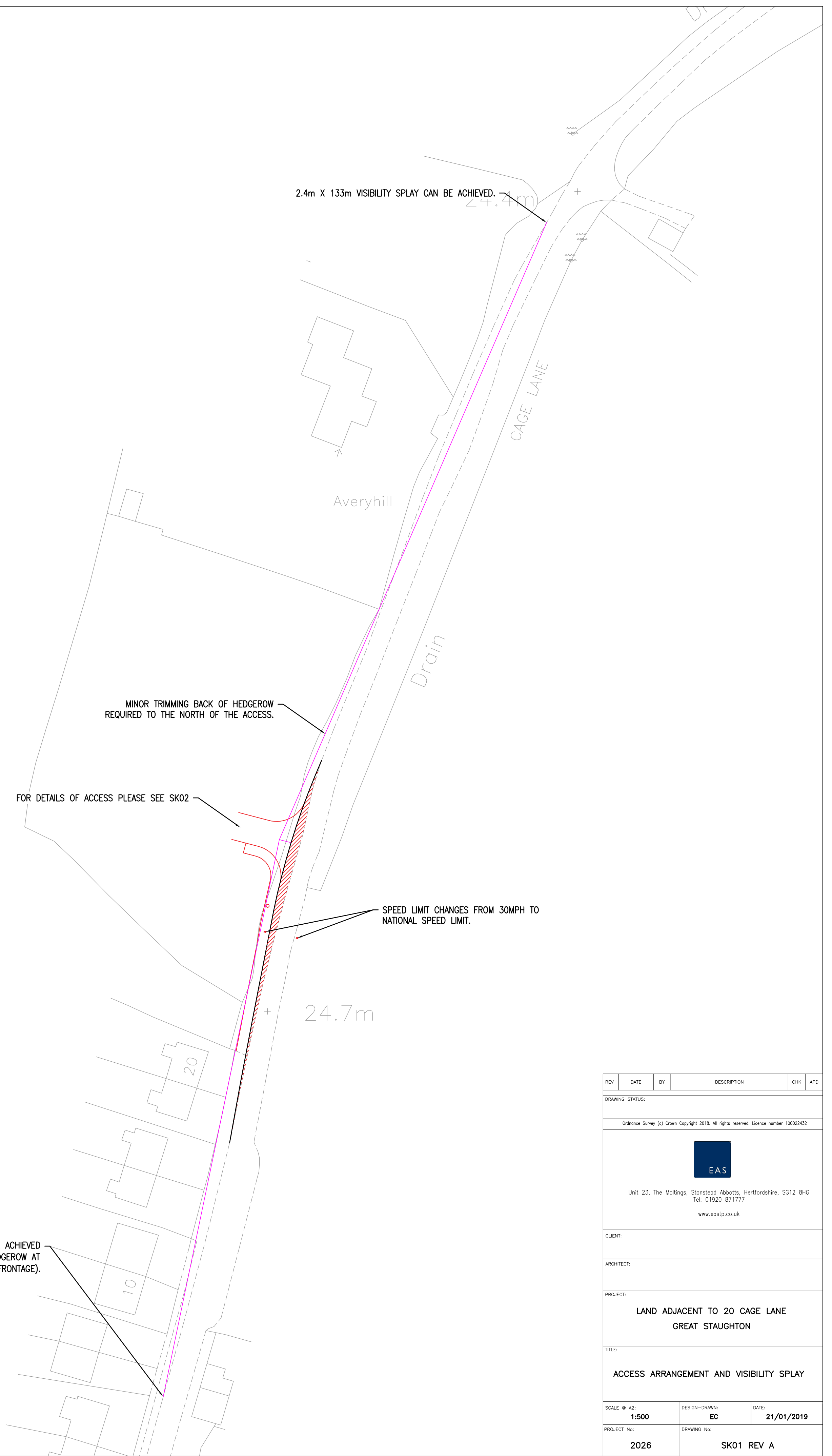
Casualty Types: All Casualty Types


Vehicles Involved: All Vehicle Types

Search



Appendix: F – Access Arrangement and Visibility Splays



REV	DATE	BY	DESCRIPTION	CHK	APD
DRAWING STATUS:					
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 Unit 23, The Mallings, Stanstead Abbots, Hertfordshire, SG12 8HG Tel: 01920 871777 www.eastp.co.uk					
CLIENT:					
ARCHITECT:					
PROJECT: LAND ADJACENT TO 20 CAGE LANE GREAT STAUGHTON					
TITLE: ACCESS ARRANGEMENT AND VISIBILITY SPLAY					
SCALE: A2: 1:500		DESIGN-DRAWN: EC		DATE: 21/01/2019	
PROJECT No: 2026		DRAWING No: SK01 REV A			

Drain

PROPOSED 5.5m WIDE ACCESS ROAD AND 2m FOOTWAY. COULD BE SHARED SURFACE WITHIN THE SITE.

R6.0m

WIDEN CARRIAGEWAY TO 4.8m TO ALLOW TWO CARS TO PASS.


R6.0m

BT POLE

CURRENT POSITION OF 30mph / NATIONAL SPEED LIMIT SIGNS.

PROPOSED 2m FOOTWAY TO EXTEND TO EXISTING FOOTWAY.

+ 24.7m

REV	DATE	BY	DESCRIPTION	CHK	APD
DRAWING STATUS:					
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 Unit 23, The Mallings, Stanstead Abbots, Hertfordshire, SG12 8HG Tel: 01920 871777 www.eastp.co.uk					
CLIENT:					
ARCHITECT:					
PROJECT: LAND ADJACENT TO 20 CAGE LANE GREAT STAUGHTON					
TITLE: ACCESS ARRANGEMENT					
SCALE: A2: 1:200		DESIGN-DRAWN: EC		DATE: 21/01/2019	
PROJECT No: 2026		DRAWING No: SK03 REV A			



Appendix: G – TRICS Assessment

Calculation Reference: AUDIT-743101-190103-0108

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED
 MULTI-MODAL VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	ES EAST SUSSEX	3 days
	HC HAMPSHIRE	1 days
	KC KENT	4 days
	SC SURREY	1 days
	WS WEST SUSSEX	5 days
04	EAST ANGLIA	
	CA CAMBRIDGESHIRE	2 days
	NF NORFOLK	3 days
	SF SUFFOLK	2 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Secondary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Number of dwellings
 Actual Range: 7 to 805 (units:)
 Range Selected by User: 7 to 805 (units:)

Parking Spaces Range: Selected: 16 to 1726 Actual: 16 to 1726

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/10 to 20/11/18

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	3 days
Tuesday	4 days
Wednesday	5 days
Thursday	6 days
Friday	3 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	21 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	9
Edge of Town	12

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	21
------------------	----

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3 20 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 1 mile:

1,000 or Less	1 days
1,001 to 5,000	2 days
5,001 to 10,000	5 days
10,001 to 15,000	5 days
15,001 to 20,000	3 days
20,001 to 25,000	5 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	1 days
25,001 to 50,000	2 days
50,001 to 75,000	4 days
75,001 to 100,000	5 days
100,001 to 125,000	1 days
125,001 to 250,000	8 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	5 days
1.1 to 1.5	16 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	7 days
No	14 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	21 days
-----------------	---------

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	CA-03-A-04	DETACHED		CAMBRI D G E S H I R E
	PETERBOROUGH THORPE PARK ROAD Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 9 <i>Survey date: TUESDAY 18/10/11</i>			<i>Survey Type: MANUAL</i>
2	CA-03-A-05	DETACHED HOUSES		CAMBRI D G E S H I R E
	EASTFIELD ROAD PETERBOROUGH Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 28 <i>Survey date: MONDAY 17/10/16</i>			<i>Survey Type: MANUAL</i>
3	ES-03-A-02	PRIVATE HOUSING		EAST SUSSEX
	SOUTH COAST ROAD PEACEHAVEN Edge of Town Residential Zone Total Number of dwellings: 37 <i>Survey date: FRIDAY 18/11/11</i>			<i>Survey Type: MANUAL</i>
4	ES-03-A-03	MIXED HOUSES & FLATS		EAST SUSSEX
	SHEPHAM LANE POLEGATE Edge of Town Residential Zone Total Number of dwellings: 212 <i>Survey date: MONDAY 11/07/16</i>			<i>Survey Type: MANUAL</i>
5	ES-03-A-04	MIXED HOUSES & FLATS		EAST SUSSEX
	NEW LYDD ROAD CAMBER Edge of Town Residential Zone Total Number of dwellings: 134 <i>Survey date: FRIDAY 15/07/16</i>			<i>Survey Type: MANUAL</i>
6	HC-03-A-20	HOUSES & FLATS		HAMPSHIRE
	CANADA WAY LIPHOOK Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 62 <i>Survey date: TUESDAY 20/11/18</i>			<i>Survey Type: MANUAL</i>
7	KC-03-A-03	MIXED HOUSES & FLATS		KENT
	HYTHE ROAD ASHFORD WILLESBOROUGH Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 51 <i>Survey date: THURSDAY 14/07/16</i>			<i>Survey Type: MANUAL</i>
8	KC-03-A-04	SEMI-DETACHED & TERRACED		KENT
	KILN BARN ROAD AYLESFORD DITTON Edge of Town Residential Zone Total Number of dwellings: 110 <i>Survey date: FRIDAY 22/09/17</i>			<i>Survey Type: MANUAL</i>

LIST OF SITES relevant to selection parameters (Cont.)

9	KC-03-A-06 MARGATE ROAD HERNE BAY	MIXED HOUSES & FLATS		KENT
	Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 363 <i>Survey date: WEDNESDAY 27/09/17</i>			
10	KC-03-A-07 RECVLVER ROAD HERNE BAY	MIXED HOUSES		KENT
	Edge of Town Residential Zone Total Number of dwellings: 288 <i>Survey date: WEDNESDAY 27/09/17</i>			
11	NF-03-A-01 YARMOUTH ROAD CAISTER-ON-SEA	SEMI DET. & BUNGALOWS		NORFOLK
	Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 27 <i>Survey date: TUESDAY 16/10/12</i>			
12	NF-03-A-02 DEREHAM ROAD NORWICH	HOUSES & FLATS		NORFOLK
	Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 98 <i>Survey date: MONDAY 22/10/12</i>			
13	NF-03-A-03 HALING WAY THETFORD	DETACHED HOUSES		NORFOLK
	Edge of Town Residential Zone Total Number of dwellings: 10 <i>Survey date: WEDNESDAY 16/09/15</i>			
14	SC-03-A-04 HIGH ROAD BYFLEET	DETACHED & TERRACED		SURREY
	Edge of Town Residential Zone Total Number of dwellings: 71 <i>Survey date: THURSDAY 23/01/14</i>			
15	SF-03-A-04 NORMANSTON DRIVE LOWESTOFT	DETACHED & BUNGALOWS		SUFFOLK
	Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 7 <i>Survey date: TUESDAY 23/10/12</i>			
16	SF-03-A-05 VALE LANE BURY ST EDMUNDS	DETACHED HOUSES		SUFFOLK
	Edge of Town Residential Zone Total Number of dwellings: 18 <i>Survey date: WEDNESDAY 09/09/15</i>			

LIST OF SITES relevant to selection parameters (Cont.)

17	WS-03-A-04	MIXED HOUSES		WEST SUSSEX
	HILLS FARM LANE			
	HORSHAM			
	BROADBRIDGE HEATH			
	Edge of Town			
	Residential Zone			
	Total Number of dwellings:		151	
	<i>Survey date: THURSDAY</i>		<i>11/12/14</i>	<i>Survey Type: MANUAL</i>
18	WS-03-A-05	TERRACED & FLATS		WEST SUSSEX
	UPPER SHOREHAM ROAD			
	SHOREHAM BY SEA			
	Suburban Area (PPS6 Out of Centre)			
	Residential Zone			
	Total Number of dwellings:		48	
	<i>Survey date: WEDNESDAY</i>		<i>18/04/12</i>	<i>Survey Type: MANUAL</i>
19	WS-03-A-06	MIXED HOUSES		WEST SUSSEX
	ELLIS ROAD			
	WEST HORSHAM			
	S BROADBRIDGE HEATH			
	Edge of Town			
	Residential Zone			
	Total Number of dwellings:		805	
	<i>Survey date: THURSDAY</i>		<i>02/03/17</i>	<i>Survey Type: MANUAL</i>
20	WS-03-A-08	MIXED HOUSES		WEST SUSSEX
	ROUNDSTONE LANE			
	ANGMERING			
	Edge of Town			
	Residential Zone			
	Total Number of dwellings:		180	
	<i>Survey date: THURSDAY</i>		<i>19/04/18</i>	<i>Survey Type: MANUAL</i>
21	WS-03-A-09	MIXED HOUSES & FLATS		WEST SUSSEX
	LITTLEHAMPTON ROAD			
	WORTHING			
	WEST DURRINGTON			
	Edge of Town			
	Residential Zone			
	Total Number of dwellings:		197	
	<i>Survey date: THURSDAY</i>		<i>05/07/18</i>	<i>Survey Type: MANUAL</i>

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL VEHICLES
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.076	21	138	0.309	21	138	0.385
08:00 - 09:00	21	138	0.139	21	138	0.392	21	138	0.531
09:00 - 10:00	21	138	0.153	21	138	0.179	21	138	0.332
10:00 - 11:00	21	138	0.125	21	138	0.161	21	138	0.286
11:00 - 12:00	21	138	0.144	21	138	0.156	21	138	0.300
12:00 - 13:00	21	138	0.158	21	138	0.149	21	138	0.307
13:00 - 14:00	21	138	0.178	21	138	0.164	21	138	0.342
14:00 - 15:00	21	138	0.166	21	138	0.191	21	138	0.357
15:00 - 16:00	21	138	0.267	21	138	0.179	21	138	0.446
16:00 - 17:00	21	138	0.283	21	138	0.172	21	138	0.455
17:00 - 18:00	21	138	0.353	21	138	0.161	21	138	0.514
18:00 - 19:00	21	138	0.316	21	138	0.192	21	138	0.508
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.358			2.405			4.763

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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Parameter summary

Trip rate parameter range selected:	7 - 805 (units:)
Survey date date range:	01/01/10 - 20/11/18
Number of weekdays (Monday-Friday):	21
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	3
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL TAXIS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.001	21	138	0.001	21	138	0.002
08:00 - 09:00	21	138	0.003	21	138	0.003	21	138	0.006
09:00 - 10:00	21	138	0.002	21	138	0.001	21	138	0.003
10:00 - 11:00	21	138	0.002	21	138	0.002	21	138	0.004
11:00 - 12:00	21	138	0.002	21	138	0.002	21	138	0.004
12:00 - 13:00	21	138	0.002	21	138	0.002	21	138	0.004
13:00 - 14:00	21	138	0.002	21	138	0.002	21	138	0.004
14:00 - 15:00	21	138	0.002	21	138	0.003	21	138	0.005
15:00 - 16:00	21	138	0.006	21	138	0.005	21	138	0.011
16:00 - 17:00	21	138	0.004	21	138	0.004	21	138	0.008
17:00 - 18:00	21	138	0.002	21	138	0.001	21	138	0.003
18:00 - 19:00	21	138	0.002	21	138	0.002	21	138	0.004
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.030			0.028			0.058

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL OGVS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.000	21	138	0.000	21	138	0.000
08:00 - 09:00	21	138	0.002	21	138	0.002	21	138	0.004
09:00 - 10:00	21	138	0.003	21	138	0.002	21	138	0.005
10:00 - 11:00	21	138	0.004	21	138	0.004	21	138	0.008
11:00 - 12:00	21	138	0.002	21	138	0.003	21	138	0.005
12:00 - 13:00	21	138	0.001	21	138	0.001	21	138	0.002
13:00 - 14:00	21	138	0.002	21	138	0.001	21	138	0.003
14:00 - 15:00	21	138	0.001	21	138	0.002	21	138	0.003
15:00 - 16:00	21	138	0.000	21	138	0.000	21	138	0.000
16:00 - 17:00	21	138	0.001	21	138	0.001	21	138	0.002
17:00 - 18:00	21	138	0.001	21	138	0.001	21	138	0.002
18:00 - 19:00	21	138	0.000	21	138	0.000	21	138	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.017			0.017			0.034

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL PSVS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.000	21	138	0.000	21	138	0.000
08:00 - 09:00	21	138	0.000	21	138	0.000	21	138	0.000
09:00 - 10:00	21	138	0.000	21	138	0.000	21	138	0.000
10:00 - 11:00	21	138	0.000	21	138	0.000	21	138	0.000
11:00 - 12:00	21	138	0.000	21	138	0.000	21	138	0.000
12:00 - 13:00	21	138	0.000	21	138	0.000	21	138	0.000
13:00 - 14:00	21	138	0.000	21	138	0.000	21	138	0.000
14:00 - 15:00	21	138	0.000	21	138	0.000	21	138	0.000
15:00 - 16:00	21	138	0.000	21	138	0.000	21	138	0.000
16:00 - 17:00	21	138	0.000	21	138	0.000	21	138	0.000
17:00 - 18:00	21	138	0.000	21	138	0.000	21	138	0.000
18:00 - 19:00	21	138	0.000	21	138	0.000	21	138	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.000			0.000			0.000

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL CYCLISTS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.007	21	138	0.011	21	138	0.018
08:00 - 09:00	21	138	0.006	21	138	0.012	21	138	0.018
09:00 - 10:00	21	138	0.001	21	138	0.003	21	138	0.004
10:00 - 11:00	21	138	0.002	21	138	0.003	21	138	0.005
11:00 - 12:00	21	138	0.003	21	138	0.004	21	138	0.007
12:00 - 13:00	21	138	0.004	21	138	0.004	21	138	0.008
13:00 - 14:00	21	138	0.002	21	138	0.003	21	138	0.005
14:00 - 15:00	21	138	0.003	21	138	0.003	21	138	0.006
15:00 - 16:00	21	138	0.009	21	138	0.006	21	138	0.015
16:00 - 17:00	21	138	0.009	21	138	0.010	21	138	0.019
17:00 - 18:00	21	138	0.018	21	138	0.010	21	138	0.028
18:00 - 19:00	21	138	0.010	21	138	0.009	21	138	0.019
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.074			0.078			0.152

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL VEHICLE OCCUPANTS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.096	21	138	0.436	21	138	0.532
08:00 - 09:00	21	138	0.180	21	138	0.686	21	138	0.866
09:00 - 10:00	21	138	0.196	21	138	0.252	21	138	0.448
10:00 - 11:00	21	138	0.165	21	138	0.222	21	138	0.387
11:00 - 12:00	21	138	0.187	21	138	0.222	21	138	0.409
12:00 - 13:00	21	138	0.213	21	138	0.210	21	138	0.423
13:00 - 14:00	21	138	0.249	21	138	0.228	21	138	0.477
14:00 - 15:00	21	138	0.225	21	138	0.259	21	138	0.484
15:00 - 16:00	21	138	0.464	21	138	0.255	21	138	0.719
16:00 - 17:00	21	138	0.468	21	138	0.253	21	138	0.721
17:00 - 18:00	21	138	0.535	21	138	0.235	21	138	0.770
18:00 - 19:00	21	138	0.465	21	138	0.290	21	138	0.755
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			3.443			3.548			6.991

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL PEDESTRIANS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.016	21	138	0.034	21	138	0.050
08:00 - 09:00	21	138	0.032	21	138	0.117	21	138	0.149
09:00 - 10:00	21	138	0.042	21	138	0.044	21	138	0.086
10:00 - 11:00	21	138	0.038	21	138	0.043	21	138	0.081
11:00 - 12:00	21	138	0.031	21	138	0.032	21	138	0.063
12:00 - 13:00	21	138	0.038	21	138	0.034	21	138	0.072
13:00 - 14:00	21	138	0.036	21	138	0.028	21	138	0.064
14:00 - 15:00	21	138	0.034	21	138	0.048	21	138	0.082
15:00 - 16:00	21	138	0.114	21	138	0.046	21	138	0.160
16:00 - 17:00	21	138	0.072	21	138	0.044	21	138	0.116
17:00 - 18:00	21	138	0.068	21	138	0.042	21	138	0.110
18:00 - 19:00	21	138	0.049	21	138	0.050	21	138	0.099
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.570			0.562			1.132

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL BUS/TRAM PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.001	21	138	0.014	21	138	0.015
08:00 - 09:00	21	138	0.000	21	138	0.023	21	138	0.023
09:00 - 10:00	21	138	0.002	21	138	0.008	21	138	0.010
10:00 - 11:00	21	138	0.003	21	138	0.004	21	138	0.007
11:00 - 12:00	21	138	0.001	21	138	0.004	21	138	0.005
12:00 - 13:00	21	138	0.003	21	138	0.004	21	138	0.007
13:00 - 14:00	21	138	0.004	21	138	0.003	21	138	0.007
14:00 - 15:00	21	138	0.005	21	138	0.003	21	138	0.008
15:00 - 16:00	21	138	0.015	21	138	0.005	21	138	0.020
16:00 - 17:00	21	138	0.014	21	138	0.004	21	138	0.018
17:00 - 18:00	21	138	0.013	21	138	0.002	21	138	0.015
18:00 - 19:00	21	138	0.016	21	138	0.004	21	138	0.020
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.077			0.078			0.155

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL TOTAL RAIL PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.001	21	138	0.006	21	138	0.007
08:00 - 09:00	21	138	0.000	21	138	0.011	21	138	0.011
09:00 - 10:00	21	138	0.000	21	138	0.004	21	138	0.004
10:00 - 11:00	21	138	0.000	21	138	0.002	21	138	0.002
11:00 - 12:00	21	138	0.000	21	138	0.001	21	138	0.001
12:00 - 13:00	21	138	0.000	21	138	0.003	21	138	0.003
13:00 - 14:00	21	138	0.001	21	138	0.001	21	138	0.002
14:00 - 15:00	21	138	0.001	21	138	0.000	21	138	0.001
15:00 - 16:00	21	138	0.002	21	138	0.001	21	138	0.003
16:00 - 17:00	21	138	0.003	21	138	0.001	21	138	0.004
17:00 - 18:00	21	138	0.008	21	138	0.001	21	138	0.009
18:00 - 19:00	21	138	0.006	21	138	0.001	21	138	0.007
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.022			0.032			0.054

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL COACH PASSENGERS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.000	21	138	0.000	21	138	0.000
08:00 - 09:00	21	138	0.000	21	138	0.000	21	138	0.000
09:00 - 10:00	21	138	0.000	21	138	0.000	21	138	0.000
10:00 - 11:00	21	138	0.000	21	138	0.000	21	138	0.000
11:00 - 12:00	21	138	0.000	21	138	0.000	21	138	0.000
12:00 - 13:00	21	138	0.000	21	138	0.000	21	138	0.000
13:00 - 14:00	21	138	0.000	21	138	0.000	21	138	0.000
14:00 - 15:00	21	138	0.000	21	138	0.000	21	138	0.000
15:00 - 16:00	21	138	0.001	21	138	0.000	21	138	0.001
16:00 - 17:00	21	138	0.000	21	138	0.000	21	138	0.000
17:00 - 18:00	21	138	0.000	21	138	0.000	21	138	0.000
18:00 - 19:00	21	138	0.000	21	138	0.000	21	138	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.001			0.000			0.001

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL PUBLIC TRANSPORT USERS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.002	21	138	0.021	21	138	0.023
08:00 - 09:00	21	138	0.000	21	138	0.034	21	138	0.034
09:00 - 10:00	21	138	0.002	21	138	0.013	21	138	0.015
10:00 - 11:00	21	138	0.003	21	138	0.006	21	138	0.009
11:00 - 12:00	21	138	0.001	21	138	0.005	21	138	0.006
12:00 - 13:00	21	138	0.003	21	138	0.007	21	138	0.010
13:00 - 14:00	21	138	0.005	21	138	0.004	21	138	0.009
14:00 - 15:00	21	138	0.006	21	138	0.003	21	138	0.009
15:00 - 16:00	21	138	0.018	21	138	0.006	21	138	0.024
16:00 - 17:00	21	138	0.018	21	138	0.005	21	138	0.023
17:00 - 18:00	21	138	0.021	21	138	0.003	21	138	0.024
18:00 - 19:00	21	138	0.022	21	138	0.005	21	138	0.027
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.101			0.112			0.213

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL TOTAL PEOPLE
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.121	21	138	0.502	21	138	0.623
08:00 - 09:00	21	138	0.219	21	138	0.849	21	138	1.068
09:00 - 10:00	21	138	0.241	21	138	0.312	21	138	0.553
10:00 - 11:00	21	138	0.209	21	138	0.274	21	138	0.483
11:00 - 12:00	21	138	0.222	21	138	0.263	21	138	0.485
12:00 - 13:00	21	138	0.258	21	138	0.255	21	138	0.513
13:00 - 14:00	21	138	0.292	21	138	0.263	21	138	0.555
14:00 - 15:00	21	138	0.268	21	138	0.313	21	138	0.581
15:00 - 16:00	21	138	0.605	21	138	0.312	21	138	0.917
16:00 - 17:00	21	138	0.566	21	138	0.311	21	138	0.877
17:00 - 18:00	21	138	0.643	21	138	0.291	21	138	0.934
18:00 - 19:00	21	138	0.546	21	138	0.354	21	138	0.900
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			4.190			4.299			8.489

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
 MULTI-MODAL Servicing Vehicles
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	21	138	0.013	21	138	0.006	21	138	0.019
08:00 - 09:00	21	138	0.012	21	138	0.008	21	138	0.020
09:00 - 10:00	21	138	0.016	21	138	0.011	21	138	0.027
10:00 - 11:00	21	138	0.015	21	138	0.016	21	138	0.031
11:00 - 12:00	21	138	0.014	21	138	0.016	21	138	0.030
12:00 - 13:00	21	138	0.012	21	138	0.011	21	138	0.023
13:00 - 14:00	21	138	0.017	21	138	0.020	21	138	0.037
14:00 - 15:00	21	138	0.011	21	138	0.018	21	138	0.029
15:00 - 16:00	21	138	0.012	21	138	0.011	21	138	0.023
16:00 - 17:00	21	138	0.008	21	138	0.009	21	138	0.017
17:00 - 18:00	21	138	0.006	21	138	0.009	21	138	0.015
18:00 - 19:00	21	138	0.005	21	138	0.006	21	138	0.011
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.141			0.141			0.282

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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EAS

www.eastp.co.uk

Flood Risk Assessment
January 2019

The logo for EAS (East Angles Association) is a dark blue square with the letters 'EAS' in white, bold, sans-serif font.

Land Between 20 Cage Lane and Avery Hill

Great Staughton
Huntingdonshire

Document History

JOB NUMBER: 2026/2019
 DOCUMENT REF: Cage Lane Flood Risk Assessment Jan 2019
 REVISIONS: B- For Submission

Revision	Comments	By	Checked	Authorised	Date
A	Client Draft	RC	SA	SA	15/01/2019
B	For Submission	RC	SA	SA	22/01/2019

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1 Introduction

- 1.1 EAS has been commissioned to prepare a Flood Risk Assessment (FRA) to support the promotion of land between 20 Cage Lane and Avery Hill, Great Staughton, Huntingdonshire. A location plan and red line boundary is included as **Appendix A**.
- 1.2 The red line boundary covers an area of 0.39 hectares. The existing site is undeveloped and is located on the edge of the village of Great Staughton. It is understood the proposed size of development at the site could offer approximately 14 homes as well as the provision of access for pedestrians and vehicles. The initial sketch of a site plan demonstrates 12 dwellings comprising of four 2-bed houses, five 3-bed houses and three 4-bed houses. The initial sketch is contained in **Appendix B**.
- 1.3 This document includes:
 - Section 2 describes relevant policy;
 - Section 3 describes site description, including site levels, proximity to watercourses etc;
 - Section 4 describes potential sources of flooding and any mitigation measures required;
 - Section 5 describes the existing site hydrology and outlines a surface water drainage strategy
 - Section 6 provides a summary and conclusions

2 Policy Context

Introduction

- 2.1 This section sets out the policy context. The contents of this FRA are based on the advice set out in The National Planning Policy Framework (NPPF) published in July 2018 and the Planning Practice Guidance (PPG), published March 2014.

National Planning Policy Framework

- 2.2 Paragraph 065 of the NPPF defines each Flood Zone along with appropriate land use and FRA requirements. The flood risk zones are defined as:
- Flood Zone 1- This zone comprises land assessed as having a less than 1 in 1,000 annual probability of river flooding (<0.1%)
 - Flood Zone 2- This zone comprises land assessed as having between a 1 in a 100 and 1 in 1,000 annual probability of river flooding.
 - Flood Zone 3a- This zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), and for tidal flooding at least a 0.5% annual probability of flooding from tidal sources.
 - Flood Zone 3b- This zone comprises land where water has to flow or be stored in times of flood.
- 2.3 Paragraph 155 discusses the suitability of development location, particularly with regard to future risks induced by climate change:

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere”.

- 2.4 Paragraph 156 of the National Planning Policy Framework (NPPF) sets out how:

“Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards”.

- 2.5 Paragraphs 165 NPPF discusses the application of sustainable drainage systems:

“Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- Take account of advice from the lead local flood authority;
- Have appropriate proposed minimum operational standards;
- Have maintenance arrangements in place to ensure an acceptable standard of operation of the lifetime of the development; and

- Where possible, provide multifunctional benefits.
- 2.6 The Flood Map for Planning (available at <https://flood-map-for-planning.service.gov.uk/>) shows the site to be located entirely within Flood Zone 1, at low risk from fluvial flooding. The Flood Map for Planning is enclosed in **Appendix C**.

Huntingdonshire District Council Core Strategy Development Plan Document (September 2009)

- 2.7 The Core Strategy Development Plan Document (DPD) was adopted by Huntingdonshire District Council on 23 September 2009. The Core Strategy sets the strategic spatial planning framework for how Huntingdonshire will develop up to 2026. It contains strategic policies to manage growth and guide new development in Huntingdonshire. Policy CS 1 includes flood risk and water consumption criteria:
- 2.8 Policy CS 1: Sustainable Development in Huntingdonshire

All plans, policies and programmes of the Council and its partners, with a spatial element, and all development proposals in Huntingdonshire will contribute to the pursuit of sustainable development.

Reflecting environmental, social and economic issues the following criteria will be used to assess how a development proposal will be expected to achieve the pursuit of sustainable development, including how the proposal would contribute to minimising the impact on and adaptability to climate change. All aspects of the proposal will be considered including the design, implementation and function of development. The criteria are:

...Reducing water consumption and wastage, minimising the impact on water resources and water quality and managing flood risk;

- 2.9 In addition to the Core Strategy the saved policies from the 1995 Local Plan remain part of the strategic policy background used to guide new development. Policies CS8 and CS9 include recommendations on surface water runoff and flood risk:

CS8: The district council will require satisfactory arrangements for the availability of water supply, sewerage and sewage disposal facilities, surface water runoff facilities and provision for land drainage when considering planning applications for development.

CS9: The district council will normally refuse development proposals that prejudice schemes for flood water management.

Huntingdonshire District Council Strategic Flood Risk Assessment (June 2017).

- 2.10 Published in June 2017, the document provides an update to the original 2010 document. The purpose of the document is to provide the latest flood information which can be utilized for flood risk assessment and emergency planning. The SFRA assess flood risk from all sources across the district and aims to explore opportunities to reduce flood risk.
- 2.11 Historically, Huntingdonshire has experienced flooding primarily from fluvial sources. The River Great Ouse and its tributaries are the main source of fluvial flooding in the district and there are now a number of flood defence systems in place along the River Great Ouse to protect urban areas.

- 2.12 Appendix E of the SFRA shows the surface water flood risk across the district. The site is shown not to be located within an area affected by surface water flooding.
- 2.13 Appendix F of the SFRA shows areas susceptible to ground water flooding. The site is shown to be at $\geq 75\%$ susceptibility to groundwater flooding, the highest classification of susceptibility.
- 2.14 The DG5 register of sewer flooding was not provided by Anglian Water at the time the SFRA was published and therefore no sewer flooding information has been provided.
- 2.15 The site is not shown as being covered by a Flood Warning Service.

3 Existing Site Assessment

Site Description

- 3.1 The site covers an area of 0.39 hectares and is currently undeveloped land. The site is located on the outskirts of the village of Great Staughton and is approximately 11km south west of the large town of Huntingdon.
- 3.2 Immediately west, north and east of the site is rural undeveloped land.
- 3.3 It is understood the proposed size of development at the site could offer approximately 14 homes as well as the provision of access for pedestrians and vehicles. The initial sketch of a site plan demonstrates 12 dwellings comprising of four 2-bed houses, five 3-bed houses and three 4-bed houses. The initial sketch is contained in Appendix B.

Local Watercourses

- 3.4 The River Kym is located approximately 230m west of the site. A ditch associated with River Kym located parallel to Cage Lane is located directly opposite the site on the other side of the road. There are various ditches likely to be associated with agricultural activity surrounding the site. There is a ditch located along the western perimeter of the site and to the north of the site running parallel to Cage Lane.
- 3.5 The Grafham Water Reservoir is located approximately 2km north of the site.

Geology

- 3.6 The online British Geological Survey (BGS) mapping shows the site to be located in an area with a bedrock of Oxford Clay Formation - Mudstone. Superficial deposits of River Terrace Deposits, 1 To 2 - Sand And Gravel.

Site Levels

- 3.7 LIDAR data shows the site has a level of approximately 25m AOD and a general fall to the east towards Cage Lane.

Sewer records

- 3.8 Anglian water records show there is a foul sewer flowing south in Cage Lane. There is another foul sewer located along the southern boundary of the site flowing east meeting the foul sewer in Cage Lane. Sewer mapping is enclosed in **Appendix D**.

Existing Drainage

- 3.9 As the site is currently undeveloped there is no formal drainage strategy in place. A site visit confirmed the site falls mainly to the east therefore any surface water runoff is likely to enter Cage Lane, some of which may enter the ditch on the opposite side of the road to the site. A sketch enclosed in **Appendix E** shows the location of various ditches near the site.
- 3.10 There are small deviations within the fall of the land meaning surface water may also fall to the north east and north west corners of the site, again likely entering the ditches located there.

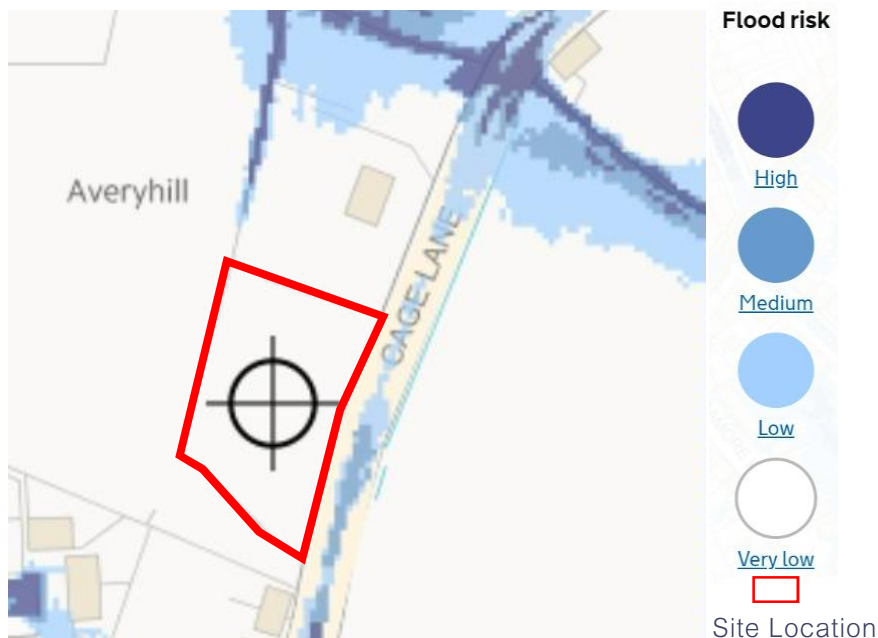
4 Potential Sources of Flooding

Fluvial

- 4.1 A copy of the Flood Map for Planning is enclosed in **Appendix C**. The mapping shows the site is located in Flood Zone 1, at low risk of flooding from fluvial. Areas at 'low' risk have a less than 1 in 1000 annual probability of flooding from rivers and the sea.
- 4.2 The risk from fluvial flooding is therefore deemed low.

Surface Water

- 4.3 Surface water flooding refers to flooding caused when the intensity of rainfall, particularly in urban areas, can create runoff which temporarily overwhelms the capacity of the local drainage systems or does not infiltrate into the ground. The water ponds on the ground and flows towards low-lying land. This source of flood risk is also known as 'pluvial'.
- 4.4 Figure 1 provides an extract from the EA surface water flood map.
- 4.5 The site is shown not be at 'very low' risk of surface water flooding meaning each year this area has a chance of flooding of less than 0.1%.
- 4.6 Areas at low to medium risk of surface water flood risk are present within Cage Lane which is unlikely to affect the site and remain within the road.
- 4.7 Accounting for the above, the risk of surface water flooding at the site can be considered low.



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*Figure 1: Extract from EA Surface Water Flood Map
Source: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?eastings=513388&northing=264775>*

Groundwater

- 4.8 Appendix F of the SFRA shows areas susceptible to ground water flooding. The site is shown to be at $\geq 75\%$ susceptibility to groundwater flooding, the highest classification of susceptibility.
- 4.9 The EA groundwater mapping located in MAGIC Maps (available at: <http://magic.defra.gov.uk/MagicMap.aspx>) shows the site is not located in a source protection zone.
- 4.10 The site is not shown to be located above an aquifer based on the bedrock. Based on the superficial drift, the site is located on the boundary of a Secondary Aquifer. A Secondary Aquifer is defined as “*predominantly lower permeability strata which may in part have the ability to store and yield limited amounts of groundwater by virtue of localised features such as fissures, thin permeable horizons and weathering*”.
- 4.11 Given the information above, there appears there could be a risk of groundwater flooding in the local area. There are no local borehole records available and therefore to get a better understanding of local groundwater conditions, ground investigation works could be undertaken at the site.

Sewer Flooding

- 4.12 Anglian Water sewer records show a foul water sewer flowing south in Cage Lane and south of the site flowing west to join the foul sewer in Cage Lane. Should the foul water sewer surcharge it is likely that the volumes would be low and the effluent would remain in the highway and not enter the site.
- 4.13 There are no surface water sewers located in the vicinity of the site.
- 4.14 Therefore, the risk of flooding from a sewer is deemed to be low.

Artificial

- 4.15 The GOV.UK website does not indicate the site to be within a reservoir flood risk extent. There are no other artificial sources in the area, therefore the risk of flooding to the site from artificial sources is considered to be low.
- 4.16 As the site has been shown to be at low risk of flooding from various sources it is not deemed necessary to provide any specific mitigation measures.

5 Drainage Strategy

Pre-development Runoff Rate

- 5.1 As the existing site is completely undeveloped, it is assumed that the existing runoff rate will be 100% greenfield. Runoff from the proposed development should therefore be restricted to the existing greenfield rate to reduce flood risk in the area as a result of increasing the impermeable area.
- 5.2 Greenfield runoff rates calculations have been carried out using the WINDES MicroDrainage software. The ICP SUDS Mean Annual Flood method was used. Greenfield runoff rates at the site for QBAR, 1 year, 30 year and 100-year events are summarised below per hectare and for the site area of 0.39 hectares:
- QBAR – 3.7l/s/ha (1.44l/s)
 - 1 in 100 year- 5.10l/s (13.1l/s/ha)
 - 1 in 30 year- 3.43l/s (8.8l/s/ha)
 - 1 in 1 year- 1.24l/s (3.2l/s/ha)
- 5.3 The WINDES MicroDrainage runoff output is included in **Appendix F**.

Relevant SUDS Policy

- 5.4 SUDS mimic the natural drainage system and provide a method of surface water drainage which can decrease the quantity of water discharged, and hence reduce the risk of flooding. In addition to reducing flood risk, these features can improve water quality and provide biodiversity and amenity benefits.
- 5.5 The SUDS management train incorporates a hierarchy of techniques and considers all three SUDS criteria of flood reduction, pollution reduction, and landscape and wildlife benefits. In decreasing order of preference, the preferred means of disposal of surface water runoff is:
- Discharge to ground.
 - Discharge to a surface water body.
 - Discharge to a surface water sewer.
 - Discharge to a combined sewer.
- 5.6 The philosophy of SuDS is to replicate as closely as possible the natural drainage from a site predevelopment and to treat runoff to remove pollutants, resulting in a reduced impact on the receiving watercourses. The benefits of this approach are as follows:
- Reducing runoff rates, thus reducing the flood risk downstream;
 - Reducing pollutant concentrations, thus protecting the quality of the receiving water body;
 - Groundwater recharge;
 - Contributing to the enhanced amenity and aesthetic value of development areas; and

- o Providing habitats for wildlife in developed areas, and opportunity for biodiversity enhancement.

Site Specific SUDS

5.7 The various SUDS methods have been considered in relation to site-specific constraints. Table 5.1 outlines the constraints and opportunities to each of the SUDS devices in accordance with the hierarchical approach outlined in The SUDS Manual CIRIA C753. It also indicates what could and could not be incorporated within the development, based upon site-specific criteria.

Device	Description	Constraints / Comments	Appropriate
Living roofs (source control)	Provide soft landscaping at roof level which reduces surface water runoff.	Unlikely to be viable due to residential nature of development.	No
Infiltration devices & Soakaways (source control)	Store runoff and allow water to percolate into the ground via natural infiltration.	Unlikely due to geology of Mudstone. It may be necessary to undertake infiltration tests to confirm.	No
Pervious surfaces (source control)	Storm water is allowed to infiltrate through the surface into a storage layer, from which it can either infiltrate and/or slowly release to sewers.	It is proposed to use lined permeable paving for all surfaces within the development.	Yes
Rainwater harvesting (source control)	Reduces the annual average rate of runoff from the Site by reusing water for non-potable uses e.g. toilet flushing, recycling processes.	May be possible to include these in design.	Possibly
Swales (permeable conveyance)	Broad shallow channels that convey / store runoff, and allow infiltration (ground conditions permitting).	Not included due to spatial limitations of the site.	No
Filter drains & perforated pipes (permeable conveyance)	Trenches filled with granular materials (which are designed to take flows from adjacent impermeable areas) that convey runoff while allowing infiltration.	Not proposed for this development.	No
Infiltration basins (end of pipe treatment)	Depressions in the surface designed to store runoff and allow infiltration.	Unlikely due to geology of Mudstone. It may be necessary to undertake infiltration tests to confirm.	No
Wet ponds & constructed wetlands (end of pipe treatment)	Provide water quality treatment & temporary storage above the permanent water level.	Not included due to spatial limitations of the site.	No
Attenuation Underground (end of pipe treatment)	Oversized pipes or geo-cellular tanks designed to store water below ground level.	This feature is not required as the proposed lined permeable paving will provide sufficient attenuation for the site.	No

Table 5.1: Site-Specific Sustainable Drainage Techniques

Proposed Drainage Strategy

- 5.8 At present, much of the site drains to the east where runoff would enter the ditch located along Cage Lane. In order to discharge to the existing ditch along Cage Lane and create a new headwall the ownership of the ditch will need to be further investigated.
- 5.9 Dependant on ownership, all surrounding ditches may need to be considered as potential locations for the site to outfall. It is also recommended that infiltration tests are undertaken in order to explore all potential drainage methods at the site. If infiltration tests prove that an infiltration strategy is not viable, and an agreement cannot be obtained to discharge to a nearby ditch then it may be necessary to explore discharging into the foul sewer in Cage Lane. Noteworthy all avenues must be explored before such an option is taken as discharging to a foul sewer is the least favourable option.
- 5.10 The underlying geology of mudstone suggests the ground may not be suitable for infiltration devices as a means of discharging runoff. However, this would be dependent upon the results of infiltration tests to determine the soakage rate across the site. Therefore, at this stage an attenuation and discharge strategy has been proposed.
- 5.11 An initial site sketch has been provided and is enclosed in Appendix B. At this preliminary stage, the drainage strategy described is an outline and provides potential options which could be applied to the site.
- 5.12 A quick storage estimate was carried out for the area to be covered by the proposed development assuming 50% of the site area would be impermeable following development. This would result in an impermeable area of 0.2 hectares. Using the WINDES MicroDrainage software, the required storage for a number of return periods (including 40% climate change) is shown in Table 5.2. The quick storage estimate parameters and output is included at **Appendix G**.

Return Period	Maximum Allowable Discharge (l/s)	Required Attenuation Storage
QBAR (+40% Climate Change)	0.74	128-167 m ³
Q1 Year (+40% Climate Change)	0.64	133-172 m ³
Q30 Year (+40% Climate Change)	1.76	102-136 m ³
Q100 Year (+40% Climate Change)	2.62	93-125 m ³

Table 5.2: Maximum allowable runoff rates and estimated attenuation volume for proposed development.

- 5.13 It is proposed that lined permeable paving could be used to construct the driveways, turning head and footpaths, should they remain private, to provide the required storage which will discharge into one of the local ditches. It is likely that an orifice plate or hydrobrake will be used to restrict the discharge to the greenfield runoff rate for all events up to and including the 100-year plus climate change event.
- 5.14 The depth and size of the paving will be confirmed at a later stage. As the levels of the ditches in Cage Lane and surrounding area are unknown, it is not known whether a

gravity connection could be achieved. If a gravity connection cannot be achieved, then a pumped outfall may be required.

- 5.15 The outfall rate will also need to be agreed which is likely to match the greenfield run off rate. As discussed, permission will need to be sought to outfall into the ditch, dependant on ownership and an outfall rate agreed.

Foul Water Strategy

- 5.16 Details of proposals for foul water system for the development site will be further defined at a later stage as part of the detailed design. A capacity check via Anglian Water may need to be undertaken.

Maintenance of Development Drainage

- 5.17 It is assumed that all elements of the proposed drainage system will remain private and the responsibility for maintenance will remain with the site owner/manager or an appointed management company.

6 Summary and Conclusion

- 6.1 EAS has been commissioned to prepare a Flood Risk Assessment (FRA) to support the promotion of land between 20 Cage Lane and Avery Hill, Great Staughton, Huntingdonshire. The existing site is undeveloped and is located on the edge of the village of Great Staughton.
- 6.2 The site is located in Flood Zone 1 on the Flood Map for Planning indicating the site is at 'low' risk meaning it has less than 1 in 1000 annual probability of flooding from rivers and the sea. The site is also shown to be at 'very low' risk of surface water flooding and is not located within an artificial flooding extent.
- 6.3 No other sources of flood risk have been identified that will require any further investigation.
- 6.4 At present, an initial site sketch is available thus this Flood Risk Assessment has provided potential options for SuDS at the site. Infiltration tests should be carried out to determine the feasibility of infiltration methods however with a geology of mudstone it is unlikely such methods will be viable. Dependant on ownership, all surrounding ditches may need to be considered as potential locations for the site to outfall. If infiltration tests prove that an infiltration strategy is not viable, and an agreement cannot be obtained to discharge to a nearby ditch then it may be necessary to explore discharging into the foul sewer in Cage Lane. At this moment in time, an attenuation and discharge approach has been explored.
- 6.5 Based upon the assumed impermeable area of 50% of the total site area (0.2 hectares) and assuming all water will be attenuated and discharged at greenfield rate, it will be necessary to provide up to 172 m³ of storage volume. It is proposed that lined permeable paving could be used on the driveways and turnings heads provided they remain private to provide adequate storage. It is then proposed to outfall to one of the local ditches via an orifice plate or hydrobrake. As levels are unknown at present, it is not known if a gravity connection can be made therefore a pumped outfall may be required.
- 6.6 We believe that the development proposals comply with the guidance provided by the NPPF and that no reason exists to object to the proposals in terms of flood risk.

7 Appendices

Appendix: A - Location Plan
Appendix: B – Initial Site Sketch
Appendix: C – Flood Map for Planning
Appendix: D – Anglian Water Sewer Records
Appendix: E – Site Sketch
Appendix: F – Greenfield Run off Rate
Appendix: G- Quick Storage Estimate



Appendix: A - Location Plan



REV	DATE	BY	DESCRIPTION	CHK	APD

DRAWING STATUS:
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Unit 23, The Maltings, Stanstead Abbots, Hertfordshire, SG12 8HG
 Tel: 01920 871777
 www.eastp.co.uk

CLIENT:

ARCHITECT:

PROJECT:
**LAND ADJACENT TO 20 CAGE LANE
 GREAT STAUGHTON**

TITLE:
LOCATION PLAN

SCALE @ A3: 1:10000	DESIGN-DRAWN: RC	DATE: 08/01/2019
-------------------------------	----------------------------	----------------------------

PROJECT No: 2026	DRAWING No: FIG02
----------------------------	-----------------------------



Appendix: B – Initial Site Sketch



SCHEDULE OF ACCOMMODATION

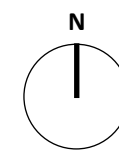
- 2 bed (75-80sqm) - 4no.
- 3 bed (90-110sqm) - 5no.
- 4 bed (120-130sqm) - 3no.

Total 12no. dwellings

Site Area: 0.39ha (subject to survey & land registry)

Subject to:

- Planning
- Highways
- Services
- Tree Survey
- Topographical Survey
- Site Investigation





Appendix: C – Flood Map for Planning

Flood map for planning

Your reference
Cage Lane

Location (easting/northing)
513386/264778

Created
18 Dec 2018 3:14

Your selected location is in flood zone 1, an area with a low probability of flooding.

This means:

- you don't need to do a flood risk assessment if your development is smaller than 1 hectare and not affected by other sources of flooding
- you may need to do a flood risk assessment if your development is larger than 1 hectare or affected by other sources of flooding or in an area with critical drainage problems

Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

The Open Government Licence sets out the terms and conditions for using government data.
<https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>

Flood map for planning

Your reference

Cage Lane

Location (easting/northing)

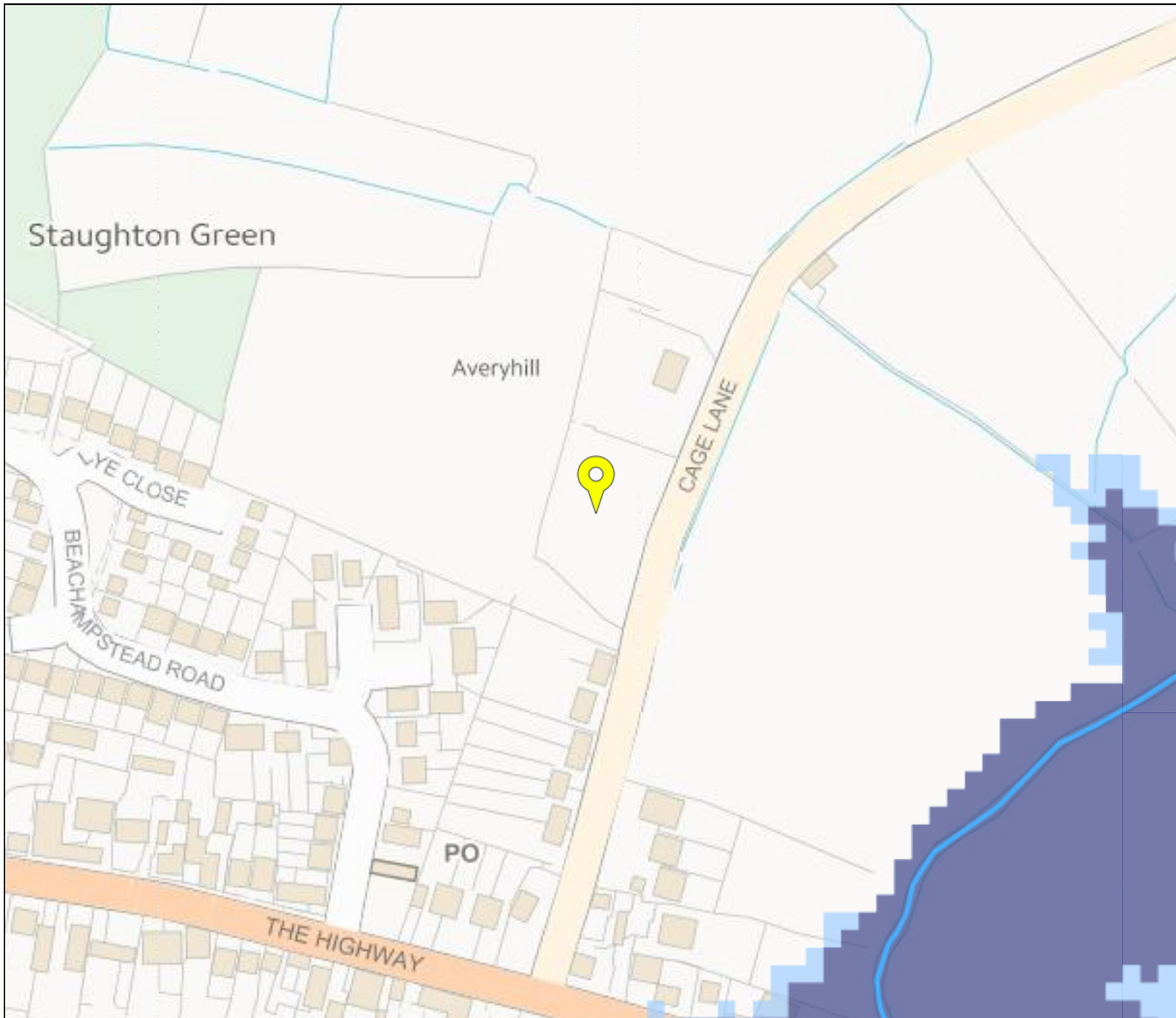
513386/264778









Scale

1:2500

Created

18 Dec 2018 3:14



-  Selected point
-  Flood zone 3
-  Flood zone 3: areas benefiting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area

0 20 40 60m



Appendix: D – Anglian Water Sewer Records



(c) Crown copyright and database rights 2018 Ordnance Survey 100022432 Date: 18/12/18 Scale: 1:1250 Map Centre: 513390,264708 Data updated: 04/09/18 Our Ref: 292106 - 1 Wastewater Plan A3

This plan is provided by Anglian Water pursuant its obligations under the Water Industry Act 1991 sections 198 or 199. It must be used in conjunction with any search results attached. The information on this plan is based on data currently recorded but position must be regarded as approximate. Service pipes, private sewers and drains are generally not shown. Users of this map are strongly advised to commission their own survey of the area shown on the plan before carrying out any works. The actual position of all apparatus MUST be established by trial holes. No liability whatsoever, including liability for negligence, is accepted by Anglian Water for any error or inaccuracy or omission, including the failure to accurately record, or record at all, the location of any water main, discharge pipe, sewer or disposal main or any item of apparatus. This information is valid for the date printed. This plan is produced by Anglian Water Services Limited (c) Crown copyright and database rights 2018 Ordnance Survey 100022432. This map is to be used for the purposes of viewing the location of Anglian Water plant only. Any other uses of the map data or further copies is not permitted. This notice is not intended to exclude or restrict liability for death or personal injury resulting from negligence.

Foul Sewer					
Surface Sewer		Outfall*		Sewage Treatment Works	
Combined Sewer				Public Pumping Station	
Final Effluent		Inlet*		Decommissioned Pumping Station	
Rising Main*		Manhole*			
Private Sewer*					
Decommissioned Sewer*					

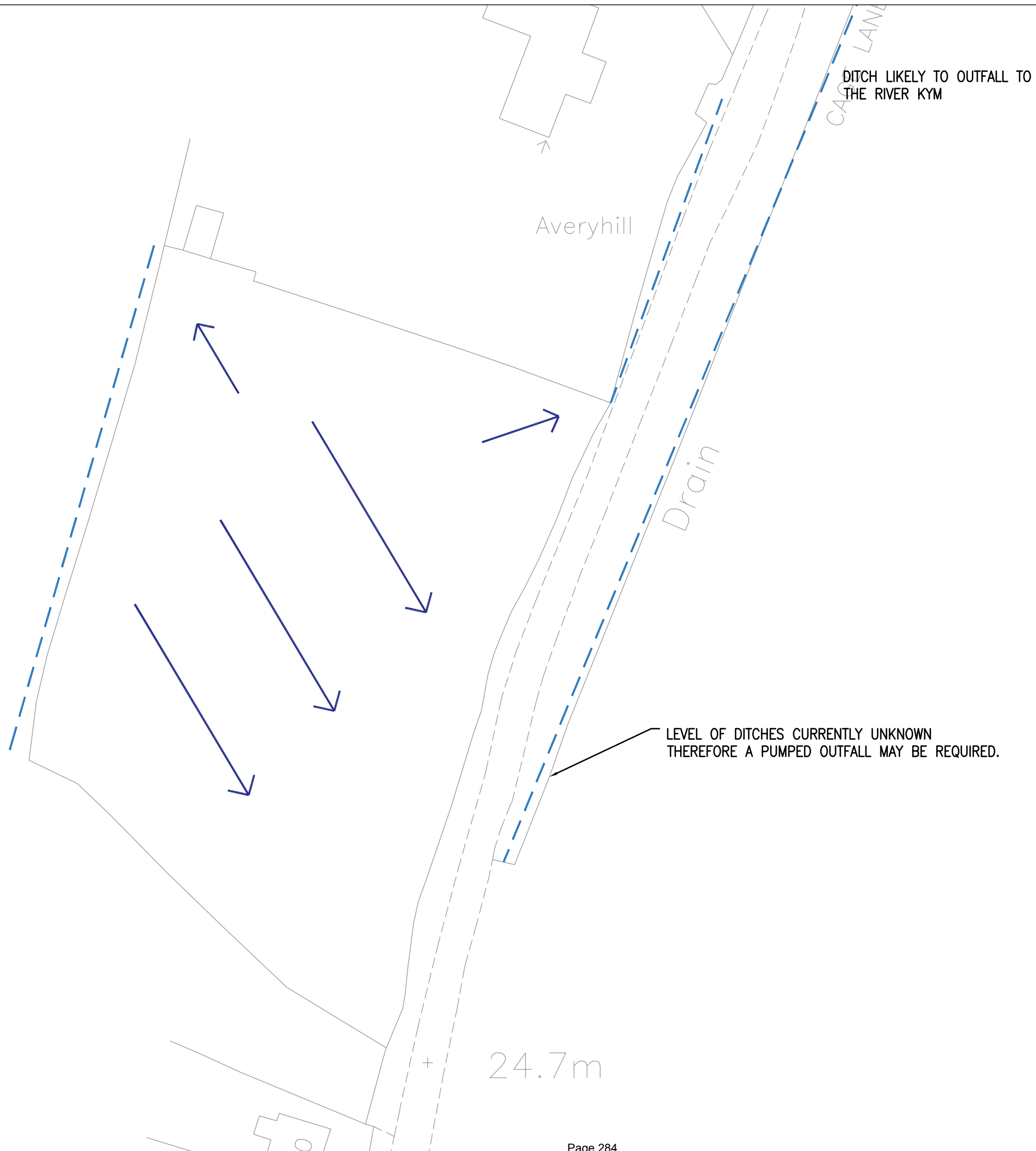
*(Colour denotes effluent type)

rose.cargill@eastp.co.uk
Cage Lane





Appendix: E – Site Sketch



KEY

-  LIKELY SURFACE WATER FLOW PATHS BASED ON SITE VISIT OBSERVATIONS
-  DITCH

REV	DATE	BY	DESCRIPTION	CHK	APD

DRAWING STATUS:

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Unit 23, The Maltings, Stanstead Abbots, Hertfordshire, SG12 8HG
 Tel: 01920 871777
 www.eastp.co.uk

CLIENT:

ARCHITECT:

PROJECT:
**LAND NEXT TO 20 CAGE LANE
 GREAT STAUGHTON**


TITLE:
LOCATION OF DITCHES

SCALE © A3: 1:500	DESIGN-DRAWN: RC	DATE: 22/01/2019
-----------------------------	----------------------------	----------------------------

PROJECT No: 2026	DRAWING No: SK02 REV A
----------------------------	----------------------------------



Appendix: F – Greenfield Run off Rate

EAS		Page 1
Unit 108 The Maltings Stanstead Abbotts Hertfordshire SG12 8HG		
Date 08/01/2019 09:14 File	Designed by Maz Checked by	
Micro Drainage	Source Control 2013.1.1	

ICP SUDS Mean Annual Flood

Input

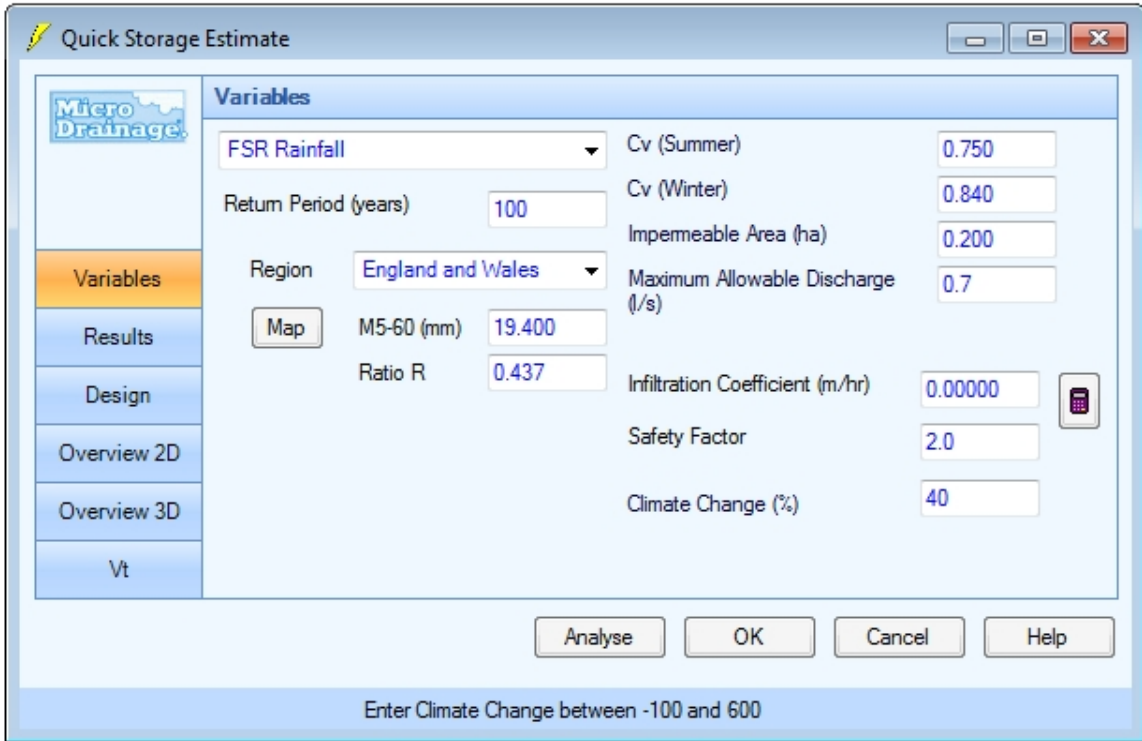
Return Period (years)	100	Soil	0.450
Area (ha)	1.000	Urban	0.000
SAAR (mm)	600	Region Number	Region 5

Results 1/s

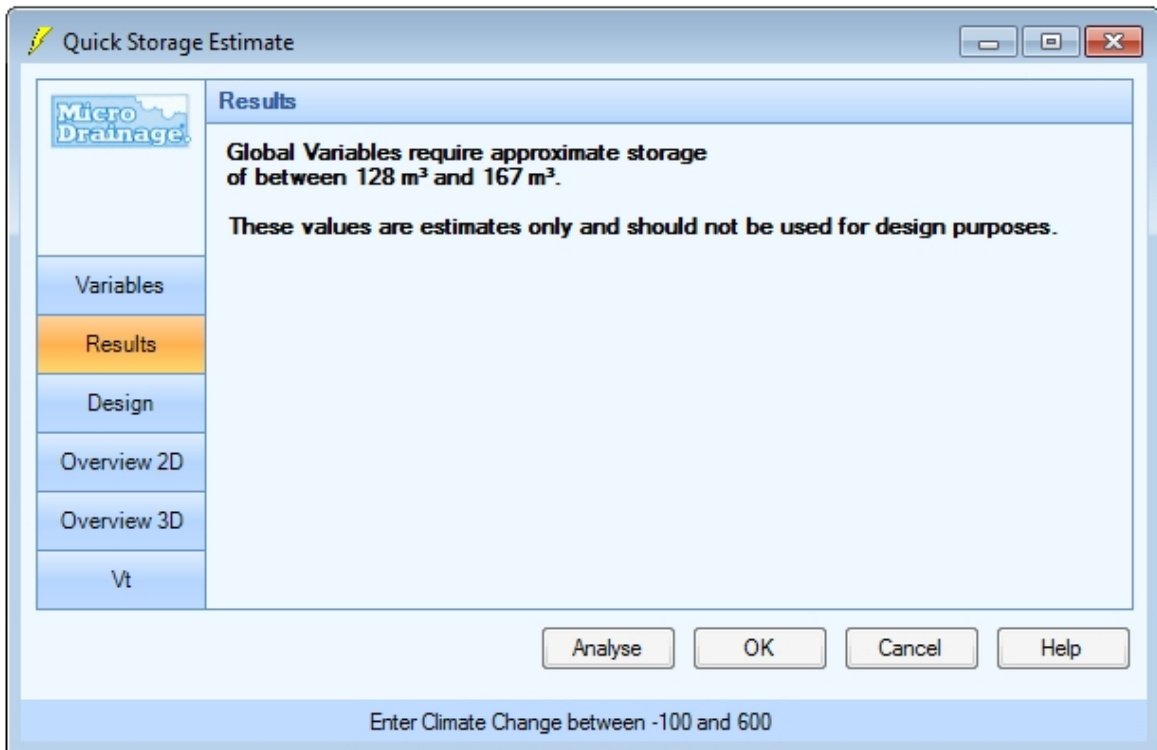
QBAR Rural	3.7
QBAR Urban	3.7
Q100 years	13.1
Q1 year	3.2
Q30 years	8.8
Q100 years	13.1



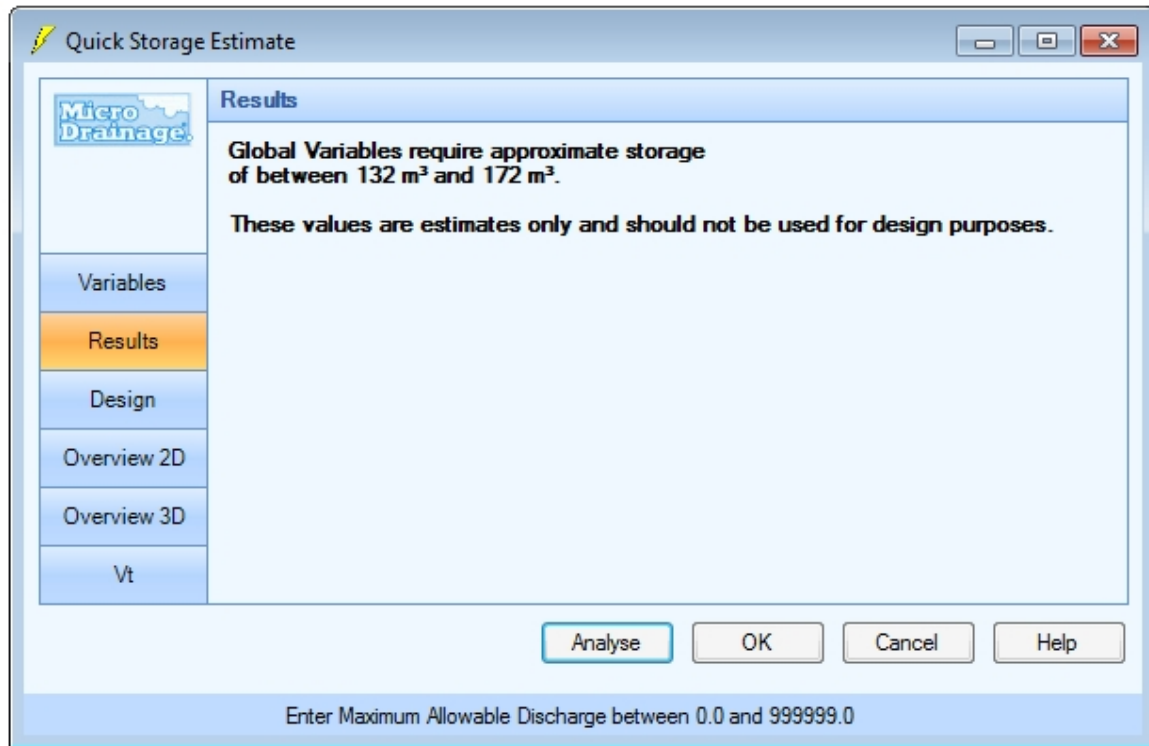
Appendix: G- Quick Storage Estimate



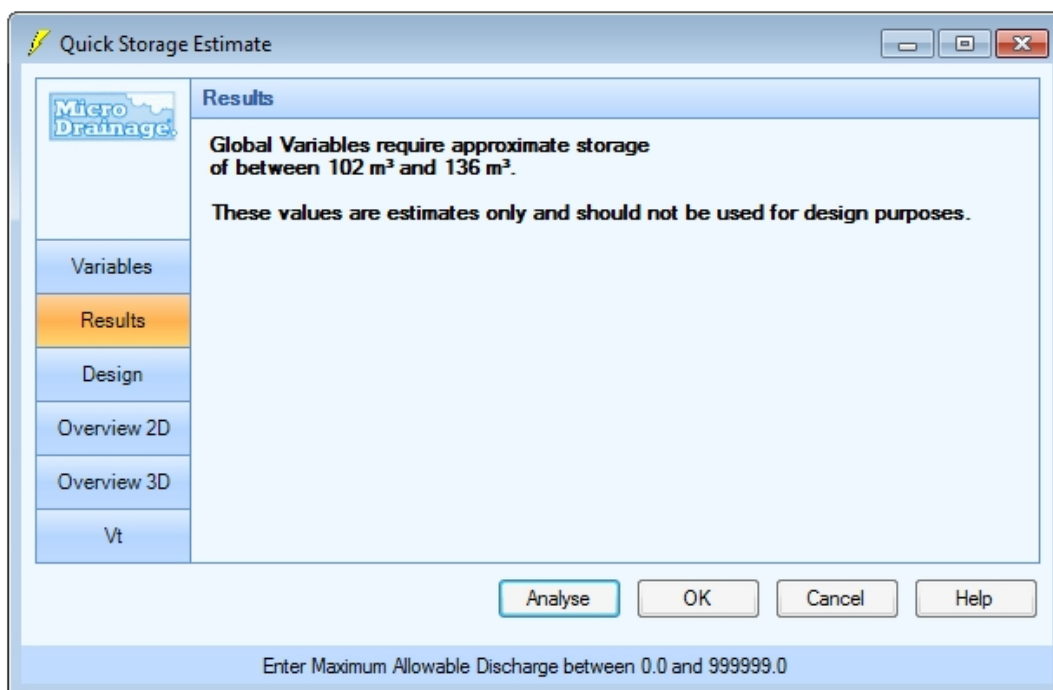
QBAR + 40% Climate Change



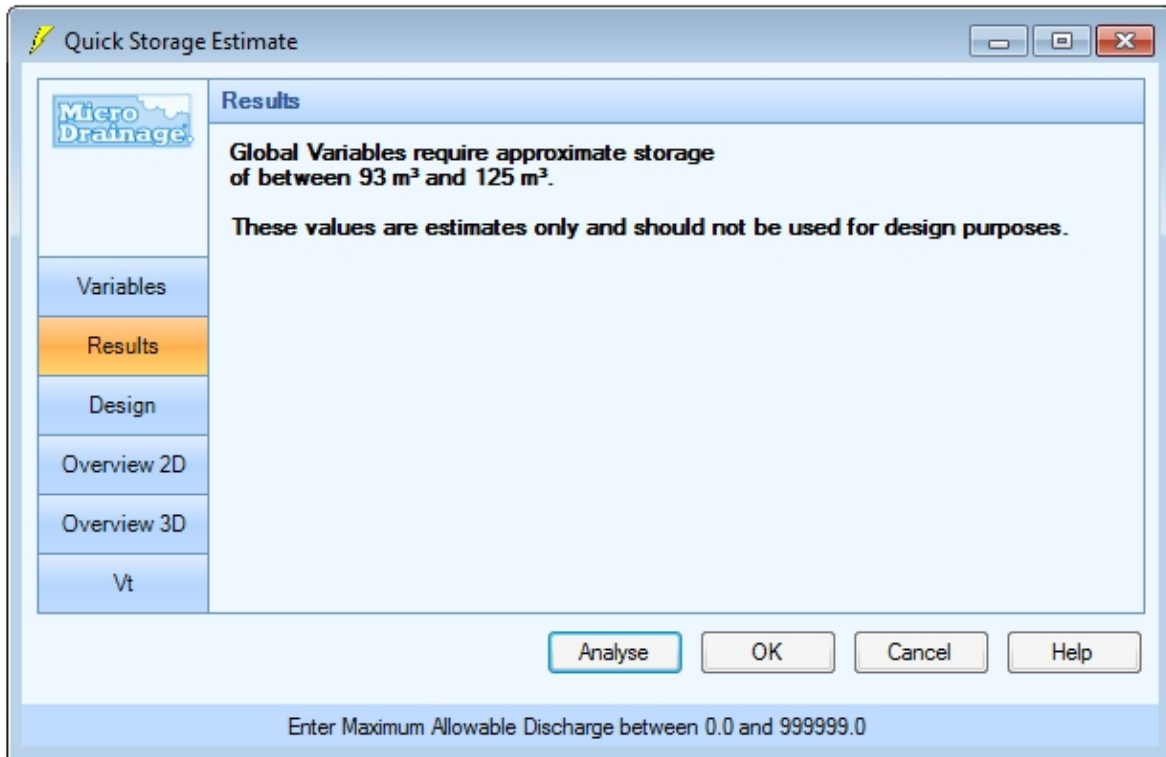
Q1 Year + 40% Climate Change



Q30 Year +40% Climate Change



Q100 Year +40% Climate Change



Family or Company Name: Godfrey, Jane
Agent: PlanSurv Ltd (Hendry, Michael)
PMM: MM4

Comment

Agent	Mr Michael Hendry (772729)
Email Address	[REDACTED]
Company / Organisation	PlanSurv Ltd
Address	[REDACTED]
Consultee	Ms Jane Godfrey (1196923)
Address	[REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Ms Jane Godfrey (1196923)
Comment ID	PMM2018:14
Response Date	22/01/19 15:41
Consultation Point	Proposed Main Modification 4 (View)
Status	Processed
Submission Type	Web
Version	0.3

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Object

Do you consider this proposed main modification Not Sound to be sound?

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification Justified is not sound because it is not... Effective

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

The removal of the reference to Local Service Centres in Main Modification 4 that reflects the proposed removal of that tier of the settlement hierarchy in Main Modification 1 should not be made as the removal is considered unjustified and will negatively affect the Plan's effectiveness in delivering the necessary growth and maintaining and enhancing the sustainability of the settlements.

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Main Modification 4 should not be made.

Summary

Object to Main Modification 4. It is considered unjustified and will negatively affect the Plan's effectiveness in delivering the necessary growth and maintaining and enhancing the sustainability of the settlements.

Family or Company Name: Godfrey, Jane
Agent: PlanSurv Ltd (Hendry, Michael)
PMM: MM6

Comment

Agent	Mr Michael Hendry (772729)
Email Address	[REDACTED]
Company / Organisation	PlanSurv Ltd
Address	[REDACTED]
Consultee	Ms Jane Godfrey (1196923)
Address	[REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Ms Jane Godfrey (1196923)
Comment ID	PMM2018:16
Response Date	22/01/19 15:42
Consultation Point	Proposed Main Modification 6 (View)
Status	Processed
Submission Type	Web
Version	0.3

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Object

Do you consider this proposed main modification Not Sound to be sound?

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification Justified is not sound because it is not... Effective

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

The removal of the reference to Local Service Centres in Main Modification 6 that reflects the proposed removal of that tier of the settlement hierarchy in Main Modification 1 should not be made as the removal is unjustified and will negatively affect the Plan's effectiveness in delivering the necessary growth and maintaining and enhancing the sustainability of the settlements.

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Main Modification 6 should not be made.

Summary

Object to Main Modification 6. The removal of Local Service Centres is unjustified and will negatively affect the Plan's effectiveness in delivering the necessary growth and maintaining and enhancing the sustainability of the settlements.

Family or Company Name: Godfrey, Jane
Agent: PlanSurv Ltd (Hendry, Michael)
PMM: MM7

Comment

Agent	Mr Michael Hendry (772729)
Email Address	[REDACTED]
Company / Organisation	PlanSurv Ltd
Address	[REDACTED]
Consultee	Ms Jane Godfrey (1196923)
Address	[REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Ms Jane Godfrey (1196923)
Comment ID	PMM2018:15
Response Date	22/01/19 15:42
Consultation Point	Proposed Main Modification 7 (View)
Status	Processed
Submission Type	Web
Version	0.8
Files	Cage Lane Gt Staughton SketchSitePlan-S3-P1.pdf Transport Statement (1) Cage Lane FRA and Drainage Strategy For Submission.pdf

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Object

Do you consider this proposed main modification Not Sound to be sound?

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not... . Justified
Effective

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

The proposed Main Modification 7 (MM7) to remove Policy LP9 from the Local Plan risks the sustainability and currently available services of the existing settlements of Alconbury, Bluntisham and Great Staughton. The greater distribution of new dwellings across a wider number of settlements, proportionate to their size, helps to ensure the effectiveness and deliverability of the Plan and the housing growth contained therein. The removal of Policy LP9 makes the Local Plan more vulnerable to economic change and the deliver rates of fewer larger sites, where delays can often be significant. The deletion of Policy LP9 therefore negatively impacts the promotion of growth in sustainable locations and retaining the quiet rural character of the area (SA objective 8 and 10) by relying of larger allocations rather than a more disbursed approach. In addition the removal of Policy LP9 and its associated residential allocations fails to match population and employment growth (SA objective 18) the Local Service Centres and therefore encourages commuting and prevents a critical mass of population in these settlement that might ultimately help to sustain existing services and attract new services to these Local Service Centres thereby improving their overall sustainability. Main Modification 7 should note be made and Policy LP9 along with its residential allocations should be reinstated in order to deliver proportionate growth to the Local Service Centres to ensure they remain vibrant communities. If the Inspector continues to feel that it is necessary to remove this tier of the settlement hierarchy careful consideration should be given to the retention of the emerging allocations in the villages Alconbury, Bluntisham and Great Staughton within the Small Settlement tier so as to help maintain and improve the sustainability and vitality of theses communities. An indicative layout plan, Transport Statement and Flood Risk Assessment accompany the representation to demonstrate the deliverability and sustainability of the Land Between 20 Cage Lane and Averyhill, Great Staughton (Emerging Allocation GS 2).

Supporting documents

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to a website where it is available or give a full reference (including author(s), full title and date of publication) in your comment.

By submitting a supporting document you give permission for the council to use it for the purposes of drawing up planning policy for Huntingdonshire and to reproduce the document for such purposes.

Please note: There is no limit to the size of documents that can be uploaded but please only upload relevant documents and consider the use of extracts for long documents.

To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

Transport Statement (1)

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Main Modification 7 (MM7) should not be made or if it is the allocations within proposed allocations in the villages of Alconbury, Bluntisham and Great Staughton should be retained.

Summary

Object to Main Modification 7. Removal of Policy LP 9 is contrary to Sustainability objectives 8,10 and 18. It impacts upon the promotion of growth in sustainable locations, forces the Plan to rely on the delivery of large allocations, encourages commuting and reduces ability to retain existing services and attract new ones to the area. Allocations in the Local Service Centre Category should be retained. Allocation GS 2 is deliverable and sustainable; supporting documents are supplied.

Family or Company Name: Godfrey, Jane
Agent: PlanSurv Ltd (Hendry, Michael)
PMM: MM8

Comment

Agent	Mr Michael Hendry (772729)
Email Address	[REDACTED]
Company / Organisation	PlanSurv Ltd
Address	[REDACTED]
Consultee	Ms Jane Godfrey (1196923)
Address	[REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Ms Jane Godfrey (1196923)
Comment ID	PMM2018:17
Response Date	22/01/19 15:43
Consultation Point	Proposed Main Modification 8 (View)
Status	Processed
Submission Type	Web
Version	0.7
Files	Cage Lane Gt Staughton SketchSitePlan-S3-P1.pdf Final Transport Statement for Cage Lane.pdf FRA and Drainage Statement

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Object

Do you consider this proposed main modification Not Sound to be sound?

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

- Positively prepared
- Justified
- Effective

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

The insertion of Alconbury, Bluntisham and Great Staughton as part of the Small Settlements proposed by Main Modification 8 should not be made and the Local Service Centre tier should be retained to ensure the effectiveness of the plan in delivering growth and maintaining and improving the sustainability and vitality of these settlements. If the Local Service Centre tier of the hierarchy is to be removed then the proposed allocations in the settlements of Alconbury, Bluntisham and Great Staughton should be retained as deliverable development in sustainable locations. An indicative layout plan, Transport Statement and Flood Risk Assessment accompany the representation to demonstrate the deliverability and sustainability of the Land Between 20 Cage Lane and Averyhill, Great Staughton (Emerging Allocation GS 2).

Supporting documents

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to a website where it is available or give a full reference (including author(s), full title and date of publication) in your comment.

By submitting a supporting document you give permission for the council to use it for the purposes of drawing up planning policy for Huntingdonshire and to reproduce the document for such purposes.

Please note: There is no limit to the size of documents that can be uploaded but please only upload relevant documents and consider the use of extracts for long documents.

To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

FRA and Drainage Statement

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Main Modification 8 should not be made; however, if it is then the proposed allocations in the settlements of Alconbury, Bluntisham and Great Staughton should be retained as deliverable development in sustainable locations.

Summary

Object to Main Modification 8. Proposed allocations should be retained to ensure the effectiveness of the plan in delivering growth and maintaining and improving the sustainability and vitality of these settlements. Allocation GS 2 is deliverable and sustainable; supporting documents are supplied.

Family or Company Name: Godfrey, Jane
Agent: PlanSurv Ltd (Hendry, Michael)
PMM: MM11

Comment

Agent Mr Michael Hendry (772729)
Email Address [REDACTED]
Company / Organisation PlanSurv Ltd
Address [REDACTED]
Consultee Ms Jane Godfrey (1196923)
Address [REDACTED]
Event Name Proposed Main Modifications 2018
Comment by Ms Jane Godfrey (1196923)
Comment ID PMM2018:18
Response Date 22/01/19 15:44
Consultation Point Proposed Main Modification 11 ([View](#))
Status Processed
Submission Type Web
Version 0.3

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Object

Do you consider this proposed main modification to be sound? Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not... . Justified
. Effective

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

The removal of the reference to Local Service Centre proposed by Main Modification 11 should not be made as it risks the effectiveness of the Plan's delivery of the growth in sustainable locations.

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Main Modification 11 should not be made

Summary

Object to Main Modification 11. The removal of Local Service Centres risks the effectiveness of the Plan's delivery of the growth in sustainable locations.

Family or Company Name: Godfrey, Jane
Agent: PlanSurv Ltd (Hendry, Michael)
PMM: MM34

Comment

Agent	Mr Michael Hendry (772729)
Email Address	[REDACTED]
Company / Organisation	PlanSurv Ltd
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Ms Jane Godfrey (1196923)
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Ms Jane Godfrey (1196923)
Comment ID	PMM2018:19
Response Date	22/01/19 15:44
Consultation Point	Proposed Main Modification 34 (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	Sketch Layout

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Support Object

Do you consider this proposed main modification to be sound? Yes Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not... . Justified
Effective

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

The proposed removal of the Local Service Centre chapter fails to recognise the level of existing services contained in Alconbury, Bluntisham and Great Staughton and the contribution that the proposed allocation in these settlements will make to the vitality of the community and the settlement's ability to retain and attract further services. Main Modification 34 should not therefore be made.

Supporting documents

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to a website where it is available or give a full reference (including author(s), full title and date of publication) in your comment.

By submitting a supporting document you give permission for the council to use it for the purposes of drawing up planning policy for Huntingdonshire and to reproduce the document for such purposes.

Please note: There is no limit to the size of documents that can be uploaded but please only upload relevant documents and consider the use of extracts for long documents.

To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

Sketch Layout

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Main Modification 34 should not be made

Summary

Objects to Main Modification 34. The removal of the Local Service Centre chapter fails to recognise the level of existing services and the contribution that the proposed allocation in these settlements will make to the vitality of the community and the settlement's ability to retain and attract further services.

Family or Company Name: Godfrey, Jane
Agent: PlanSurv Ltd (Hendry, Michael)
PMM: MM39

Comment

Agent	Mr Michael Hendry (772729)
Email Address	[REDACTED]
Company / Organisation	PlanSurv Ltd
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Ms Jane Godfrey (1196923)
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Ms Jane Godfrey (1196923)
Comment ID	PMM2018:20
Response Date	22/01/19 15:45
Consultation Point	Proposed Main Modification 39 (View)
Status	Processed
Submission Type	Web
Version	0.9
Files	Final Transport Statement for Cage Lane.pdf Sketch Layout (1) Cage Lane FRA and Drainage Strategy For Submission.pdf

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Object

Do you consider this proposed main modification Not Sound to be sound?

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

- Positively prepared
- Justified
- Effective

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

The removal of the allocation GS2 as part of the proposed Main Modification 39 (MM39) risks the sustainability and currently available services of the existing settlement of Great Staughton. The greater distribution of new dwellings across a wider number of settlements, proportionate to their size, helps to ensure the effectiveness and deliverability of the Plan and the housing growth contained therein. The removal of Policy LP9 makes the Local Plan more vulnerable to economic change and the deliver rates of fewer larger sites, where delays can often be significant. The deletion of allocation GS2 therefore negatively impacts the promotion of growth in sustainable locations and retaining the quiet rural character of the area (SA objective 8 and 10) by relying of larger allocations rather than a more disbursed approach. In addition the removal of the allocation fails to match population and employment growth (SA objective 18) and therefore encourages commuting and prevents a critical mass of population in these settlement that might ultimately help to sustain existing services and attract new services to Great Staughton thereby improving the overall sustainability. Main Modification 39 should be removed and allocation GS2 should be reinstated in order to deliver proportionate growth to the Great Staughton to ensure it remains vibrant and sustainable community regardless of whether the Local Service Centre tier of the hierarchy is retained. An indicative layout plan, Transport Statement and Flood Risk Assessment accompany the representation to demonstrate the deliverability and sustainability of the Land Between 20 Cage Lane and Averyhill, Great Staughton (Emerging Allocation GS 2) and the contribution it could make to housing in the early years of the Plan.

Supporting documents

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to a website where it is available or give a full reference (including author(s), full title and date of publication) in your comment.

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Sketch Layout (1)

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed Yes
by making changes to the proposed main
modification?**

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Main Modification 39 should not be made regardless of whether Great Staughton is in the Local Service Centre or Small Settlement tier of the hierarchy as its delivery will help ensure the vitality of the village both in terms of the demographic and its ability to maintain and attract services.

Summary

Object to Main Modification 39. Removal of Policy LP 9 is contrary to Sustainability objectives 8,10 and 18. It impacts upon the promotion of growth in sustainable locations, forces the Plan to rely on the delivery of large allocations making it more vulnerable to economic change, encourages commuting and reduces ability to retain existing services and attract new ones to the area. Allocations in the Local Service Centre Category should be retained. Allocation GS 2 is deliverable and sustainable; supporting documents are attached.

Comment

Consultee Ms Vicky Pryce (1197248)
Email Address [REDACTED]
Address [REDACTED]
Event Name Proposed Main Modifications 2018
Comment by Ms Vicky Pryce (1197248)
Comment ID PMM2018:12
Response Date 22/01/19 11:28
Consultation Point Proposed Main Modification 23 ([View](#))
Status Processed
Submission Type Web
Version 0.5

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Object

Do you consider this proposed main modification to be sound? Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not... Effective

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

Do you consider this proposed main modification to be legally compliant? Legally compliant

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

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Please enter your representation here.

We object to the removal of this allocation. GMCTC supports mixed use redevelopment of this previously developed land, assuming appropriate mitigation can be taken against flood risk and adequate parking is provided on site. It is currently an eyesore with previously attractive old buildings falling into decay and needs improvement. As it is a prominent site forming a gateway to Godmanchester and Huntingdon, high quality design will be particularly important.

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Maintain the designation of the site for mixed development.

Summary

Object to Main Modification 23. The allocation should be retained for mixed use development provided appropriate mitigation against flood risk and parking is provided on site. The allocation is currently an eyesore.

Family or Company Name: Godmanchester Town Council
(Pryce, Vicky)
PMM: MM24

Comment

Consultee	Ms Vicky Pryce (1197248)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Ms Vicky Pryce (1197248)
Comment ID	PMM2018:21
Response Date	23/01/19 09:24
Consultation Point	Proposed Main Modification 24 (View)
Status	Processed
Submission Type	Web
Version	0.3

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Support

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

Noted

Summary

Support Main Modification 24.

Comment

Consultee	Mr Paul Grace (1147551)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Mr Paul Grace (1147551)
Comment ID	PMM2018:8
Response Date	15/01/19 19:17
Consultation Point	Proposed Main Modification 32 (View)
Status	Processed
Submission Type	Web
Version	0.3

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Support

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

I support the proposal to remove site SM5 East of Robert Avenue from the Huntingdonshire Local Plan to 2036. Good sense has prevailed in preventing this site from being developed. The areas adjacent to the site are designated nature reserves. These areas have been developed into nature reserves over 40 years and are as a result of hard work by many villagers have become an asset to not only Somersham but also to surrounding villages. To allow this land to be built on would be disastrous for the nature reserves. To increase the number of properties in Somersham would create more vehicles using the two junctions at Parkhall Road and Feofees Road which are already overstretched. The land is open countryside and any development would impinge on it. I fully support the stance of Somersham Parish Council and HDC in removing this site from the local plan and also the action of the Inspector in recognising the issues should this site have been included.

Summary

Support Main Modification 32. The proposed development would increase traffic on roads through the village that are already congested at peak times. The loss of habitat next to the local nature reserve would have a negative impact and is an asset to not only Somersham but also to surrounding villages.

Family or Company Name: Hallam Land Management
Agent: Carter Jonas LLP (Flynn, Brian)
PMM: MM1

Comment

Agent	Mr Brian Flynn (1104428)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas LLP
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Mr Tom Thornewill (1118661)
Company / Organisation	Hallam Land Management
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Hallam Land Management (Mr Tom Thornewill - 1118661)
Comment ID	PMM2018:60
Response Date	29/01/19 15:09
Consultation Point	Proposed Main Modification 1 (View)
Status	Processed
Submission Type	Web
Version	0.3

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Object

Do you consider this proposed main modification Not Sound to be sound?

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Matter 7 Statement and Paragraphs 1.3 to 1.15 of the Matter 12 Statement. In summary, there are three factors that should inform predictions about housing delivery rates at the larger strategic allocations, including Alconbury Weald, RAF Alconbury and Ermine Street, which are as follows:

- National evidence on housing delivery rates contained in the Nathaniel Lichfield & Partners research report 'Start to Finish - How Quickly do Large-Scale Housing Sites Deliver?' (November 2016) provided evidence on the speed and rate of delivery of large-scale housing developments. One of the key findings of the research report is that the average annual build rate for a scheme of 2,000+ dwellings is 161 dwellings per year.
- Cambourne new settlement in South Cambridgeshire provides evidence of housing delivery rates at an established strategic development in the local area over a number of years and points in the housing market cycle. The average annual delivery rate at Cambourne is 229 dwellings. It is unrealistic to assume that delivery rates at Alconbury Weald would be higher than those achieved at Cambourne.
- Alconbury Weald, RAF Alconbury and Ermine Street are located in close proximity to one another, which is likely to have significant implications for housing delivery because they will in effect be competing sites within the same local housing market. It is possible that development could occur at neighbouring sites at the same time but adjustments to housing delivery rates should be made. The Council has recently published the Annual Monitoring Report for 2017/18 (dated December 2018). The AMR includes the adjustments to housing delivery recommended by the Inspector. It is noted in the AMR that 115 dwellings have been delivered at Alconbury Weald during 2017/18 (48 dwellings were delivered during 2016/17). It is likely that housing delivery rates at Alconbury Weald will increase in 2018/19 as one or two more housebuilders commence development at the site, but there is no evidence to support a significant increase in housing delivery to more than 200 dwellings per annum, particularly when compared with historic delivery rates at Cambourne and the fact that development at Northstowe new settlement (in South Cambridgeshire) has also started within the last couple of years. It is acknowledged that a planning application has been submitted for part of the Ermine Street site, and a planning application is being prepared for the remainder of this site, which indicates that these sites might be available. However, the challenges to the delivery of safe pedestrian and cycle access connections across the A141 remain, the application documents state that these works are subject to detailed design. At this stage the Highway Authority has not confirmed that the proposed pedestrian and cycle access arrangements are acceptable. It is considered that even if these sites are deliverable and the transport and access constraints can be satisfactorily resolved, then adjustments to predicted delivery rates will be required to take into account the close proximity of development at Alconbury Weald. Taking into account the above, it is requested that the combined housing delivery rate for Alconbury Weald (SEL1.1) and Ermine Street (HU1) should be capped at a maximum of 250 dwellings per annum. This requested change would reduce the housing land supply position during the plan period by 650 dwellings. There remains uncertainty about the availability of some sites included within the housing trajectory, including RAF Alconbury (Policy SEL1.2) which is currently occupied by the US Air Force. It has not yet been confirmed that the USAF intend to move from the site, and there is no indication or agreed timetable for when this might occur. It is considered that no evidence was provided to the Examination to demonstrate that RAF Alconbury is actually available for development during the plan period. It is requested that RAF Alconbury is deleted from the housing land supply, which would reduce the housing land supply position by 1,600 dwellings. If RAF Alconbury is retained as an allocation then the requested housing delivery cap of a maximum of 250 dwellings per annum should apply to all three strategic sites within the Huntingdon SPA i.e. Alconbury Weald, RAF Alconbury and Ermine Street because all three sites are located within close proximity of one another. The reduction in housing delivery from the larger strategic allocations (Alconbury Weald, RAF Alconbury, Ermine Street and St Neots East) and reflected in the revised housing trajectory included in MM1 would result in the delivery of less affordable housing during the plan period. It is already proposed that the approved developments at Alconbury Weald and St Neots East will not deliver policy compliant levels of affordable housing. The approved amount of affordable housing for these developments is as follows:
- The outline approval for Alconbury Weald for 5,000 dwellings includes an affordable housing review mechanism. The 1st Phase of the development is for 631 dwellings. It was agreed that affordable housing levels for the 1st Phase is 0% for the first 300 dwellings and 10% for remaining 331 dwellings. The agreed proportion of affordable housing from the 1st Phase of Alconbury Weald would be 33 affordable dwellings, compared with a policy requirement of 264 affordable dwellings; which results in an overall shortfall of 231 affordable dwellings from the 1st Phase. There is no agreement or commitment to increase affordable housing levels in later phases which are subject to the review mechanism and it is unlikely that affordable housing in excess of the 40% policy requirement will be provided in those later phases to compensate for the undersupply in the initial phases.
- It has been agreed through the planning application process for Loves Farm - St

Neots East that the proposed development for 1,020 dwellings will provide 28% affordable housing. The s106 Agreement has not yet been completed and a Decision Notice has not yet been issued. The proportion of affordable housing from Loves Farm - St Neots East agreed by Development Management Committee would be 286 affordable dwellings, compared with a policy requirement of 408 affordable dwellings; which results in overall shortfall of 122 affordable dwellings from the site. • The outline approval for Wintringham Park – St Neots East for 2,800 dwellings includes an affordable housing review mechanism. The 1st Phase of the development is for 500 dwellings. It was agreed that affordable housing levels for the 1st Phase of the proposed development is 25% for the first 500 dwellings. The agreed proportion of affordable housing from the 1st Phase of Wintringham Park - St Neots East would be 125 affordable dwellings, compared with a policy requirement of 200 affordable dwellings; which results in overall shortfall of 75 affordable dwellings from the 1st Phase. There is no agreement or commitment to increase affordable housing levels in later phases which are subject to the review mechanism, and it is unlikely that affordable housing in excess of the 40% policy requirement will be provided in those later phases to compensate for the undersupply in the initial phases. The proportion of affordable housing that will be provided at the Ermine Street sites is not stated in the application documents or any documents submitted to the Examination, and is therefore unknown. The proportion of affordable housing that will be provide at the RAF Alconbury site is also unknown. It is clear from the above that neither Alconbury Weald nor St Neots East will deliver policy compliant levels of affordable housing. The adjustments to housing delivery rates at Alconbury Weald, RAF Alconbury, Ermine Street and St Neots East will mean that less affordable housing will be delivered from these sites. Furthermore, if as requested, more realistic housing delivery rates are applied to the Alconbury Weald and Ermine Street sites of a combined maximum of 250 dwellings per annum, and RAF Alconbury is deleted because of uncertain availability, then the delivery of affordable housing from these sites would be further reduced. It appears that the housing land supply position has been boosted by the inclusion of dwellings from prior approvals, small housing sites and rural exception sites. However, prior approvals and small sites are not required to provide affordable housing, and therefore it is clear that these sources will not increase the supply of affordable housing during the plan period or offset the under-delivery of affordable housing from Alconbury Weald and St Neots East. The affordable housing requirement during the plan period is 7,900 dwellings. An average of 316 affordable dwellings per annum are required to meet the affordable housing requirement. However, recent monitoring data demonstrates that an insufficient amount of affordable housing has been delivered so far: 129 in 2014/15; 55 in 2015/16; 128 in 2016/17; and, 142 in 2017/18. As a result, there is already a significant shortfall in the delivery of affordable housing. As set out above, an insufficient amount of affordable housing is planned to be delivered from the two strategic expansion locations of Alconbury Weald and St Neots East: the 1st Phase of Alconbury Weald will lead to a shortfall of 231 affordable dwellings; there will be an overall shortfall of 122 affordable dwellings from the Loves Farm – St Neots East site; and, the 1st Phase of Wintringham Park – St Neots East will lead to a shortfall of 75 affordable dwellings. Therefore, the position on affordable housing for PS HLP2036 is that the two strategic expansion locations will deliver an insufficient amount of affordable housing during the plan period, prior approvals and small sites are not required to provide affordable housing, and an insufficient number of other allocations have been identified to meet the affordable housing requirement (of 7,900 dwellings) during the plan period. Paragraph 47 of NPPF1 (2012) expects local plans to meet the objectively assessed needs for affordable housing, but it is clear that PS HLP2036 is unsound because of the failure to plan to meet affordable housing needs. The other authorities in Cambridgeshire are also failing to deliver sufficient quantities of affordable housing, and monitoring data shows that affordable housing targets are not being met. The Inspector for the Cambridge Local Plan Examination noted that the affordable housing need for Cambridge City during the plan period is 10,402 dwellings, but accepted that only half of that affordable housing need would actually be met (see Paragraph 37 of Inspector's Report); the affordable housing needs of approximately 5,200 households from Cambridge would remain unmet. The Inspector for the South Cambridgeshire Local Plan Examination noted that the affordable housing need for South Cambridgeshire during the plan period is 5573 dwellings, and concluded that all of those housing needs would be met (see Paragraph 36 of the Inspector's Report); the developments on the edge of Cambridge are delivering 40% affordable housing, but it has been accepted in planning permissions that Northstowe new settlement and the urban extension at Cambourne West will not meet the 40% affordable housing policy requirement, and the proportion of affordable housing required from the new settlements at Waterbeach and Bourn Airfield are unknown at this stage. It is clear that affordable housing needs are not being met elsewhere in Cambridgeshire. It would be reasonable to conclude that there will be a significant shortfall in the supply of affordable housing in Cambridge, South Cambridgeshire and Huntingdonshire to meet identified needs during the plan periods, and the

affordable housing needs of Cambridge and South Cambridgeshire will not be met in more affordable locations such as Huntingdonshire, because the Council does not plan to meet its own locally generated affordable housing needs. This outcome is not consistent with Paragraph 47 of NPPF1 (2012). The negative impact of Main Modification MM1 (and MM15 and MM16) on the supply of affordable housing is acknowledged in the findings of the Sustainability Appraisal. The purpose of the Sustainability Appraisal is to make the policies and allocations in PS HLP2036 more sustainable, but it is clear that in terms of affordable housing there would be a negative outcome for housing related sustainability objectives because substantially less affordable housing would be delivered. As set out below, there are realistic alternatives to increase the supply of affordable housing during the plan period, one of which is to allocate more land for housing on sites which can deliver policy compliant levels of affordable housing including land promoted on behalf of Hallam Land Management at Gifford's Park in St Ives. Gifford's Park in St Ives was promoted for a residential-led mixed use development on behalf of Hallam Land Management through representations to PS HLP2036 and in the Matter 8 Hearing Statement and subsequent hearing session. A residential-led mixed use development at Gifford's Park would deliver housing and affordable housing in St Ives, an identified location for growth but which is only expected to accommodate a limited amount of development in the proposed strategy. The proposed development would delivery policy compliant levels of affordable housing, unlike the two identified strategic expansion locations at Alconbury Weald and St Neots East. The site at Gifford's Park is accessible to the services, facilities and employment opportunities in St Ives by walking and cycling, and it is within close proximity of the Cambridge Guided Busway.. The proposed development at Gifford's Park makes provision for a primary school, supermarket, neighbourhood centre and health care facility, which would meet the needs of residents of the development and the surrounding area. In addition, the proposed development includes land for the relocation of St Ives Football Club. There are no significant constraints to development at the site. Two Statements of Common Ground were submitted to the Examination for the proposed development; one with Cambridgeshire County Council on highway and transport matters, and another with the Environment Agency and Cambridgeshire County Council as Lead Local Flood Authority on flood risk matters. At the hearing session for Matter 8 the potential transport impact of development at Gifford's Park was discussed. At the hearing session for Matter 8 the potential transport impact of development at Gifford's Park was discussed. In order to understand those potential transport impacts in more detail it was decided that a highways pre-application request should be submitted. The following statement confirms the latest position on the highway pre-application discussions: "Peter Brett Associates, on behalf of HLM, have agreed a comprehensive scope for a Transport Assessment with Cambridgeshire County Council as the Highway Authority. In accordance with this scope, a draft Transport Assessment has now been prepared and has been provided to the Highway Authority. This is being worked through between the developer and Cambridgeshire County Council with a view to identifying the development impacts and the associated mitigation package required to prevent any severe impacts. This work is ongoing. HLM commits to continue to work with the County Council prior to any submission and that subject to resolution of all technical matters Peter Brett Associates considers that the scheme can be deemed acceptable in transport terms in conjunction with a yet to be agreed set of planning conditions and obligations." The representations and the HLM representations contained a new replacement policy for Policy SI 3: Gifford's Park, which is as follows: 127.4ha of land at Gifford's Park, on land east of Somersham Road and north of Needingworth Road is allocated for a mixed use sustainable urban extension of St Ives to comprise:

- 45.9 ha of land for housing, providing approximately 1,750 homes
- 0.7 ha of land for extra care/care home
- 2.7 ha of land for employment (Class 'B')
- Up to 3.0 ha of land for primary school
- 0.4 ha for hotel
- 0.35 ha for health care
- 0.6ha for neighbourhood centre
- ha for supermarket
- land to accommodate relocation of St Ives Football Club
- allotments
- a central park
- land for sport and recreation
- land for green infrastructure

The development of the site will deliver:

- satisfactory resolution of the impact of additional traffic on the local highway network having regard to a transport assessment and travel plan;
- Policy compliant levels of Affordable Housing
- comprehensive master planning to be undertaken by the site developer with public engagement with the cooperation of the Council;
- provision of quality pedestrian and cycle improvements to the town centre and other key service destinations, including the Guided Bus;
- production and implementation of a development strategy that seeks to ensure balanced delivery of industrial and commercial development with development of homes, infrastructure, services and facilities;
- the arrangement of different uses in a manner that minimises the need to travel and includes a transport network that promotes sustainable travel modes;
- differentiated densities of development with higher densities around defined centres and the development of distinctive character areas;
- enhancement and provision for habitats in accordance with an ecological assessment and strategy
- a landscaping scheme recognising and

enhancing vistas, boundaries, and green infrastructure networks; • design codes for the appearance of development proposals; • flood risk assessment and provision of sustainable drainage systems; • production and implementation of a waste audit and a waste minimisation, re-use and recovery strategy; • agreement with the Environment Agency and Anglian Water Services that waste water flows from the proposal can be accommodated; and, • agreement with the Environment Agency that meeting the requirements of the Water Framework Directive would not be compromised.

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed Yes by making changes to the proposed main modification?

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Requested Changes

It is requested that further modifications are required to the housing trajectory contained in Main Modification MM1, and that an additional main modification is required to allocate another strategic site to meet housing and affordable housing needs.

It is requested that the combined housing delivery rate for Alconbury Weald (SEL1.1) and Ermine Street (HU1) should be capped at a maximum of 250 dwellings per annum.

It is requested that RAF Alconbury (SEL1.2) is deleted from the housing land supply because there is no evidence that the site is available during the plan period.

It is requested that the full identified affordable housing needs are met during the plan period, and that additional sites which provide policy compliant levels of affordable housing are allocated.

It is requested that Policy SI 3 is modified to provide for a residential-led mixed use development at Gifford's Park in St Ives.

Summary

The proposed revised housing trajectory in MM1 is unsound for the following reasons: 1. The combined housing delivery rate of 300 dwellings per annum for Alconbury Weald, RAF Alconbury and Ermine Street is unrealistic and inconsistent with national evidence on delivery rates and examples elsewhere in Cambridgeshire. 2. There is still no evidence that RAF Alconbury is actually available for development during the plan period, and therefore it cannot be considered deliverable or developable. 3. The adjustments to housing delivery rates at the larger strategic allocations (Alconbury Weald, RAF Alconbury, Ermine Street and St Neots East) would mean that even less affordable housing will be delivered during the plan period; the approved developments at Alconbury Weald and St Neots East will not provide policy compliant levels of affordable housing, and prior approvals and small housing sites (other than rural exception sites) are not required to provide affordable housing. The impact of Main Modification MM1 (and MM15 and MM16) on the supply of affordable housing is acknowledged in the findings of the Sustainability Appraisal to be negative; separate representations are submitted on behalf of Hallam Land Management to the Sustainability Appraisal.

Comment

Consultee	Katie Pell (1197826)
Email Address	[REDACTED]
Company / Organisation	Hemingford Grey Parish Council
Address	- - -
Event Name	Proposed Main Modifications 2018
Comment by	Hemingford Grey Parish Council (Katie Pell - 1197826)
Comment ID	PMM2018:25
Response Date	23/01/19 16:09
Consultation Point	Huntingdonshire Local Plan to 2036: Proposed Main Modifications 2018 for Consultation (View)
Status	Processed
Submission Type	Email
Version	0.3

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound and legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Support

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

Hemingford Grey Parish Council has no comments to make on the consultations.

Summary

Hemingford Grey Parish Council has no comments to make on the consultations.

Comment

Consultee	Ms Debbie Mack (56252)
Email Address	[REDACTED]
Company / Organisation	Historic England
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Historic England (Ms Debbie Mack - 56252)
Comment ID	PMM2018:48
Response Date	29/01/19 10:33
Consultation Point	Huntingdonshire Local Plan to 2036: Proposed Main Modifications 2018 for Consultation (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	Mack for Historic England_Redacted.pdf

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you **Object**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

Thank you for consulting Historic England about the Proposed Main Modifications to the Huntingdonshire Local Plan. We have the following comments to make on the suggested changes to the Plan:-

General Comments We have made a number of comments on previous consultations of the Local Plan including our letters dated 25th August 2017 and 5th February 2018. Further to that, on 20th June 2018 we advised the Programme Officer that we would not be submitting hearing statements of Statements of Common Ground but would 'be relying on our previously submitted written representations, thereby indicating that our representations still stand. It is therefore disappointing to see that there have been almost no changes to the Plan in response to our representations and indeed none in relation to the sites where we expressed greatest concern, namely sites HU3, SM4 and WB2.

Detailed Comments

Site Deletions We note that a number of sites have been deleted from the Plan including: · HU9 Main Street Huntingdon · HU16 Tyrell's Marina, Godmanchester · SN5 Former Youth Centre, Priory Road, St Neots · SI4 Former Car Showroom, London Road, St Ives · SM5 East of Robert Avenue, Somersham · AL1 North of School Lane, Alconbury · BL1 West of Longacres, Bluntisham · BL2 North of 10 Station Road, Bluntisham · GS1 South of 29, The Green, Great Staughton · GS2 Between 20 Cage Land and Averyhill, Great Staughton This therefore addresses any concerns we previously raised about these sites.

MM30 RA3 West Station Yard and Northern Mill, Ramsey We note that this policy now includes the caveat that the retention of the existing Northern Mill building to act as a local landmark subject to viability. We would highlight the importance of seeking to sustain and enhance heritage assets (whether designated or undesignated) (para 185a and 197 of the NPPF. Paragraph 195 that discusses viability matters relates to designated assets, though many of the same principles apply. We would continue to emphasise the desirability of retaining the Northern Mill building in the first instance.

MM31 SM2 Newlands, St Ives Road, Somersham We welcome the addition of a reference to the nearby listed Somersham House and its setting. Rather than simply stating that the development should 'acknowledge the listed building and its setting', we recommend that it should also preserve the listed building and its setting in line with both legislation and policy. We suggest the following wording: d. high quality development that preserves and acknowledges the nearby listed Somersham House and its setting

As it happens, we had specifically requested reference to Somersham House and the Conservation Area in relation to policy SM3 The Pasture. We are disappointed that this has not been included as a proposed modification.

Historic England's representations that have not been addressed in the Proposed Modifications

Finally, we list below all of the policies/sites/parts of the plan where we have requested changes and yet, as far as we can see, no modifications have been proposed:

Policy LP20: Rural Economy Policy LP21: Homes for Rural Workers Policy LP22: Town Centre Vitality and Viability Policy LP28: Gypsies, Travellers and Travelling Showpeople Policy LP30: Rural Exceptions Housing Heritage Strategy Policy LP36: Heritage Assets and their Settings Site Allocations Site Allocation General Policy

wording

Comments on individual sites

SEL 1.1 Alconbury Weald SEL 1.2 RAF Alconbury

HU3 Former Police HQ site, Huntingdon

HU4 West of Railway, Brampton Road

HU5 West of Edison Bell Way

HU6 George Street, Huntingdon

HU8 California Road, Huntingdon

HU13 Brampton Park

HU17 RGE Engineering, Godmanchester

HU19 Bearscroft Farm, Godmanchester

SEL 2 St Neots East

SN1 St Mary's Urban Village

SN3 Cromwell Road North

SN6 North of St James Road, Little Paxton

SI1 St Ives West

SI2 St Ives Football Club

RA1 Ramsey Gateway (High Lode)

RA2 Ramsey Gateway

RA3 West Station Yard and Northern Mill

RA5 Whytefield Road

RA6 94 Great Whyte

RA8 Former RAF Upwood and Upwood Hill House

BU1 East of Silver Street and South of A1

BU2 Lucks Lane, Buckden

FS1 Former Dairy Crest Factory

FS2 Cambridge Road West

FS3 Cambridge Road East

KB1 West of Station Road

KB2 North of Station Road/Stowe Road

SY2 South of Gidding Road

SM2 Newlands, St Ives Road

SM3 The Pasture

SM4 Somersham Town Football Ground

WB1 West of Ramsey Road

WB2 Manor Farm Buildings

WB3 South of Stirling Close

WB4 South of Farrier's Way

YX1 Askew's Lane

Proposals Map re Elton Park

Glossary

We would again express our concern that the above matters do not appear to have been addressed through the Proposed Main Modifications to the Plan.

Sustainability Appraisal of the Proposed Main Modifications We do not have the capacity to comment in any detail upon the Sustainability Appraisal at this stage in the process.

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed Yes
by making changes to the proposed main
modification?**

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Below are all of the policies/sites/parts of the plan where we have requested changes and yet, as far as we can see, no modifications have been proposed: LP20, 21, 22, 28, 30 and 36 and site allocation general policy wording and allocations SEL 1.1, SEL 1.2, HU3, HU4, HU5, HU6, HU8, HU13, HU17, HU19, SEL 2, SN1, SN3, SN6, SI1, SI2, RA1, RA2, RA3, RA5, RA6, RA8, BU1, BU2, FS1, FS2, FS3, KB1, KB2, SY2, SM2, SM3, SM4, WB1, WB2, WB3, WB4, YX1, The Proposals Map regarding Elton Park and the Glossary.

Summary

The deletion of sites HU9, HU16, SN5, SI4, SM5, AL1, BL1, BL2, GS1 and GS2 addresses any concerns previously raised about these sites. It is disappointing to see that there have been almost no changes to the Plan in response to our representations and indeed none in relation to the sites where we expressed greatest concern, namely sites HU3, SM4 and WB2. Finally, we list below all of the policies/sites/parts of the plan where we have requested changes and yet, as far as we can see, no modifications have been proposed: LP20, 21, 22, 28, 30 and 36 and site allocation general policy wording and allocations SEL 1.1, SEL 1.2, HU3, HU4, HU5, HU6, HU8, HU13, HU17, HU19, SEL 2, SN1, SN3, SN6, SI1, SI2, RA1, RA2, RA3, RA5, RA6, RA8, BU1, BU2, FS1, FS2, FS3, KB1, KB2, SY2, SM2, SM3, SM4, WB1, WB2, WB3, WB4, YX1, The Proposals Map regarding Elton Park and the Glossary. We do not have the capacity to comment in any detail upon the Sustainability Appraisal at this stage in the process.



Planning Policy Team
Huntingdonshire District Council

Direct Dial: [REDACTED]

Our Ref: PL00041045

29 January 2019

Dear Planning Policy Team

re: Proposed Main Modifications to the Huntingdonshire Local Plan 2018

Thank you for consulting Historic England about the Proposed Main Modifications to the Huntingdonshire Local Plan. We have the following comments to make on the suggested changes to the Plan:-

General Comments

We have made a number of comments on previous consultations of the Local Plan including our letters dated 25th August 2017 and 5th February 2018. Further to that, on 20th June 2018 we advised the Programme Officer that we would not be submitting hearing statements of Statements of Common Ground but would 'be relying on our previously submitted written representations, thereby indicating that our representations still stand.

It is therefore disappointing to see that there have been almost no changes to the Plan in response to our representations and indeed none in relation to the sites where we expressed greatest concern, namely sites **HU3, SM4 and WB2**.

Detailed Comments

Site Deletions

We note that a number of sites have been deleted from the Plan including:

- HU9 Main Street Huntingdon
- HU16 Tyrell's Marina, Godmanchester
- SN5 Former Youth Centre, Priory Road, St Neots
- SI4 Former Car Showroom, London Road, St Ives
- SM5 East of Robert Avenue, Somersham
- AL1 North of School Lane, Alconbury



EAST OF ENGLAND OFFICE

- BL1 West of Longacres, Bluntisham
- BL2 North of 10 Station Road, Bluntisham
- GS1 South of 29, The Green, Great Staughton
- GS2 Between 20 Cage Land and Averyhill, Great Staughton

This therefore addresses any concerns we previously raised about these sites.

MM30 RA3 West Station Yard and Northern Mill, Ramsey

We note that this policy now includes the caveat that the retention of the existing Northern Mill building to act as a local landmark subject to viability.

We would highlight the importance of seeking to sustain and enhance heritage assets (whether designated or undesignated) (para 185a and 197 of the NPPF. Paragraph 195 that discusses viability matters relates to designated assets, though many of the same principles apply. We would continue to emphasise the desirability of retaining the Northern Mill building in the first instance.

MM31 SM2 Newlands, St Ives Road, Somersham

We welcome the addition of a reference to the nearby listed Somersham House and its setting. Rather than simply stating that the development should 'acknowledge the listed building and its setting', we recommend that it should also preserve the listed building and its setting in line with both legislation and policy. We suggest the following wording:

d. high quality development that preserves and acknowledges the nearby listed Somersham House and its setting

As it happens, we had specifically requested reference to Somersham House and the Conservation Area in relation to policy **SM3 The Pasture**. We are disappointed that this has not been included as a proposed modification.

Historic England's representations that have not addressed in the Proposed Modifications

Finally, we list below all of the policies/sites/parts of the plan where we have requested changes and yet, as far as we can see, no modifications have been proposed:

Policy LP20: Rural Economy

Policy LP21: Homes for Rural Workers

Policy LP22: Town Centre Vitality and Viability

Policy LP28: Gypsies, Travellers and Travelling Showpeople

Policy LP30: Rural Exceptions Housing

Heritage Strategy

Policy LP36: Heritage Assets and their Settings



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Telephone 01223 582749
HistoricEngland.org.uk





Site Allocations

Site Allocation General Policy wording

Comments on individual sites

SEL 1.1 Alconbury Weald
SEL 1.2 RAF Alconbury
HU3 Former Police HQ site, Huntingdon
HU4 West of Railway, Brampton Road
HU5 West of Edison Bell Way
HU6 George Street, Huntingdon
HU8 California Road, Huntingdon
HU13 Brampton Park
HU17 RGE Engineering, Godmanchester
HU19 Bearscroft Farm, Godmanchester
SEL 2 St Neots East
SN1 St Mary's Urban Village
SN3 Cromwell Road North
SN6 North of St James Road, Little Paxton
SI1 St Ives West
SI2 St Ives Football Club
RA1 Ramsey Gateway (High Lode)
RA2 Ramsey Gateway
RA3 West Station Yard and Northern Mill
RA5 Whytefield Road
RA6 94 Great Whyte
RA8 Former RAF Upwood and Upwood Hill House
BU1 East of Silver Street and South of A1
BU2 Lucks Lane, Buckden
FS1 Former Dairy Crest Factory
FS2 Cambridge Road West
FS3 Cambridge Road East
KB1 West of Station Road
KB2 North of Station Road/Stowe Road
SY2 South of Gidding Road
SM2 Newlands, St Ives Road
SM3 The Pasture
SM4 Somersham Town Football Ground
WB1 West of Ramsey Road
WB2 Manor Farm Buildings
WB3 South of Stirling Close
WB4 South of Farrier's Way
YX1 Askew's Lane

Proposals Map re Elton Park



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Glossary

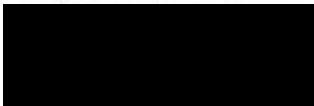
We would again express our concern that the above matters do not appear to have been addressed through the Proposed Main Modifications to the Plan.

Sustainability Appraisal of the Proposed Main Modifications

We do not have the capacity to comment in any detail upon the Sustainability Appraisal at this stage in the process.

If you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Yours Sincerely



Debbie Mack

Historic Environment Planning Adviser, Planning Group



Comment

Consultee	Ms Debbie Mack (56252)
Email Address	[REDACTED]
Company / Organisation	Historic England
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Historic England (Ms Debbie Mack - 56252)
Comment ID	PMM2018:49
Response Date	29/01/19 10:48
Consultation Point	Proposed Main Modification 30 (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Mack for Historic England_Redacted.pdf

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you **Object**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

MM30 RA3 West Station Yard and Northern Mill, Ramsey We note that this policy now includes the caveat that the retention of the existing Northern Mill building to act as local landmark subject to viability. We would highlight the importance of seeking to sustain and enhance heritage assets (whether designated or undesignated) (para 185a and 197 of the NPPF). Paragraph 195 that discusses viability matters relates to designated assets, though many of the same principles apply. We would continue to emphasise the desirability of retaining the Northern Mill building in the first instance.

Supporting documents

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

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To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

[Mack for Historic England Redacted.pdf](#)

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Highlight the importance of seeking to sustain and enhance heritage assets (whether designated or undesignated) (para 185a and 197 of the NPPF). Continue to emphasise the desirability of retaining the Northern Mill building in the first instance.

Summary

Object to Main modification 30. We would highlight the importance of seeking to sustain and enhance heritage assets (para 185a and 197 of the NPPF). Paragraph 195 relates to designated assets, though many of the same principles apply. We would continue to emphasise the desirability of retaining the Northern Mill building in the first instance.

Comment

Consultee	Ms Debbie Mack (56252)
Email Address	[REDACTED]
Company / Organisation	Historic England
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Historic England (Ms Debbie Mack - 56252)
Comment ID	PMM2018:51
Response Date	29/01/19 10:53
Consultation Point	Proposed Main Modification 31 (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Mack for Historic England_Redacted.pdf

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you **Object**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

MM31 SM2 Newlands, St Ives Road, Somersham We welcome the addition of a reference to the nearby listed Somersham Hosue and its setting. Rather than simply stating that the development should 'acknowledge the listed building and its setting', we recommend that it should also preserve the listed building and its setting in line with both legislation and policy. We suggest the following wording: d. high quality development that preserves and acknowledges the nearby listed Somersham House and its setting As it happens, we had specifically requested reference to Somersham House and the Conservation Area in relation to policy SM3 The Pasture. We are disappointed that this has not been included as a proposed modification.

Supporting documents

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

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Mack for Historic England Redacted.pdf

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Following wording suggested:d. high quality development that preserves and acknowledges the nearby listed Somersham House and its setting

Summary

Main Modification 31. Welcome the addition of a reference to the nearby listed Somersham Hosue and its setting, however it is recommend that it should also preserve the listed building and its setting in line with both legislation and policy. Following wording suggested: d. high quality development that preserves and acknowledges the nearby listed Somersham House and its setting

Family or Company Name: Homes England
Agent: AECOM (Carlisle, David)
PMM: MM1

Comment

Agent	David Carlisle (1098957)
Email Address	[REDACTED]
Company / Organisation	AECOM
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Claire Hupton (1095549)
Email Address	[REDACTED]
Company / Organisation	Homes Engalnd (formerly Homes and Communities Agency)
Address	* * *
Event Name	Proposed Main Modifications 2018
Comment by	Homes Engalnd (formerly Homes and Communities Agency) (Claire Hupton - 1095549)
Comment ID	PMM2018:76
Response Date	29/01/19 14:28
Consultation Point	Proposed Main Modification 1 (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Carlisle, AECOM for Homes England.pdf

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you **Support**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

RE: Huntingdonshire Local Plan to 2036: Proposed Modifications 2018 for Consultation On behalf of Homes England, the attached representations respond to all relevant main modifications pertaining to our client's landholding (Houghton Grange and the Field Site - part of allocation SI 1 St Ives West) and the wider St Ives Spatial Planning Area. Proposed Main Modification reference number: MM1; and MM9. Local Plan page: 32; and 61-62. Policy/paragraph: LP 2 Strategy for Development; and LP11 The Countryside. Homes England supports the insertion of the word 'recognise' before 'the intrinsic character and beauty of the countryside' in policy LP2 and in policy LP11 (clause b). 'Recognise' is preferable to 'protect' when read in combination with the detailed implementation guidance table that follows paragraph 4.84 (Built up Area definition). In addition, 'recognise' is internally consistent with the supporting text set out in paragraph 4.117. This modification makes the plan more effective in dealing with land that forms part of allocations in Spatial Planning Areas ('SPA') but which currently falls outside of the Built up Areas (as per the definition). The modifications in combination with the Built up Area implementation guidance table, permits development for limited and specific opportunities as provided for in other policies in the plan.

Supporting documents

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

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[Carlisle, AECOM for Homes England.pdf](#)

Summary

Support Main Modification MM1. Insertion of the word 'recognise' is preferable when read in combination with the detailed implementation guidance table that follows paragraph 4.84 (Built up Area definition) and is internally consistent with the supporting text set out in paragraph 4.117.



29 January 2019


Annette Feeney
Local Plan Programme Officer, c/o
Huntingdonshire District Council,
Pathfinder House,
St Mary's Street,
Huntingdon,
PE29 3TN
Sent by Email

Dear Sir/Madam,

RE: Huntingdonshire Local Plan to 2036: Proposed Modifications 2018 for Consultation

On behalf of Homes England, the attached representations respond to all relevant main modifications pertaining to our client's landholding (Houghton Grange and the Field Site - part of allocation SI 1 St Ives West) and the wider St Ives Spatial Planning Area.

Yours sincerely,

David Carlisle
Associate Director
AECOM Limited, on behalf of Homes England


Proposed Main Modification reference number: MM1; and MM9.

Local Plan page: 32; and 61-62.

Policy/paragraph: LP 2 Strategy for Development; and LP11 The Countryside.

Homes England supports the insertion of the word 'recognise' before 'the intrinsic character and beauty of the countryside' in policy LP2 and in policy LP11 (clause b). 'Recognise' is preferable to 'protect' when read in combination with the detailed implementation guidance table that follows paragraph 4.84 (Built up Area definition). In addition, 'recognise' is internally consistent with the supporting text set out in paragraph 4.117. This modification makes the plan more effective in dealing with land that forms part of allocations in Spatial Planning Areas ('SPA') but which currently falls outside of the Built up Areas (as per the definition). The modifications in combination with the Built up Area implementation guidance table, permits development for limited and specific opportunities as provided for in other policies in the plan.

Proposed Main Modification reference number: MM28

Local Plan page: 205

Policy/paragraph: SI1 St Ives West paragraph 11.11

Homes England supports the removal of paragraph 11.1 from the supporting text, the deleted paragraph did not relate to any of the policy clauses within SI1. Policies LP22 and LP23 provide the policy framework for retail proposals outside of existing town centres.

Proposed Main Modification reference number: MM29; and MM5

Local Plan page: 209 – 210; and page 49.

Policy/paragraph: SI4 Former Car Showroom and paragraphs 11.20 to 11.28; and Figure 2 Key Diagram.

The removal of allocation SI4 (Former Car Showroom) from the Local Plan (MM29) leaves the St Ives SPA with only two recognised residential allocations in which to deliver circa 150 dwellings. The modification would result in an overall reduction of 50 units for the St Ives SPA to 430 units. The related modifications to Figure 2: Key Diagram (MM5) illustrate that proportionally the St Ives SPA is contributing very few new homes in comparison to the other SPAs and in light of the services available within the settlement. In this respect, Homes England disagrees with the conclusion of the 'Proposed Main Modifications 2018 Sustainability Appraisal' ('the SA') which does not explicitly address this 50 unit reduction in relation to the wider SPA and development strategy (p4): "*No change to the SA findings.*" However, the SA did find when assessing the removal of SI4 in isolation (MM29) that: "**The removal of the allocation reduces the certainty of housing provision within St Ives**".

Following the removal SI4 (Former Car Showroom), the Field site (SI 1) is St Ives principal allocation for major new housing growth. The SA reaffirms that (p87): "**This area [SI1] offers a sustainable opportunity for growing St Ives together with providing additional green infrastructure**".

Of the approximately 400 new homes allocated in SI 1 (St Ives West), planning permission is in place for 281 dwellings that make up the wider allocation. As such the Field site is the only available allocated parcel in the SPA that can make a meaningful contribution to meeting the District's housing needs over the coming plan period and is available now. The other much smaller allocation (SI 2) is contingent on alternative improved provision of pitches, whereas Homes England's land does not carry any such constraints or dependencies. This greater reliance on SI1, as a consequence of SI4's removal, intensifies the issues raised previously in Homes England's representations and hearing statements - namely the embargo on development placed on the entire eastern extent of the Field site. Homes England's view is that this makes the plan less effective and more inflexible.

The only options available to make the plan more effective at this stage of the examination would be to: (1) improve the clarity of SI1's supporting text and diagram; and (2) maintain St Ives SPA housing target at 480 units as submitted (with the 50 units from SI4 to be delivered on SI1). Critically, the

illustrative diagram that accompanies policy SI1 should either be deleted or altered (see overleaf) via minor modifications. Homes England's landscape appraisal and preliminary masterplanning exercise demonstrates that the site could comfortably provide for the 50 units lost as a result of SI4's removal and still remain in conformity with the Development Plan.

It is noted that it is outside the Inspector's remit to identify, or recommend changes to the Local Plan Policies Maps (namely the Proposals Map and Map 5). However, it is within the Inspector's gift (via the Inspector's Report) and Huntingdonshire District Council's ('HDC') remit (via the proposal of minor modifications) to help ensure the Development Plan remains internally consistent and provides clear guidance to both applicants and decision makers.

The SI1 illustrative diagram predetermines the masterplanning exercise required under SI1 (clause a) and LP14, making the plan internally inconsistent. With the removal of SI4 it is even more important that SI1 is not unnecessarily hampered by onerous supporting text or the current depiction of the illustrative diagram. Extant policy within the Houghton Wyton Neighbourhood Plan (Policy HWNP 3: Anti – Coalescence) in combination with SI1 (clause g) provides the statutory framework for informing future applications and the development management process for this site.

In the submitted Statement of Consultation (see p109-110 and p455-457), in respect of the Field Site, HDC state: 'detailed landscape negotiations' and 'further community involvement' are required. This flexibility is not reflected in policy SI 1's supporting text at present. In addition, the Local Plan was not amended following the detailed analysis provided by the Houghton and Wyton Neighbourhood Plan examiners. The two examiners both proposed modifications that removed references to a strategic gap on the Field Site and both resisted wording and maps that would place an 'embargo' on development for the Field Site. Yet the submitted SI 1 illustrative diagram *does* place an embargo on the eastern side of the site without any statutory policy hooks and contrary to the landscape evidence and SI (clause g) – this is unjustified.

How the plan can be made sound and the precise changes/wording that is being sought

MM5 should be altered and maintain the St Ives SPA housing target as 480 units (as submitted). The use of the word 'approximately' under SI1 (1) allows sufficient flexibility for the allocation to help achieve this plan period SPA target.

The plan would also benefit from minor modifications that would afford Homes England the flexibility to continue to explore development options for the most optimal use of the site, in compliance with the provisions of SI 1, LP2, LP11-LP14 and extant policy contained within the Houghton and Wyton Neighbourhood Plan (Policy HWNP3 Anti –coalescence). This will ensure the physical and visual separation of the Field Site and The Spires whilst still delivering much needed housing in St Ives. Placing an embargo on a large swathe of Homes England's landholding is not justified by the evidence (for the detailed reasons set out in our earlier Regulation 19 representations and Matter 8 Hearing Statement). Amending the illustrative diagram to provide greater flexibility would improve the effectiveness of the plan.

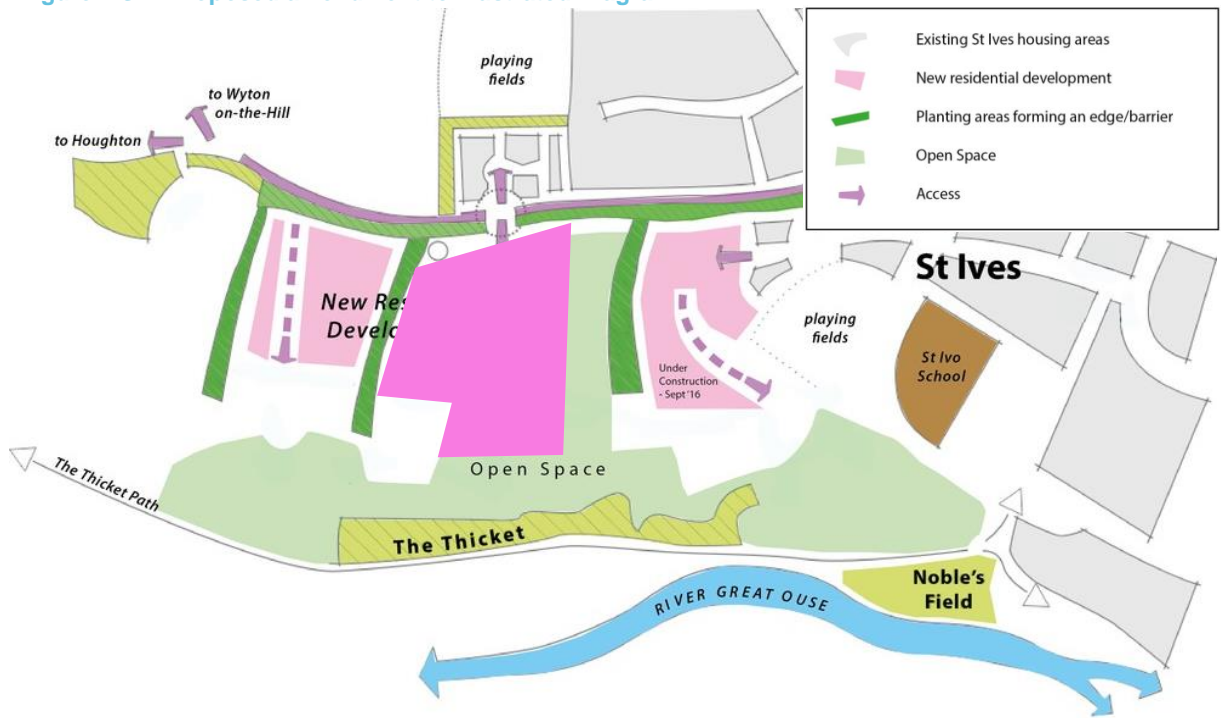
The following minor modifications to the supporting text are also recommended:

11.4 ...The indicative illustration ~~below~~ summarises ~~detailed urban design work setting out~~ how development of the area could take place. Detailed scheme designs shall be established via a masterplan and public consultation in accordance with policies SI 1 and LP 14.

11.9 ... A ~~substantial~~ band of greenspace should be retained through the portion of the ~~BBSRC field to the eastern of the derelict buildings extent of the Field site~~ and up to the western edge of residential development at 'The Spires'...

Finally, the illustrative diagram should be amended as follows (see overleaf – an enlarged 'New residential development' is proposed in compliance with SI1 clause g):

Figure 1 SI 1 Proposed amendment to Illustrated Diagram



Family or Company Name: Homes England
Agent: AECOM (Carlisle, David)
PMM: MM5

Comment

Agent	David Carlisle (1098957)
Email Address	[REDACTED]
Company / Organisation	AECOM
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Claire Hupton (1095549)
Email Address	[REDACTED]
Company / Organisation	Homes Engalnd (formerly Homes and Communities Agency)
Address	* * *
Event Name	Proposed Main Modifications 2018
Comment by	Homes Engalnd (formerly Homes and Communities Agency) (Claire Hupton - 1095549)
Comment ID	PMM2018:80
Response Date	29/01/19 14:28
Consultation Point	Proposed Main Modification 5 (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	Carlisle, AECOM for Homes England.pdf

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you **Object**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

Proposed Main Modification reference number: MM29; and MM5 Local Plan page: 209 – 210; and page 49. Policy/paragraph: SI4 Former Car Showroom and paragraphs 11.20 to 11.28; and Figure 2 Key Diagram. The removal of allocation SI4 (Former Car Showroom) from the Local Plan (MM29) leaves the St Ives SPA with only two recognised residential allocations in which to deliver circa 150 dwellings. The modification would result in an overall reduction of 50 units for the St Ives SPA to 430 units. The related modifications to Figure 2: Key Diagram (MM5) illustrate that proportionally the St Ives SPA is contributing very few new homes in comparison to the other SPAs and in light of the services available within the settlement. In this respect, Homes England disagrees with the conclusion of the 'Proposed Main Modifications 2018 Sustainability Appraisal' ('the SA') which does not explicitly address this 50 unit reduction in relation to the wider SPA and development strategy (p4): "No change to the SA findings." However, the SA did find when assessing the removal of SI4 in isolation (MM29) that: "The removal of the allocation reduces the certainty of housing provision within St Ives". Following the removal SI4 (Former Car Showroom), the Field site (SI 1) is St Ives principal allocation for major new housing growth. The SA reaffirms that (p87): 'This area [SI1] offers a sustainable opportunity for growing St Ives together with providing additional green infrastructure'. Of the approximately 400 new homes allocated in SI 1 (St Ives West), planning permission is in place for 281 dwellings that make up the wider allocation. As such the Field site is the only available allocated parcel in the SPA that can make a meaningful contribution to meeting the District's housing needs over the coming plan period and is available now. The other much smaller allocation (SI 2) is contingent on alternative improved provision of pitches, whereas Homes England's land does not carry any such constraints or dependencies. This greater reliance on SI1, as a consequence of SI4's removal, intensifies the issues raised previously in Homes England's representations and hearing statements - namely the embargo on development placed on the entire eastern extent of the Field site. Homes England's view is that this makes the plan less effective and more inflexible. The only options available to make the plan more effective at this stage of the examination would be to: (1) improve the clarity of SI1's supporting text and diagram; and (2) maintain St Ives SPA housing target at 480 units as submitted (with the 50 units from SI4 to be delivered on SI1). Critically, the illustrative diagram that accompanies policy SI1 should either be deleted or altered (see overleaf) via minor modifications. Homes England's landscape appraisal and preliminary masterplanning exercise demonstrates that the site could comfortably provide for the 50 units lost as a result of SI4's removal and still remain in conformity with the Development Plan. It is noted that it is outside the Inspector's remit to identify, or recommend changes to the Local Plan Policies Maps (namely the Proposals Map and Map 5). However, it is within the Inspector's gift (via the Inspector's Report) and Huntingdonshire District Council's ('HDC') remit (via the proposal of minor modifications) to help ensure the Development Plan remains internally consistent and provides clear guidance to both applicants and decision makers. The SI1 illustrative diagram predetermines the masterplanning exercise required under SI1 (clause a) and LP14, making the plan internally inconsistent. With the removal of SI4 it is even more important that SI1 is not unnecessarily hampered by onerous supporting text or the current depiction of the illustrative diagram. Extant policy within the Houghton Wyton Neighbourhood Plan (Policy HWNP 3: Anti – Coalescence) in combination with SI1 (clause g) provides the statutory framework for informing future applications and the development management process for this site. In the submitted Statement of Consultation (see p109-110 and p455-457), in respect of the Field Site, HDC state: 'detailed landscape negotiations' and 'further community involvement' are required. This flexibility is not reflected in policy SI 1's supporting text at present. In addition, the Local Plan was not amended following the detailed analysis provided by the Houghton and Wyton Neighbourhood Plan examiners. The two examiners both proposed modifications

that removed references to a strategic gap on the Field Site and both resisted wording and maps that would place an 'embargo' on development for the Field Site. Yet the submitted SI 1 illustrative diagram does place an embargo on the eastern side of the site without any statutory policy hooks and contrary to the landscape evidence and SI (clause g) – this is unjustified. How the plan can be made sound and the precise changes/wording that is being sought MM5 should be altered and maintain the St Ives SPA housing target as 480 units (as submitted). The use of the word 'approximately' under SI1 (1) allows sufficient flexibility for the allocation to help achieve this plan period SPA target. The plan would also benefit from minor modifications that would afford Homes England the flexibility to continue to explore development options for the most optimal use of the site, in compliance with the provisions of SI 1, LP2, LP11-LP14 and extant policy contained within the Houghton and Wyton Neighbourhood Plan (Policy HWNP3 Anti –coalescence). This will ensure the physical and visual separation of the Field Site and The Spires whilst still delivering much needed housing in St Ives. Placing an embargo on a large swathe of Homes England's landholding is not justified by the evidence (for the detailed reasons set out in our earlier Regulation 19 representations and Matter 8 Hearing Statement). Amending the illustrative diagram to provide greater flexibility would improve the effectiveness of the plan. The following minor modifications to the supporting text are also recommended: 11.4 ...The indicative illustration below summarises detailed urban design work setting out how development of the area could take place. Detailed scheme designs shall be established via a masterplan and public consultation in accordance with policies SI 1 and LP 14. 11.9 ... A substantial band of greenspace should be retained through the portion of the BBSRC field to the eastern of the derelict buildings extent of the Field site and up to the western edge of residential development at 'The Spires'... Finally, the illustrative diagram should be amended as follows (see overleaf – an enlarged 'New residential development' is proposed in compliance with SI1 clause g): Figure 1 SI 1 Proposed amendment to Illustrated Diagram

Supporting documents

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Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

MM5 should be altered and maintain the St Ives SPA housing target as 480 units (as submitted). The use of the word 'approximately' under SI1 (1) allows sufficient flexibility for the allocation to help achieve this plan period SPA target.

Summary

Object to Main Modification 5. The removal of allocation S14 (Former Car Showroom) from the Local Plan (MM29) leaves the St Ives SPA with only two recognised residential allocations. The modification would result in an overall reduction of 50 units for the St Ives SPA to 430 units. This greater reliance on S11, as a consequence of S14's removal, intensifies the issues raised previously in Homes England's representations and hearing statements - namely the embargo on development placed on the entire eastern extent of the Field site. Homes England's view is that this makes the plan less effective and more inflexible. Modifications should be made to S11 to address these issues. MM5 should be altered and maintain the St Ives SPA housing target as 480 units (as submitted).

Family or Company Name: Homes England
Agent: AECOM (Carlisle, David)
PMM: MM9

Comment

Agent	David Carlisle (1098957)
Email Address	[REDACTED]
Company / Organisation	AECOM
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Claire Hupton (1095549)
Email Address	[REDACTED]
Company / Organisation	Homes Engalnd (formerly Homes and Communities Agency)
Address	* * *
Event Name	Proposed Main Modifications 2018
Comment by	Homes Engalnd (formerly Homes and Communities Agency) (Claire Hupton - 1095549)
Comment ID	PMM2018:77
Response Date	29/01/19 14:28
Consultation Point	Proposed Main Modification 9 (View)
Status	Processed
Submission Type	Email
Version	0.3
Files	Carlisle, AECOM for Homes England.pdf

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you **Support**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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Please enter your representation here.

RE: Huntingdonshire Local Plan to 2036: Proposed Modifications 2018 for Consultation On behalf of Homes England, the attached representations respond to all relevant main modifications pertaining to our client's landholding (Houghton Grange and the Field Site - part of allocation SI 1 St Ives West) and the wider St Ives Spatial Planning Area. Proposed Main Modification reference number: MM1; and MM9. Local Plan page: 32; and 61-62. Policy/paragraph: LP 2 Strategy for Development; and LP11 The Countryside. Homes England supports the insertion of the word 'recognise' before 'the intrinsic character and beauty of the countryside' in policy LP2 and in policy LP11 (clause b). 'Recognise' is preferable to 'protect' when read in combination with the detailed implementation guidance table that follows paragraph 4.84 (Built up Area definition). In addition, 'recognise' is internally consistent with the supporting text set out in paragraph 4.117. This modification makes the plan more effective in dealing with land that forms part of allocations in Spatial Planning Areas ('SPA') but which currently falls outside of the Built up Areas (as per the definition). The modifications in combination with the Built up Area implementation guidance table, permits development for limited and specific opportunities as provided for in other policies in the plan.

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Summary

Support Main Modification MM9. Insertion of the word 'recognise' is preferable when read in combination with the detailed implementation guidance table that follows paragraph 4.84 (Built up Area definition) and is internally consistent with the supporting text set out in paragraph 4.117.

Family or Company Name: Homes England
Agent: AECOM (Carlisle, David)
PMM: MM28

Comment

Agent	David Carlisle (1098957)
Email Address	[REDACTED]
Company / Organisation	AECOM
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Claire Hupton (1095549)
Email Address	[REDACTED]
Company / Organisation	Homes Engalnd (formerly Homes and Communities Agency)
Address	* * *
Event Name	Proposed Main Modifications 2018
Comment by	Homes Engalnd (formerly Homes and Communities Agency) (Claire Hupton - 1095549)
Comment ID	PMM2018:78
Response Date	29/01/19 14:28
Consultation Point	Proposed Main Modification 28 (View)
Status	Processed
Submission Type	Email
Version	0.3
Files	Carlisle, AECOM for Homes England.pdf

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you **Support**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

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Please enter your representation here.

Proposed Main Modification reference number: MM28 Local Plan page: 205 Policy/paragraph: SI1 St Ives West paragraph 11.11 Homes England supports the removal of paragraph 11.1 from the supporting text, the deleted paragraph did not relate to any of the policy clauses within SI1. Policies LP22 and LP23 provide the policy framework for retail proposals outside of existing town centres.

Supporting documents

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Summary

Support Main Modification 28 as the deleted paragraph did not relate to any of the policy clauses within SI1. Policies LP22 and LP23 provide the policy framework for retail proposals outside of existing town centres.

Family or Company Name: Homes England
Agent: AECOM (Carlisle, David)
PMM: MM29

Comment

Agent	David Carlisle (1098957)
Email Address	[REDACTED]
Company / Organisation	AECOM
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Claire Hupton (1095549)
Email Address	[REDACTED]
Company / Organisation	Homes Engalnd (formerly Homes and Communities Agency)
Address	* * *
Event Name	Proposed Main Modifications 2018
Comment by	Homes Engalnd (formerly Homes and Communities Agency) (Claire Hupton - 1095549)
Comment ID	PMM2018:79
Response Date	29/01/19 14:28
Consultation Point	Proposed Main Modification 29 (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Carlisle, AECOM for Homes England.pdf

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Do you **Object**

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Please enter your representation here.

Proposed Main Modification reference number: MM29; and MM5 Local Plan page: 209 – 210; and page 49. Policy/paragraph: SI4 Former Car Showroom and paragraphs 11.20 to 11.28; and Figure 2 Key Diagram. The removal of allocation SI4 (Former Car Showroom) from the Local Plan (MM29) leaves the St Ives SPA with only two recognised residential allocations in which to deliver circa 150 dwellings. The modification would result in an overall reduction of 50 units for the St Ives SPA to 430 units. The related modifications to Figure 2: Key Diagram (MM5) illustrate that proportionally the St Ives SPA is contributing very few new homes in comparison to the other SPAs and in light of the services available within the settlement. In this respect, Homes England disagrees with the conclusion of the 'Proposed Main Modifications 2018 Sustainability Appraisal' ('the SA') which does not explicitly address this 50 unit reduction in relation to the wider SPA and development strategy (p4): "No change to the SA findings." However, the SA did find when assessing the removal of SI4 in isolation (MM29) that: "The removal of the allocation reduces the certainty of housing provision within St Ives". Following the removal SI4 (Former Car Showroom), the Field site (SI 1) is St Ives principal allocation for major new housing growth. The SA reaffirms that (p87): 'This area [SI1] offers a sustainable opportunity for growing St Ives together with providing additional green infrastructure'. Of the approximately 400 new homes allocated in SI 1 (St Ives West), planning permission is in place for 281 dwellings that make up the wider allocation. As such the Field site is the only available allocated parcel in the SPA that can make a meaningful contribution to meeting the District's housing needs over the coming plan period and is available now. The other much smaller allocation (SI 2) is contingent on alternative improved provision of pitches, whereas Homes England's land does not carry any such constraints or dependencies. This greater reliance on SI1, as a consequence of SI4's removal, intensifies the issues raised previously in Homes England's representations and hearing statements - namely the embargo on development placed on the entire eastern extent of the Field site. Homes England's view is that this makes the plan less effective and more inflexible. The only options available to make the plan more effective at this stage of the examination would be to: (1) improve the clarity of SI1's supporting text and diagram; and (2) maintain St Ives SPA housing target at 480 units as submitted (with the 50 units from SI4 to be delivered on SI1). Critically, the illustrative diagram that accompanies policy SI1 should either be deleted or altered (see overleaf) via minor modifications. Homes England's landscape appraisal and preliminary masterplanning exercise demonstrates that the site could comfortably provide for the 50 units lost as a result of SI4's removal and still remain in conformity with the Development Plan. It is noted that it is outside the Inspector's remit to identify, or recommend changes to the Local Plan Policies Maps (namely the Proposals Map and Map 5). However, it is within the Inspector's gift (via the Inspector's Report) and Huntingdonshire District Council's ('HDC') remit (via the proposal of minor modifications) to help ensure the Development Plan remains internally consistent and provides clear guidance to both applicants and decision makers. The SI1 illustrative diagram predetermines the masterplanning exercise required under SI1 (clause a) and LP14, making the plan internally inconsistent. With the removal of SI4 it is even more important that SI1 is not unnecessarily hampered by onerous supporting text or the current depiction of the illustrative diagram. Extant policy within the Houghton Wyton Neighbourhood Plan (Policy HWNP 3: Anti – Coalescence) in combination with SI1 (clause g) provides the statutory framework for informing future applications and the development management process for this site. In the submitted Statement of Consultation (see p109-110 and p455-457), in respect of the Field Site, HDC state: 'detailed landscape negotiations' and 'further community involvement' are required. This flexibility is not reflected in policy SI 1's supporting text at present. In addition, the Local Plan was not amended following the detailed analysis provided by the Houghton and Wyton Neighbourhood Plan examiners. The two examiners both proposed modifications

that removed references to a strategic gap on the Field Site and both resisted wording and maps that would place an 'embargo' on development for the Field Site. Yet the submitted SI 1 illustrative diagram does place an embargo on the eastern side of the site without any statutory policy hooks and contrary to the landscape evidence and SI (clause g) – this is unjustified. How the plan can be made sound and the precise changes/wording that is being sought MM5 should be altered and maintain the St Ives SPA housing target as 480 units (as submitted). The use of the word 'approximately' under SI1 (1) allows sufficient flexibility for the allocation to help achieve this plan period SPA target. The plan would also benefit from minor modifications that would afford Homes England the flexibility to continue to explore development options for the most optimal use of the site, in compliance with the provisions of SI 1, LP2, LP11-LP14 and extant policy contained within the Houghton and Wyton Neighbourhood Plan (Policy HWNP3 Anti –coalescence). This will ensure the physical and visual separation of the Field Site and The Spires whilst still delivering much needed housing in St Ives. Placing an embargo on a large swathe of Homes England's landholding is not justified by the evidence (for the detailed reasons set out in our earlier Regulation 19 representations and Matter 8 Hearing Statement). Amending the illustrative diagram to provide greater flexibility would improve the effectiveness of the plan. The following minor modifications to the supporting text are also recommended: 11.4 ...The indicative illustration below summarises detailed urban design work setting out how development of the area could take place. Detailed scheme designs shall be established via a masterplan and public consultation in accordance with policies SI 1 and LP 14. 11.9 ... A substantial band of greenspace should be retained through the portion of the BBSRC field to the eastern of the derelict buildings extent of the Field site and up to the western edge of residential development at 'The Spires'... Finally, the illustrative diagram should be amended as follows (see overleaf – an enlarged 'New residential development' is proposed in compliance with SI1 clause g): Figure 1 SI 1 Proposed amendment to Illustrated Diagram

Supporting documents

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to a website where it is available or give a full reference (including author(s), full title and date of publication) in your comment.

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To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

[Carlisle, AECOM for Homes England.pdf](#)

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Include modifications to SI1:

Amend the illustrative diagram to provide greater flexibility would improve the effectiveness of the plan.

The following minor modifications to the supporting text are also recommended:

11.4 ...The indicative illustration ~~below~~ summarises ~~detailed urban design work setting out~~ how development of the area could take place. Detailed scheme designs shall be established via a masterplan and public consultation in accordance with policies SI 1 and LP 14.

11.9 ... A ~~substantial~~ band of greenspace should be retained through the portion of the BBSRC field ~~to the eastern of the derelict buildings~~ extent of the Field site and up to the western edge of residential development at 'The Spires'...

Summary

Object to Main Modification 29. The removal of allocation S14 (Former Car Showroom) from the Local Plan (MM29) leaves the St Ives SPA with only two recognised residential allocations. The modification would result in an overall reduction of 50 units for the St Ives SPA to 430 units. This greater reliance on S11, as a consequence of S14's removal, intensifies the issues raised previously in Homes England's representations and hearing statements - namely the embargo on development placed on the entire eastern extent of the Field site. Homes England's view is that this makes the plan less effective and more inflexible. Modifications should be made to S11 to address these issues.

Comment

Consultee	houghton (1198301)
Email Address	[REDACTED]
Company / Organisation	Houghton & Wyton Neighbourhood Plan
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Houghton & Wyton Neighbourhood Plan (houghton - 1198301)
Comment ID	PMM2018:56
Response Date	29/01/19 13:27
Consultation Point	Proposed Main Modification 28 (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	MM28 Table showing inconsistency.docx

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you Sound Object

Do you consider this proposed main modification to be sound? Sound Object

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

Do you consider this proposed main modification Not legally compliant to be legally compliant?

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

We are concerned that the Sustainability Main Modifications Appraisal may contain references to a document quashed by the High Court in April 2013 and which therefore may lead to unlawful conclusions. There are 4 references to what is called an Urban Design Framework which the council have used when assessing impacts on SA6; SA8; SA16; and SA21. This Framework has been particularly important in the council answering the decision aiding questions and arriving at their answer, because it apparently contains solutions mitigating issues of transport, pedestrian and cycle access and safety, low carbon energy and the detrimental impacts upon significant visibility from the surrounding conservation area of any development on the site. These are the ones mentioned, but the UDF may have influenced HDC's decisions in other ways too. Following a thorough search we can find no link to the UDF document other than St.Ives west Urban design Framework (October 2011). However as the District Council is aware, following a successful challenge to the adoption by the Council of the St.Ives west UDF October 2011 (R (Houghton & Wyton Parish Council) v Huntingdonshire District Council [2013] EWHC 1476 (Admin)), the UDF was quashed. In the judgement, Charles Gore QC stated, at paragraph 56, that "(u)nless formally quashed, the [UDF] will be invoked, possibly by developers and/or third parties, as well as by the [Council], in respect of planning applications, both those within the study area and elsewhere [...] if unquashed the [UDF] will inevitably mislead". HDC have been made aware of this issue several times and the Parish Council have always reserved the right to take legal action should they feel the instructions of the court were not being followed. This issue was raised with Mr Kevin Ward from the Planning Inspectorate at the start of the Local Plan Hearing covering St.Ives west on 13th September 2018, hence we are surprised it has not been properly addressed by HDC. The issue is of course much larger than simply the comparison following the Main Modification 28 and the Final Sustainability Appraisal Report (CORE/07) plus HEELA 2017. Unfortunately the production of both of these consultations builds upon previous studies which were also heavily influenced by the UDF and we believe contain conscious and unconscious bias. To demonstrate, a simple exercise looking at the decisions of each of the criteria versus the commentary results in a very different picture. The SA poses what are potentially negative questions and correctly answered in the affirmative but rather than be classified 'orange -ve', they are somehow given a positive 'green +' score. For example, SA 1 Is more than half the site located on grade 3 agricultural land or lower (including urban and non-agricultural), Grade 2, or Grade 1? Answer = yes which should result in an orange negative answer rather than the green + it scores by HDC. (Other examples where we see inconsistency between HDC's commentary and the final classification are shown in a table attached). When scored accurately, the results paint a far less positive and more realistic picture for the land in question. Even with this, the latest SA has reaffirmed sustainability limitations, which coupled with the green field status, agricultural grade of land, plus flooding risk (lower slopes and topography making SUDS less suitable) reaffirms capacity limitations for the site. However, we believe the outcome would be far more limiting for development if the SA went further as it should do to look more fully at the impacts on the surrounding area, valued the land as an asset as a backdrop to the Great Ouse Valley and the economic impact to our local tourism and sustainability of the surrounding villages, plus protecting the separate identity of the neighbouring settlements. To this end we are surprised that given comments are been made in relation to the MMSA 28, which on the one hand bring some information up to date ,such as bus stops and greater exposure of the site, unfortunately there is still no reference to the Houghton & Wyton Neighbourhood Plan. Bearing in mind this was examined; made

in March 2018; and is planning policy adopted by HDC, it is therefore a material change to the previous study. This contains an anti coalescence policy HWNP 3, which describes and defines the gap together with considerable evidence and justification which is very relevant to the site. This policy was recommended by the Examiner from the May 2016 Submission of the Houghton & Wyton Neighbourhood Plan, to maintain the important distinction between the village and Market Town of St.Ives. Hence it is a major omission not even to be referenced, particularly in the new SA conclusions, given certain development might easily compromise the policy. It is particularly pertinent to the BBSRC field given its pivotal role in providing the gap and worthy of consideration as it influences both capacity and densities on the site. Quite correctly, the role of the gap is not new and has been seen as an important consideration in previous strategic Housing and Land assessments. It was considered so vitally important in the SHLAA of 2008 and which provided the evidence base for the current Core Strategy 2009, that it concluded the BBSRC field was not suitable for housing development. Yet as we say, gets no mention now. These points have been raised before, but alas we do not know how much consideration has been given to them. However, we do feel they are sufficient to warrant that if the St.Ives West UDF (October 2011) has been used in this SA, it is not based on legal judgement. Likewise, to make this consultation meaningful and valid, if HDC have produced and are using a different St.Ives west UDF then it needs to have been produced properly and published so that we and others can see it. Given its importance in the conclusions drawn and decisions made in the SA then it should also have had a link to it as per the Final Sustainability Appraisal Report (CORE/07) and HEELA 2017. It is noted that people did ask to see this document when making comments during the previous consultation (ref: Houghton & Wyton Parish Council comments) but we are not aware of anything being supplied. We have submitted a Freedom Of Information request to see the document, but sadly this has not materialised before the close of this consultation. You will have gathered that we care a great deal about where we live and are keen to engage and make a positive contribution to the plan making process by offering local knowledge. However as it stands without seeing this document we do not feel, or indeed even know whether we have had the chance to make the comments we need to make from a local perspective as part of this consultation.

Supporting documents

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

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To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

[MM28 Table showing inconsistency.docx](#)

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

UDF needs to be published and consulted

If the UDF relates to the quashed UDF this needs to be removed

Making the final SA scoring consistent with the written conclusions

Summary

Object to Main Modification 28. Further assessment of the Sustainability Appraisal is needed to justify housing site allocation. There are 4 references to an Urban Design Framework used to assess the impacts on SA6; SA8; SA16; and SA21 and address mitigation measures. There is no link to this document and the UDF was quashed following a successful challenge to the adoption by the Council of the St.Ives west UDF October 2011 (R (Houghton & Wyton Parish Council) v Huntingdonshire District Council [2013] EWHC 1476 (Admin)). There is no reference to the Neighbourhood Plan and the anti coalescence policy which the BBSRC field plays an important role in. There are inconsistencies in the scoring of Sustainability Appraisal objectives 1, 5, 6, 9, 10, 12, 18, 19 and 21

Table showing inconsistency comparing HDC commentary with resultant scoring of St.Ives west Main Modifications Sustainability Appraisal.

SA 1 Is more than half the site located on grade 3 agricultural land or lower (including urban and non-agricultural), Grade 2, or Grade 1?	Answer = yes orange, but HDC score it green +.
SA5 Is the site a designated nature site, immediately adjacent to a designated nature site or within 2km of a Ramsar, SAC or SPA, 1km of a SSSI or NNR or 200m of a CWS?	Answer = Yes Orange (HDC's commentary), but score it blue neutral.
SA 5 Are protected species known to exist on the site or is there potential for protected species to exist on the site?	Answer = Yes Orange (HDC's commentary) but score it blue neutral.
SA6 Will development have a significant impact on the surrounding townscape or landscape?	Answer = Yes (HDC suggest this could be significant) but classify as blue neutral, due to urban design framework which we have not seen.
SA9 Is the site outside or adjacent to an air quality management area?	Answer = yes. HDC scores positive, yet mention traffic impacts and are well aware of complaints regards pollution from over capacity of A1123 and queuing traffic on Houghton Hill.
SA 10 Is the site located in such a position that development is unlikely to cause widespread light, noise or other forms of pollution?	Answer = Yes (HDC's commentary) but classify blue neutral.
SA 12 Is the site within 500m of an existing area of open space?	Answer = no (HDC's commentary) but scored green positive because HDC state that there will be open land provided to the south of the site. This is very specific and presumably once again comes from the urban design framework which must specify exactly how the land will be developed – much like A Development Plan Document DPD would do.
SA 18 Is the site within 2km of a major concentration of employment opportunities and/or potential employees?	Answer = about half the site, therefore suggests neutral, but HDC classify as green positive.
SA 19 Will the site provide opportunities for investment to create additional jobs?	Answer = No because with removal of shop only very limited (home working and community facilities) but HDC classify as blue neutral.
SA21 Will the site support a mix of uses such as housing, employment, retail and/or community facilities?	Answer = No because with removal of the shop there will be very limited mix use (residential and limited community facilities only) but HDC classify as green positive.

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Comment

Consultee	Miss Lois Dale (836660)
Email Address	[REDACTED]
Company / Organisation	Houghton & Wyton Parish Council
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Houghton & Wyton Parish Council (Miss Lois Dale - 836660)
Comment ID	PMM2018:29
Response Date	28/01/19 13:07
Consultation Point	Proposed Main Modification 1 (View)
Status	Processed
Submission Type	Web
Version	0.3

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you **Support**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

Houghton & Wyton Parish Council support the removal of this additional level of 'settlement'

Summary

Support Main Modification 1.

Comment

Consultee	Miss Lois Dale (836660)
Email Address	[REDACTED]
Company / Organisation	Houghton & Wyton Parish Council
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Houghton & Wyton Parish Council (Miss Lois Dale - 836660)
Comment ID	PMM2018:30
Response Date	28/01/19 13:09
Consultation Point	Proposed Main Modification 5 (View)
Status	Processed
Submission Type	Web
Version	0.3

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you **Support**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

Houghton & Wyton Parish Council support the reduction in housing in the St Ives SPA from 480 to 430 dwellings

Summary

Support Main Modification 5 and the reduction in housing from 480 to 430 dwellings.

Comment

Consultee	Miss Lois Dale (836660)
Email Address	[REDACTED]
Company / Organisation	Houghton & Wyton Parish Council
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Houghton & Wyton Parish Council (Miss Lois Dale - 836660)
Comment ID	PMM2018:31
Response Date	28/01/19 13:15
Consultation Point	Proposed Main Modification 12 (View)
Status	Processed
Submission Type	Web
Version	0.3

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you **Support**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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Please enter your representation here.

Houghton & Wyton Parish Council support this modification and feel that tourism and recreation areas are routinely neglected at the expense of economic growth strategies.

Summary

Support Main Modification 12. Tourism and recreation areas are routinely neglected at the expense of economic growth strategies.

Comment

Consultee	Miss Lois Dale (836660)
Email Address	[REDACTED]
Company / Organisation	Houghton & Wyton Parish Council
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Houghton & Wyton Parish Council (Miss Lois Dale - 836660)
Comment ID	PMM2018:33
Response Date	28/01/19 14:06
Consultation Point	Proposed Main Modification 28 (View)
Status	Processed
Submission Type	Web
Version	0.4

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you **Object**

Do you consider this proposed main modification to be sound? **Sound**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

Do you consider this proposed main modification is not sound because it is not...

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

Do you consider this proposed main modification to be legally compliant? Not legally compliant

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.

Please enter your representation here.

MM28 - Removal of retail space within LP St.Ives west Whilst we support the removal of the retail space requirement we have concerns about this policy and want to assure that there is further assessment of the Sustainability Appraisal to justify housing site allocation. We are concerned that the Sustainability Main Modifications Appraisal may contain references to a document quashed by the High Court in April 2013 and which therefore may lead to unlawful conclusions. There are 4 references to what is called an Urban Design Framework which the council have used when assessing impacts on SA6; SA8; SA16; and SA21. This Framework has been particularly important in the council answering the decision aiding questions and arriving at their answer, because it apparently contains solutions mitigating issues of transport, pedestrian and cycle access and safety, low carbon energy and the detrimental impacts upon significant visibility from the surrounding conservation area of any development on the site. These are the ones mentioned, but the UDF may have influenced HDC's decisions in other ways too. Following a thorough search we can find no link to the UDF document other than St.Ives west Urban design Framework (October 2011). However as the District Council is aware, following a successful challenge to the adoption by the Council of the St.Ives west UDF October 2011 (R (Houghton & Wyton Parish Council) v Huntingdonshire District Council [2013] EWHC 1476 (Admin)), the UDF was quashed. In the judgement, Charles Gore QC stated, at paragraph 56, that "(u)nless formally quashed, the [UDF] will be invoked, possibly by developers and/or third parties, as well as by the [Council], in respect of planning applications, both those within the study area and elsewhere [...] if unquashed the [UDF] will inevitably mislead". HDC have been made aware of this issue several times and the Parish Council have always reserved the right to take legal action should they feel the instructions of the court were not being followed. This issue was raised with Mr Kevin Ward from the Planning Inspectorate at the start of the Local Plan Hearing covering St.Ives west on 13th September 2018, hence we are surprised it has not been properly addressed by HDC. The issue is of course much larger than simply the comparison following the Main Modification 28 and the Final Sustainability Appraisal Report (CORE/07) plus HELAA 2017. Unfortunately the production of both of these consultations built upon previous studies which were also heavily influenced by the UDF and we believe contain conscious and unconscious bias. To demonstrate, a simple exercise looking at the decisions of each of the criteria versus the commentary results in a very different picture. The SA poses what are potentially negative questions and correctly answered in the affirmative but rather than be classified 'orange -ve', they are somehow given a positive 'green +' score. These are shown in a table at the end of this comment. Scored accurately, the results paint a far less positive and more realistic picture for the land in question. Even with this, the latest SA has reaffirmed sustainability limitations, which coupled with the green field status, agricultural grade of land, plus flooding risk (lower slopes and topography making SUDS less suitable) reaffirms capacity limitations for the site. However, we believe the outcome would be far more limiting for development if the SA went further as it should do to look more fully at the impacts on the surrounding area, valued the land as an asset and the economic impact to our local tourism and sustainability of the surrounding villages, plus protecting the separate identity of the neighbouring settlements. We are surprised that comments that have been made in relation to the MMSA 28, which on the one hand bring some information up to date regards the bus stops and greater exposure of the site, but which still make NO REFERENCE TO THE NEIGHBOURHOOD PLAN. Bearing in mind this was examined, made in March 2018 and is planning policy adopted by HDC it is therefore a material change to the previous study. This contains an ANTI COALESCENCE POLICY HWNP 3, which describes and defines the gap together with considerable evidence and justification which is very relevant to the site. THIS POLICY WAS RECOMMENDED BY THE EXAMINER of the May 2016 Submission of the Houghton & Wyton Neighbourhood Plan TO

MAINTAIN THE IMPORTANT DISTINCTION BETWEEN THE VILLAGE AND MARKET TOWN OF ST IVES AND HENCE IS A MAJOR OMISSION NOT EVEN TO BE REFERENCED, particularly in the new SA conclusion if this might be compromised by development. It is particularly pertinent to the BBSRC field given its pivotal role in providing the gap and worthy of consideration as it influences both capacity and densities on the site. The role of the gap is not new and has been seen as an important consideration in previous strategic Housing and Land assessments. It was considered so vitally important in the SHLAA of 2008 and which provided the evidence base for the current Core Strategy 2009, that it concluded the BBSRC field was not suitable for development. Yet as we say, gets no mention now. These points have been raised before, but alas we do not know how much consideration has been given to them. However, we do feel they are sufficient to warrant that if the St.Ives west UDF (October 2011) has been used in this SA, it is not based on sound or legal judgement. If HDC have produced and are using a different St.Ives west UDF where is this? And where is the evidence of due process and consultations leading to its adoption? It is noted that people did ask to see this document when making comments during the previous consultation (Houghton & Wyton Parish Council) but we are not aware of anything being supplied. Table showing inconsistency comparing HDC commentary with resultant scoring of St.Ives west Main Modifications Sustainability Appraisal. SA 1 Is more than half the site located on grade 3 agricultural land or lower (including urban and non-agricultural), Grade 2, or Grade 1? Answer = yes orange, but HDC score it green +. SA5 Is the site a designated nature site, immediately adjacent to a designated nature site or within 2km of a Ramsar, SAC or SPA, 1km of a SSSI or NNR or 200m of a CWS? Answer = Yes Orange (HDC's commentary), but score it blue neutral. SA 5 Are protected species known to exist on the site or is there potential for protected species to exist on the site? Answer = Yes Orange (HDC's commentary) but score it blue neutral. SA6 Will development have a significant impact on the surrounding townscape or landscape? Answer = Yes (HDC suggest this could be significant) but classify as blue neutral, due to urban design framework which we have not seen. SA9 Is the site outside or adjacent to an air quality management area? Answer = yes. HDC scores positive, yet mention traffic impacts and are well aware of complaints regards pollution from over capacity of A1123 and queuing traffic on Houghton Hill. SA 10 Is the site located in such a position that development is unlikely to cause widespread light, noise or other forms of pollution? Answer = Yes (HDC's commentary) but classify blue neutral. SA 12 Is the site within 500m of an existing area of open space? Answer = no (HDC's commentary) but scored green positive because HDC state that there will be open land provided to the south of the site. This is very specific and presumably once again comes from the urban design framework which must specify exactly how the land will be developed – much like A Development Plan Document DPD would do. SA 18 Is the site within 2km of a major concentration of employment opportunities and/or potential employees? Answer = about half the site, therefore suggests neutral, but HDC classify as green positive. SA 19 Will the site provide opportunities for investment to create additional jobs? Answer = No because with removal of shop only very limited (home working and community facilities) but HDC classify as blue neutral. SA21 Will the site support a mix of uses such as housing, employment, retail and/or community facilities? Answer = No because with removal of the shop there will be very limited mix use (residential and limited community facilities only) but HDC classify as green positive.

Please tell us whether changes can be made to address the issue(s) you have identified.

Can the issue(s) you have identified be addressed by making changes to the proposed main modification? No

Summary

Object to Main Modification 28. Support the removal of the retail space requirement. Further assessment of the Sustainability Appraisal is needed to justify housing site allocation. There are 4 references to an Urban Design Framework used to assess the impacts on SA6; SA8; SA16; and SA21 and address mitigation measures. There is no link to this document and the UDF was quashed following a successful challenge to the adoption by the Council of the St.Ives west UDF October 2011 (R (Houghton & Wyton Parish Council) v Huntingdonshire District Council [2013] EWHC 1476 (Admin)). There is no reference to the Neighbourhood Plan and the anti coalescence policy which the BBSRC field plays an important role in. There are inconsistencies in the scoring of Sustainability Appraisal objectives 1, 5, 6, 9, 10, 12, 18, 19 and 21