

## **Huntingdonshire Local Plan to 2036**

### **Response to the Consultation from Hemingford Abbots Parish Council**

Hemingford Abbots Parish Council is a signatory to the letter from 10 Parish and Town Councils and other organisations dated 17 February 2015 and addressed to Huntingdon District Council. That letter expressed the grave concern of the signatories that the HDC Local Plan to 2036 ('the Plan') as currently drafted would be at risk of being found unsound and of being rejected by the Planning Inspector during examination. The risk of rejection is because the Plan does not take proper account of the circumstances that currently exist with regard to housing targets and infrastructure and of the highly probable changes in development land availability that will occur within the shorter term Plan period.

The Inspector's rejection of the Local Plan to 2036 would place the entire District area at risk of unsolicited speculative development proposals and it is this 'free for all' that would be of such serious detriment to our communities and which, through their representative Parish and Town Councils, those communities are seeking to avoid.

#### **Where the Local Plan as drafted is at risk**

In particular the Plan continues to propose major housing development at Wyton Airfield for which no sustainable transport infrastructure has been or is identified despite its inclusion within iterations of the Plan for some 3 years and despite the substantial increase in housing numbers from the initial proposal in 2012 of 870/1750 to the current proposal in the 2015 draft Plan for 4500 houses.

The Plan, except by passing reference, ignores the potential for providing for the housing need beyond the initial 5 year planning requirement at an extension to Alconbury Weald, where the necessary transport and other infrastructure is planned to be provided.

#### **Avoiding this risk**

Alconbury Weald is shown in this version of the Plan as providing 5000 houses towards the total District requirement. The Draft Strategic Options and Policies consultation document stated in August/November 2012 in the High Growth option that Alconbury Weald could provide 7220 houses.

Alconbury Weald is sited alongside the A1, a strategic road providing access to the North and to the South of the country and rapid and easy access to the, soon to be improved, A14 strategic road linking with the West and the East and, importantly, to the high growth area of Cambridge. Alconbury Weald is to be provided with a railway station on the East Coast Main Line providing not only commuter services to London but also easy access to the entire national rail network. The major development is attached to and is intended to be integrated with Huntingdon Town, which will be its main service centre. Alconbury Weald is to have 150 hectares of business development with an estimated 8000 'jobs' all sited within an 'Enterprise Zone' a significant financial draw for new business start-up and existing business expansion, probably to the exclusion of other nearby potential employment sites.

At Wyton Airfield, on the other hand, the Plan proposes development of a 'new town' of 4500 houses with just 10 hectares of employment opportunity on a site that currently has poor existing transport infrastructure, with only an indicated intention to "*safeguard a possible new alignment for the A141 around the north of Huntingdon*" to the west and with no sustainable way in which the essential transport infrastructure to the south and east yet identified. This is despite the fact that most of the expected 10,000 population will need to travel to and from their employment, shopping and leisure activities. The CCC LTTS suggested a new road across the Ouse Valley somewhere between Cow Lane, Godmanchester and Hemingford Abbots. This is without any doubt environmentally unsustainable and if this is the only solution contemplated it renders Wyton Airfield development itself unsustainable and contrary to the requirement of the NPPF for sustainable development.

In addition the 'new township' at Wyton Airfield would be sited midway between the towns of Huntingdon and St Ives separated from and with no community attachment to either of these service centres. The separation from them is by limited rural green space that will inevitably disappear and result in the worst example of 'urban sprawl'. Its proximity to St Ives will threaten the setting of the market town and its size will disrupt St Ives' current function as a hub for the neighbouring villages. The cumulative effect of widespread urbanisation of the area north of the Great Ouse between Huntingdon and St Ives will significantly change the nature of the area. Wyton might have been a good site for an airfield but it has no benefit as the site of a new town.

The obvious conclusion from a comparison of the merits of the two development locations is that the bulk of the proposed development of Wyton Airfield included within the Plan should be transferred to Alconbury Weald where the infrastructure to cater for it will exist.

### **Other considerations**

The USAF has indicated closing and withdrawing from their facilities at RAF Alconbury located immediately adjacent Alconbury Weald. These facilities include housing units and all the support services for a community including, shops, a supermarket and a school. Whilst redevelopment would be needed, the large area of land that will be released is defined as 'previously developed' land and could provide for very significant additional housing numbers.

### **Amendment of the draft Local Plan**

Firstly, it is acknowledged that unless Wyton Airfield is to be returned to agriculture, some limited development on the site of the order of a few hundred houses may ultimately be required to render Wyton on the Hill into a more viable village community.

The NPPF requires the local planning authority to

*"identify and update annually a supply of specific deliverable<sup>11</sup> sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period)"* and to

*"identify a supply of specific, developable<sup>12</sup> sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15" (NPPF Para 47).*

*"<sup>11</sup> To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. ...."*

*"<sup>12</sup> To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged."*

By these criteria, Wyton Airfield is neither deliverable nor, without a sustainable and viable way of providing the essential transport infrastructure for the development, developable.

Since the NPPF and its Guidance also expects that in keeping a Local Plan up to date it will be revised at least every 5 years. There is no need for Wyton Airfield to appear in the Local Plan as a development site at this time. If and when, at some time in the future, a sustainable way has been identified of dealing with the traffic generated by the Wyton Airfield development it could be reintroduced into a required update of the Local Plan.

The draft Local Plan should, therefore, now be amended with the proposed development site at Wyton Airfield being either removed entirely from the Plan or at the very least the scale of planned development must be severely reduced with the bulk of the currently proposed development being transferred to Alconbury Weald where the infrastructure to cater for it will exist. In addition the option for re-use of the USAF facilities / land at RAF Alconbury should also be included in the Plan. The release of this land will permit the transfer of further significant housing numbers from the proposed Wyton Airfield development.

### **Possible transport infrastructure solution**

If eventually some limited development is to take place at Wyton Airfield then a solution to dealing with the traffic generated to and from the East and South quadrants must be identified. . As stated above, any new road crossing the Ouse Valley between the existing bridges at Huntingdon / Godmanchester and St Ives is environmentally unsustainable. . The landscape of the Ouse Valley is of high quality and there is a current submission, supported by HDC and a large number of local councils and other bodies, for this area to be designated as an AONB. Almost the whole of this area is currently designated as a SSSI, Conservation Area, County Wildlife Site or Wild Life Reserve. Any intrusion or fragmentation of this landscape and natural habitat is unacceptable and must be ruled out of further consideration. In any case, the traffic projections in the CCC LTTS indicate that such a road would at best only maintain the status quo for the current severe congestion problems around St Ives and north of the Great Ouse.

A solution could be provided by a full by-pass of St Ives to the north and east joining the A141 at Wyton to the present A14 at or adjacent its Junction 26. Such a solution has not, for some reason, been tested by the County Council in their LTTS, which considered only by-passes from Wyton to Compass Point north east of St Ives and of the Low Road junction with some improvements to junctions in between.

The present A1096 is heavily congested at peak times and this congestion will increase when the A14 improvement is completed and additional traffic diverts to it to make use of the relieved A14 (*Highways Agency A14 Consent Order submission Vol 7.2 para 7.5.14 refers*). The A1123 west of St Ives is likewise already seriously congested even before the proposed St Ives West housing development is commenced. A bypass to the North and East of St Ives by intercepting through traffic on the A141, B1086, A1123 east and A1096 will alleviate congestion on the existing A1096 and in St Ives town and remove some traffic from the A1123 west. From their LTTS report CCC has presumably already identified alignments for the by-passes from Wyton Airfield to Compass Point and around the Low Road junction. The alignment of the 'missing link' between the two would deviate from the present road to rise and bridge over Meadow Lane, the Busway car park and the Busway itself, thus avoiding all the delays from the notorious signalised Busway / Harrison Way crossing, before dropping to cross the Ouse flood plain adjacent the existing Harrison Way bridge thus minimising the visual intrusion. The by-pass could then either follow the CCC proposed alignment to A14 J26 or in the alternative follow alongside Low Road to the A14 east of J26. Clearly the land to accommodate such a scheme will need to be set aside in the Local Plan.