

**Core Strategy 2008
Submission - Representation Form**

Can you access the Internet?

An interactive version of the Core Strategy is available on the Council's consultation website: <http://consult.huntsdc.gov.uk/portal>. Instructions on how to enter representations are provided on the website. This is the Council's preferred method of receiving comments as it will help us to handle your representation quickly and efficiently.

If you are unable to use the on-line representations system you may submit representations using this form. An electronic version is available from the Council. For more information please contact us. If you are completing the form by hand please write as clearly as possible.

All comments must be received by 12pm on Friday 15 August 2008.

Return by e-mail to ldf@huntsdc.gov.uk or by post to Development Plans Manager, Huntingdonshire District Council, Pathfinder House, St Mary's Street, Huntingdon, PE29 3TN.

Please read the Guidance Notes that come with this form before you complete it.

Your contact details
information

*required

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Your Agent's details

If you have appointed someone to act on your behalf please give their name and contact details.

Name:	
Organisation:	
Address:	
Post code:	Telephone:
E-mail:	

1. Which document are you commenting on?

Please identify which document your comment relates to. Please use a separate form for each element you wish to comment on.

Yes **Submission Core Strategy 2008**

Final Sustainability Appraisal on the Submission Core Strategy 2008

Non-technical Summary of the Final Sustainability Appraisal

2. Which part of the document do you wish to make a representation on?

Paragraph e.g. 1.1		Policy e.g. CS1		Figure e.g. Key Diagram		Table e.g. 8.1	
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3.

Do you consider the document to be legally compliant?

Yes

Do you consider the document to be sound?

No

4. Tests of Soundness

If you have identified that you think the document is unsound, please identify why.

The Core Strategy is unsound because it is not:

Justified Effective or Consistent with national policy

5. Your comment

Please give details of your answer to 3. Please be as precise as possible.

1. Introduction

The Core Strategy does not take adequate account of the increased traffic congestion in Godmanchester and the existing traffic problems, the lack of infrastructure, the loss of greenfield land, surface water runoff and flood risks, and the potential use of brownfield sites on RAF bases such as Alconbury, Brampton and Wyton. We also note that sites are included which HDC has previously rejected.

2. Summary Comments on the Strategic Housing Land Availability Assessment for Godmanchester June 2008

Locations identified in the Strategic Housing Land Availability Assessment June 2008 as suitable for some kind of development are as follows (our comments follow in **bold**):

site 3. Paddock at end of Corpus Christi Lane - "suitable for small scale development subject to access issues being addressed" – **in practice the access problems are insurmountable**

site 4. Farmyard East of Earning St opposite Sylton Close - "suitable for small scale development subject to access issues being addressed" - **agreed**

site 7. Rectory Farm - "unsuitable for residential development but potential as employment site" – **agreed subject to traffic and access resolved**

site 8. South of cardinal park depot and East of A1198 - "suitable once A14 re-routed and A1198 reengineered and A1198 traffic flows decrease". **As noted in the document, this site would not provide an integrated development with the rest of the town. We remain unconvinced that this development would not result in significant extra traffic flows in the town.**

Consequently we do not agree that this site is suitable for development as stated. See additional comments below

site 9. Paddock off Cob Place "suitable for small scale development subject to Crowhill highway issues being addressed" – **we do not agree that a development of 50+ dwellings is acceptable due to the access and traffic problems**

12. Farm complex south of Wigmore Farm - "suitable for development once Silver St access issues addressed" - **agreed that suitable for a few houses but with reservations re how Silver St access issues would be addressed given the current high level of on street parking.**

3. Further analysis of the development proposals for Godmanchester

We support the broad allocation of housing in the District with the exception of those for Godmanchester and the reference to the redundant military bases. These bases should be given greater prominence, especially as the Core Strategy will be looking to 2026.

Government policy emphasises the need to reuse brownfield land. We consider that greater attention needs to be given to the use of the various ex MoD sites at Upwood, Wyton Airfield and Alconbury Airfield for development in preference to the loss of greenfield land. All the MoD sites meet the broad sustainability criteria proposed in the previous Issues and Options consultation and therefore should be mentioned in the Spatial Principles. The types of development may vary according to the site. As suggested RAF Brampton is suited to mixed use whilst Alconbury and Wyton Airfields are large enough to consider as an exemplary "eco-towns" offering homes, retail and job opportunities.

The future of the use of Alconbury Airfield should not be left until the next review of the Regional Spatial Strategy. The review of RSS14 has now commenced and is due to be complete in 2011 and so a decision on the future of Alconbury will be known in time to inform the developments in the latter part of the Core Strategy Period. In the meantime inappropriate green field sites are proposed for housing allocations in preference to developing brown field land. Alternatively, provision should be included to swap land allocations should Alconbury become available before other greenfield sites, particularly in Godmanchester south of the A1198 are developed. This site is particularly appropriate for a swap policy as it is not proposed for development until after the A14 bypass is completed.

We were pleased to support the statement that the "growth of key service centres will be restricted to a level that will help sustain the existing facilities and amenities, without encouraging growth in these less sustainable locations" in the previous consultation document *Towards a Spatial Strategy for Huntingdonshire* and wish to see that phrase maintained. We were also pleased that Godmanchester's separate identity from Huntingdon was recognised by its designation as a "Key Service Centre" rather than as part of the Huntingdon Market town. Maintaining the separate identity of Godmanchester is important and should be maintained as it is for Yaxley and other villages close to Peterborough

We note and reluctantly support Godmanchester's designation as a Key Service Centre means it would have to accept moderate and minor development, (up to 60 dwellings) but more than this number are already completed or committed. Godmanchester has suffered recently from large development without commensurate improvements in infrastructure and community provision, for example from the 149 dwelling London Road site currently under construction, the recently completed Roman Way site and the major development at Wigmore Farm to the south west of the town also under construction. The proposals for development to the south east/east that we oppose are for major large scale development; this is not compatible with the settlement policy

hierarchy and therefore the development should not go ahead.

The Preferred Options approach aimed to make good use of brownfield land and existing or improving public transport, particularly to Cambridge. In Godmanchester neither of these factors is present and we do not believe development south of the A1198 meets the principles of sustainable development. Godmanchester is not well connected with Cambridge – there are minimal public transport links existing with no improvements planned and the areas proposed for new mixed use, in practice likely to be homes and warehousing, are remote from Huntingdon, the main market town.

We commented on the Huntingdonshire District Council's Housing Land Availability Assessment in February, the recent Issues and Options Consultation and consultation on Towards a Spatial Strategy for Huntingdonshire. We will continue to object to substantial developments in Godmanchester. We accept that development of small scale sites within the existing built up framework may be appropriate for limited development depending on local circumstances. However we do not think that the substantial greenfield housing release outside the village limit and south of the A1198 is either needed, or meets the proposed Spatial Principles for Key Service Centres.

Over the last few years Godmanchester has suffered from the growth in housing due to inadequate community facilities and infrastructure. Further developments, particularly the 650+ dwelling development south east of the A1198 and outside of the Town's boundary would be unsustainable. This site is not suitable for development:

- The site is outside the built up limit of the town
- It is south of the logical boundary of the town formed by the A1198
- Disconnected and separated from facilities in the town (as the Land Availability Assessment concluded for site 10)
- On high grade agricultural land
- More than 800m from the local shops and the only primary school currently with significant spaces (as recommended in the draft Huntingdonshire Design Guide (Oct 2006)
- Would require residents to cross a busy, wide main road – even when the A14 is built, the A1198 will still carry significant traffic flows
- The additional traffic would lead to further congestion and increase parking problems near the town's few shops

The Alterations to the Huntingdonshire Local Plan covered the period to 2006 in order to ensure Huntingdonshire achieved its allocation of dwellings set out in the adopted County Structure Plan. The allocations in the Modifications to the Proposals included 4 sites in Godmanchester; 131 houses on a site off London Road, 56 off Roman Way, 70 on Wigmore Farm and 25 at the Parks (already constructed). The assumption was that all these new dwellings (282) were required and would be built by mid 2006.

In practice only the Roman Way site has been developed. Developers have extant permission for 82 dwellings on Wigmore Farm, and 149 properties approved on the land off London Road; both substantially greater than recommended by the Inspector and accepted by HDC in the Local Plan Housing Alterations.

In addition, around 132 houses have been built in the last few years, on Devana Park and Martins Close. Godmanchester has therefore already experienced a significant level of growth. In the view of the Town Council any further increase would exacerbate existing problems, particularly from traffic along the old historical roads in the centre of the town.

Some years ago, at the Local Plan inquiry, the District Council stated, in relation to the Wigmore Farm proposal, “further development of this scale would represent an unacceptable level of growth inappropriate in relation to the size of the settlement and the availability of services, infrastructure and employment opportunities available Godmanchester is not considered appropriate for further growth compared with the other Market Towns”. The Godmanchester Town Council still agrees with this statement and believes the current situation, even without the impact of further housing development supports this conclusion.

The Inspector’s report also stated that “there are concerns over the ability of Godmanchester to accommodate growth beyond that planned” and “the highway network serving the site would be at or near its environmental capacity. She therefore also had reservations about further growth in Godmanchester.

4. Employment

We broadly support the spatial planning approach to employment but oppose the proposals for Godmanchester. We do not consider land should be designated for mixed use to the south east/east. In various Local Plans, employment land has been allocated to Godmanchester but then changed into housing, demonstrating a lack of market demand. Several of the warehouses on the Cardinal Distribution Park remained empty for many years, as have the office buildings and industrial units on London Road. We do not believe there is a local demand for new employment opportunities. Any new warehousing should be located at multi-modal locations.

The district council should be aiming to attract knowledge-based industries in zero-carbon buildings to support the development of a higher skilled workforce that is likely to bring greater benefits to the district than warehousing.

Continue on a separate sheet if necessary.

3. Changes

If you think the document is not legally compliant or is unsound please give details of what change(s) you consider are necessary, having regard to the test that you have identified in question 4 and the guidance notes.

You will need to say why you think this change will make the Core Strategy legally compliant or sound. It will be very helpful if you could also put forward your suggested revised wording of any policy or text.

Please note your comment should briefly cover all the information, evidence and supporting information necessary to support or justify the representation and the suggested change, as after this stage, further submissions will be only possible at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please be as precise as possible.

Remove the new substantial allocations for housing and employment in Godmanchester and allocate development to ex MoD sites. Reasons are given above and more information can be provided as necessary

Continue on a separate sheet if necessary

4. Summary

Please provide a short summary of your representation. Summaries must be limited to no more than 150 words. If you do not provide a summary the Council will summarise your representation. The Council also reserves the right to amend summaries that are provided to ensure they reflect the information in the comment.

Godmanchester Town Council broadly supports the spatial planning approach but opposes the proposals for Godmanchester. We note that greenfield land within the town is currently being built on to help meet the District's housing allocation figures. Additional greenfield land in Godmanchester should not be designated for housing, and particularly not for mixed use to the south east/east of the A1198 for reasons described earlier.

5. Examination

If you are seeking a change, do you consider it necessary to appear in person at the oral part of the examination?

Yes, a Town Councillor will appear in person

If you wish to appear in person at the oral part of the examination, please outline why you consider this to be necessary.

To represent the views of Godmanchester's residents

Signature:

Date:

NB: A signature is not required on forms returned electronically

Huntingdonshire District Council is registered with the Data Protection Act 1998 for the purpose of processing personal data in the performance of its legitimate business. Any information held by the Council will be processed in compliance with the principles set out in the Act. The preparation of the Core Strategy is a public process and your full representation and address details will be made public for this purpose.

For Official Use Only

Respondent no:

Rep no:

Received:

*Required information