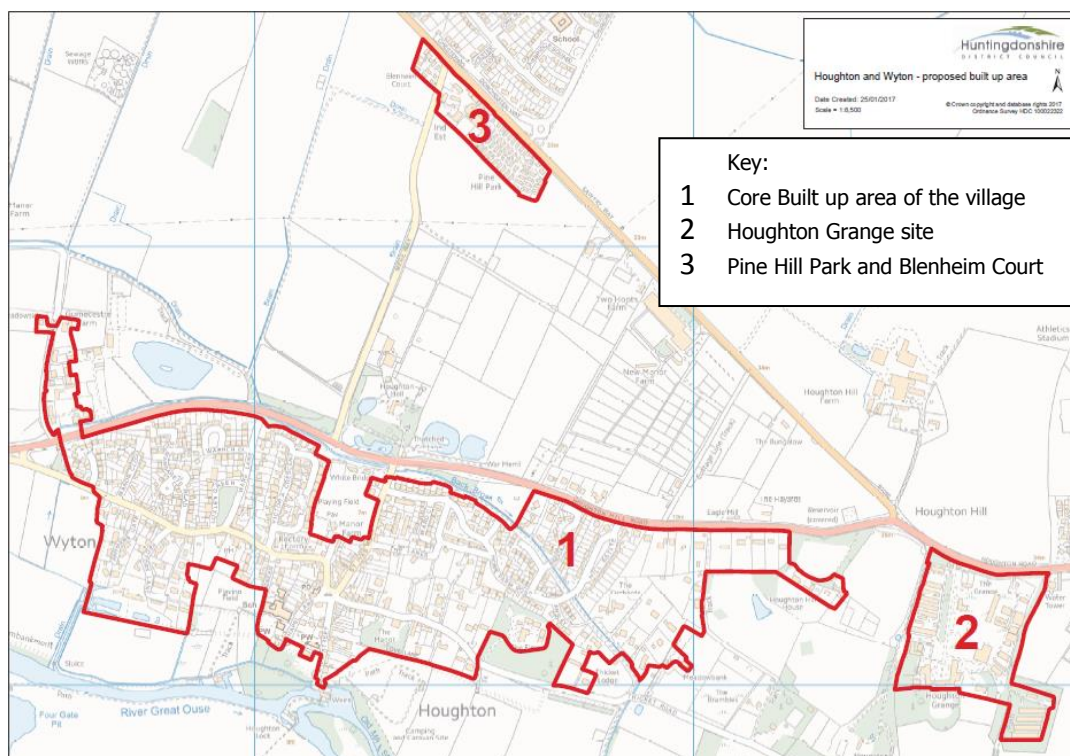


Alternative Modification 1 - HWNP 1 Built Up Areas

The following content replaces Figure 3: Indicative Built Up area of Houghton and Wyton and policy HWNP1 – Houghton and Wyton village limits/built up area.

Policy justification

- 1.1 The NPPF makes clear distinctions between built up areas and the countryside. To assist with interpretation of the neighbourhood plan's policies, built up areas have therefore been defined and mapped; all land outside the defined boundary is deemed to be countryside and subject to policies influencing development outside the built up area.



Policy

Policy HWNP1 - Houghton and Wyton built up area

A built up area is defined as a distinct group of 30 or more homes and their immediate surroundings.

Other areas outside the built up area are part of the open countryside.

Proposals for development within the built up area will be guided by the relevant Neighbourhood Plan policies and other policies in the development plan.

Proposals for development outside of the defined built up areas will be acceptable where they comply with relevant policies for building in the countryside.

Objectives addressed by Policy HWNP1	1,2,3,10,16
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Alternative Modification 2 – HWNP 3 Anti Coalescence

The following content replaces Local Settlement Gap paragraphs 5.5 to 5.7, policy HWNP3 – Local Settlement Gap and Figure 7: local Settlement Gap.

Prevention of coalescence with St Ives

Working together with policy HWNP1, this policy seeks to protect the village character and distinctiveness by retaining and enhancing a clear and obvious open land gap between the village and neighbouring market town of St Ives.

Historically the land identified in Development Plan documents separating Houghton & Wyton from St.Ives has comprised that land extending east of Houghton Grange and being made up of the St.Ives Golf Course, BBSRC Field and Thicket Wood.

Previous Inspectors of Development Plan documents have carefully described and defined the area in question using various terms such as ‘green gap’, ‘open gap’; ‘separation’ and ‘green wedge’. They have valued its importance using comments that it ‘should not be impinged upon’, ‘not compromised’ and ‘should be protected’, including that it was ‘vital’.

The Inspector of the Core Strategy 2009 stated that ‘separation should be retained’ and during preparation of the plan, the SHLAA 2009 specifically excluded the BBSRC field from development for this reason.

Whilst recognising the vital importance of maintaining a gap between village and town, subsequent plans have allowed some development of the town westwards and onto the northern section of old St.Ives golf course. In so doing this has reduced the area of land capable of physically separating the communities.

The depletion of historic land area once making up the ‘green gap’ now means that the BBSRC field occupies the only undeveloped frontage adjoining the A1123. It represents the last undeveloped and largely open area of agricultural and grassland countryside east of the village, as well as running north to south, uninterrupted from the A1123 south to the Thicket.

As a consequence the BBSRC field has gained importance in ensuring anti coalescence is maintained.

Whilst the BBSRC field together with the Thicket wood immediately to the south of it, remains the cornerstone of this policy, it should be noted that the surrounding areas of land which knit together in a patchwork across Houghton Hill, and continue to include the remaining undeveloped southern slopes of the old golf course (although not within the designated area of this Neighbourhood Plan) ; the county wildlife site (south of Houghton Grange); as well as the albeit secondary, more manicured gardens belonging to the

scattering of houses west of Houghton Grange; are all now increasingly important in helping to maintain the perception of separation.

Whilst recognising an increased reliance upon the wider area working together to deliver the objective of anti coalescence, the Core Strategy 2009 does not include a specific anti-coalescence policy which brings these areas together and defines them as a gap.

The importance to the community of anti coalescence between Houghton and Wyton the western edge of St Ives has historically been very significant. This continues to be the case as evidenced through the funding of a court case, a petition of over 700 signatures and many letters to the District Council on the subject as well as the Neighbourhood Plan surveys and consultations. It is the opinion of the community of Houghton and Wyton that, with the growth of neighbouring St Ives, assimilation would not be possible without totally destroying the historic character of the parish and the settlements.

It is therefore the purpose of HWNP policy 3 to define and protect those areas of land responsible for delivering both the actual and perceived anti coalescence of village and town as experienced from road, footpaths, meadow or river.

Policy justification

Huntingdonshire is characterised by a variety of individual towns and villages. However, as stated in the Local Development Scoping Report 2007 which informed the Core Strategy 2009, the extent of urban development over the past 50 years has transformed the appearance of its market towns and has also had a major impact on many of the villages. It went on to say that in some cases this has led to the incorporation of previously distinct settlements such as Eaton Socon (St. neots) and Hartford (Huntingdon).

Houghton and Wyton can contribute to maintaining this rich tapestry by way of ensuring the continued separation between the built up area of the village and the town of St Ives. This will help to protect the special character of Houghton and Wyton which has a clear and distinct identity as a village from that of St Ives as a market town.

The landscape of Houghton Hill is valued as a significant and unique topographical feature in the area forming a key element in long distance views across the Ouse Valley and contributing to the setting of both Houghton and Wyton and St Ives.

Historically Houghton Hill House and Houghton Grange stood in extensive grounds somewhat detached from the eastern end of Houghton. Housebuilding since the 1950s has extended the village eastwards such that Houghton Hill House is now connected to the eastern end of the defined built up area. Houghton Hill house has an entrance from the A1123 with a section of landscaped garden with ornamental tree cover fronting the road and helping to partially conceal the house.

Next to this is Houghton Grange which has been identified as an allocated development site within the Core Strategy. This site is detached from the core village and when developed will be large enough to create its own built up area. The woodland belt surrounding the site on three sides to the south, east and west, does screen views of the site. This is particularly important on the eastern flank and to the south where it links to Houghton Meadow county wildlife site and leads down to countryside footpaths.

On the northern edge of the site, two large listed gate houses front onto the road on either side of a long wide entrance. A water tower is also situated on the north-eastern corner next to the A1123 and both form landmarks when travelling along this road.

To the north of the A1123 recent development in St Ives has extended westwards such that it now directly abuts the extensive open farmland rising to the north of Houghton Grange; however, this land lies within the parish of Wyton on the Hill and is outside the scope of this neighbourhood plan.

Westward of Houghton Grange, a scattering of individual properties and gardens create a patchwork and populate the ridge and lower slopes before connecting with the built up area of the core village.

The eastern edge is separated from St Ives by a more open and larger tract of land, known as the BBSRC Field. It is the only significant natural grassland area left between the village and the town. It is also the last remaining area of open frontage along the A1123 affording glimpses of long distance views from the road. Taken together with the Thicket wood it is the only area of land which runs uninterrupted by housing north to south from the road to the valley floor. It does contain two small groups derelict buildings on its western edge, formerly used in association with Houghton Grange as a poultry research station. One of these groups is attached to the south western corner of Houghton Grange and has been included within the built up area specified in Policy HNWP1. Once again this is heavily screened from the southern approaches by mature trees.

The District's historical Development Planning documentation stretching back over 20 years has consistently recognised the BBSRC field and Thicket wood as being at the heart of providing the important and substantial separation of Houghton & Wyton from St.Ives.

In the development of the Core Strategy 2009 the BBSRC Field is expressly treated by the source material for Policy CS2 of the Core Strategy as being unsuitable for residential development, precisely because of its importance in forming the landscape gap between St Ives and Houghton.

Further support for the above interpretation comes from the Core Strategy's express saving of Policies EN 15 and EN17 of the 1995 Local Plan.

With the granting of planning permission and current building programme for the old St.Ives golf course, the remaining land i.e. the BBSRC field and Thicket wood, has become significantly more important to maintain separation. However, it is also much more apparent that in order to maintain a meaningful perception of separation, both visually and physically, this now has to work in conjunction with other areas of undeveloped and unallocated land lying between the two settlements.

This policy recognises this need, ensuring that coalescence with St Ives is prevented and the special character of Houghton and Wyton is therefore retained. In doing so it puts the BBSRC field and Thicket wood at the heart of that area essential to ensuring anti coalescence, together with the surrounding area of the County wildlife site (south of Houghton Grange) and the gardens west of Houghton Grange (but excluding the built up areas defined in HWNP1).

Policy

Policy HWNP3 – Anti –coalescence

Development proposals should respect the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives. Development will not be permitted if, individually or cumulatively, it would result in the loss of the visual and physical separation which currently exists between these two settlements, or would lead to their coalescence.

Objectives addressed by Policy HWNP3	1, 2, 3, 4, 5, 9,
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Appendix A HWNP Policy 1 Built Up Areas Methodology

The methodology used to inform this policy is set out below and provides a framework to ensure a consistent and comprehensive approach to identifying the built up area boundary.

It focuses on distinguishing between the separate characteristics and land use functions of the built up area and the countryside.

The methodology sets out guiding principles coupled with notes to assist implementation to determine whether a site should be in the built up area or the countryside.

It is designed to be applied through a combination of Ordnance Survey mapping, aerial and ground photography, site visits and local knowledge.

This table will be attached as an appendix to the Neighbourhood Plan.

Guiding Principle	Implementation Notes	Methodology in action
<p>The built up area boundary does not have to be continuous; any distinct group of 30 or more dwellings and their immediate surroundings may constitute a separate built up area within the parish.</p>	<p>Distinct areas of development may exist within the parish separated by areas of countryside. The remainder of the guiding principles provide advice on whether separate clusters of development constitute a separate built up area or are deemed to be isolated or sporadic development within the countryside.</p>	<p>Applying this methodology, three built up areas have been identified and mapped within the Parish – namely the core village of Houghton & Wyton; Houghton Grange, a substantial building with planning permission for conversion and construction of new homes in the grounds; and Pine Hill Park plus Blenheim Court and Upland industrial estate on the northern edge of the parish near to Wyton on the Hill, where a park home community is situated.</p> <p>The community of Houghton and Wyton has been very clear that development should mainly be directed towards the existing core of the village south of the A1123 which is considered the most sustainable of the three Built Up Areas.</p>

Guiding Principle	Implementation Notes	Methodology in action
		<p>Hartford Marina comprises a collection of permanent residential moorings and flats, as well as holiday lets. The disparate layout and configuration relates much more to the countryside and areas of open water than to any built up area, and with no cluster being of 30 or more permanent residences, the site has been excluded from the built up area.</p>
<p>The built up area boundary will follow clearly defined physical features such as walls, fences, hedgerows, roads, field boundaries and property lines unless set out as exceptions below.</p>	<p>Where practical the built up area boundary will include the whole curtilage of a property in recognition of the combined status of properties and their curtilages as a single planning unit. Exceptions are set out below for determining the boundary around extensive properties on the edge of the built up area to reflect the difference in character between parts of the grounds closely related to the property, for instance containing garaging and tennis courts and that which has a more natural countryside character.</p>	<p>When considering whether development proposals are located within a built up area the significance of the A1123 as a barrier has been taken into account.</p> <p>The A1123 is the main road between Huntingdon and St Ives and lies to the north of the historic core of the village. This road is a significant barrier with the few residents who live north of the road feeling disconnected from the rest of the village and its services, often driving to the village centre rather than walking or cycling. It is a busy road with the only island crossing points being located at the western edge of Wyton and between the junction with the B1090 and Houghton Grange towards the east side of the parish. The perception is that crossing the road safely and/ or quickly is a challenge, especially for the elderly or disabled. Except for a short section between the western edge of Wyton and the garden centre, footpath and cycle connections run along the south of this road.</p>

Guiding Principle	Implementation Notes	Methodology in action
		Elsewhere, property boundaries (barring exceptions see later) , footpaths, ditches and the flood bank have all been used to mark the boundary.

The built up area will include:		
Residential, community, retail and employment buildings which are wholly encompassed by other buildings.	The majority of buildings within the built up area boundary will fall within this category. It is included for the sake of completeness as most attention is paid to determining where the edges of the built up area are.	Notable examples include Houghton Primary school, St.Mary's Church and Centre.
Existing commitments for residential, community, retail and employment uses on sites which are physically/functionally related to the settlement.	Where development for residential, community, retail or employment use has commenced or has outstanding planning permission the principle of development has been approved. The precise boundary around such sites is determined with regard to the detailed guidance within this table.	The Houghton Grange site is the only substantial site which is identified as an existing commitment. Whilst this site is not currently built out, it is included as a built up area to help future-proof the NP.
Greenfield land which is predominantly encompassed by and integral to the built up area and defined by strong boundary features.	Some greenfield uses such as recreational or amenity open space, churchyards, wide grass verges and allotments, can form an integral and valuable part of the built up area and its character. Typically these should have buildings on at least three sides and have a clear physical and visual relationship with the built up area rather than any adjoining countryside.	As such the school playing field and sports and recreation ground has been excluded from the built up area. The school playing field is excluded as it has a clear visual relationship with the countryside to the south. Houghton Mill campsite is excluded as it predominantly comprises grassland which

		relates strongly to the open land to the east.
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	The built up area will exclude:	
Open spaces and sports and recreational facilities, paddocks, allotments, caravan sites, churchyards and cemeteries which extend into the countryside or primarily relate to the countryside in form or character.	Areas of open space, sports and recreational facilities, paddocks, allotments, caravan sites, churchyards and cemeteries provide a visual buffer between the built form and the open countryside, softening the visual impact and linking the built up area with its rural context. Such land is generally considered to primarily relate to the countryside where it is encompassed by built development on two sides or less.	The school playing field, Sports and Recreation ground are both excluded from the built up area.
Isolated properties and areas of ribbon and fragmented development which are physically or visually detached from the main built form.	To avoid areas of intervening countryside being unnecessarily included within the built up area properties which are physically or visually detached should be excluded.	With the exception of those properties forming a cluster adjoining Splash Lane, all other properties north of the A1123 are considered ribbon development and excluded from the built up area. Outlying properties south of Houghton Hill House and disconnected to the houses at the Orchards estate have been treated as isolated and outside the built up area.
Farmyards and associated agricultural buildings which extend into the countryside or primarily relate to the countryside in form or character.	Agricultural buildings tend to relate more to the surrounding countryside when still in use for agricultural purposes. However, if the building comprises a long standing traditionally built building and is well related in terms of scale and positioning to eligible properties with a defensible boundary it may be included as it is likely to be deemed suitable for	Those buildings clearly disconnected from the Splash Lane residential cluster have been excluded from the built up area.

	reuse under permitted development rights.	
Sections of large curtilages of buildings which relate more to the character of the countryside than the built form.	<p>Large curtilages with grounds stretching away from the rest of the built up area are excluded to prevent sub-division of the plot for new development and protect any vegetation which is likely to shield views into the plot from the public domain.</p> <p>Where practical the built up area boundary will be drawn along physical features such as hedges and fences which sub-divide elements of the grounds that relate closely to the buildings, for instance formal gardens, ancillary parking and hard tennis courts from those with a more natural, rural character.</p> <p>Where no clear boundary features exist the built up area boundary will be drawn 15m behind the relevant wall to allow scope for minor alterations and extensions to the property.</p>	The built up area boundary around Houghton Hill House (Houghton Hill), The Elms (Home Farm Road), The Moorings (Chapel Lane), properties south of Rhymers Gate and along Splash Lane has been drawn within 15m of the built form to reflect the size of plot and absence of physical features.
Fingers of agricultural land, woodland, meadow, areas of water and natural habitats that penetrate the built form but primarily relate to the countryside in form or character.	These spaces can provide a visual buffer between built development and the open countryside, softening the visual impact and linking the built up area with its rural context.	The triangle of agricultural ridge and furrow land located between Thicket Lodge, Thicket road and the back brook, has been excluded from the built up area as it relates very strongly to the countryside.



Houghton and Wyton Neighbourhood Development Plan 2015 – 2036

Report on the Examination of the Built up Areas and Anti-Coalescence Policies

**An Examination undertaken for Huntingdon Council with the support of
the Houghton and Wyton Parish Council.**

Independent Examiner: Robert Yuille MSc DipTP MRTPI

Date of Report: 20 November 2017

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Map 1	Provided as a separate attachment to the report

Main Findings - Executive Summary

From my examination of the Built Up areas and Anti-Coalescence policies in the Houghton and Wyton Neighbourhood Plan, taking into account the alternative modifications put forward by Huntingdon District Council and representations made, I have concluded that subject to the policy modifications recommend in this report, those policies meet the Basic Conditions and other relevant legal requirements.

I recommend that the Plan should proceed to Referendum, in accordance with the recommendations made in the Examination Report of 14 December 2015 subject to:

- the modification proposed on page 21 of the first examiner's report being replaced by Alternative Modification 1, subject to the changes proposed in PM1 and PM2 of this report; and
- the modification proposed on page 25 of the first examiner's report being replaced by Alternative Modification 2, subject to the changes proposed in PM3 and PM4 of this report.

1. Introduction and Background

Houghton and Wyton Neighbourhood Plan 2015-2036

- 1.1 The Houghton and Wyton Neighbourhood Plan (the Plan / HWNP) has previously been submitted for an independent examination, which commenced on 14 September 2015. An examination report was produced by Ann Skippers BSc (Hons) Dip Mgmt (Open) PGC(TLHE)(Open) MRTPI FHEA FRSA AoU ('the first examiner') on 14 December 2015 ('the December 2015 Report') setting out her proposed modifications to the Plan.
- 1.2 Following Huntingdon District Council's (the District Council) consideration of the December 2015 Report, it resolved to accept all the first examiner's recommendations except those relating to the Village Limits/Built Up Area (HWNP1) and the Local Settlement Gap (HWNP3). These policies seek to define the built-up area of the Parish and protect the two villages of Houghton and Wyton (which lie side-by-side) from coalescence with the settlement at St Ives, which lies to the east. Working together, the District Council and the Houghton and Wyton Neighbourhood Plan Working Group have drawn up alternative modifications that seek to address the original concerns of the first examiner and meet the Basic Conditions.
- 1.3 The District Council has consulted on these modifications, and in the light of the responses received, decided it is appropriate to put these two matters to independent examination.

The Independent Examiner

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- 1.4 I have been appointed by the District Council to examine the 'issue', which for the purposes of this examination are the matters of the Built Up areas and Anti-Coalescence policies in the HWNP and the suggested alternative modifications. My appointment has been made with the agreement of the Houghton and Wyton Parish Council ('the Parish Council').
- 1.5 I am a chartered town planner and former government Planning Inspector, with considerable experience in examining development plans and, more recently, neighbourhood plans. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.
- 1.6 In undertaking this independent examination, I am not bound by any previous work of the first examiner in relation to Policies HWNP1 and HWNP3. Given that the first examiner's 14 December 2015 Report has been accepted by the District Council in so far as it relates to all issues other than the two matters dealt with by these policies, it is not within my remit to revisit other aspects of the Plan. However, whilst the scope of the examination is confined to these two matters, I will need to consider if there are any consequences arising from the view I take on policies HWNP1 and HWNP3, which may have a direct or cumulative impact on other policies within the Plan. I may further need to consider if any consequential amendments are required to the Plan through modifications.

The Scope of the Examination

- 1.7 Paragraph 13(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act') provides that if
- (a) the local planning authority propose to make a decision which differs from that recommended by the examiner, and
 - (b) the reason for the difference is (wholly or partly) as a result of new evidence or a new fact or a different view taken by the authority as to a particular fact,
- the authority must notify prescribed persons of their proposed decision (and the reason for it) and invite representations.
- 1.8 Paragraph 13(2) of Schedule 4B allows for the exercise of the discretion of the local planning authority in so far as it provides that if the authority considers it appropriate to do so, they may refer the issue to independent examination.
- 1.9 Paragraph 13(3) of Schedule 4B is an enabling provision which provides for the making of regulations about an examination under paragraph 13. However, to date, provision has only been made in relation to the decision

timetable following the completion of the examination of an issue and the procedure for the Secretary of State's (SOS) intervention¹. The Planning Practice Guidance (PPG) similarly only refers to this process with regard to the local planning authority's decision timetable and SOS intervention.

1.10 Therefore, in the absence of further procedural regulations or guidance governing an examination under paragraph 13(2), my starting point is Paragraph 8(1) of Schedule 4B to the 1990 Act, which requires the examiner to consider:

- Whether the Plan meets the Basic Conditions;
- Whether the Plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development';
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area;
 - whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum; and
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the 2012 Regulations').

1.11 A neighbourhood plan examination is confined to the matters within Paragraph 8(1) of Schedule 4B to the 1990 Act. However, the Plan must also be compatible with the Human Rights Convention (and relevant Protocols).

1.12 From my assessment, it would appear that not all of the requirements in paragraph 8(1) are directly relevant to the examination of an issue under paragraph 13(2). In particular, the overarching plan requirements of

¹ The Neighbourhood Planning (General) Regulations 2012 (as amended) provide in Regulation 17A(5)(b)(i) that the local planning authority is required to make a decision on recommendations made under a paragraph 13(2) examination within 56 days of receipt of the examiner's report (see also paragraph 13A of Sch.4B). Paragraphs 13B and 13C further deal with Secretary of State intervention.

sections 38A and 38B of the 2004 Act where the first examiner will already have dealt with these in terms of the Plan as a whole i.e. the status of the qualifying body; the neighbourhood plan area; the period of the Plan and the Plan's preparation and consultation. Furthermore, the area in which the referendum is to take place is not an issue which can be considered under paragraph 13².

1.13 In contrast, the consideration of whether the issue relates to a land use planning matter and is not excluded development is relevant, as is the requirement to ensure that the issue is compatible with the European Convention of Human Rights. I deal with the specific application of the procedural legal requirements in more detail in Section 3 of this report.

1.14 As this is an examination under paragraph 13 of Schedule 4B to the 1990 Act, I shall also consider whether the local planning authority has complied with the prior consultation requirements in paragraph 13(1).

Basic Conditions

1.15 I consider all of the Basic Conditions are potentially relevant to this examination, notwithstanding they refer to the 'plan' rather than the 'issue'. The Basic Conditions are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;
- Be compatible with and not breach European Union (EU) obligations; and
- Meet prescribed conditions and comply with prescribed matters.

1.16 Regulation 32 of the 2012 Regulations prescribes a further basic condition for the Plan. This requires that it should not be likely to have a significant effect on a European Site (as defined in the Conservation of Habitats and Species Regulations 2010) or a European Offshore Marine Site (as defined in the Offshore Marine Conservation (Natural Habitats etc.) Regulations 2007), either alone or in combination with other plans or projects.

Referendum

² See paragraph 13(4) of Schedule 4B to the 1990 Act.

1.17 I am required to make a final recommendation as to whether the Plan should proceed to referendum, in accordance with the first examiner's recommendations, combined with any modifications I may make as a result of this second examination.

2. Approach to the Examination

Planning Policy Context

- 2.1 The Development Plan for this part of Huntingdonshire, not including documents relating to excluded minerals and waste development, is; the Huntingdonshire Core Strategy adopted in September 2009 (the Core Strategy); saved policies from the Local Plan 1995 (the 1995 Local Plan); and saved policies from the Local Plan Alteration 2002 (the Local Plan Alteration). The Core Strategy sets out the spatial framework for Huntingdonshire's future to 2026.
- 2.2 Consultation was completed on 25 August 2017 on Huntingdonshire's Local Plan to 2036: Consultation Draft 2017 (the emerging Local Plan). The 'Proposed Submission Draft' (Publication Version) is scheduled for consultation in December 2017 and is likely to be submitted to the Secretary of State for examination around Spring 2018. If an emerging Local Plan is in conflict with a neighbourhood plan, there is a risk that, when the Local Plan is adopted, it will undermine the effectiveness of that neighbourhood plan. Having regard for these factors and the advice in the Planning Practice Guidance (PPG)³, I shall take the emerging Local Plan into consideration in this examination where it is relevant to the two policies under consideration.
- 2.3 The planning policy for England is set out principally in the National Planning Policy Framework ('the Framework'). The PPG offers guidance on how this policy should be implemented.

Submitted Documents

- 2.4 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- Houghton & Wyton Submission Version Neighbourhood Plan*;
 - Independent Examiner's Report, 14 December 2015*;
 - Alternative Modification 1 – HWNP1 Built Up Areas*;
 - Appendix A – Methodology for Alternative Modification 1*;
 - Alternative Modification 2 – HWNP3 Anti Coalescence*;
 - Consultation Notes for Alternative Modification 2 HWNP3 Anti Coalescence*;

³ PPG Reference ID 41-009-20160211.

- Report on comments made on Houghton & Wyton Neighbourhood Plan: Proposed Alternative Modifications examination consultation*;
- Extracts from the Inspector's Report in to the Local Plan Alteration (2002) – Chapter 1 Settlement Strategy;
- High Court Judgement: Houghton & Wyton Parish Council vs. Huntingdonshire District Council May 2013;
- Appeal Decision – St Ives Golf Club, December 2015;
- The District Council's answers to various questions raised by me. These answers are contained in emails dated 13/09/17, 03/10/17 and 16/10/17*;
- Plan provided by Design Planning and Economics on 28/09/17 showing the extent of HCA land ownership and the boundaries of its planning permission;* and
- Plan provided by the District Council on 16/10/17 showing various built up area boundaries and other information*.

**Available on District Council web site⁴*

Site Visit

- 2.5 I made an unaccompanied site visit to the Neighbourhood Plan Area on 4 October 2017 to familiarise myself with it, particularly focusing on the extent of the built up area and the land south of the A1123 between the village and St Ives.

Written Representations with or without Public Hearing

- 2.6 This examination has been dealt with solely by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the alternative modifications.

Modifications

- 2.7 Where necessary, I have recommended modifications to the plan (**PMs**) in this report in order that they meet the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in Appendix 1.

3. Procedural Compliance and Human Rights

Plan Wide Compliance Issues

⁴<http://www.huntingdonshire.gov.uk/planning/neighbourhood-planning/>

3.1 As noted in paragraph 1.12 above, I consider that a number of the procedural compliance issues are based on the assessment of the HWNP as a whole and have been dealt with by first examiner in her December 2015 Report, and subsequently agreed by the District Council. I see no reason to disagree with her conclusions. For the sake of completeness these are summarised as follows:

(i) Qualifying Body and Neighbourhood Plan Area

Section 4.0, page 6 of the December 2015 Report confirms that the Parish Council is the qualifying body and the neighbourhood area was duly designated on 19 December 2012 as per Figure 1 on Page 2 of the HWNP. It also confirms the HWNP is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.

(ii) Plan Period

Subject to the modification the first examiner recommends in the second bullet point on page 16 of the December 2015 Report, she confirms on page 6 that the plan period is 21 years from 2015 – 2036.

(iii) Neighbourhood Plan Preparation and Consultation

Section 6, pages 8-9 of the December 2015 Report covers the HWNP preparation and consultation process, including the Pre-Submission Draft Plan consultation which ran for 7 weeks from 14 November 2014 to 3 January 2015 (Regulation 14) and the Submission Plan consultation (Regulation 16) which ran for a 6 week period from 19 June 2015 to 31 July 2015, thus meeting the legal requirements. The overall conclusion is that there seems to have been a fairly comprehensive campaign in publicising the Plan and, on balance, there seems to have been adequate opportunity for interested parties including land owners to participate.

Policy Specific Compliance Issues

3.2 The following legal compliance requirements can be applied specifically to the two policies I am examining:

(i) Development and Use of Land

I am satisfied that the matters dealt with by HWNP 1 and HWNP 3 relate to the development and use of land in accordance with s.38A of the 2004 Act.

(ii) Excluded Development

Neither HWNP 1 nor HWNP 3 deal with matters which relate to 'excluded development'.

(iii) Human Rights

From my own independent assessment, I am satisfied that the matters in HWNP1 and HWNP3 do not breach Human Rights (within the meaning of the Human Rights Act 1998).

(iv) Further Consultation

The District Council proposes to make a decision which differs to that in the December 2015 Report as a result of a different view taken by the local authority on an issue, which is the matters of the Built Up Areas and Anti-Coalescence policies. A consultation exercise on the alternative modifications to the HWNP (to those proposed in the December 2015 Report) was consulted on from 7 April 2017 to 22 May 2017. 30 responses were received. I am therefore satisfied that the District Council has complied with the requirements in paragraph 13(1) of Schedule 4B to the 1990 Act.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The first examiner deals with these matters on pages 11 to 14 of the December 2015 Report and in essence concludes that a Strategic Environmental Assessment of the Plan would not be required although it would be prudent for the District Council to review this in the light of her proposed modifications. She also concludes that a Habitats Regulations Assessment would not be required. Nothing has happened in the intervening period to invalidate these conclusions and I see no reason to disagree with them.

Background

- 4.2 Before defining the main issues it is useful to set out the version of Policies HWNP 1 and HWNP 3 contained in the submitted version of the Plan, to summarise what the first examiner concluded about these policies and to set out the version of these policies contained in the Alternative Modifications.
- 4.3 **Alternative Modification 1** relates to Policy HWNP 1 of the Plan, a policy which deals with Built Up Areas. This Policy states:

There is a presumption in favour of sustainable development within the built up area which shall be guided by the relevant Neighbourhood Plan policies and other policies in the development plan.

Outside the built up area any development is considered to represent development in the open countryside. Such development will be acceptable if it represents a use that supports rural activities or quiet tourism.

Across the neighbourhood plan area, there shall be a presumption against all types of vulnerable new development being located in flood zones 2 and 3. This shall include such development within the built-up area.

Figure 3 shows the extent of the built up area on a plan.

- 4.4 The first examiner proposed that this policy together with its supporting text (which includes Figure 3) be deleted. Her reasons for this are summarised as being:

'..the lack of evidence for this policy and the very limited explanation of the built up area boundary, its unclear definition on the map and the stance of the policy itself..' ⁵

- 4.5 The District Council in consultation with the Parish Council has not accepted this Proposed Modification. It has put forward Alternative Modification 1 which reads as follows:

"Policy HWNP1 - Houghton and Wyton built up area

A built up area is defined as a distinct group of 30 or more homes and their immediate surroundings.

Other areas outside the built up area are part of the open countryside. Proposals for development within the built up area will be guided by the relevant Neighbourhood Plan policies and other policies in the development plan.

Proposals for development outside of the defined built up areas will be acceptable where they comply with relevant policies for building in the countryside."

- 4.6 The boundary of the built up area is shown on a plan attached to Alternative Modification 1. Attached at Appendix A is the *Built up Areas Methodology* – a document that sets out the methodology used to inform the definition of the built up area boundary.
- 4.7 **Alternative Modification 2** relates to Policy HWNP 3 which deals with the Local Settlement Gap between the village and St Ives. This Policy states:

Policy HWNP 3 – Local Settlement Gap.

Within the identified settlement gap, development will not be permitted if it would add to existing sporadic or isolated development or lead to the coalescing of the village with the neighbouring town of St Ives, in turn leading to the loss of the individual identity of Houghton and Wyton.

The settlement gap is identified on Figure 7.

- 4.8 The first examiner proposed that Figure 7 be deleted and that the wording of the policy be amended to read:

⁵ 14 December 2015 Report. Paragraph at the bottom of page 20 and the top of page 21. Intelligent Plans and Examinations (IPE) Ltd, Regency Offices, 37 Gay Street, Bath BA1 2NT
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*Development proposals should respect the individual and distinct identities of the village of Houghton and the town of St Ives. Development will not be permitted if, individually or cumulatively, it would result in the loss of the visual and physical separation of these two settlements or lead to their coalescence.*⁶

The reasons given by the first examiner for this proposed modification are summarised in her report as follows:

*'Therefore designation of the gap would prevent, or, at the very least, make it harder for the District Council to plan for the strategic needs of the District, particularly given various constraints including flooding in the area. As a result I consider the proposed gap cannot be said to be in general conformity with the relevant strategic policies in the development plan or pay sufficient regard to national policy and advice or would contribute to the achievement of sustainable development.'*⁷

- 4.9 The District Council in consultation with the Parish Council has not accepted this Proposed Modification. Instead it has proposed Alternative Modification 2 which states:

Policy HWNP3 – Anti –coalescence

Development proposals should respect the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives. Development will not be permitted if, individually or cumulatively, it would result in the loss of the visual and physical separation which currently exists between these two settlements, or would lead to their coalescence.

- 4.10 The main difference between the first examiner's version of this policy and that set out in Alternative Modification 2 is that the latter adds the words *'..which currently exists between...'*. Alternative Modification 2 does not define a settlement gap on a plan. It does however contain a fairly lengthy block of supporting text and a document entitled 'Consultation Notes for Alternative Modification 2 HWNP3 Anti Coalescence'. This document consists largely of a legal opinion expressing the view that Policy HWNP3 complies with the Basic Conditions.

Main Issue

- 4.11 With this background in mind I consider the main issue in this re-examination to be whether Alternative Modifications 1 and 2 have regard to national policies and advice, are in general conformity with the strategic policies of the development plan and contribute to the achievement of sustainable development.

Alternative Modification 1 – HWNP 1 Built Up Areas

- 4.12 In principle there is no objection to making a clear distinction between built up areas and the countryside. There is nothing in the Framework to

⁶ 14 December 2015 Report. Top of page 25.

⁷ 14 December 2015 Report. Second paragraph, page 24.

prevent this and such a distinction is made in the development plan. In the 1995 Local Plan this distinction is made by defining on a map what is termed a 'Village Limits' boundary for villages such as Houghton and Wyton.

4.13 This boundary is still part of the development plan by virtue of its being referred to, albeit under the different name of 'Village Environmental Limits', in policies such as saved policy En17 of the 1995 Local Plan. The built up area boundary proposed in Alternative Modification 1 differs somewhat from the equivalent boundary shown in the 1995 Local Plan (see Map 1 provided as a separate attachment to this report) but that is to be expected given that over 20 years have elapsed since the first boundary was defined and the two boundaries have been defined in the context of different policy backgrounds.

4.14 A different approach is taken in the Core Strategy (paragraph 5.15) and in the emerging Local Plan (paragraphs 4.61 – 4.64) which each contain written definitions of the term built up area.

4.15 The definition contained in the Core Strategy is as follows:

'The definition of the built-up area will be set out in more detail in the Development Management DPD but for the purposes of the Core Strategy it is considered to be the existing built form excluding:

- *buildings that are clearly detached from the main body of the settlement;*
- *gardens and other undeveloped land within the curtilage of buildings at the edge of the settlement, where these relate more to the surrounding countryside than they do to the built-up parts of the village; and*
- *agricultural buildings where they are on the edge of the settlement.*⁸

4.16 The emerging Local Plan defines a built up area in the following terms:

*'A built-up area is considered to be a distinct group of buildings and their immediate surroundings that includes 30 or more homes. Land that does not meet the definition of Previously Developed Land, as set out in the Glossary, and relates more to the surrounding countryside than to any buildings, is not part of the built-up area.'*⁹

4.17 As the emerging Local Plan points out there are advantages to such an approach:

*'.....among other benefits, it avoids the perception that any form of development on any land within a drawn boundary would be acceptable and the pressure for every piece of land within the boundary to be developed, thus damaging the loose knit character of many settlements in Huntingdonshire by creating harder, more regular edges to settlements.'*¹⁰

⁸ Core Strategy. Paragraph 5.15.

⁹ Emerging Local Plan. Paragraph 4.61.

¹⁰ Emerging Local Plan. Paragraph 4.62.

- 4.18 However, identifying a boundary on a map is also a valid way of defining a built up area, as indeed has been done in the 1995 Local Plan. I see no objection in principle to a Neighbourhood Plan seeking to add an additional level of detail to the existing and emerging development plan definitions of built up areas by applying them to a particular village and showing the result of this exercise on a plan.
- 4.19 In this context, it is relevant to note that the District Council has changed its position on the advisability of defining a built up area boundary. It advised the first examiner that defining such a boundary ‘..*might be counterproductive*...’¹¹ although it did not see this as conflicting in any fundamental way with existing policies. Having considered the matter further it now takes the view that to delete such a boundary would result in a plan that would not reflect the community’s views and aspirations¹². In principle, I see nothing objectionable in this change of stance.
- 4.20 Such a boundary must, of course, be based on sensible principles that have been consistently applied. Attached to Alternative Modification 1 is a document entitled *Appendix A. HWNP Policy 1 Built Up Areas Methodology*. This sets out a number of guiding principles which underpins the definition of the built up area boundary together with implementation notes which assist in determining how these principles will be applied in practice. The document also contains a section called ‘*Methodology in Action*’ which describes, with examples, how the guiding principles have been applied in practice.
- 4.21 The guiding principles identified in the document include the provision that any distinct group of 30 or more dwellings and their immediate surroundings may constitute a separate built up area within the parish; that the built up area boundary will, subject to specified exceptions, follow clearly defined physical features; that sites with existing planning commitments will be included within the built up area boundary and that isolated properties and areas of ribbon or fragmented development which are physically or visually detached from the main built form will be excluded from the built up area as will sections of large curtilages which relate more to the countryside than the built up area.
- 4.22 I see nothing objectionable in these and the other guiding principles identified in the document. They and the implementation notes attached to them simply put flesh on the bones of the definition of built up area boundaries contained in the existing and emerging development plan and they provide some systematic basis for determining whether a site should be in the built up area or the countryside.

¹¹ 14 December 2015 Report. Page 20, second paragraph.

¹² District Council email dated 03/10/17.

- 4.23 The point has been made that the *Built Up Areas Methodology* document is not of itself an objective piece of evidence and this is true. But I do not see this as a fundamental criticism, as defining a built up area inevitably involves a series of subjective judgements. For the most part, the judgements made in this instance are uncontentious and having driven and walked around the area, I am satisfied that, by and large, a sensible built up area boundary has been defined and that this boundary is justified by the evidence and explanation set out in the *Built Up Area Methodology* document.
- 4.24 There are, however, two contentious areas. The first relates to the built up area boundary in the vicinity of the dwelling known as The Moorings. The proposed boundary includes the house but excludes the sizeable garden of this property. This garden contains a flood bank beyond which is the River Great Ouse. The flood bank is a clearly defined physical feature and the area of garden it encloses – with its mown lawn and its trees and shrubs – relates more to the character of the built up area than that of the countryside. The built up area boundary in the vicinity of The Moorings should, therefore, be altered to follow the line of the flood bank as indicated in **PM1**.
- 4.25 The second contentious area relates to the proposed boundary in the vicinity of Houghton Grange. Houghton Grange itself is included within the proposed built up area boundary as it has outline planning permission for housing (Ref: 1402210OUT) but the adjoining site, the BBSRC¹³ Field, is excluded. For the most part, this is understandable since this land, which consists largely of open pasture leading down towards the River Great Ouse, clearly has more in common with the countryside than the built up area.
- 4.26 However, this field also contains within it a freestanding group of buildings set close to Houghton Road on the northern boundary of the site. These buildings, like the buildings within Houghton Grange, are disused and partially overgrown but, also like the buildings within Houghton Grange, they have not blended into the landscape and should, therefore, be treated as previously developed land.
- 4.27 Nonetheless, this group of buildings is not particularly prominent, being surrounded by trees and brambles, and sits fairly unobtrusively in the surrounding countryside. It is, moreover, much smaller than the group at Houghton Grange and it is not physically linked to Houghton Grange. These are all cogent reasons for not including them within the built up area boundary. While it is true that part of this group, as well as a portion of land between it and Houghton Grange, are included within the boundary of the outline planning permission at Houghton Grange, the

¹³ Biotechnology and Biological Sciences Research Council.

current indications are that it will not be built on but will simply be used to provide access. On balance, therefore, I am satisfied that there are sufficient grounds for excluding this land from the built up area.

- 4.28 I also note that land to the south of the main house at Houghton Grange is excluded from the built up area although it is within the boundary of the planning permission for Houghton Grange. Once again, I consider that there are cogent reasons for this - these being that there is currently no indication that this land would be built on and, having visited the site, I am satisfied that the character and appearance of this area relates more to the countryside to the south than to the built up area to the north.
- 4.29 Before concluding on this matter, it is necessary to look at the terms of Policy HWNP1 as put forward in Alternative Modification 1. These simply give a brief definition of the term built up area, state that areas outside that boundary are part of the open countryside and make clear what policies will apply to the built up area and open countryside. There is no mention of sustainable development and flooding, matters which were mentioned in the previous version of this policy and which were of concern to the first examiner. I am satisfied that the terms of policy HWNP1 as now proposed are appropriate although they lack an element of precision in that they do not cross refer to the built up area boundary shown on the map. This deficiency would be remedied by making that reference as shown in **PM2**.
- 4.30 Drawing together my findings on Alternative Modification 1, I am satisfied that, subject to the changes I have proposed, adequate evidence for and explanation of the built up area boundary proposed is contained in the *Built Up Areas Methodology* document contained at Appendix A to this modification. I see nothing in national policy and advice or in the strategic policies of the development plan which preclude the definition of a built up area boundary for Houghton and Wyton nor have I seen any compelling evidence that the boundary proposed would hinder the achievement of sustainable development. Alternative Modification 1, as modified, would, therefore, meet the Basic Conditions.

Alternative Modification 2 – HWNP3 Anti Coalescence

- 4.31 The undeveloped gap between St Ives and Houghton and Wyton has been referred to in various terms in a range of planning documents and by various Planning Inspectors in different reports and decision letters. However, while the retention of this gap is of considerable importance to the local community, it does not feature unequivocally in any development plan policy.

- 4.32 The nearest that any development plan policy comes to safeguarding this gap is in saved policy En15 of the 1995 Local Plan. This policy states that: *"On open spaces and gaps for protection identified on the inset maps development which would impair their open nature will not normally be allowed."* However, as the Inspector at the former St Ives Golf course appeal noted, by including the word *"normally"* this policy allows for exceptions but does not indicate the circumstances in which they may arise¹⁴. He also points out that the policy notation for En15 only extends partway across the frontage of the gap between St Ives and Houghton and Wyton¹⁵ – something which I find surprising if this policy were indeed intended to safeguard the whole of the gap between the two settlements. He also took the view that neither the policy nor its supporting text indicated that the intended role for this policy was to preserve the separate identity of settlements¹⁶. I agree.
- 4.33 That is not to say that this gap should not receive some form of policy protection. Certainly, that is the wish of the community of Houghton and Wyton – and if this is to be done it is appropriate that it be done through a neighbourhood plan. Such a policy must, however have regard to the need to provide housing in the area.¹⁷
- 4.34 As has been established earlier in this report, the first examiner was satisfied that what she termed an anti-coalescence policy was justified but did not consider that the Local Settlement Gap defined in the submitted version of the Plan would meet the basic conditions. Her concern was that it would *"... prevent, or, at the very least, make it harder for the District Council to plan for the strategic needs of the District..."*¹⁸.
- 4.35 It is relevant to ask whether the same applies to the wording of Policy HWNP3 proposed in Alternative Modification 2. The District Council has confirmed that in its view Policy HWNP3 as now proposed *"...is not considered to have a material effect on the ability of the District Council to plan for the strategic needs of the district."* and points out that in the latest draft of the emerging Local Plan it is only intended to accommodate 400 houses in this area rather than 500 as proposed in an earlier draft¹⁹.
- 4.36 This statement warrants closer examination. Policy CS2 of the Core Strategy states:

¹⁴ Appeal Reference APP/H0520/W/15/3007954. Paragraph 21.

¹⁵ Ibid. Paragraph 22.

¹⁶ Ibid. Paragraph 28.

¹⁷ Paragraph 16 of the Framework.

¹⁸ 14 December 2015 Report. Page 24, second paragraph.

¹⁹ District Council's email 3 October 2017.

"....In the St Ives Spatial Planning Area where at least 500 homes will be provided. Of these, at least 100 homes will be on previously developed land, about 400 homes will be on greenfield land and about 200 will be affordable. Provision will be in the following general locations:

In a significant greenfield development to the west of the town;

In the redevelopment of previously developed land within the built-up area of the town."

- 4.37 The general location of the significant greenfield development to the west of St Ives is shown on the Key Diagram by way of an arrow pointing westwards out of the town towards Houghton and Wyton.
- 4.38 In the emerging Local Plan it is proposed to accommodate 400 homes within the site defined in Policy SI 1 and shown on Map 1 provided as a separate attachment to this report. This site consists of 5 parcels of land, these being;
- firstly, the former St Ives Golf Course which has planning permission for 184 dwellings and a new country park (Ref: 1301895OUT) which was granted on appeal and is now under construction;
 - secondly, The How which has a resolution to grant planning permission for 7 dwellings (Ref: 1201890FUL and Ref: 1201891FUL);
 - thirdly, the BBSRC Field which has an undetermined planning application for housing and other uses (Ref: 1301056OUT);
 - fourthly Houghton Grange, which has outline planning permission for an unspecified number of houses but which the District Council estimate could accommodate 90 dwellings (Ref: 1402210OUT); and
 - fifthly, a county wildlife site which presumably has limited potential to accommodate housing.²⁰
- 4.39 All these sites, with the exception of The How (the position of which can be deduced) are shown on Map 1 provided as a separate attachment to this report to this report. The BBSRC Field is referred to on this map as the Local Settlement Gap. Broadly speaking the Houghton Grange site is the western part of site SI 1 to the west of the Local Settlement Gap and to the north of the County Wildlife Site.
- 4.40 In other words, out of the 400 houses to be provided between St Ives and Houghton and Wyton, planning permission for some 281 dwellings has been granted or resolved to be granted on three of the five sites which make up this land. Of the remaining two sites, one is a county wildlife site which has limited potential for housing. This leaves the BBSRC Field as the only land at present which does not have either a planning permission, a resolution to grant planning permission or a restrictive policy designation attached to it. It is, therefore, on the face of it, the

²⁰ District Council's email 16 October 2017.

only land on which the remaining 119 or so houses allocated to this area could be sited.

- 4.41 I can understand the desire of the community to provide protection for the BBSRC Field. While there is other undeveloped land to the west of Houghton Grange, the BBSRC Field is the most prominent area of open countryside between St Ives and Houghton and Wyton and, when viewed from the road between the two, it gives long distance views towards the River Great Ouse. But Policy HWNP3 as now proposed includes the phrase;

Development will not be permitted if, individually or cumulatively, it would result in the loss of the visual and physical separation which currently exists between these two settlements, or would lead to their coalescence. (Emphasis added)

- 4.42 As it could be argued that any development would result in some loss of visual or physical separation as it now exists, this comes close to placing an embargo on development on the BBSRC Field.
- 4.43 Decisions as to which parcels of land should be developed in this area are to be made in the emerging Local Plan and that plan could change its approach to such development. It may be that the District Council intends to provide elsewhere for the remaining 119 or so houses allocated to this area. Additionally, or alternatively, it might be intending to reduce this number. However, it has given no indication that this is the case in either the emerging Local Plan or in the evidence to this examination. It is likely, therefore, that some difficult judgements will need to be made in that emerging plan as to where to provide for the number of houses required by Policy CS2 while treating the BBSRC Field as the cornerstone of the anti-coalescence Policy HWNP 3.
- 4.44 On the evidence available to me, however, I consider that the wording of Policy HWNP 3, which seeks to safeguard the visual and physical separation between the settlements which currently exists, would, to paraphrase the words of the first examiner, prevent, or at least make it harder for, the District Council to plan for the strategic needs of the District.
- 4.45 In this respect Policy HWNP 3 as now proposed would fail to meet the Basic Conditions in three respects. It would fail to have regard to national policy which includes the requirement to boost significantly the supply of housing²¹; it would not be in general conformity with Policy CS2 of the Core Strategy which allocates about 400 homes to a significant greenfield development to the west of St Ives and, consequently, it would not contribute to the achievement of sustainable development.

²¹ Paragraph 47 of the Framework.

- 4.46 I consider that these defects would be remedied by deleting the words “*which currently exists*” as shown in **PM3**. This would be a return to the policy wording proposed by the first examiner and, in my judgement, would give the District Council sufficient leeway to make the difficult decisions it faces.
- 4.47 Moving on to another matter. It has been pointed out that the supporting text to a planning policy is relevant in determining the proper application of that policy, albeit that this text is not part of the policy²². It is, therefore, relevant to this examination to consider the supporting text to Policy HWNP 3 contained in Alternative Modification 2.
- 4.48 While this text makes several references to the BBSRC Field remaining the ‘cornerstone’ of this policy and being ‘*at the heart of that area essential to ensuring anti-coalescence*’ it does not refer to the need to provide for housing. In this respect, this supporting text is unbalanced and it should include a reference to the requirement for housing in the area as shown in **PM4**.

5. Conclusions

Summary

- 5.1 My examination has investigated whether the matters dealt with in the policies HWNP 1 and HWNP 3 meet the Basic Conditions and other legal requirements. I have had regard for all the responses made following consultation on the alternative modifications proposed to the two policies and the other evidence documents submitted.
- 5.2 I have made recommendations to change the Alternative Modifications. With these changes, I am satisfied Policies HWNP 1 and HWNP 3 meet the Basic Conditions and other legal requirements.

The Referendum

- 5.3 I recommend that the Plan should proceed to referendum in accordance with the recommendations made in the December 2015 Report, subject to:

²² Legal Principle 1 of the Consultation Notes for Alternative Modification 2 HWNP 3 Anti-Coalescence.

- the modification proposed on page 21 of the first examiner's report being replaced by Alternative Modification 1, subject to the changes proposed in **PM1** and **PM2** of this report; and
- the modification proposed on page 25 of the first examiner's report being replaced by Alternative Modification 2, subject to the changes proposed in **PM3** and **PM4** of this report.

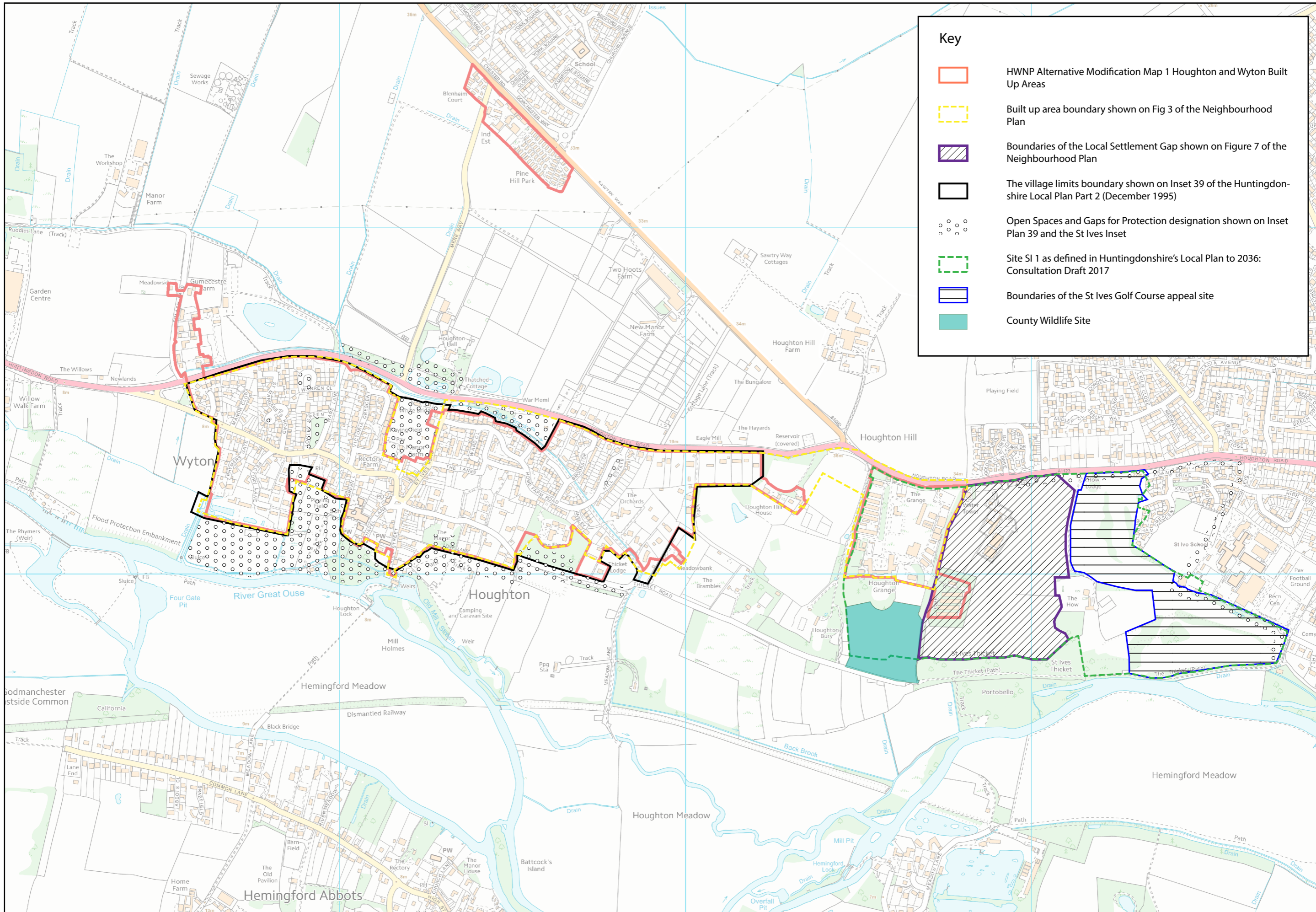
Bob Yuille

Examiner

Appendix 1: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	The map attached to Alternative Modification 1	<i>The built up area boundary shown on this map should be modified to include part of the garden to The Moorings as shown on the map attached to the representation made by Mr David Mead on behalf of Mr William King.</i>
PM2	Policy HWNP 1	<i>The built up area boundary for Houghton and Wyton is shown on Figure....</i> (The map attached to Alternative Modification 1 needs to be given a number)
PM3	Policy HWNP 3	<i>Policy HWNP 3: Anti - Coalescence</i> <i>Development proposals should respect the individual and distinct identities of the village of Houghton and Wyton and the town of St Ives. Development will not be permitted if, individually or cumulatively, it would result in the loss of the visual and physical separation which currently exists between these two settlements, or would lead to their coalescence.</i>
PM4	Policy Justification to Policy HWNP 3	<u>Add the following paragraph at the end of this section</u> <u>The aim of preventing the coalescence of St Ives and Houghton and Wyton has, however, to be balanced against the fact that Policy CS2 of the Core Strategy allocates about 400 houses to a significant greenfield development to the west of the town. Planning permission has been granted for some of these houses a number of which have been built. Decisions as to where the remainder of these houses will</u>

		<u>be located will be made in the emerging Local Plan.</u>
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Key

- HWNP Alternative Modification Map 1 Houghton and Wyton Built Up Areas
- Built up area boundary shown on Fig 3 of the Neighbourhood Plan
- Boundaries of the Local Settlement Gap shown on Figure 7 of the Neighbourhood Plan
- The village limits boundary shown on Inset 39 of the Huntingdonshire Local Plan Part 2 (December 1995)
- Open Spaces and Gaps for Protection designation shown on Inset Plan 39 and the St Ives Inset
- Site SI 1 as defined in Huntingdonshire's Local Plan to 2036: Consultation Draft 2017
- Boundaries of the St Ives Golf Course appeal site
- County Wildlife Site