

Examiner Correspondence on the Godmanchester Neighbourhood Plan.

Independent examination of Godmanchester's submission neighbourhood plan took place between 3 July and 30 August 2017. In relation to the examination, the following correspondence was received:

1. the independent examiner of the plan sent the council and Godmanchester Town Council a procedural letter on 11 July 2017.
2. the examiner sent a request for information to Godmanchester Town Council on 24 July 2017. The Town Council responded on the same day - its responses are included in red.
3. the examiner then sent a further request for information on 26 July 2017. The Town Council again responded on the same day - its responses are included in red.

INDEPENDENT EXAMINATION OF GODMANCHESTER NEIGHBOURHOOD PLAN

EXAMINER: Jill Kingaby BSc(Econ) MSc MRTPI

Stuart Morris
Senior Planning Policy Officer
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Huntingdon PE29 3TN

Examination Ref: 01/JK/GNP

Via email:

Stuart.Morris@huntingdonshire.gov.uk

cc. townclerk@gmccouncil.com

11 July 2017

Dear Stuart

GODMANCHESTER NEIGHBOURHOOD PLAN EXAMINATION

Following the submission of the Godmanchester Neighbourhood Plan for examination, I would like to clarify several initial procedural matters.

1. Examination Documentation

I can confirm that I am satisfied that I have received a complete submission of the draft Plan and accompanying documentation, including the Basic Conditions Statement, the Consultation Statement and the Regulation 16 representations, to enable me to undertake the examination.

Subject to my detailed assessment of the draft plan, I have not at this initial stage identified any very significant and obvious flaws in the plan that might lead me to advise that the examination should not proceed.

2. Site Visit

I intend to undertake a site visit to the neighbourhood plan area during the week commencing 17 July 2017. This will assist in my assessment of the draft Plan, including the issues identified in the representations.

The site visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the neighbourhood area, as this could be perceived to prejudice my independence and risk compromising the fairness of the examination process.

3. Written Representations with or without a Hearing Session

I am not yet in a position to determine whether the examination can be conducted solely by the written representations procedure or will need a hearing session. I have decided to defer this decision until I have had an opportunity to conduct my site visit.

As you will be aware, I may convene a hearing session where it is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

4. Further Clarification

Again, subject to my site visit and decision on whether a hearing session is required, I may have a number of questions seeking clarification on various matters, which I will wish to put to the qualifying body and the Council. These questions will be set out in a separate letter.

5. Examination Timetable

I am not in a position to advise further on the examination timetable until I have conducted the site visit. Should I need to seek any further clarification and/or hold a hearing session this will inevitably extend the duration of the examination, albeit I will endeavour to minimise any delay where practicable.

If you or the qualifying body have any process questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure a copy of this is placed on the local authority and qualifying body's website.

Thank you in advance for your assistance.

Your sincerely

Jill Kingaby

Examiner

INDEPENDENT EXAMINATION OF GODMANCHESTER NEIGHBOURHOOD PLAN

EXAMINER: Jill Kingaby BSc(Econ) MSc MRTPI

Mrs Crampton
Town Clerk
Godmanchester Town Council
1 Post Street
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PE29 2NB

Examination Ref: 02/JK/GNP

Via email: townclerk@gmccouncil.com

cc: Stuart.Morris@huntingdonshire.gov.uk

24 July 2017

Dear Mrs Crampton

Godmanchester Neighbourhood Plan – Examiner’s Questions

I have now carried out a site visit of Godmanchester and have read the evidence base for the submitted Neighbourhood Plan. A number of questions have arisen and it would be most helpful if the Town Council could provide its views (with additional evidential clarification, if appropriate) to assist me in reaching conclusions as to whether the submitted plan meets the basic conditions.

Plan preparation timetable details

Firstly, the plan is entitled “Godmanchester Neighbourhood Plan 2017-36 Submission Version 2017”. It would be helpful to know the month as well as the year that the submission version was finalised.

May 2017

Also, there appear to be some discrepancies over the dates to which this plan version will apply:- paragraph 1.1 on Page 5 states that the time period is 2016-36, rather than 2017-36; Page 2 is headed “Pre-submission consultation Nov 2016”.

Our apologies, the plan has been in existence since 2015...so it should read 2017 – 2036 and page 2 should have been updated accordingly

Other procedural points

Please would you advise on the date (month in 2017) when the Basic Conditions and Consultation Statement were finalised?

Finalised in April 2017

I understand that the Regulation 14 consultation stage occurred between Nov 2016 and Jan 2017. How many responses were received, and did these inform the drafting of the Submission Version of the Neighbourhood Plan?

We received 31 responses during this formal consultation stage, having contacted 266 individuals / organisations and advertised via newsletter to all homes and businesses in the Town. We took account of all comments that related to the Neighbourhood Plan. These informed the revised version of the plan. During the earlier 18 month consultation period / drafting stage we received 100 questionnaires and 313 competition entries from the schools as well as feedback from stakeholder events. These are available on request.

Matters raised by respondents

As you will be aware, there were 7 responses received at Regulation 16 stage. There are a number of points that have been raised by the representors upon which it would be helpful for me to gain the views of the Town Council

1. The Fairfield Partnership's representation argues that the Neighbourhood Plan may not make an appropriate contribution towards the housing development which Huntingdonshire will require by 2036? Although not a requirement, Is there a particular reason why the Neighbourhood Plan does not allocate housing sites?

This is a conscious decision taken by the Town Council following the initial consultation stages where there was considerable feedback that residents felt that recently agreed developments (753 houses at Bearscroft) and others proposed in the HDC Draft Local Plan to 2036 (93 homes over another 3 identified sites) would fundamentally change the character of the Town and put excessive burdens on the infrastructure in the historic core. The Town Council was very aware that the Bearscroft Farm Development alone will increase the population of Town by 25% and has noted the views of many of its residents: more than a third of Godmanchester's residents signed a petition to oppose the development based on its impact on the Town. Since then Fairfield has approached the Town Council seeking feedback on their proposal to add an additional 900 homes subject to a future planning application. HDC have robustly demonstrated that they currently have a viable five-year supply and that the new Draft Plan will also exceed this requirement when adopted so it is unnecessary for the Town Council to allocate further land for development.

2. Gladman Developments Ltd assert that the settlement boundary defined in the Neighbourhood Plan is "unnecessarily restrictive". What is this Town Council's view on this? Gladman point to the emerging Local Plan, which seeks to use a criteria-based approach for determining where development will be permitted, so as to "resolve problems with delineated boundaries in the previous Local Plan. What is the Town Council's view of Gladman's proposed new wording for Policy GMC1?

We have carefully weighed all the options before settling on a boundary. Godmanchester is surrounded by high quality agricultural land and set in an important landscape. The land beyond the settlement boundary is open countryside and feedback from residents was that it was important to retain this. The area inside the boundary includes all the sites currently identified in the Draft Local Plan and recognises that this development is already considered to be sustainable by HDC. For example, the HDC Housing and Economic Land Assessment (HELA) published as part of the latest consultation on the draft Local Plan comments that an extension east of the Bearscroft farm development: "is not considered to be suitable for development due to the environmental and social impacts on the existing community". The other sites around the Town (i.e. along the proposed

settlement boundary) have already been considered in detail by HDC as part of the Local Plan process and dismissed as not being sustainable. It is the view of those we have consulted that the Town needs to retain its new settlement size in order to retain its essential character. To remain a good example of an effective community, as quoted by Cambridgeshire County Council New Communities Officers, it needs to grow to the size already planned and assimilate its new residents.

3. Savills, on behalf of the Church Commissioners for England, put forward a possible new housing site and request amendment to the settlement boundary with a change of wording to refer to “accommodating future housing development in and around Godmanchester during the Plan period”. How does the Town Council view this?

This site was included in the Draft Local Plan Stage 3 Targeted Plan as a site only covering the redevelopment of land already occupied by houses. A subsequent planning application came forward that also included the paddock. Since then English Heritage have granted Grade 2 listed building status to the houses identified to be demolished. The Town Council in considering the planning application submitted the following: “Godmanchester Town Council recommends this planning application is refused as the access arrangements are unsafe for a development of this scale and the proposals to mitigate the impacts are inadequate. There will be an increased danger to pedestrians and cyclists who use the wide footpath which crosses the entrance to Corpus Christi Lane. The concealed junction where Corpus Christi Lane meets Old Court Hall is too close to adjacent junctions and visibility is frequently obstructed by parked vehicles. Residents have also expressed concerns about the loss of a small historic meadow and the changes to the character of this unique semi-rural location in the heart of Godmanchester.” The Town Council’s view is that the meadow / paddock should remain outside the settlement boundary as it relates more to the countryside and is important for the setting of the listed building in Corpus Christi Lane.

4. Gladman also criticises Policy GMC3, partly because it addresses Local Green Spaces (LGSs) and Other Green Spaces in the same policy. Should the policy be limited so that it only covers the former? In addition, concern is expressed that some of the proposed LGSs are extensive tracts of land and inappropriate for designation. It would help me to know the size of each of the largest spaces (roughly, in hectares or acres), and whether the Town Council is alert to the possibility that some may, potentially, be too large for inclusion in the policy.

The policy for Local Green Spaces is distinct from that for Other Green spaces which is our local proposed policy as opposed to LGS which is set out by legislation. Other Green Spaces identify those open areas that are important to be retained as they are key features that give the Town its semi-rural character.

5. I also wish to know the Town Council’s response to the representation from Cambridgeshire County Council TA Team regarding consistency with policies and objectives with the Cambridgeshire Local Transport Plan, and Huntingdon and Godmanchester Market Town Transport Strategy? In particular, how does the Town Council respond to the comment that the parking figures in Policy GM14 should not be used; a bespoke level of parking should be sought for each development that comes forward.

In considering the parking policy we were mindful that as policies set by CCC and HDC have changed we have been left with developments which do not work: parking is so limited that on road parking is now preventing emergency vehicle access and severely restricting amenity for residents. The examples

of when poor planning decisions don't work used in HDC's Design guide on page 84 are from Godmanchester. As a historic Town, we already suffer from a severe lack of parking in the established areas of resident housing. The newer developments have proved to have failed in their design as it's as poor as those never intended for cars! The policy seeks to set a minimum to ensure that as a Town we are building homes which have the appropriate level of amenity. Residents are clear from their feedback that the biggest priority for the neighbourhood plan to address, after traffic congestion, was parking. Please note that the policy relating to seeking additional parking in the historic core was specially included to address the conflict between the needs of modern life and car owning residents and a housing stock built long before cars were invented. Please note that CCC failed to respond to our request for comments during earlier consultation and then submitted these comments after the closing date.

Finally, from my site visit, I appreciate that Godmanchester has many heritage assets and is a distinctive historic town. I have read the two Conservation Area Character Statements for Earning Street and Post Street, referenced in paragraph 5.10 of the Neighbourhood Plan. Policy GMC11 and the supporting text refer to the "historic core" which is shown on the Historic Core Map on Page 68. How has the historic core been defined? The Planning (Listed Buildings and Conservation Areas) Act 1990 applies to those specific designations (listed buildings and conservation areas) and their settings. Is all the historic core of Godmanchester either within a Conservation Area or its setting, and is there any evidential documentation to explain how the historic core has been defined?

The Historic Core has emerged as a concept specially arising from the consultation process with residents. It covers the area where our listed buildings are located and includes the Conservation Areas. We are unusually rich in the number of listed buildings densely located in a settlement. This is the architectural context that makes the Town so attractive to live in and is regularly photographed and shared in the national media. We have sought to define it for the purposes of the plan as it is integral to the character and heritage that makes Godmanchester special. It also closely corresponds to the map of listed building used by Historic England <https://historicengland.org.uk/listing/the-list/map-search>.

It would be helpful if you are able to respond within the next two weeks so that I can reach conclusions on the Neighbourhood Plan and report back to you at the earliest possible date. However, please do let me know if you require more time.

In the interests of transparency, may I prevail upon you to ensure a copy of this letter and your response is placed on the Town Council's website (and Mr Morris, who is copied in, on the local authority's website).

Thank you in advance for your assistance.

Your sincerely

Jill Kingaby

Examiner

INDEPENDENT EXAMINATION OF GODMANCHESTER NEIGHBOURHOOD PLAN

EXAMINER: Jill Kingaby BSc(Econ) MSc MRTPI

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Examination Ref: 03/JK/GNP

Via email: townclerk@gmccouncil.com

cc: Stuart.Morris@huntingdonshire.gov.uk

26 July 2017

Dear Mrs Crampton

Godmanchester Neighbourhood Plan Examination

I would like to thank the Town Council for the very swift response to my letter dated 21 July. There are two matters I would like to follow up, flowing on from your comprehensive reply.

With regard to the representations received under Regulation 14, I would be grateful to be provided with an electronic link (or whatever format is most convenient) so I can access these representations.

These documents will be provided as an attached file. Please note there are 33 not 31 responses as previously stated.

Concerning my request relating to the extent of the proposed Local Green Space designations, I have set out below the individual sites where it would be helpful for me to have an approximation of their extent (roughly, in hectares or acres).

I have grouped together some sites because they adjoin each other.

Please note that whilst some sites are located adjacently they are not in the same ownership. We are providing the approximate sizes for each area of land for transparency.

- 4 Godmanchester Nature Reserve: **61 acres 90- % water filled gravel pits**
- 5 The Cow Lane Gravel Pits etc: **64 acres 95% water filled gravel pits**
- 19 Proposed Neolithic Country Park: **48 acres of land on top of landfill**
- 6 Recreation ground leading up to the lock: **4.5 acres in flood zone 3**
- 7 Queens Walk: **0.5 acres in flood zone 3**
- 8 The Cricket Pitch: **3.4 acres**
- 9 Green space adjacent to the Cricket Pitch: **2.2 acres**
- 10 Land between the school, church and East Chadley Lane: **1.4 acres**
- 21 Community nursery: **4.4 acres**
- 12 Wigmore Meadow: **10 acres**
- 15 Judith's Field: **6.9 acres**

If you are able to respond within the next two weeks, it will ensure I can continue to progress the Neighbourhood Plan examination and report back to you at the earliest possible date. However, please do let me know if you require more time.

In the interests of transparency, may I prevail upon you to ensure a copy of this letter and your response is placed on the Town Council's website (and Mr Morris, who is copied in, on the local authority's website). I was very pleased to see that you placed our prior exchange on the Town Council's website so expeditiously.

Thank you in advance for your assistance.

Your sincerely

Jill Kingaby

Examiner