

Report on comments on Houghton and Wyton Submission Neighbourhood Plan and Alternative Modifications

Comments on Houghton and Wyton Submission Neighbourhood Plan

Name	Comment ID	Comment on	Support/ Object/ Have Observations	Comment	Changes required?	Proposed changes	Supporting documents
Chris Shaw	HWSNP1	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	I entirely support the proposals outlined in the Houghton and Wyton Neighbourhood Plan. The Parish is a jewel in Huntingdonshire's rural crown and I am anxious that it's unique character should be protected. I am particularly concerned that the gap between Houghton and St Ives should be preserved to prevent the westwards growth of St Ives subsuming the parish in continuous development.	No		
Marine Management Organisation	HWSNP2	Houghton and Wyton Neighbourhood Plan (Whole document)	Have observations	The MMO has no comments to submit in relation to this consultation as it is not within our remit.			
Philip Raiswell Sport England	HWSNP3	Houghton and Wyton Neighbourhood Plan (Whole document)	Have observations	Planning Policy in the National Planning Policy Framework identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important. It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular			

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				<p>reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England’s role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, ‘A Sporting Future for the Playing Fields of England – Planning Policy Statement’.</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below:</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations.</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</p> <p>If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p>			
Nicholas Ruston	HWSNP4	Houghton and Wyton Neighbourhood Plan (Whole	Support	Having lived in Houghton for all but 5 of my 58 years, I have seen many changes in the village. However, as they took place in a controlled manner over a significant period of time, these changes have generally enhanced the community.	No		

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		document)		<p>Change will no doubt continue to take place. This is not a problem as long as it takes place in a controlled manner. In recent years, however, it has seemed that our community has been facing revolution rather than evolution. We have been facing large scale developments to the west of St Ives and on the Wyton airfield. These would destroy our village identity and the effects on the roads, schools, doctors' surgeries, etc. would be unthinkable.</p> <p>If, however, the next 20 - 30 years see evolutionary changes along the lines laid out in the Houghton & Wyton Neighbourhood Plan, Houghton & Wyton will continue to thrive and will remain a pleasant place to live, work and 'play'.</p>			
Office of Rail and Road	HWSNP5	Houghton and Wyton Neighbourhood Plan (Whole document)	Have observations	Thank you for consulting ORR on the above Houghton and Neighbourhood Plan. The Office of Rail and Road has no comment to make on this particular document.			
David Grech Historic England	HWSNP6	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	<p>Thank you for your electronic notification inviting Historic England to comment on the Submission Draft of the Houghton and Wyton Neighbourhood Plan.</p> <p>Towards the end of 2014 Historic England (then operating under the title of English Heritage) were consulted by the Neighbourhood Plan Working Group on a pre-submission draft of the plan. We provided a detailed response by letter (dated 02 December 2014) and are pleased to note all of our recommendations have addressed in the Submission Plan (May 2015). We therefore do not wish to offer further detailed comments at this stage.</p>	No		
Alastair Price	HWSNP7	Houghton and Wyton	Support	Houghton & Wyton is a village that has maintained its individuality and has a strong sense of community. This is supported by the village sports	Yes	The character area of Houghton Hill should	

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		Neighbourhood Plan (Whole document)		<p>teams and events such as the Feast Week celebration. HDC is proposing housing developments which will merge the village with St Ives and destroy its community spirit. It is imperative that separation is maintained to preserve the village feel. The HDC proposals will also significantly harm the tourism industry on which the whole area depends by causing massive traffic congestion thereby discouraging visitors. Particularly worrying is the potential impact on the Ouse Valley Way. The potential for the isolated route becoming a source of crime against walkers is high If houses are built with ready access to the walk and the new residents have a profile similar to that at Slepe meadow which has high levels of reported anti-social behaviour.</p> <p>One omission from the character areas is Houghton Hill. The land from Hill Estate to Houghton Hill House was originally all part of the estate of the latter. The land was gradually sold off after the owners moved out of the main house and into the Gate House in the 1910s. Whilst the housing is of different characters and most is relatively new they share large plots which support a high degree of bio-diversity and form part of the conservation area. This area includes two listed buildings.</p>		be added particularly as this is most at risk from the proposed HDC housing developments and the massive increase in traffic congestion these would entail.	
Robert Anderson	HWSNP8	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	I have lived in Houghton and Wyton all my life and this is the first time that we are moving forward in a constructive, positive manner. Our consultative team have done a wonderful job in preparation and I support it wholeheartedly.			
Greg Andrell	HWSNP9	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	An excellent well thought out document	No		

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Roger Emms	HWSNP10	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	I have lived in Wyton since 1979, and believe that the adoption of the Neighbourhood Plan is absolutely vital in order to safeguard the longevity of the unique character and culture of Houghton and Wyton. Without the Neighbourhood Plan, the prospect of successful future attempts by developers and others to virtually obliterate the uniqueness of Houghton and Wyton doesn't bear thinking about.	No		
Alan Williams Houghton and Wyton Parish Council	HWSNP11	Houghton and Wyton Neighbourhood Plan (Whole document)	Have observations	PRO: A well-thought out and presented document that has been carefully researched. Village presentations and surveys have ensured that the views of residents are reflected, not just the authors. CON: Little is said about "affordable" housing, especially "Rural Exception Housing".	Yes	After asking HDC Housing Dept to do a Rural Exception Survey to assess the number of dwellings that could be supported by such a scheme, the Parish Council should identify site(s) that could accomodate them.	
Alison Melnychuk St Ives Town Council	HWSNP12	Houghton and Wyton Neighbourhood Plan (Whole document)	Object	The plan contradicts with the current HDC Core Strategy and emerging Local Plan with regard to provision of new housing to the west of St Ives. Restrictions on the location of new housing will mean the current HDC Core Strategy can not be delivered.	Yes		
Alison Melnychuk St Ives Town Council	HWSNP14	Houghton and Wyton Neighbourhood Plan (Whole document)	Have observations	Previous comments from St Ives Town council direct to Houghton and Wyton Parish Council when requested for feedback on the draft plan are not included in the statement of public consultation Appendix G.	No		

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Local Plans Team Huntingdonshire District Council	HWSNP15	Houghton and Wyton Neighbourhood Plan (Whole document)	Have observations	Contents page Section 8: Developer contributions for community infrastructure is omitted from the Contents Page still being listed under Section 7 as in the previous version. Consequentially all following Section numbers are incorrect on the Contents Page.	Yes		
Local Plans Team Huntingdonshire District Council	HWSNP16	Houghton and Wyton Neighbourhood Plan (Whole document)	Have observations	Mapping The mapping throughout the document is variable with the scale and shading used on a number of maps making interpretation of the information being presented difficult. Provision of high quality maps has been offered to the Neighbourhood Plan Working Group but not taken up. The Council remains willing to provide replacement maps if required.	Yes		
Local Plans Team Huntingdonshire District Council	HWSNP17	Houghton and Wyton Neighbourhood Plan (Whole document)	Have observations	Figures and illustrations Figures are not consistently numbered: for example, Fig 2, Figure 8.1 (following Paragraph 9.9), Figures for Houghton Grange, Beer's Garage and Appendix A Character Areas (no figure references). In addition, references to Figures give incorrect numbers in Paragraphs 4.5, 5.24, 12.3 and Policy HWNP4.	Yes		
James Holden	HWSNP35	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	As residents of Wyton my wife and I welcome the publication of the Submission Plan and endorse the comment at para. 15.2 that the central theme of the NP 'is about improving quality of life'. Equally, we note that the NP is designed to improve the quality of life of people living in the parish and the NP is to be monitored to assess the impact it has 'on the quality of life of those living in Houghton and Wyton'. Our comments on the Submission Plan are framed within the context of those statements in the NP and the Vision which refers to the fact that we are a cohesive community, proud to live in the special landscape which surrounds us. We understand that the NP has to be in general conformity with the Huntingdonshire Core Strategy 2009 and, given that context, we would	No		

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				<p>observe that Policy CS9 of the adopted CS identifies the Great Ouse Valley as a strategic green infrastructure enhancement area. This is the landscape that contributes so much to our quality of life and it is vitally important that the NP secures its protection in the period to 2036. It is an issue of importance to us as local residents but we are concerned that the proposals outlined in the Huntingdonshire Local Plan to 2036: Targeted Consultation will threaten the integrity of that landscape and, with it, the community's quality of life and the particular distinctiveness of Houghton/Wyton described at para. 12.3 of the NP.</p> <p>The relationship between the NP and the emerging HLP can be readily understood by reference to both the NPPF and the Planning Practice Guidance. The PPG acknowledges that a Neighbourhood Plan is not tested against the policies in an emerging Local Plan 'although the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested'. Section 38 (5) of the Planning and Compulsory Purchase Act 2004 requires that any conflict between the policies in a neighbourhood plan and those in an emerging local plan 'must be' resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan. This must mean that the proposals in the emerging HLP will inevitably override issues deemed to be important to the local community well before 2036. For that reason, we are fearful that the NP does not provide the local community with a powerful tool to guide the long term future of the village and its surrounding countryside for the period through to 2036 (para. 1.4 of the NP).</p> <p>We support fully the Vision contained in the NP but are concerned that it cannot be realised in the period to 2036 because of the emerging HLP. Figure 1 shows the NP boundary and it seems to us that the proposals contained in the emerging HLP for Wyton on the Hill (SEL 3 – 4,500 homes with an unspecified access strategy) and St Ives West (SI 1 – 500 dwellings) will inevitably have a detrimental impact upon the quality of</p>			

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				<p>life of our community, a key consideration of the Submission Plan. We agree with para. 2.18 that the parish is an attractive place in which to live and hope that the NP can ‘maintain and enhance this situation’ in the period to 2036. We sincerely hope that HDC, when producing the HLP, will give full and proper consideration to the NP as the latter plainly represents the views of our local community.</p> <p>The NP understandably maintains that its principal purpose ‘is to guide development within the parish’ (para. 1.9). Unfortunately, external pressures will ultimately have a greater impact upon our quality of life than the limited development anticipated in the parish in the period to 2036 as described in the Submission Plan. Para. 2.41 appropriately describes two aspects that are considered to threaten our quality of life. We would suggest that a third substantive issue be incorporated, namely the proposals for Wyton on the Hill and the ramifications of the access strategy for that site. The Cambridgeshire Local Transport Plan 2011-2031: Long Term Transport Strategy (November 2014) acknowledges that there will be a need for new road capacity around a number of the county’s ‘major growth sites’, including Wyton Airfield. The LTTS, referring to access to Wyton Airfield, notes unhelpfully that additional study work is required in order to identify the measures to support the proposed development at Wyton Airfield. Developments anticipated beyond the boundary of our parish will have a damaging impact upon our quality of life and contextual landscape.. The local community is aware that one of the possible options for a new access strategy would be a road across the Ouse Valley, an outcome which will have significantly harmful implications for the quality of our landscape as described at para. 3.4 of the NP.</p> <p>Vision and Objectives</p> <p>We support the Vision and Objectives of the Neighbourhood Plan. Objectives 1, 3, 5 and 12 are of particular importance to the local community as they constitute key elements underpinning the particular distinctiveness of the parish. They respond to the important attributes</p>			

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				<p>outlined at paras. 2.20 – 2.22. As noted above, however, we are extremely concerned about the implications of the proposed Wyton Airfield development in the light of the comment at page B-4 of the LTTS that one of the options for enhanced highway capacity in the A1123 corridor is a new road between Wyton Airfield and the A14 ‘on an unspecified alignment’.</p> <p>We endorse the observation at para. 3.4 that it is necessary ‘to protect our special landscape’ in order to achieve the Vision.</p> <p>Village Limits We support Policy HWNP1 which will relate to the indicative built-up area shown on Figure 3.</p> <p>Natural Environment We support Policy HWNP2 and have noted the extensive tract of land identified at Figure 4 which constitutes the context for our community. Figure 4 graphically illustrates the value of the Great Ouse Valley. It would be helpful if the NP could define the ‘exceptional circumstances’ referred to in Policy HWNP2. Could such circumstances encompass the construction of a new road through the important environmental assets shown on Figure 4? The integrity of the valley landscape will be irretrievably lost if an access road to Wyton on the Hill is constructed to the west of Wyton. The value of the Valley in landscape and ecological terms is exceptional and should not be overridden by proposals seeking to exhibit wider strategic characteristics. The retention and enhancement of the landscape features shown on Figure 4 is itself a strategic issue which should be recognised in the evolution of planning policies for Huntingdonshire.</p> <p>Local Settlement Gap Para. 5.5 rightly observes that Policy HWNP3 seeks to protect village character and distinctiveness. This is the principal consideration for us as local residents as it has a direct connection to our valued quality of life. The concept of distinctiveness incorporates not only the important issue of St Ives West but also the impact upon the Ouse Valley and the A1123</p>			

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				<p>of the proposed development at Wyton on the Hill. We agree with the sentiments expressed in para. 5.6 but feel reference should be made in this part of the NP to the contribution of the Ouse Valley both to the setting and character/distinctiveness of the parish.</p> <p>We absolutely support Policy HWNP3.</p> <p>Para. 5.8 rightly notes that the parish is within the setting of the proposed AONB. We consider that the NP should be amended to state that development will not be supported which does not recognise the importance of the setting of the village, containing the elements shown at Figure 4. This consideration is worthy of a new policy statement HWNP3 (a).</p> <p>Local Green Spaces</p> <p>We support Policy HWNP4 as the locations described are deemed to be important to the local community. The suggested identification of these green spaces seems to us to follow the advice at para. 77 of the NPPF.</p> <p>Verges and Greens</p> <p>We support Policy HWNP5 and endorse the comments with regard to the green spaces at St Margaret's Road and Loxley Green.</p> <p>Tourism</p> <p>We support the approach to tourism and agree with the comment at para. 6.7 that the scale of any future tourism-related development should be appropriate and does not have a detrimental impact on the quality of life of the local community.</p> <p>Traffic and Transport</p> <p>The NP recognises the significant problems posed by the traffic flows along the A1123 and it is important to ensure that, in the period to 2036, developments proposed in and adjoining the parish do not add to those flows to the detriment of highway safety and community cohesion.</p> <p>Parking in the village centre is problematic and can be visually intrusive. It would be helpful if a practical scheme could be devised to address this aspect. In that context, we agree with Policy HWNP14 which indicates that any proposals to provide additional car parking to serve the village</p>			

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				<p>will be supported in principle.</p> <p>Business We recognise and support the need to enhance economic opportunities in the parish. We agree with Policy HWNP17 that safeguards must be in place in order to protect our rural setting and avoid inappropriate ribbon development leading out from the village, particularly along the A1123.</p> <p>Housing We endorse the observation at para. 12.3 that protecting the separate identity of Houghton and Wyton is a key objective of the NP and agree that 'retention of this surrounding countryside is crucial to retaining the distinctiveness of the village'. Thus, it is appropriate for the NP to focus development within the built-up area of the village. Within this context, we support Policy HWNP19 and Policy HWNP20 which seeks to ensure that any new development is of a design that complements existing character.</p> <p>Existing Development Sites We endorse the suggested approach to both Houghton Grange and Beer's Garage Site.</p>			
<p>Julian Austin AMEC E&I UK for National Grid</p>	<p>HWSNP44</p>	<p>Houghton and Wyton Neighbourhood Plan (Whole document)</p>	<p>Have observations</p>	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distribution's Intermediate/High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area. Whilst there is no record of National Grid Gas Distribution's Intermediate/High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes within proposed development sites. If further information is required in relation to the LP/MP network please contact plantprotection@nationalgrid.com</p>			

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Janet Nuttall Natural England	HWSNP50	Houghton and Wyton Neighbourhood Plan (Whole document)	Have observations	The lack of further comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may be able to make comments that will help the Local Planning Authority (LPA) to fully take account of the environmental value of areas affected by this plan in the decision making process.			
C Pollock Hemingford Abbots Parish Council	HWSNP52	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	<p>1. The Parish of Hemingford Abbots adjoins that of H&W along the River Great Ouse.</p> <p>The 2 parishes are in the same District Council and County Council Ward.</p> <p>2. The Conservation Areas of Hemingford Abbots and Houghton & Wyton are adjoining and part of a larger area of Conservation Area of the Great Ouse Valley between Huntingdon and St Ives which includes those Conservation Areas of Hemingford Grey, St Ives, Godmanchester and Huntingdon/Hartford.</p> <p>3. Because of the points as identified above, Hemingford Abbots has a close relationship with its neighbouring parish, and would therefore wish to comment on the H&W Neighbourhood Plan.</p> <p>Policies 1,2,3,4: HAPC supports H&W in its wish to protect and enhance important green spaces within the parish, and also to protect the green spaces around the built-up areas of the village. It is important that the village retains its separate identity as a village and does not merge with neighbouring built-up areas and become a suburb. The retention of green space between St Ives and Houghton is essential to prevent an anonymous and sudden urban sprawl which will cause the loss of a historic village unit that has been slowly compiled over centuries. The same green spaces between H&W and St Ives are invaluable to the whole of the Great Ouse Valley – an area currently proposed as AONB. The views of this green space on the slopes of Houghton Hill are an intrinsic part of the wider landscape and Conservation Areas that benefit all the neighbouring parishes.</p> <p>Policies 6,8 9, 10 : HAPC supports H&W in its wish to encourage quiet</p>	No		

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				<p>tourism along the river, in the meadows and the neighbouring villages. This is to the benefit of many local businesses and the economy of the area. Therefore it is vital that the reasons why the visitors come here should be supported – the beautiful countryside should be recognised, respected and, above all, retained. Facilities for visitors should be developed where appropriate and necessary.</p>			
Anthony Garside	HWSNP53	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	<p>I would like to record my support for the Houghton and Wyton Neighbourhood Plan.</p> <p>The document is a clear statement of the wishes of Houghton & Wyton community as their vision for their future, whilst recognising the need for controlled and sympathetic development necessary for its future prosperity.</p> <p>The document correctly identifies the key areas important to village life, defining objectives and policies as a balanced and comprehensive framework for the positive control of future development.</p> <p>It is clear that the community has been involved at all stages of the preparation of the Plan and that the protection of all aspects of the village identity is a key priority. Of particular importance are the protection of green spaces and the prevention of merging with neighbouring villages and towns.</p> <p>I believe Neighbourhood Plans are a valuable instrument in the Government's plan to deliver localism and that the Houghton and Wyton Plan represents a rigorously prepared and workable development control document.</p> <p>For this reason I would strongly support the Plan's adoption as an important step forward in the community's development.</p>	No		
Lesley Craig	HWSNP54	Houghton and Wyton Neighbourhood	Support	<p>This is needed to support and protect the village and its identity and is vital for the future. There is a need to prevent the village becoming a suburb of Huntingdon and St Ives and continue to be the community and</p>	No		

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		Plan (Whole document)		rural tourist attraction that it is.			
Graham Jenkins	HWSNP55	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	<p>The people who compiled this report have put a great deal of effort into encouraging and incorporating comments from everyone in the area this concerns, including myself.</p> <p>It's a fantastic document and certainly includes my views. Where there are some parts that are not necessarily my opinion I know from personal experience that those parts do represent the opinions of other fellow villagers. As such I consider this to be objective and represents the holistic village view, and it therefore has my full support</p>	No		
Eileen Murphy	HWSNP56	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	<p>Great piece of work reflecting what a great area we live in, well done to all those that did all that hard work.</p> <p>It reflects the cohesive passionate community we are and I feel very encouraged by the consideration of 1-2 hopefully 'affordable' developments for younger/older people as this may enable my children to stay in this wonderful village.</p> <p>My 12 year old son's view is to develop the tourism more, this is addressed in the plan.</p> <p>Better that we are taken forward by this considered thorough view rather than dictated to by external factors, it really is a great village to live in.</p> <p>Thank you</p>	No		
Jonathan McGee	HWSNP57	Houghton and Wyton Neighbourhood Plan (Whole document)	Have observations	<p>In the main support the Houghton and Wyton Neighbourhood plan.</p> <p>However a few comments:</p> <p>5.11 and HWNP4 - It should be noted that The Elms gardens are not an 'accessible' local green space - it is a private residence and should remain so. However its character should be preserved for those viewing it from the Thicket. Additionally small development (storage/sheds etc) should be allowable by residents and owner of the Elms.</p>	Yes	<p>Clarification stating that the Elms gardens are private.</p> <p>Remove HWNP10</p> <p>Amend HWNP17</p>	

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				<p>HWNP10 - Housing availability (including for locals) is at a premium and affordability is decreasing daily. The village is primarily a residential area, not a tourist destination and therefore tourist housing stock should be allowed to convert back to permanent residence.</p> <p>HWNP17 - Many businesses are now small/based online etc and do not always afford provision to provide employment opportunities or necessarily operate as public facing retail units (though maybe engaged in retail). But these type of businesses should also be facilitated.</p>			
Jamie Roberts Pegasus Group for Histon	HWSNP58	Houghton and Wyton Neighbourhood Plan (Whole document)	Object	See attached statement	Yes	See attached statement	Yes
Edward Wilkinson	HWSNP59	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	The plan has the support of a great many people in the village, not surprisingly since we all helped create it. I support it too; the plan should reflect the views of the people most affected. Anything else does not sound like democracy...	No		
Kate Smith	HWSNP61	Houghton and Wyton Neighbourhood Plan (Whole document)	Object	<p>I live at The Elms and I do not want my home to be a tourist attraction and I certainly do not want complete strangers to be wandering on our private grounds!</p> <p>This is a PRIVATE residence. No different to anyone else. I am sure you would not like people walking onto your private property. Utterly object.</p>	No		
John Fleming Gladman	HWSNP64	Houghton and Wyton Neighbourhood	Have observations	<p>Introduction</p> <p>Gladman Developments Ltd (Gladman) specialise in the promotion of strategic land for residential development and associated community</p>			See HWSNP66

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Developments LTD		Plan (Whole document)		<p>infrastructure. From this experience, we understand the need for planning to deliver the homes, jobs and thriving local places that the country needs. Every effort should be made to delivering the housing and economic needs for an area, whilst responding positively to the wider opportunities for growth.</p> <p>These representations are made in response to the current consultation held by Huntingdonshire District Council on the Houghton & Wyton Neighbourhood Plan (HWNP) under regulation 16 of the Neighbourhood Planning (General) regulations 2012. Through these representations, Gladman provide an analysis of the HWNP's vision, objectives and suite of policies as submitted, highlighting areas in which we feel that the document currently lacks clarity or there is insufficient justification for the policies the plan seeks to adopt.</p> <p>Gladman contend that the HWNP, as submitted, contains a series of flaws not only in its application of local and national planning policy, but also lacks clear, robust and up-to-date evidence to justify the inclusion of a number of policies and objectives it seeks to adopt. We recommend that progression of the HWNP to independent examination be delayed to allow sufficient time for the Parish Council to undertake the necessary work through a fundamental overhaul of the development strategy as proposed, so that the plan can be found consistent with national planning policy, guidance and the Neighbourhood Plan Basic Conditions. Failure to do so will likely result in the HWNP being found unable to meet basic conditions (a), (d), (e) and (f) if it is progressed to examination at this time.</p> <p>National Planning Policy and Guidance</p> <p>The National Planning Policy Framework (The Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out requirements for the preparation of Neighbourhood Plans and the role these should take in setting out policies for the local area. The requirements set out in the Framework have now been supplemented by the Neighbourhood Planning Chapter</p>			

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				<p>contained in the Planning Practice Guidance (PPG). Paragraph 16 of the Framework sets out the positive role that Neighbourhood Plans should play in meeting the development needs of the local area. Its states that: “The application of the Presumption (In Favour of Sustainable Development, set out in paragraph 14 of Framework) will have implications for how communities engage in neighbourhood planning. Critically it will mean that neighbourhoods should:</p> <ul style="list-style-type: none"> • Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; • Plan positively to support local development, shaping and directing development in their area that is outside of the strategic elements of the Local Plan” <p>Further guidance on the relationship between Neighbourhood Plans and strategic policies for the wider area set out in a Council’s Local Plan is included in paragraph 184 of the Framework: “The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date plan is in place as quickly as possible. Neighbourhood Plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood Plans...should not promote less development than set out in the Local Plan or undermine its strategic policies”.</p> <p>Before a Neighbourhood Plan can proceed to referendum it must be tested against the Neighbourhood Plan Basic Conditions, set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 and further detailed in paragraph 065 of the Neighbourhood Plan PPG. These Basic Conditions are:</p> <p>a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the</p>			

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				<p>neighbourhood plan</p> <p>b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order</p> <p>c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order</p> <p>d) The making of the neighbourhood plan contributes to the achievement of sustainable development</p> <p>e) The making of the neighbourhood plan is in general conformity with the strategic policies contained within the development plan for the area of the authority</p> <p>f) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations</p> <p>g) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan</p> <p>If a Neighbourhood Plan is not developed in accordance with the Neighbourhood Plan Basic Conditions then there is a real risk that the Plan will fail when it reaches Independent Examination.</p> <p>Relationship with Local Plans</p> <p>To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, Neighbourhood Plans should be prepared to conform to up-to-date strategic policy requirements set out in Local Plans. Where an up-to-date Local Plan has been adopted and is in place for the wider authority area, it is the strategic policy requirements set out in this document that a Neighbourhood Plan should seek to support and meet. When a Local Plan is emerging or is yet to be found sound at Examination, there will be lack of certainty over what scale of development a community must accommodate or the direction the policies in the Neighbourhood Plan should take.</p> <p>The current Development Plan consists of the Core Strategy (adopted</p>			

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				<p>2009), the Huntingdon West Area Action Plan (adopted 2011) and the saved policies from the Local Plan 1995 and Local Plan Alteration 2002. Given that the Development Plan is based on a pre-Framework Development Plan we consider that it is now out-of-date against the requirements of the Framework and only limited weight can be attached to this document as it is not based on the full objectively assessed needs (OAN) for housing as required by the Framework.</p> <p>Gladman note that the Council have commenced work on its emerging Local Plan which will cover the period up to 2036 and will replace all existing policies contained in the Development Plan. The Council consulted on its pre-submission version of the Plan, which ended in March 2015. However, the publication of the Proposed Submission Local Plan has been delayed pending the production of further evidence base documents and is not expected to be published for public consultation until mid 2016.</p> <p>As part of the evidence base work, the Council will need to update its OAN to take account of the 2012 household projections. This may result in a significantly higher level of housing need being identified and may result in a spatial strategy that significantly differs from the pre-submission version. The outcome of the additional evidence base work may result in Houghton and Wyton being required to deliver a higher level of housing growth than what was previously identified. The progression of the HWNP at this time will therefore pre-empt the strategic priorities for the wider area.</p> <p>At present, there is no up-to-date, adopted development plan in place to which the HWNP can be based or tested against. Gladman submit that it is inappropriate to progress with a Neighbourhood Plan at this time until the emerging Local Plan has reached a more advanced stage and has been submitted to Secretary of State for Examination, successfully tested by an Inspector and subsequently adopted by Huntingdonshire District Council.</p> <p>Although the Neighbourhood Plan PPG indicates that Neighbourhood</p>			

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				<p>Plans can be advanced before an up-to-date Local Plan is in place, Gladman would strongly question the ability to progress the Neighbourhood Plan on this basis. If a Neighbourhood Plan is progressed prior to an up-to-date Local Plan being prepared, or the strategic policies and development requirements set out in an emerging Local Plan change, then work on the Neighbourhood Plan is likely to be abortive representing both a waste of Parish Council and local planning authorities' time and resources. A Neighbourhood Plan cannot be consistent with the requirements of the Framework or meet the Neighbourhood Plan Basic Conditions if it is progressed on a development plan that is out-of-date.</p> <p>Gladman consider that the HWNP in its current form fails to comply with various key paragraphs of the Framework and PPG as well as failing to meet basic conditions (a), (d), (e) and (f) which will be addressed throughout this representation. If the Parish Council fails to heed this advice and attempts to progress the Neighbourhood Plan to examination it will likely be found unable to meet the Neighbourhood Plan Basic Conditions and will not be able to proceed to referendum. It is Gladman's view that the HWNP is fundamentally flawed and requires substantial amendment, redrafting and the removal of several policies before progressing any further.</p> <p>See also detailed comments submitted seperately.</p> <p>Conclusion</p> <p>Gladman recognises the role of Neighbourhood Plan's as a tool for local people to shape the development of their local community, however it is clear from national guidance that Neighbourhood Plan's must be consistent with national planning policy and the up-to-date strategic requirements of the wider local authority area.</p> <p>Through these representations, Gladman have highlighted a number of significant concerns with the Neighbourhood Plan as proposed. The HWNP contains a series of flaws not only in its application of local and national policy, but lacks clear, robust and up-to-date evidence to</p>			

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				<p>support a number of its objectives and policies. A number of areas contained within the Neighbourhood Plan need to be addressed through a fundamental overhaul to the development strategy as proposed. Failure to do so may result in the plan being found unable to meet the basic conditions if progressed in its current form to Independent Examination. The HWNP contains a number of matters which contravene the following basic conditions:</p> <p>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State,</p> <ul style="list-style-type: none"> - The strategy as proposed by the HWNP's vision, objectives and suite of policies, including their supporting text, actively seek to constrain the delivery of sustainable development. The approach taken throughout the Neighbourhood Plan is contrary to the entire ethos of the Framework and has no regard to the need to significantly boost the supply of housing or the presumption in favour of sustainable development. - The HWNP has no regard to the advice and guidance contained in the PPG. <p>(d) The making of the order contributes to the achievement of sustainable development,</p> <ul style="list-style-type: none"> - A number of policies throughout the HWNP actively seek to constrain the ability for sustainable development to come forward and are used as mechanisms to prevent future sustainable growth without regard to the district's housing needs. - The HWNP provides no flexibility through the use of a restrictive and inflexible settlement boundary. The Neighbourhood Plan may fail to maintain the town's vitality and the Plan's wider aspirations as it does not provide housing of a scale to meet localised or district wide housing needs. <p>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area (or any part of that area)</p> <ul style="list-style-type: none"> - The HWNP lacks a credible and up to date evidence base. The Council's 			

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				<p>Core Strategy is a pre-NPPF development plan and was never based on an objective assessment of housing need. There is no up to date adopted development plan to which the HWNP can be based or tested against. The Council are currently in the early stages of preparing its emerging Local Plan, the progression of the HWNP will therefore pre-empt the strategic development requirements for the wider area rather than support them.</p> <p>(f) The making of the order does not breach, and is otherwise compatible with EU obligations</p> <p>- No SEA/SA has been undertaken as part of the HWNP process. The HWNP should be tested with significant SEA-level scrutiny and should be able to identify, describe and evaluate the likely significant effects on the environment and all reasonable alternatives.</p>			
John Fleming Gladman Developments LTD	HWSNP65	Houghton and Wyton Neighbourhood Plan (Whole document)	Object	<p>Upon reviewing the submission version of the HWNP it is clear that the Neighbourhood Plan's vision, aims, objectives and suite of policies throughout are inconsistent with the requirements of the Framework, PPG and the Neighbourhood Plan Basic Conditions.</p> <p>In its current form the HWNP is inflexible, ineffective and will be unable to respond rapidly to changes in the market i.e. where the Council is unable to identify a five year housing land supply. The approach taken throughout the Neighbourhood Plan as submitted comprises of a number of policies which will actively seek to restrict the ability of future sustainable growth being delivered without any regard to the district's full OAN.</p> <p>Gladman submit that a fundamental overhaul to the development strategy as submitted is required to ensure that the HWNP can be found consistent with national planning policy, guidance and the Neighbourhood Plan Basic Conditions.</p>	Yes		See HWSNP66
John Fleming	HWSNP74	Houghton and	Have	Sustainability Appraisal/Strategic Environmental Assessment			See

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Gladman Developments LTD		Wyton Neighbourhood Plan (Whole document)	observations	<p>The requirement to produce a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) goes to the core compliance of basic condition (f) which requires strict adherence to the requirements of the Strategic Environmental Assessment Directive and implementing UK Regulations. Where an adequate SEA/SA has not been undertaken a Neighbourhood Plan is unlikely to meet this basic condition.</p> <p>The Screening Opinion produced by Huntingdonshire District Council confirms that an SEA is not required. Gladman note several reservations were made by the Environment Agency and the need for SEA, which have since been withdrawn following the recommendations provided by the Environment Agency. Whilst it is considered that an SEA is not required, Gladman believe that the production of an SA may be a useful tool to consider the sustainability of the HWNP's policies. Although PPG indicates that Neighbourhood Plans do not require a SA of their proposals, preparing an SA can help demonstrate how the HWNP will contribute to the achievement of sustainable development, a Neighbourhood Plan Basic Condition. Therefore, the guidance on SA for Local Plan's should be referred to (PPG, Reference ID: 11-026). The PPG makes clear at paragraph 007 (Reference ID: 11-007) that an SA should meet all of the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p>Legislation from the Environmental Assessment of Plans and Programmes Regulations 2004 makes clear at paragraph 12 (2) 'The report shall identify, describe and evaluate the likely significant effects on the environment of – (a) Implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (our emphasis).'</p> <p>Gladman submit that it is of critical importance that the HWNP be tested with significant SEA level scrutiny and should test all reasonable alternatives, including whether a pro-growth scenario in line with the requirements of the Framework is capable of being delivered. If it is found that a higher level of growth can be delivered it should be this</p>			HWSNP66

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				figure the HWNP should seek to deliver.			
David Sweet	HWSNP75	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	A lot of time and effort was put into making this document by consulting with the people that will be directly affected by it. As a resident I fully support this document, in particular sections 5.5, 5.6 and 5.7.	No		
John Bannerman	HWSNP77	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	<p>This is a well thought out and thorough plan that considers all aspects of the community's needs and aspirations as well as the planning context both regionally and nationally.</p> <p>It is particularly pleasing that it recognises the special character of the village and surrounding area and seeks not only to protect it but to also use it to help guide the vision for its future development. It is absolutely right that the community behaves as responsible custodians of this beautiful landscape and settlement and puts the long term quality of life of residents and substantial pleasure of visitors above the short term aims of those who might otherwise wish to profit financially from its urbanisation and environmental damage.</p> <p>It has been great to see so many people attend the consultations and give their opinions and help make the plan a real reflection of the community.</p>	Yes		
David Bonny	HWSNP80	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	<p>Success of this Neighbourhood Plan is vital to secure local input and opinion into local planning decisions on a par with the local planning authority (HDC) and Cambridgeshire County Council. The legal status of this plan will hopefully avoid the current David and Goliath situation where, in order for the Parish to get it's views heard and more importantly listened to, the Parish has to behave in what some think is a belligerent and contentious way.</p> <p>Full weight and consideration will have to be given to the policies within this plan for such important issues as the guided bus stop on the A1123</p>	No		

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				and maintenance of the strategic gap between St Ives and the village of Houghton and Wyton.			
Pat Clifford Etherington	HWSNP81	Houghton and Wyton Neighbourhood Plan (Whole document)	Object	We bought an apartment at The Elms on the understanding that the site would be private. The inclusion of the gardens etc. are part of our contract and the area should not, under any circumstances, become open to the public. The trees on site are protected as is the woodland flora and fauna. It is a gross intrusion in to our lives to have people wandering around all day and night. This is a private garden and should be respected as such.	Yes	Merely cancelling any idea of opening The Elms to the public.	
Martin Page Barford+Co	HWSNP82	Houghton and Wyton Neighbourhood Plan (Whole document)	Object	Refer to attached document	Yes	Deletion of the Proposed Strategic Gap - for the reasons explained in the attached document. Deletion of the BBSRC Field as a Local Green Space - for the reasons explained in the attached document. Revise the proposed built up area plan Figure 3 - for the reasons explained in the attached document.	Yes
Rebecca Barrett	HWSNP83	Houghton and Wyton	Have	I refer in the main to 5.11 - Although The Elms is historically relevant and important to the village of Houghton & Wyton, it is a private dwelling and	Yes		

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		Neighbourhood Plan (Whole document)	observations	<p>should not be included in the neighbourhood plan. It certainly is not an 'accessible local green space' as indicated in 5.11 and should be removed from that context. It is not a public space and, galanthropiles or not, the public are not entitled to wander around the estate at will and uninvited. That does not mean that residents don't value the property's importance to the village, just that residents' privacy and ownership be respected. The Elms takes its responsibility as a Grade II listed building seriously and the buildings and grounds are well maintained in line with local planning and conservation restrictions.</p> <p>I also note Objective 14 refers to housing provision for older people but have concern about the lack of objective to meet similar provision for young people and families to address the imbalance outlined in 2.35</p> <p>Please note: There are many other residents from The Elms who have the same concerns as me regarding our inclusion in the NP but are unable to comment due to time constraints and imminent deadline.</p>			
Ann Hall	HWSNP90	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	I totally agree and support fully the Houghton and Wyton Neighborhood Plan. This strongly protects the village identity and prevents us from merging with neighboring villages and towns. The plan meets the needs of the residents in my view and I thank personally all those people who have put so much effort into producing this document.	No		
Lisa Watson	HWSNP91	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	<p>The neighbourhood plan document outlines the potential impact of future developments in and around the village.</p> <p>Whilst not addressing specific sites it looks at the village and surrounding enviroment as a whole and addresses the importance of maintaining the current village ethos and ambiance with room to grow in keeping with a village of this size.</p> <p>It also addresses the importance of the traffic situations in and around the village (espically on which on the main A1123) which are dangerous at current levels and developments have had a major contribution to this.</p>	No		

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				This document clearly reflects the issues the village and surrounding areas face now and in the future.			
David Keane	HWSNP93	Houghton and Wyton Neighbourhood Plan (Whole document)	Support	Having grown up in St Ives and lived in Houghton for last 6 years the very strong community spirit in the Village is something special and needs to be protected. This plan would support that in keeping the distinctiveness of the Village whilst recognizing the needs to evolve.	No		
Alison Melnyczuk St Ives Town Council	HWSNP32	Houghton and Wyton Neighbourhood Plan (Whole document)	Object	The plan contradicts with the current HDC Core Strategy and emerging Local Plan with regard to provision of new housing to the west of St Ives. Restrictions on the location of new housing will mean the current HDC Core Strategy can not be delivered.	Yes		
Alison Melnyczuk St Ives Town Council	HWSNP33	Houghton and Wyton Neighbourhood Plan (Whole document)	Object	Although the NP supports additional facilities for tourism, no specific sites have been allocated for this meaning that the objectives of the plan can not be delivered.	Yes		
Jonathan McGee	HWSNP60	Houghton and Wyton Neighbourhood Plan (Whole document)	Have observations	In the main support the Houghton and Wyton Neighbourhood plan. However a few comments: 5.11 and HWNP4 - It should be noted that The Elms gardens are not an 'accessible' local green space - it is a private residence and should remain so . However its character should be preserved for those viewing it from the Thicket. Additionally small development (storage/sheds etc) should be allowable by residents and owner of the Elms. HWNP10 - Housing availability (including for locals) is at a premium and affordability is decreasing daily. The village is primarily a residential area, not a tourist destination and therefore tourist housing stock should be	Yes		

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				allowed to convert back to permanent residence. HWNP17 - Many businesses are now small/based online etc and do not always afford provision to provide employment opportunities or necessarily operate as public facing retail units (though maybe engaged in retail). But these type of businesses should also be facilitated.			
Martin Page Barford+Co	HWSNP89	Houghton and Wyton Neighbourhood Plan (Whole document)	Object	Refer to accompanying document.	Yes	Deletion of the Proposed Strategic Gap - for the reasons explained in the attached document. Deletion of the BBSRC Field as a Local Green Space - for the reasons explained in the attached document. Revise the proposed built up area plan Figure 3 - for the reasons explained in the attached document.	See HWSNP82
Local Plans Team Huntingdonshire District Council	HWSNP18	1. Introduction	Have observations	Section 1 Introduction Paragraph 1.11 setting out the structure of the Neighbourhood Plan appears to contain incorrect numbering in as much as the sections listed do not coincide with the structure of the document or the contents page: <ul style="list-style-type: none"> • Section 1 as listed commences partway through Section 2: Local Context • Section 2 as listed contains the second part of Section 3 	Yes		

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				<ul style="list-style-type: none"> • Section 3 as listed contains the third part of Section 3 • Sections 4-13 as listed contains Sections 4-14 but it would be clearer if the last reference to sites with planning permission were to be listed separately as that does not contain any policy guidance • an additional bullet point could then reflect Section 14: Existing Development Sites – parish needs and intentions; and • Section 14 as listed should be renumbered as Section 15: Monitoring and Community Action Plan. 			
<p>Local Plans Team Huntingdonshire District Council</p>	<p>HWSNP19</p>	<p>2. Local Context</p>	<p>Have observations</p>	<p>Paragraph 2.17 and Figure 2 lacks clarity due to scale of map used, the solid colour overlay denoting the parish area and the depiction of the adjoining Hemingfords conservation area as well as that for Houghton and Wyton. A replacement map showing just the Houghton and Wyton conservation area would be beneficial.</p> <p>Paragraph 2.22 refers to the ‘area proposed to be designated as an Area of Outstanding Natural Beauty’. This is considered to be premature as the application for AONB status submitted by a local interest group is not in Natural England’s current programme and advice from Natural England’s AONB designations team received on 10 July 2015 states that: ‘Our current programme of AONB boundary variations will fully commit the resources we have available for landscape designation activity until 2018/19. It is unlikely that we will be in a position to make decisions regarding any future new AONB/National Park designations or boundary variations until our existing work is at or near completion. Any change to our resource situation in the intervening period may require us to review this timetable.’</p> <p>Source: email from Janet Nutall, Natural England, 10 July 2015.</p> <p>The paragraph should be rephrased to clarify that the AONB application reflects an aspiration of a local interest group and there is no commitment from Natural England to pursuing its designation.</p>	<p>Yes</p>		

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Ian Bates Cambridgeshire County Council	HWSNP39	2. Local Context	Have observations	At 2.22, and elsewhere in the Document, the Area of Outstanding Natural Beauty is mentioned, to date, my understanding is that Natural England will not be able to commit until 2018/2019, as they have a full commitment to date. It will, therefore, be inappropriate for this to be included at this time. A better phrase to use would be 'an area of best landscape'	Yes		
Local Plans Team Huntingdonshire District Council	HWSNP20	3. Vision and Objectives	Have observations	Section 3 Vision and Objectives Paragraph 3.11 estimates the village has in excess of 150,000 visitors every year with footnote 6 citing the evidence of 'Over 100,000 visitors visit the National Trust Mill'. This is inaccurate; earlier versions attributed this number to the car park which is used by many local residents as well as visitors. The National Trust Annual Report 2013/14 lists all National Trust properties which receive over 50,000 visitors per year, Houghton Mill does not feature in the list. The District Council acknowledge that the 150,000 visitors figure is an estimate but is concerned that much of the Neighbourhood Plan's support for 'quiet tourism' is predicated on unreliable information. This has been raised in previous comments which variously quoted 100,000 and 150,000 visitors per year. No source is given in the evidence base for either figure.	Yes		
Janet Nuttall Natural England	HWSNP45	Objectives of the Neighbourhood Plan	Support	Natural England supports the objectives of the Neighbourhood Plan, particularly objectives 1, 4 and 5 which seek to protect and enhance green spaces and biodiversity and to promote the growth in appropriate 'quiet tourism' in countryside of the River Great Ouse and meadows.			
Adam Ireland Environment	HWSNP87	Objectives of the Neighbourhood	Support	We support that one of the objectives of the plan is to direct vulnerable development away from areas where there is a medium or high probability of flooding (Objective 17). This objective is carried forward	No		

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Agency		Plan		<p>into various policies, in particular policy 16.</p> <p>However, there appears to be some confusion as to what development should be permitted within areas at risk of flooding, in particular areas benefitting from flood defences. We therefore recommend that the wording of policies 1 and 16 is reviewed as detailed in our comments on those sections.</p>			
<p>Local Plans Team Huntingdonshire District Council</p>	<p>HWSNP21</p>	<p>4. Village Limits/ Built Up Area</p>	<p>Have observations</p>	<p>Section 4 Village Limits/ Built up Area HWNP1 - Houghton and Wyton village limits/built up area The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice • contributes to the achievement of sustainable development • is in general conformity with the strategic policies contained in the development plan <p>Comment Paragraph 4.3 contains a quote from the Core Strategy (2009); in the second bullet point this incorrectly quotes 'cartilage (sic)' whereas the adopted Core Strategy correctly uses the word 'curtilage'. This paragraph also quotes the emerging Local Plan to 2036 (without citing the version quoted which is the targeted consultation version from January 2015) that will go out of date in 2016. The adopted development plan for Huntingdonshire currently comprises the Core Strategy (2009), saved policies of the Huntingdonshire Local Plan (1995), saved policies of the Local Plan Alteration (2002) and the Cambridgeshire and Peterborough Minerals and Waste Core Strategy and Site Specific Proposals Plan (2011). It is suggested that no direct quotes are included from the emerging Local Plan to 2036 as these currently have no formal status and are highly likely to change over the next couple of years and so would have the potential to mislead those using the Neighbourhood Plan in the future. A reference signposting any newer district-wide policy guidance would be beneficial. Paragraph 4.5 provides a textual definition of the built-up area for Houghton and Wyton that is inconsistent with application of both the</p>	<p>Yes</p>		

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				<p>criteria in the adopted Core Strategy or those in the emerging Local Plan to 2036. Paragraph 4.5 directs people to Figure 4.1 to see the mapped boundaries of the built-up area; this is incorrectly referenced as it is actually Figure 3.</p> <p>The built-up area boundary should be in accordance with the definition in the Core Strategy. The boundary shown in Figure 3 includes land that would not be considered to be part of the built-up area as defined in the Core Strategy. There is a real concern that someone will rely on this neighbourhood plan when applying for planning permission to state that their site is within the built-up area when the district council would consider the site to not be within the built-up area using the definition in the Core Strategy.</p> <p>The neighbourhood plan is required to be in conformity with the strategic policies of the development plan. The concept of strategic policies had not been established when the Core Strategy was adopted. However, as the Core Strategy sets out the strategy for how the development needs of the district are to be met and does not go into site specific detail its policies can reasonably be considered to be the strategic policies of the development plan at present. The definition of built-up areas is not part of a Core Strategy policy but is essential to the application of policy CS 3. It is suggested that the definition of the built-up area should be considered as part of the strategic policies of the development plan and so the neighbourhood plan should be in conformity with that definition. Having a boundary defined in the neighbourhood plan, accompanied by policies directing new growth to locations within the built up area, may be counterproductive to achieving objectives 2 and 12 of the neighbourhood plan as it could undermine part of the reasoning for the Core Strategy adopting the criteria based approach - maintaining the loose-knit character on the edge of settlements.</p> <p>It is suggested that the map of the built-up area boundary is deleted from the Neighbourhood Plan and the textual definition amended to reflect</p>			

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				that in the adopted development plan.			
Janet Nuttall Natural England	HWSNP47	4. Village Limits/ Built Up Area	Support	We support policies HWNP4-HWNP8 seek to protect and maintain the natural environment including the species-rich meadows and biodiversity assets of the River Great Ouse and best and most versatile agricultural land.			
John Fleming Gladman Developments LTD	HWSNP66	4. Village Limits/ Built Up Area	Object	<p>Policy HWNP1 – Houghton and Wyton Village Limits/Built Up Area</p> <p>The above policy states that there will be a presumption in favour of sustainable development within the built up area boundary. Outside the built up area 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.</p> <p>Gladman contend that Policy HWNP1 is ineffective, inflexible and will be unable to respond rapidly to changes in the market i.e. where the Council is unable to identify a five year housing land supply. Policy HWNP1 seeks to confine development within the built up area and seeks to contain the physical growth of Houghton and Wyton with no regard to the district's full OAN. Gladman consider this to be a restrictive policy that will only serve to preclude otherwise sustainable growth opportunities from being delivered. Gladman recommend that it is appropriate to delete the above policy as it is inconsistent with basic conditions (a), (d) and (e) and replace it with the following wording:</p> <p>'Development adjacent to the existing settlement will be permitted provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development.'</p>	Yes	See comment.	Yes
Adam Ireland Environment Agency	HWSNP84	4. Village Limits/ Built Up Area	Have observations	<p>4 – Village Limits / Built Up Areas</p> <p>Policy HWNP1 – Houghton and Wyton village limits/built up area</p> <p>The last sentence of this policy states:</p> <p>'Across the neighbourhood plan area, there shall be a presumption</p>	Yes	While we agree with the principle of this sentence, we recommend that the	

Name	Comment ID	Comment on	Support/ Object/ Have Observations	Comment	Changes required?	Proposed changes	Supporting documents
				<p>against all types of vulnerable new development being located within flood zones 2 and 3. This shall include development within the built-up area'.</p>		<p>wording of 'all types of vulnerable new development' is changed to 'all new development classified as 'more vulnerable' or highly vulnerable' in accordance with the NPPF'. This would help to clarify which types of development should not be located within flood zones 2 and 3.</p>	
<p>Local Plans Team Huntingdonshire District Council</p>	<p>HWSNP22</p>	<p>5. Natural Environment</p>	<p>Have observations</p>	<p>Section 5 Natural Environment HWNP2 - Protection of sites The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice • contributes to the achievement of sustainable development <p>Comment The policy does not follow the hierarchical approach, set out in the NPPF, as it gives equal protection to SSSIs and CWSs and as such does not recognise the relative importance of the nationally designated SSSIs over the locally designated CWSs. Common land is protected separately under The Commons Act 2006 so its inclusion in the policy is superfluous. Figure 4 is difficult to interpret due to the scale used and overlapping annotations. County Wildlife Sites (CWS) change frequently which has potential to make the map inaccurate relatively quickly; a link to an up-to-date source may be more reliable. The River Great Ouse is a CWS but it is hard to tell whether it is identified as such on Figure 4. The Neighbourhood Plan provides no evidence to explain why common land is grouped in with other biodiversity designations rather than</p>	<p>Yes</p>		

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				<p>featuring in policy HWNP4 to be defined as Local Green Space. The policy may be better placed in the later 'Biodiversity' section, or possibly combined with policy HWNP6, if retained</p> <p>HWNP3 - Settlement Gap</p> <p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice • contributes to the achievement of sustainable development • is in general conformity with the strategic policies contained in the development plan <p>Comment</p> <p>Policies in the Core Strategy (to be continued in the emerging Local Plan) seek to ensure that sporadic or isolated development of land in the countryside does not happen. However, it is clear that this policy is an attempt to predetermine the principle of development in this location ahead of the Local Plan process.</p> <p>As the Neighbourhood Plan working group will be aware we have stated our view that the proposed allocation known as St Ives West would not lead to the removal of the gap between Houghton and Wyton and St Ives as the Houghton Grange site is not part of the main built-up area of the village. We therefore object to the penultimate sentence of Paragraph 5.7.</p> <p>We have set out our stance in relation to planning applications in this area in a position statement. The statement sets out the officers' view that development in this location should be determined through the Local Plan process. We maintain that view with regards to the neighbourhood plan. To determine the principle of development in this location through the neighbourhood plan would deny this issue the level of consultation and examination we consider is due to it, which it would receive through the Local Plan process. Therefore we object to the inclusion of this field as a settlement gap (and also as a Local Green Space).</p> <p>We are concerned that this policy may not be in accordance with national</p>			

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				<p>policy. The current development plan does not identify this land specifically for development. However, the Core Strategy was adopted before the NPPF and as a result is not fully compliant with national policy. One of the specific ways in which the Core Strategy is not compliant with the NPPF is with regards to the need for housing development, having been based on the Regional Spatial Strategy requirements rather than up to date and objective assessment of need. The Council is preparing a new Local Plan that is based on objective assessment of needs. The draft local plan includes this land as part of a proposed allocation for development – and the intention is that this will be tested at the examination into the emerging Local Plan. Including this land as a strategic gap within the Neighbourhood Plan will frustrate the Council’s efforts to plan positively to meet objectively assessed needs.</p> <p>HWNP4 - Protection and maintenance of Local Green Spaces</p> <p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice • contributes to the achievement of sustainable development • is in general conformity with the strategic policies contained in the development plan <p>Comment</p> <p>We are not convinced that the BBSRC field meets the requirements for a Local Green Space as set out in the NPPF and the NPPG. NPPF paragraph 76 sets out that ‘By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.’ This is explained in the NPPG which sets out specific guidance on designating Local Green Space and the relationship with local planning, see paragraph 37-008, which can be viewed here: http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-</p>			

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				<p>green-space/local-green-space-designation/#paragraph_007.</p> <p>The designation of the BBSRC field as Local Green Space would be counter to this requirement as it undermines the aim of plan making to identify sufficient land to meet identified development needs. The council's intention is to test the proposed allocation of land in this area (known as St Ives West and identified in Policy SI1 of the emerging Huntingdonshire Local Plan to 2036) in the Local Plan examination. Pursuant to this intention the Council refused planning application 1301895OUT on land to the east of the BBSRC field in January 2015, which is now the subject of an appeal (APP/H0520/W/15/3007954: Appeal by BDW Developments Ltd and Trustees of St Ives (Hunts) Golf Club). To agree to the designation of the BBSRC field as Local Green Space through the Neighbourhood Plan examination would be premature to full consideration being given to the role of the field through the Local Plan examination.</p> <p>Further to this the NPPF sets out specific requirements for land to be designated as Local Green Space:</p> <ol style="list-style-type: none"> 1. where the green space is in reasonably close proximity to the community it serves; 2. where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and 3. where the green area concerned is local in character and is not an extensive tract of land. <p>The main concern is that the field does not fulfil criterion 2 in that it is not both demonstrably special to the community of Houghton and Wyton and holds a local significance.</p> <p>In coming to this view we have considered the justification set out on pages 22 to 24 of the neighbourhood plan. We have also referred to the 2012 Houghton and Wyton Conservation Area boundary review. While we would not disagree with much of the history or the characterisation of</p>			

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				<p>the wider area as set out, we think that the field is quite different from its surroundings.</p> <p>The review of the conservation area considered this field for inclusion in the area. At the time it was identified that the field now lies within the Houghton and Wyton parish boundary as a result of a change in the parish boundaries following the creation of the Wyton on the Hill administrative area. It was noted that the field has historically been farmland in the parish of St Ives but was developed in part as a Poultry Research Station in the late 1950s. It was also noted that Houghton Grange to the west of this field was the furthest eastward expansion of Houghton when wealthy Victorian and Edwardian patrons bought large parts of Houghton Hill to establish their country houses and estates. Further it was noted that the BBSRC field is shielded from the conservation area by The Thicket to the south and by the deep hedgerows of the Houghton Grange estate. The view towards Houghton Grange from the meadows takes in grassland/ pasture to the front of Houghton Grange house that was included in the conservation area. The Thicket screens views from the meadows north towards the BBSRC site to a height of approximately 40 metres above sea level. The meadows are approximately 5-10 metres above sea level. It is not possible to see over The Thicket to the BBSRC field. The land is not visible from the Great Ouse valley or from Thicket Road.</p> <p>The field is currently viewable from the north on Houghton Road due to the recent creation of the road junction serving the development to the north, known as Slepe Meadow.</p> <p>We also have concerns with regards to the third area as at approximately 18.3ha it is hard to categorically say that the field is not 'an extensive tract of land' and therefore we think it is questionable whether the field fulfils this criterion.</p> <p>The policy refers to Figure 4.3 which is a typographical error and should be Figure 8.</p> <p>HWNP5 – Greens and verges</p>			

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				<p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice <p>Comment</p> <p>There is significant internal conflict between the policy which seeks to protect and enhance the greens and verges ‘in the built up area of the parish’ and the list of greens and verges named and illustrated. The following identified greens and verges lie outside the built-up area as illustrated in Figure 3:</p> <ol style="list-style-type: none"> the village pond and surrounding perimeter on the A1123 thicket footpath from the bridge at Thicket Road/ Meadow Lane crossroads, down to Portabello Wood the field on the corner of Thicket Road and Meadow Lane the national Trust car park and camp site the triangle at the crossroads of Huntingdon Road and A1123 (The Splash) Splash Lane <p>It is suggested that the policy be amended to refer to the greens and verges identified as the most significant in the village and listed in paragraph 5.12.</p> <p>No mapping for the greens and verges is included although there are many photographs highlighting the ‘most significant’ verges and greens. Without maps the policy does not provide sufficiently clear guidance as there is scope for misinterpretation.</p> <p>HWNP6 – Retain and enhancing biodiversity</p> <p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice <p>Comment</p> <p>The introduction to this policy sets out the aims for it; however, not all of the aims are addressed in the policy and several are beyond the scope of land use planning.</p> <p>Paragraphs 5.16 and 5.17 both misquote the NPPF; although the meaning is clear in both as the Neighbourhood Plan, if made, would become part</p>			

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				<p>of the statutory development plan it would be preferable to eliminate scope for misinterpretation.</p> <p>HWNP7 – Protection of best and most versatile agricultural land</p> <p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice • contributes to the achievement of sustainable development • is in general conformity with the strategic policies contained in the development plan <p>Comment</p> <p>Policies in the Core Strategy and emerging Local Plan seek to protect agricultural land. It is not clear what additional protection this policy would offer. In fact, it may indicate that development is possible in the circumstances listed in a manner contrary to the Core Strategy and national policy. The NPPF does not set any timeframe in paragraph 112 after which development of the best and most versatile agricultural land becomes acceptable.</p> <p>Paragraph 5.28 incorrectly refers to policy HWNP6, this should be corrected to policy HWNP7 which immediately follows the paragraph.</p>			
Ian Bates Cambridgeshire County Council	HWSNP40	5. Natural Environment	Have observations	At 5.3 - Common Land is mentioned. I believe the reference to this needs to be enhanced, e.g. who has these rights? What can/cannot happen on this land?	Yes		
Sian Williams The Wildlife Trust BCN	HWSNP42	5. Natural Environment	Support	The Wildlife Trust supports policy HWNP2 and we are pleased to see recognition given to both statutory and non-statutory nature conservation sites, as well as the importance of connections between sites which form part of an ecological network.			
Janet Nuttall	HWSNP46	5. Natural Environment	Have observations	The Neighbourhood Plan area incorporates the nationally designated Houghton Meadows Site of Special Scientific Interest (SSSI) and several	Yes	The Plan should identify that	

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Natural England				<p>County Wildlife Sites (CWS). Whilst we welcome Objective 4 of the Plan which seeks to ‘protect and enhance the range and distribution of biodiversity in the parish’, we are disappointed that Policy HWNP2 Protection of Sites has been modified such that planning permission for development which would result in an adverse impact on SSSIs or CWSs will be considered in exceptional circumstances, rather than generally being refused as indicated in the pre-submission Plan. The Plan should identify that exceptional circumstances, in accordance with the NPPF, are where the benefits of development clearly outweigh both the impacts that it is likely to have on the features of the SSSI that make it of special scientific interest and any broader impacts on the national network of SSSIs. Notwithstanding this Natural England is generally satisfied that the scale, location and nature of development being promoted through the Plan, is unlikely to have an adverse impact on the natural environment including Houghton Meadow.</p>		<p>exceptional circumstances, in accordance with the NPPF, are where the benefits of development clearly outweigh both the impacts that it is likely to have on the features of the SSSI that make it of special scientific interest and any broader impacts on the national network of SSSIs.</p>	
<p>John Fleming Gladman Developments LTD</p>	<p>HWSNP67</p>	<p>5. Natural Environment</p>	<p>Object</p>	<p>Policy HWNP2 – Protection of Sites The above policy states that planning applications for development which would result in any adverse impact to SSSI’s, CWS or common lands will only be considered in exceptional circumstances. Gladman submit that sufficient weight is already afforded by national policy requirements, the HWNP should seek to be consistent with the requirements in the Framework in full. In this regard, HWNP2 fails to be in conformity with the requirements of the Framework. The protection of common land does not meet the explicit requirements set out by the Framework and is not supported by any robust evidence base. Common land is not designated as a national designated asset in line with the requirements of the Framework, exceptional circumstances should therefore not be attached to the protection of this land as it will likely be used as a mechanism to preclude future sustainable growth opportunities from being delivered. This policy would only serve to repeat the protection afforded by national</p>	<p>Yes</p>	<p>See comment.</p>	<p>See HWSNP66</p>

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				<p>planning policy in respect of statutory designations, and lacks robust evidence to support the protection of common land areas. We therefore recommend the deletion of HWNP2 as it is inconsistent with basic conditions (a), (d) and (e).</p> <p>Policy HWNP3 – Local Settlement Gap The above policy states that development will not be permitted within the Local Settlement Gap.</p> <p>Gladman submit that new development can often be located in countryside gaps without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. In this regard, we question whether the proposed strategic gap has been properly informed by robust evidence i.e. a landscape and visual character assessment to support the proposed designation. We therefore submit that further evidence is required to justify the inclusion of this policy.</p> <p>Policy HWNP4 – Protection and maintenance of Local Green Spaces The above policy identifies 3 areas proposed as Local Green Space designations.</p> <p>The allocation of land as Local Green Space should be able to demonstrate robust evidence to meet national policy requirements as set out in paragraphs 76 and 77 of the Framework. Local Green Spaces should be consistent with the requirements of the Framework and should complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when the plan is prepared or reviewed and be capable of enduring beyond the end of the plan period. They should not be used as a mechanism to preclude otherwise sustainable development from coming forward.</p> <p>Local Green Space will not be appropriate for most green areas or open space. The designation should only be used:</p> <ul style="list-style-type: none"> - Where the green space is in reasonably close proximity to the community it serves; - Where the green area is demonstrably special to a local community and 			

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				<p>holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p> <p>- Where the green area concerned is local in character and not an extensive tract of land.</p> <p>The Framework makes clear that Local Green Spaces should only be allocated where it is consistent with the wider context of the area. The use of this policy tool restricts the supply of housing and does not provide appropriate justification and evidence for the inclusion of these areas and their consistency with the requirements set out above. We therefore recommend the deletion of policy HWNP4.</p> <p>Policy HWNP6 – Retaining and Enhancing Biodiversity</p> <p>The above policy states that development will be expected to retain and enhance well established features of the landscape and biodiversity assets. If there is significant loss of biodiversity as part of development, then new provision will be expected to be made elsewhere on site.</p> <p>Gladman submit that new development often offers the opportunity, where necessary, to enhance the existing biodiversity values and can often be integrated into development proposals through high quality design, ensuring both existing and future residents benefit from any potential ecological enhancements.</p> <p>This helps maintain their role as part of the local and wider area’s biodiversity network. However it is important to remember that the removal of such assets such as trees and hedges may be necessary to ensure the delivery of the wider scheme i.e. for access. Policy HWNP6 will therefore need to allow for a sufficient degree of flexibility to allow this to happen.</p> <p>Policy HWNP7 – Protection of best and most versatile agricultural land</p> <p>The above policy states that development of best and most versatile agricultural land will be refused unless it can be demonstrated that (a) there is no other land of lower agricultural quality in the parish that is capable of being sustainably developed and (b) there will be significant</p>			

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				<p>sustainability benefits that arise from development which outweigh the benefits of retaining the land in its existing agricultural use.</p> <p>Gladman note that Houghton and Wyton is surrounded by a mix of either Grade 2 or Grade 3a and 3b agricultural land, predominately comprising of the latter. Gladman contend that this policy is distinctly anti-growth and goes over and beyond the requirements of Neighbourhood Planning. The supporting text to this policy states, ‘there will be a presumption against development which reduces grazing and agricultural land,’ this approach is distinctly anti-growth and directly contrary to the explicit requirements of the Framework, specifically the presumption in favour of sustainable development set out at paragraph 14. The level of housing required to meet the District’s housing needs should be balanced against the loss of agricultural land.</p> <p>Paragraph 026 of the PPG (Reference ID: 8-026) states that local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality. However, Houghton and Wyton largely comprises of Grade 3a/3b agricultural land, Gladman consider that the impact of this loss is outweighed by the significant net benefits that residential development would deliver i.e. boosting the supply of housing, economic benefits, increased public open space etc.</p> <p>Gladman recommend that this policy be deleted from the HWNP as it is inconsistent with basic conditions (a) and (d).</p>			
<p>Jackie Worboys</p> <p>The Elms Facilities Ltd</p>	<p>HWSNP62</p>	<p>Local Green Spaces</p>	<p>Object</p>	<p>We would like to object to The gardens of the Elms being included as a Local Green Space in Houghton. This is a private garden belonging to the residents of The Elms flats 1 - 22 for their own recreational use. The gardens are maintained in line with local planning and conservation restrictions and is home to a wide range of plants and wildlife. The residents would not want the area to become accessible by the general public without invitation and pets are strictly prohibited by the residents to protect these beautiful grounds.</p>	<p>Yes</p>	<p>That The Gardens of The Elms is removed from the Neighbourhood Plan</p>	

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Sergey Grechishchev	HWSNP76	Local Green Spaces	Object	The garden of the Elms is a private garden belonging to the residents of The Elms for their own use. The garden is maintained on a regular basis and in line with local planning and conservation restrictions. The maintenance of the garden is funded from the Elms residents budget. The residents would not want the area to become accessible by the general public without invitation and pets are strictly prohibited by the residents to protect these beautiful grounds.	Yes	The Gardens of The Elms is removed from the Neighbourhood Plan	
Lauren Naisbit	HWSNP78	Local Green Spaces	Have observations	The Elms garden is privately owned land that is already protected and maintained by the owners and residents of The Elms. I agree it is an important green space and there are no plans for further development of it. Views of it from the Thicket Road can continue to be enjoyed but there should continue to be no public access for galanthophiles or others to wander through it as it is private property like all other gardens in Houghton and Wyton.	No		
Alina Laktina	HWSNP79	Local Green Spaces	Object	The garden of the Elms is a private garden belonging to the residents of The Elms. The residents of the Elms pay for the maintenance of this garden therefore they would not want the area to become accessible by the general public without invitation and pets should be strictly prohibited to protect these beautiful grounds.	Yes	The Gardens of The Elms is removed from the Neighbourhood Plan	
John Bannerman	HWSNP92	Local Green Spaces	Support	It is so vital that the BBSRC field is protected. The document does a great job in explaining why. Good to see 5.12 and 5.13 recognise our green spaces. For a rural place these really are quite meagre and tend to be insensitively managed. Would love to see 5.14 and 5.15 in action- would really enhance the environmental value of the village. Would additionally like any windfall sites give money to enhance green spaces elsewhere/outside the built up area to reflect that the increased housing density decreases our green space and thus its environmental	Yes	Only regarding the last paragraph.	

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				value.			
Sian Williams The Wildlife Trust BCN	HWSNP43	Biodiversity	Have observations	<p>The Wildlife Trust is pleased to see that policy HWNP6 commits to retaining and enhancing biodiversity assets, however believes the wording of this policy could be stronger. For example: "Development will be expected to retain and enhance biodiversity assets including species-rich meadows, the river Great Ouse, and areas of semi-natural habitat associated with the river. Planning applications for development which would result in an adverse impact on biodiversity features would only be considered in exceptional circumstances.</p> <p>If cases arise where adverse impacts are unavoidable, these will be addressed first by minimisation, then by mitigation, and finally by alternative measures such as creation of replacement habitat elsewhere."</p>	Yes		
Local Plans Team Huntingdonshire District Council	HWSNP23	6. Tourism	Have observations	<p>HWNP8 – Tourism development</p> <p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice • contributes to the achievement of sustainable development • is in general conformity with the strategic policies contained in the development plan <p>Comment</p> <p>The NPPF includes tourism development within its definition of main town centre uses and encourages most tourism related development to town centres where people can benefit from public transport access. NPPF Paragraph 28 also acknowledges the role of sustainable rural tourism and leisure in rural areas. The policy makes no locational distinction and should be amended to express a preference for tourism development to be located within the existing built up area as a first choice and only supported within the countryside where a specific operational need for such a location can be justified.</p> <p>It is considered that this policy does not provide any locally specific</p>	Yes		

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				<p>guidance at present and that these matters are sufficiently addressed in the NPPF and the Development Plan. It is suggested that the issues raised either be addressed in text or the policy amended to be more locally specific.</p> <p>HWNP9 – Provision of new tourist accommodation</p> <p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice • contributes to the achievement of sustainable development • is in general conformity with the strategic policies contained in the development plan <p>Comment</p> <p>It is considered that this policy does not provide any locally specific guidance and that these matters are sufficiently addressed in the NPPF and the Development Plan. Both the adopted and emerging development plan documents seek to concentrate new tourist accommodation within the existing built-up area of established settlements to facilitate access to services. In the case of camping and caravanning sites or tourist accommodation related to a particular attraction this is extended to locations well-related to a settlement where services can be provided. It is suggested that new tourist accommodation could be addressed in text or the policy amended to be more locally specific.</p> <p>Paragraph 6.9 refers to emerging Local Plan policy LP11. Using the targeted consultation document quoted in Section 4 policy LP11 addresses affordable housing provision so is incorrectly cited.</p> <p>HWNP10 – Change of use of existing tourist accommodation to permanent residences</p> <p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice <p>Comment</p> <p>Including a presumption against development in this situation is unlikely to be in accordance with national policy. In addition, some properties will not require planning permission to change to solely residential use as</p>			

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				certain changes can be carried out under permitted development or prior approval routes. The last sentence is more onerous than national guidance. It is suggested that this be amended to refer to the sequential test for flooding			
Ian Bates Cambridgeshire County Council	HWSNP41	6. Tourism	Have observations	Tourism - One of the attractions in this area is the Great Ouse River and, if moorings along the Hemingford Abbots side could be developed, this would encourage boat-owners to moor up, cross over at the lock and use pubs/shops etc. Or, alternatively, the GOBA moorings which is just after the lock, which are used by boats, there is no access for them to reach the Village.	Yes		
Alison Melnyczuk St Ives Town Council	HWSNP13	Tourism development	Object	Although the NP supports additional facilities for tourism, no specific sites have been allocated for this meaning that the objectives of the plan can not be delivered.	Yes		
Alison Melnyczuk St Ives Town Council	HWSNP34	Tourism development	Object	Although the NP supports additional facilities for tourism, no specific sites have been allocated for this meaning that the objectives of the plan can not be delivered.	Yes		
Local Plans Team Huntingdonshire District Council	HWSNP24	7. Community Infrastructure	Have observations	Section 7 Community Infrastructure HWNP11 – Provision of new community facilities The following basic conditions may not be met: • having regard to national policy and advice Comment This appears primarily to be a statement of intent rather than a policy. Nothing in it could be used to help determine a planning application	Yes		

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				<p>which is the fundamental purpose of a policy. It would be better rephrased as text.</p> <p>The last sentence is more onerous than national guidance. It is suggested that this be amended to refer to the sequential test for flooding.</p>			
<p>John Fleming</p> <p>Gladman Developments LTD</p>	HWSNP68	7. Community Infrastructure	Have observations	<p>Policy HWNP11 – Provision of new community facilities</p> <p>The above policy seeks the provision of new community facilities to address the identified needs of the residents in the parish. These needs could relate to new recreation, leisure, spiritual, social, education and medical facilities.</p> <p>Gladman note that their does not appear to be any robust evidence detailing the communities infrastructure needs. The supporting text to this policy states ‘It is recognised that the funding of such facilities is constrained and that the limited amount of residential development in the parish means that developer contributions will also be limited.’ It is therefore hard to see how the policies and plan objectives contained within the HWNP will be delivered without the necessary financial contributions to secure the infrastructure the plan seeks to deliver. This reinforces the need for the HWNP to allocate a sufficient level of housing land which will help contribute towards a number of the HWNP’s wider plan objectives.</p>			See HWSNP66
<p>Local Plans Team</p> <p>Huntingdonshire District Council</p>	HWSNP25	Developer contributions for community infrastructure	Have observations	<p>Section 8 Developer Contributions for Community Infrastructure</p> <p>HWNP12 – Developer contributions</p> <p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice <p>Comment</p> <p>The policy specifies that 25% of CIL receipts should be given directly to Houghton and Wyton Parish Council. Although this is the proportion set out in the current regulations it is quite possible that these will change during the lifetime of the Neighbourhood Plan. It is suggested that a</p>	Yes		

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				more flexible approach is taken and the policy amended to refer to the proportion of CIL as set out in up-to-date regulations at the time of development.			
John Fleming Gladman Developments LTD	HWSNP69	Developer contributions for community infrastructure	Object	<p>Policy HWNP12 – Developer Contributions</p> <p>This policy states that new development within the district will be expected to pay the relevant CIL charge and the funding pot used to address the infrastructure needs of Houghton and Wyton Parish. Gladman submit that there is no reasonable justification for the inclusion of this policy as we consider it to be a meaningless policy. Gladman remind the Parish Council that once a CIL charging schedule is in place, developments will be required under statute to provide the relevant level of contributions.</p> <p>Furthermore, Gladman feel that the CIL contributions the Parish Council will likely receive from the limited development opportunities set out within the Plan will fall demonstrably short of the required funds to support the Plan objectives and will have a direct impact on the viability and vitality of Houghton and Wyton. This further reinforces the need to allocate a sufficient level of housing land to help generate the necessary CIL funds required to deliver the infrastructure objectives of the HWNP.</p>			See HWSNP66
Local Plans Team Huntingdonshire District Council	HWSNP26	8. Traffic and Transport	Have observations	<p>Section 9 Traffic and Transport</p> <p>HWNP13 – Access from new development</p> <p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • contributes to the achievement of sustainable development • is in general conformity with the strategic policies contained in the development plan <p>Comment</p> <p>The County Council, as Local Highways Authority, uses technical criteria such as the Manual for Streets and the Design Manual for Roads and Bridges when advising on applications for the creation of new access</p>	Yes		

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				<p>points.</p> <p>The policy is overly onerous and incapable of being implemented as it seeks to influence development proposals outside the Neighbourhood Plan's designated area by requiring traffic modelling and analytical work to demonstrate positive need for such development in traffic terms.</p> <p>Paragraph 9.6 could mislead future users of the neighbourhood plan as, although modelling may indicate that the junction will operate beyond capacity, appropriate management of the flow of users can be amended to significantly reduce the queuing that may arise at peak times.</p> <p>HWNP14 – Parking to serve new development/Houghton and Wyton village</p> <p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice • having special regard to the desirability of preserving or enhancing the character or appearance of the conservation area • contributes to the achievement of sustainable development • is in general conformity with the strategic policies contained in the development plan <p>Comment</p> <p>Neither national policy nor the development plan advocate a numbers-led approach to car parking as it fails to take into account the individual circumstances of a particular site or the development proposed on it. A design-led approach to car parking in new developments will identify the best solutions and may reduce the land-take necessary for new development. A numbers-led approach as proposed has the potential to affect how much development will come forward to meet housing needs and to have a detrimental impact on the conservation area. It is suggested that the policy be amended to reflect a design-led approach to parking requirements.</p> <p>To avoid potential for misinterpretation use of the word 'dwelling' is suggested instead of house/ flat to address all forms of residential property eg bungalow, maisonette, park home.</p>			

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				<p>HWNP15 – Access by non-car modes</p> <p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice <p>Comment</p> <p>It is suggested that this policy may not be considered reasonable given the costs it may place on development and so should be deleted. The key message of the policy is succinctly contained within the sixth bullet of policy HWNP20 to which all planning applications for new development anywhere in the parish would be required to have regard.</p> <p>Paragraph 9.12 identifies a series of desirable foot/ cycle path connections to be made. It is suggested that those might be appropriately moved to policy HWNP12 for consideration as appropriate infrastructure to be provided through the parish’s CIL receipts.</p>			
<p>Lou Mason-Walsh</p> <p>Cambridgeshire County Council</p>	<p>HWSNP63</p>	<p>8. Traffic and Transport</p>	<p>Have observations</p>	<p>The policies within the Transport Chapter of the document as set out below;</p> <p>Policy HWNP12 – Developer contributions</p> <p>Policy HWNP13 – Access from new development</p> <p>Policy HWNP14 – Parking to serve new development/Houghton and Wyton village</p> <p>Policy HWNP15 – Access by non-car modes</p> <p>Are all issues that would be covered by the Transport assessment that would be required as part of any development and therefore all these issues will be an integral part of the application process and therefore CCC have no objection to these policies.</p> <p>The one area we would like to see amended in the proposed parking standards as set out in HWNP14. It is acknowledged that it is important that the provision of the correct level of car parking within any new development is a key issues but the level of parking to be provided on any site should be determined based on the existing level of car ownership in the local census ward and the existing level of pedestrian, cycle and public transport links in the are around the proposed development. The</p>	<p>Yes</p>	<p>See comment.</p>	

Name	Comment ID	Comment on	Support/ Object/ Have Observations	Comment	Changes required?	Proposed changes	Supporting documents
				laying down of prescriptive levels of parking for all sites could encourage greater levels of car use in the local area through the encouragement of over provision of parking within some developments.			
John Fleming Gladman Developments LTD	HWSNP70	8. Traffic and Transport	Object	<p>Policy HWNP13 – Access from new development The above policy seeks the provision of a number of requirements relating to access. Gladman consider that the application of national standards and requirements is more suited to deliver the Parish Council’s objectives and the implementation of the above policy. As significant weight is already attached through the application of national standards we recommend that Policy HWNP13 be deleted from the HWNP.</p> <p>Policy HWNP14 – Parking to serve new development/ Houghton and Wyton Village The above policy seeks the provision of parking standards. There is no evidence to support the need for high levels of parking spaces to be provided for each new dwelling. The provision of car parking can have a significant effect on the amount of land required for development and the level of parking provision proposed may have an adverse effect on the urban design of future developments, with environments becoming dominated by parked vehicles at the expense of provision for people and sustainable modes of transport. Of greater concern is that this will have a negative impact on the Council’s housing land supply. Gladman reiterate the comments made under Policy HWNP13 and consider the application of national and local standards is more suited deliver the above policy.</p>	Yes	See comment.	See HWSNP66
Local Plans Team Huntingdonshire District Council	HWSNP27	9. Flood Risk and Drainage	Have observations	<p>Section 10 Flood Risk and Drainage HWNP16 - Flooding and drainage The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice <p>Comment</p>	Yes		

Name	Comment ID	Comment on	Support/ Object/ Have Observations	Comment	Changes required?	Proposed changes	Supporting documents
				<p>It is recognised that his policy has been prepared in response to significant concerns previously expressed by the Environment Agency. However, it is suggested that first sentence is more onerous than national guidance and that the policy should be amended to refer to the sequential test for flooding.</p> <p>For the avoidance of doubt it is suggested that the last sentence be amended to refer to 'all planning permissions' rather than 'all planning applications'.</p>			
Stewart Patience Anglian Water	HWSNP51	9. Flood Risk and Drainage	Have observations	<p>Policy HWNP16 - Flooding and Drainage</p> <p>Anglian Water previously commented on the Houghton and Wyton Neighbourhood plan and recommended that a specific policy relating to surface water management should be included.</p> <p>The wording of Policy HWNP16 is consistent with our previous comments relating to this issue. Therefore we are generally supportive of this policy as it requires that applicants demonstrate that there is adequate drainage infrastructure capacity in place to serve the development without the risk of flooding to existing development. However it would be helpful if reference is also made to other surface water disposal methods which should be considered before making use of existing surface water sewers. It is also important to note that surface water runoff will not be allowed into Anglian Water's foul sewerage network under any circumstances.</p>	Yes	<p>It is therefore proposed that the fifth paragraph of Policy HWNP16 should be amended as follows:</p> <p>'All developments will be expected to demonstrate that they have followed the surface water management hierarchy to ensure that infiltration and other methods of surface water disposal isare considered and provided for before ahead of maintainingany connection to existing surface water sewers.'</p>	

Name	Comment ID	Comment on	Support/ Object/ Have Observations	Comment	Changes required?	Proposed changes	Supporting documents
John Fleming Gladman Developments LTD	HWSNP71	9. Flood Risk and Drainage	Object	<p>Policy HWNP16 – Flooding and Drainage</p> <p>The above policy attaches a number of flooding and drainage requirements associated with all new development.</p> <p>Gladman refer the Parish Council to the guidance set out in the Framework on development and flood risk, to which the Neighbourhood Plan should conform with. Whilst noting the Environment Agency’s comments we believe that this matter is more appropriately dealt with by the local planning authority and should therefore be deleted from the HWNP. We recommend that the HWNP should seek to support the requirements set out by the Framework and local planning policy.</p>	Yes	See comment.	See HWSNP66
Adam Ireland Environment Agency	HWSNP85	9. Flood Risk and Drainage	Have observations	<p>10 – Flood Risk and Drainage</p> <p>We welcome paragraph 10.4 in section 10 of the report which refers to the residual risk of flooding in the event of failure or overtopping of existing defences.</p> <p>We are aware that a Level 2 Strategic Flood Risk Assessment (SFRA) is currently being considered by Huntingdonshire District Council. This SFRA will assess the flood risk in the district in more detail using the most up-to-date modelling information available from the Environment Agency, as well as other flood risk information. This work has the potential to inform the Neighbourhood Plan and subsequent decisions on planning applications that come forward.</p> <p>We recommend that the Parish Council inputs in some form to this Level 2 SFRA. Ideally breach analysis of the flood defences in Houghton and Wyton would help inform the residual risk of flooding in the areas benefitting from defences. Any breach analysis within a Level 2 SFRA could then be used to direct development away from areas at highest risk of flooding within areas benefitting from defences. Even if breach analysis is not undertaken, a Level 2 SFRA should provide more detailed</p>			

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				<p>information on flood risk than our Flood Map. Given the extent of the impact of the plan’s flooding policy, we recommend that the Parish Council waits for the Level 2 SFRA to be completed before finalising this neighbourhood plan.</p>			
Adam Ireland Environment Agency	HWSNP86	9. Flood Risk and Drainage	Have observations	<p>Policy HWNP16 – Flooding and Drainage Please note that this policy is linked to objective 17 and not 16, as indicated in this section of the document. We have some concerns with the wording of the first sentence of this policy, as detailed below. ‘No extra ‘less vulnerable’, ‘more vulnerable’ or ‘highly vulnerable’ development (as defined in Planning Practice Guidance) shall be permitted in Flood Zones 2 and 3.’ We consider that the above sentence should only be included if the Parish Council and local planning authority are satisfied that all the need for ‘less vulnerable’, ‘more vulnerable’ and ‘highly vulnerable’ development in this area can be provided outside the extent of Flood zones 2 and 3 (i.e. within Flood Zone 1). If this sentence is included in the policy then we recommend that the word ‘extra’ is removed or reworded as it is unclear what is meant by this. We also recommend that a distinction is made between undefended and defended Flood Zone 3 as some new development may be acceptable in the defended area providing the residual risk is considered – as the Level 2 SFRA might inform. Please note that the extent of Flood Zones 2 and 3 in this area will change in the near future as we have now completed our Lower Ouse model, which includes modelling of the main rivers in this area. We therefore recommend that the Level 2 SFRA, which is based on the outputs from the Lower Ouse model, is used to inform the application of the sequential approach to any site allocations in this area (i.e. development is directed away from areas at risk of flooding). We also have concerns with the wording of the second sentence of policy</p>	Yes	See above - integral to the text of our comment	

Name	Comment ID	Comment on	Support/ Object/ Have Observations	Comment	Changes required?	Proposed changes	Supporting documents
				<p>HWNP16 as set out below.</p> <p>‘Development will only be permitted where it has been demonstrated that there is adequate flood and drainage infrastructure capacity in place to serve the development without risk to existing development, either from defence breach or over-topping from events exceeding the design standard of protection.’</p> <p>The above sentence indicates that new development may be permitted in areas benefitting from flood defences – this appears to contradict the first sentence of the policy, which indicates that only ‘water compatible’ development or ‘essential infrastructure’ may be permitted within Flood Zones 2 and 3, including in areas benefitting from defences. We recommend that this sentence is re-worded to clarify that new development will only be permitted within areas benefitting from defences where the sequential and exception tests are passed and residual risk of flooding has been considered and it can be demonstrated that the development will be safe.</p> <p>The second part of the above sentence is confusing as it appears to indicate that new development in areas benefitting from defences could increase flood risk to existing development as a result of a breach or overtopping of existing defences, which is not the case. We therefore recommend that this part of the sentence is rephrased.</p> <p>With regard to the third sentence detailed below, there seems to be some confusion as to the difference between flood risk associated with surface water drainage and loss of floodplain storage.</p> <p>‘Any development which would reduce the surface water storage capacity of the site will not be permitted unless an alternative storage facility is provided to compensate.’</p> <p>We consider that the wording of this sentence should be changed from ‘surface water storage capacity’ to ‘floodplain storage capacity’ as the requirement for compensation relates to the loss of floodplain storage rather than surface water storage. Any loss of floodplain storage will need to be compensated for within the site on a level-for-level and</p>			

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				<p>volume-for-volume basis. We recommend that reference is made to the SFRA maps here as these define the extent of the 'functional floodplain' – any new development within the functional floodplain, apart from being wholly exceptional, would need to be compensated for to ensure there is no increase in flood risk elsewhere.</p> <p>We recommend that the fifth sentence is revised to make it clearer – e.g. 'Replacement dwellings and buildings will only be permitted in areas at risk of flooding if it can be demonstrated they will be substantially safer and will reduce flood risk, taking into account the effects of climate change'.</p>			
<p>Local Plans Team Huntingdonshire District Council</p>	<p>HWSNP28</p>	<p>10. Business</p>	<p>Have observations</p>	<p>Section 11 Business HWNP17 – Provision for the needs of new or expanded businesses The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice • contributes to the achievement of sustainable development • is in general conformity with the strategic policies contained in the development plan <p>Comment The policy does not conform to national guidance and the local development plan guidance on development in the countryside. Although we understand the desire to support a prosperous rural economy it is considered that this policy could offer support to a wide range of new businesses in the countryside which could be more appropriately located within the built up part of the village or in adjoining larger settlements. As written it promotes business development in the countryside without requiring any essential need for a countryside location contrary to both national and local policy.</p> <p>It is suggested that first sentence is more onerous than national guidance and that the policy should be amended to refer to the sequential test for flooding. As written it would be unduly onerous for consideration of proposals involving the expansion of existing businesses as it could inhibit</p>	<p>Yes</p>		

Name	Comment ID	Comment on	Support/ Object/ Have Observations	Comment	Changes required?	Proposed changes	Supporting documents
				<p>some from expanding at all when they might be considered a less vulnerable use anyway.</p> <p>It is suggested that the policy could be simplified by focussing on elements relevant only to supporting new or expanded businesses and moving elements addressing issues such as pollution and landscape impact to a separate policy focusing on the potential impacts of development which could be incorporated into Section 13 and applied to all types of development proposals.</p> <p>HWNP18 - Retail units in the countryside</p> <p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice <p>Comment</p> <p>A farm shop selling unprocessed goods produced on that farm is classed as ancillary to the use as a farm in most circumstances and therefore does not require planning permission rendering much of the unnecessary and incapable of implementation. The reference to other policies of the plan is unnecessary as this is addressed in Section 1.</p> <p>It is suggested that if a policy is to be included it might more usefully focus on the circumstances where it might be acceptable to have a development proposal which would involve selling a significant proportion of goods brought in from outside the holding.</p> <p>As written it is considered that the bullet points lack clarity and could be open to misinterpretation, particularly the phrase 'the offer for sale of other goods' in the second bullet. A farm shop would not be subject to any retail impact assessment so the third bullet cannot be implemented.</p> <p>It is suggested that the fourth bullet point is more onerous than national guidance and that the policy should be amended to refer to the sequential test for flooding.</p> <p>HWNP19 – Windfall residential development</p> <p>The following basic conditions are not met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice • is in general conformity with the strategic policies contained in the 			

Name	Comment ID	Comment on	Support/ Object/ Have Observations	Comment	Changes required?	Proposed changes	Supporting documents
				<p>development plan</p> <p>Comment</p> <p>This policy is inconsistent with Core Strategy Policy CS3 which supports developments which demonstrate that they secure the most sustainable option for the site. It is suggested that the policy be amended to advocate a scale of development consistent with making best use of any potential development site arising within the built-up area of the village.</p> <p>It is suggested that the second bullet point is more onerous than national guidance and that the policy should be amended to refer to the sequential test for flooding.</p> <p>The requirement for 'predominantly' two and one bed properties in the third bullet point lacks clarity and certainty in terms of providing guidance to a potential developer. It is suggested that this is amended either to direct potential developers to the relevant section of the Strategic Housing market Assessment or to provide a locally derived proportion if this can be ascertained from the evidence base submitted.</p> <p>The Lifetime Homes standards will shortly be replaced by Building Regulations with optional higher standards on accessibility. It would be more appropriate to consider these and what evidence is available to justify seeking a higher optional standard.</p> <p>The national definition of self-build housing is very wide including any custom designed or built home. The last sentence of the policy could give rise to internal conflict with the preceding criteria.</p> <p>Paragraph 12.3 - Reference to Figure 4.1 is incorrect, it should be Figure 3.</p> <p>Paragraph 12.5 - The first sentence is misleading in claiming the 'largest proportion of the population being of retirement age'; 26.3% of the population is aged 65 or older according to the 2011 Census whereas 33.6% is aged 44-64 years.</p> <p>The housing mix of the village may benefit from reference in this or another policy to the need for affordable housing. Recent changes to national guidance will remove the scope for seeking affordable housing</p>			

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				<p>contributions from sites of 10 or fewer dwellings inhibiting opportunities to promote mixed, socially inclusive developments.</p> <p>Paragraph 12.6 – This acknowledges the need to provide affordable housing in Houghton and Wyton although no evidence is put forward to substantiate the assertion as the Issues and Options Survey circulated to households did not contain any direct question concerned with the need for affordable housing. It is considered that the lack of guidance and encouragement provided for affordable housing is a missed opportunity within the Neighbourhood Plan.</p> <p>The Core Strategy (2009) contains a target for 40% of new housing development to be provided as affordable housing to help meet the substantial need within the district for homes for people who cannot afford market housing. The Neighbourhood Plan makes a number of references to the need for smaller properties in the village with a particular emphasis on the need for homes suitable for 1 and 2 person elderly households. Paragraph 12.6 notes that only 3% of properties in the parish are for social rent which is well below the district average. However, no reference is made in any policy to the desirability of promoting additional affordable housing.</p>			
Janet Nuttall Natural England	HWSNP48	Providing for the needs of new and existing businesses	Support	Policy HWNP17 requires new or expanding businesses to demonstrate that they will result in no more than a minimal increase in light, noise and air pollution. We welcome this requirement which will help to minimise the impacts of development on the natural environment including sensitive species.			
Ian Bates Cambridgeshire County Council	HWSNP36	11. Housing	Have observations	Affordable Housing (Rural Exception Sites) - more work needs to be done on this within the Plan	Yes		

Name	Comment ID	Comment on	Support/ Object/ Have Observations	Comment	Changes required?	Proposed changes	Supporting documents
John Fleming Gladman Developments LTD	HWSNP72	11. Housing	Object	<p>Policy HWNP19 – Windfall residential development</p> <p>The above policy states that small scale windfall development within the built up area boundary will be encouraged where it fulfils the criteria proposed under this policy.</p> <p>Gladman contend that Policy HWNP19 seeks to further restrict the delivery of future sustainable growth within a tightly drawn settlement boundary. This policy further applies a cap on residential development limiting the delivery of any future sustainable development opportunities to a maximum of 5 dwellings. There is no robust evidence to support the proposed development cap, this is merely an arbitrary number produced by the Parish Council to further contain the physical growth of the settlement.</p> <p>The supporting text of this policy refers to the 2013 Cambridge Sub-Region SHMA, this evidence will need to be updated to take account of the 2012 Household Projections. Until this evidence becomes available it would be premature to progress the Neighbourhood Plan to examination as it fails to take account of the national growth agenda and the need to significantly boost the supply of housing. The HWNP should not be reliant on the provision of windfall development as by their nature these sites come forward on an ad hoc basis which may not necessarily come forward. This reinforces the need to allocate sufficient level of housing land to meet local housing needs.</p> <p>Policy HWNP19 is contrary to basic conditions (a), (d) and (e) and should be deleted from the HWNP.</p>	Yes	See comment.	See HWSNP66
Local Plans Team Huntingdonshire District Council	HWSNP29	12. Design of New Development	Have observations	<p>Section 13 Design of New DevelopmentP22 HWNP20 - Design of new development</p> <p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice • contributes to the achievement of sustainable development • is in general conformity with the strategic policies contained in the development plan 	Yes		

Name	Comment ID	Comment on	Support/ Object/ Have Observations	Comment	Changes required?	Proposed changes	Supporting documents
				<p>Comment</p> <p>There may be inherent conflict between the aspirations of this policy and those of policy HWNP19 – Windfall residential development which seeks predominantly one and two bedroomed properties that may be incongruous with the nature of development in many of the identified character areas. The requirements may also be unduly onerous detrimentally affecting the viability of any proposed development. There is conflict between the sixth criterion and Policy HWNP15; this policy is more stringent and has no regard to the deliverability or viability of requiring ‘safe, accessible and well-connected routes to the centre of the village’.</p> <p>Paragraph 13.2 refers to emerging Local Plan policy LP13 ‘Quality of Design’ this is incorrectly cited. Using the targeted consultation document quoted in Section 4 this should cite policy LP18, however, it suggested that no direct policy references or quotes should be included from the emerging Local Plan to 2036 due to the likelihood that they will be out-of-date very rapidly.</p> <p>Paragraph 13.3 still refers to ‘Building for Life’ Silver (Good) standards or higher; this is out-of-date following revisions introduced in January 2015 and is no longer being pursued through the emerging Local Plan. It is suggested that this reference is deleted. It may be appropriate to replace it with reference to the Huntingdonshire Design guide.</p> <p>Paragraph 13.8 is inconsistent with Policy HWNP20 as it refers to Character Areas (as mapped in Appendix A) and requires the same criteria should be applied to development proposals within ‘transitional areas’ as to those the Character Areas. This is more onerous than the policy itself which only requires new development to respond to the heritage and distinctive features of the Character Area without reference to any nebulous ‘transitional area’. It is suggested that reference to the ‘transitional areas’ is deleted as these clearly do not merit being incorporated within the Character Area so should not be afforded equal</p>			

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				protection. They also lack clarity as are neither defined nor mapped.			
Ian Bates Cambridgeshire County Council	HWSNP37	12. Design of New Development	Have observations	Energy Efficiency, particularly water - I believe this could be added to their Plan, to include water storage, as we are in a low rainfall part of the Country.	Yes		
Ian Bates Cambridgeshire County Council	HWSNP38	12. Design of New Development	Have observations	Broadband - to the house and in the house for any future developments.	Yes		
Janet Nuttall Natural England	HWSNP49	12. Design of New Development	Support	We support requirements through Policy HWNP20 for the design of new development to protect and sensitively incorporate existing natural features, such as trees, hedges and ponds, within the site where possible and to ensure accessible and well-connected routes to the centre of the village.			
John Fleming Gladman Developments LTD	HWSNP73	12. Design of New Development	Object	Policy HWNP20 – Design of new development The above policy states that new development will be supported where it can demonstrate that it meets the design criteria set out by this policy. Whilst recognising the importance of good quality design principles, it is important to stress that any design policies proposed throughout the Plan, should be made in strict accordance to paragraphs 59 and 60 of the Framework. Failure to do so may result in the HWNP placing undue policy burdens that might affect the viability and deliverability of future sustainable growth opportunities. Gladman note paragraph 173 of the Framework which states, ‘the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to			See HWSNP66

Name	Comment ID	Comment on	Support/ Object/ Have Observations	Comment	Changes required?	Proposed changes	Supporting documents
				<p>development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.'</p> <p>Given the above, we feel that it is necessary that the policies contained in the HWNP should be properly tested for their effects on development viability and supported by an adequate and robust evidence base. In this regard, it does not appear that the Parish Council has undertaken any up-to-date viability assessment of the HWNP's cumulative obligations.</p> <p>Gladman submit that it is of crucial importance that the Neighbourhood Plan be tested for its effects on development viability to ensure that each of the policies contained in the plan do not place undue burdens on the ability of future sustainable growth opportunities being delivered viably.</p>			
John Bannerman	HWSNP88	12. Design of New Development	Support	Small-scale and sensitively designed is essential if we are to keep our local character and sense of place. Good to see self-build and high environmental standards encouraged too.	No		
Local Plans Team Huntingdonshire District Council	HWSNP30	13. Existing Development Sites - Parish Needs & Intentions	Have observations	<p>Section 14 Existing Development Sites – Parish Needs and Intentions</p> <p>At present the 'Parish Intentions' are presented neither as policy nor allocations. This reduces the weight that would be accorded to them in the decision-making process. A substantial introduction is presented to Houghton Grange (paragraphs 14.1-14.9) but very little to the Beers Garage site (paragraph 14.10) which appears inequitable. This is further confused by paragraph 14.13 which introduces the Parish Intention for Beer's Garage site appearing under the Houghton Grange heading.</p> <p>Houghton Grange site</p> <p>The following basic conditions may not be met:</p> <ul style="list-style-type: none"> • having regard to national policy and advice • contributes to the achievement of sustainable development 	Yes		

Name	Comment ID	Comment on	Support/ Object/ Have Observations	Comment	Changes required?	Proposed changes	Supporting documents
				<ul style="list-style-type: none"> • is in general conformity with the strategic policies contained in the development plan <p>Comment</p> <p>The requirements for this site are onerous and are likely to give rise to significant viability issues. The requirement for at least 40% two and one bed properties is not justified by information from the evidence for the neighbourhood plan. The national definition of self-build is very wide including any custom designed or built home and bullet point ii) may give rise to internal conflict with the other criteria.</p> <p>No mention is made of the necessity of preserving the historic integrity of the listed buildings within the site which are protected under the Planning (Listed buildings and conservation areas) Act 1990.</p> <p>The Lifetime Homes standards will shortly be replaced by Building Regulations with optional higher standards on accessibility. It is suggested that it would be more appropriate to consider these and what evidence is available to justify seeking a higher optional standard.</p> <p>Beers Garage Site</p> <p>The basic conditions are likely to be met.</p> <p>Comment</p> <p>Unlike the parish intention for Houghton Grange very limited introductory text is presented for the Beers Garage site which might beneficially set the context for this element of the Neighbourhood Plan. A technical start has been made on the current planning permission for 4 houses which means that this will not lapse and may be completed at any convenient time making the parish intention obsolete. No consideration has been paid to viability given the permitted use of this site. Given the limited size of the site it may be challenging to accommodate all the suggested mix of uses and maintain appropriate amenity levels</p>			
Local Plans Team	HWSNP31	14. Monitoring and Community	Have observations	<p>Section 15 Monitoring and Community Action Plan</p> <p>The proposal to produce monitoring targets for the Neighbourhood Plan is supported. It would be beneficial if a commitment were to be included</p>	Yes		

Name	Comment ID	Comment on	Support/ Object/ Have Observations	Comment	Changes required?	Proposed changes	Supporting documents
Huntingdonshire District Council		Action Plan		<p>in the Neighbourhood Plan concerning the dissemination of the results of any monitoring that is undertaken.</p> <p>Paragraph 15.4 is a mystery as it simply says: 'Statement of intent.'</p> <p>Paragraph 15.5 contains the only reference in the section to a Community Action Plan, signposting the reader to Appendix B. The Table in Appendix b does not constitute what the District council would expect from a Community Action Plan</p> <p>Paragraph 15.9 on the Community Right to Bid provides a list of assets of community value which may date rapidly and has potential to misinform people in the future. It is suggested that this section is incorporated within the Community Action Plan identified in Appendix B. It is suggested that the results from the Issues and Options Survey presented in Appendix E of the HWNP Consultation Statement identify a substantially wider range of potential actions that could be incorporated.</p>			

Comments on Alternative Modifications to the Houghton and Wyton Neighbourhood Plan

Comment ID	Name	Commenting on	Support/ Object/ Have Observations	Comment	Changes required	Proposed changes	Supporting documents
H+W-AltMod:1	Mr Alastair Price	Alternative Modification 1 - HWNP1 Built Up Areas	Support	The outlined built up areas represent those clearly visible at ground level. Each area has contiguous housing development	No		
H+W-AltMod:2	Mr Alastair Price	Appendix A - Methodology for Alternative Modification 1	Have observations	Whilst Houghton Grange is a separate built up area it remains part of the village and this must be recognised. Were the field to the east of Houghton Hill House ever be developed it must be recognised that this area plus Houghton Grange would then be encapsulated within the main built up area of the village.	Yes	The reference to future development would need to be an additional comment.	
H+W-AltMod:3	Mr Alastair Price	Alternative Modification 2 - HWNP3 Anti Coalescence	Support				
H+W-AltMod:4	Mr Richard Flynn	Alternative Modification 1 - HWNP1 Built Up Areas	Support	The Neighbourhood Plan tries to include local concerns with the wider need for more housing.			
H+W-AltMod:5	Mr Alastair Price	Alternative Modification 2 - HWNP3 Anti Coalescence	Support	At the time of the last formal plan HDC, as indicated in the inspector's report, supported a green gap. By definition this had to be the BBSRC field as Houghton Grange had been identified as a village development and would form the edge of the village's building line. Under European Law people are entitled to rely on commitments made by responsible officers and therefore the above comments created official HDC policy even without a formal vote. Indeed the council passed the plan in the knowledge of these comments. Again under law they have accepted the comment and are prohibited from thereafter claiming they have not.	No		

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				<p>The independent arbiter has already ruled that the alternative gap suggested by HDC is unacceptable.</p> <p>Finally, when the parish boundary between St Ives and Houghton was changed HDC specifically stated that the BBSRC field was more in keeping with the village than the town and as part of the village putting the green gap elsewhere would end up splitting the village.</p> <p>HDC has been described as having a dog in the manger attitude to the BBSRC field as the green gap. Their continued refusal to accept the existing precedents suggests HDC continues with this mindset and is ignoring the government's stated policy of supporting the will of the affected people.</p>			
H+W-AltMod:6	Cllr Doug Dew	Alternative Modification 1 - HWNP1 Built Up Areas	Support		No		
H+W-AltMod:7	Cllr Doug Dew	Alternative Modification 1 - HWNP1 Built Up Areas	Support		No		
H+W-AltMod:8	Cllr Doug Dew	Appendix A - Methodology for Alternative Modification 1	Support		No		
H+W-AltMod:9	Cllr Doug Dew	Alternative Modification 2 - HWNP3 Anti Coalescence	Support		No		
H+W-AltMod:10	Mrs Gail Stoehr,	Alternative Modification 1 - HWNP1 Built Up	Support	Hemingford Grey Parish Council support the Neighbourhood Plan revised policies on the basis that the views from Hemingford Meadow should be	No		

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	Clerk Hemingford Grey Parish Council	Areas		preserved.			
H+W-AltMod:11	Miss wendy oldfield	Alternative Modification 1 - HWNP1 Built Up Areas	Have observations	<p>Section 9 Traffic & Transport there is no mention that any Environmental surveys have been carried out in relation to traffic and noise pollution. Tests should be carried out now to establish the current levels of Nitrogen Dioxide and Airbourne Particulates before further traffic is added to this area.</p> <p>Also, in the section regarding flooding, my observations are as follows. With all the extra run off from housing planned in this area we WILL more than likely suffer from flooding if the rivers are not maintain on a more regular basis, i.e dredging to remove silt build up. We do not want another Somerset Levels situation in this area.</p>	Yes	Environmental surveys to be carried out Nitrogen Dioxide and Airbourne Particulates along with noise pollution. More dredging of the rivers.	Yes
H+W-AltMod:12	Mr Richard Wishart	Alternative Modification 1 - HWNP1 Built Up Areas	Object	There seems to be no consideration of the extra traffic or road hazards that these proposals would generate on the A1123. We live on the "Bird" estate in Hartford and are therefore directly impacted. We can no longer even get out of Owl Way or cross the main road from the bus stop to our houses. The road is completely jammed every morning "to and from" St Ives. The road network must be able to support additional development and this has not been considered - in fact not even mentioned	Yes	We need a properly designed local road system between Huntingdon and St Ives - our local road system was deliberately omitted from the four A!4 phases and when the section between Fenstanton and Huntingdon gets de-trunked this will force even more traffic onto the A1123	
H+W-AltMod:13	Miss Lois Dale Parish Clerk Houghton and Wyton Parish	Alternative Modification 2 - HWNP3 Anti Coalescence	Support		No		

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	Council						
H+W-AltMod:14	Miss Lois Dale Parish Clerk Houghton and Wyton Parish Council	Appendix A - Methodology for Alternative Modification 1	Support		No		
H+W-AltMod:15	Miss Lois Dale Parish Clerk Houghton and Wyton Parish Council	Alternative Modification 1 - HWNP1 Built Up Areas	Support		No		
H+W-AltMod:16	Miss Lois Dale Parish Clerk Houghton and Wyton Parish Council	Alternative Modification 1 - HWNP1 Built Up Areas	Support	<p>The Parish Council is wholly supportive of the Houghton & Wyton Neighbourhood Plan, including the two outstanding issues, which as now proposed have given rise to this latest consultation. In this regard we refer to the fact that HDC, in partnership with the Houghton & Wyton Neighbourhood Plan Working Group, has reached agreement on these residual matters which hopefully concludes over five years of voluntary team work and professional input into the Neighbourhood Plan process.</p> <p>This must lead to the referendum without further delay to maintain confidence in Localism in this District of Cambridgeshire.</p>	No		
H+W-AltMod:17	Miss Lois Dale	Alternative Modification 1 - HWNP1 Built Up	Support	The Parish Council is wholly supportive of the Houghton & Wyton Neighbourhood Plan, including the two outstanding issues, which as now proposed	No		

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	Parish Clerk Houghton and Wyton Parish Council	Areas		<p>have given rise to this latest consultation. In this regard we refer to the fact that HDC, in partnership with the Houghton & Wyton Neighbourhood Plan Working Group, has reached agreement on these residual matters which hopefully concludes over five years of voluntary team work and professional input into the Neighbourhood Plan process.</p> <p>This must lead to the referendum without further delay to maintain confidence in Localism in this District of Cambridgeshire.</p>			
H+W-AltMod:18	Miss Lois Dale Parish Clerk Houghton and Wyton Parish Council	Appendix A - Methodology for Alternative Modification 1	Support	<p>The Parish Council is wholly supportive of the Houghton & Wyton Neighbourhood Plan, including the two outstanding issues, which as now proposed have given rise to this latest consultation. In this regard we refer to the fact that HDC, in partnership with the Houghton & Wyton Neighbourhood Plan Working Group, has reached agreement on these residual matters which hopefully concludes over five years of voluntary team work and professional input into the Neighbourhood Plan process.</p> <p>This must lead to the referendum without further delay to maintain confidence in Localism in this District of Cambridgeshire.</p>	No		
H+W-AltMod:19	Mr Chris Butterworth	Alternative Modification 1 - HWNP1 Built Up Areas	Support	<p>Crucial to have a thorough, detailed and balanced opinion of the built-up and open area. This definition clearly reflects such. The gap, particularly the BBSRC field and Thicket separating the two different communities is clearly defined through this analysis.</p>	No		
H+W-AltMod:20	Mr Ian Douglas	Alternative Modification 1 - HWNP1 Built Up Areas	Support	<p>I fully support the current H & W amended plan which complies with the inspector's requirements.</p>	No		
H+W-	Mr	Alternative	Support	<p>South of the 1123, there remain now only one clear</p>	No		

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AltMod:21	Ian Douglas	Modification 2 - HWNP3 Anti Coalescence		break between the villages of Houghton & Wyton and St. Ives, and that break must be clearly identified as is now proposed. It is not enough simply to accept the principle of non-coalescence. The break rigorously defined.			
H+W-AltMod:22	Mr Anthony Garside	Alternative Modification 1 - HWNP1 Built Up Areas	Support	<p>Please take this submission as a statement of SUPPORT for the latest version of the Houghton & Wyton Neighbourhood Plan</p> <p>I commend this latest version as a valuable and practical document offering clear guidance to the planning process within the Parish of Houghton and Wyton</p> <p>Extending the definition of the anti-coalescence gap to the east of The Grange, to include the extension to the North is a key element of the document.</p>	Yes		
H+W-AltMod:23	Mr Lewis Denton	Alternative Modification 2 - HWNP3 Anti Coalescence	Support	The settlement gap identified in Policy HWNP3 is the only significant undeveloped area, which runs uninterrupted from the A1123 to the Thicket Path, which separates the built up area of Houghton and Witton village and the town of St. Ives. If it is desirable to ensure that the village does not merge with St. Ives (and the Inspector on page 24 of her report fully recognises and accepts that) then it is necessary to have a policy such as HWNP3 in order to achieve that objective. It seems to me that the value of such an "anti-coalescence" policy would be seriously diluted if the area to which it applies is not clearly defined, as it could lead to endless argument at appeal and elsewhere as to exactly which areas of land the policy applies. This is particularly so where, as in this case, the gap which needs to be protected is the only significant undeveloped area between the two settlements, namely the area known locally as the BBSRC field.	No		

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				<p>In these circumstances the logical step is to define in a map the area of land to which the policy applies. The legality of such a step and its' conformity with current development plan policies has been confirmed in a legal opinion obtained by the Parish Council, and which is available on the Consultation website. There is therefore no reason why the area covered by the policy should not be defined in a map as part of the HWNP.</p>			
H+W-AltMod:24	<p>Mr John Fleming Gladman Developments LTD</p>	<p>Houghton and Wyton Neighbourhood Plan: Proposed Alternative Modifications</p>	<p>Object</p>	<p>The Independent Examination of Neighbourhood Plans is intended to ensure that those plans meet the basic conditions under paragraph 8 of Schedule 4b together with a number of other mandatory legal requirements. The Independent Examiner's Report published in December 2015 makes clear that:</p> <p>"I am satisfied that the Houghton and Wyton Neighbourhood Development Plan, subject to the modifications I have recommended, meets the basic conditions and the other statutory requirements outlined earlier in this report.</p> <p>I am therefore pleased to recommend to Huntingdonshire District Council that, subject to the modifications proposed in this report, the Houghton and Wyton Neighbourhood Development Plan can proceed to a referendum..."</p> <p>Gladman support a number of modifications implemented by the examiner and consider that the changes to the HWNP were necessary to ensure that the plan meets the basic conditions. Gladman however feel that modifications made by the District and Parish Councils have in a number instances overturned and reversed the Examiners changes and in doing so have taken the HWNP policies back into a state of non-compliance with the basic conditions.</p>			<p>Yes</p>

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				<p>It is further noted that the Council’s website states ‘The Houghton and Wyton Neighbourhood Plan Working Group has drawn up alternative modifications that seek to address the concerns of the Examiner, meet the Basic Conditions and reflect both the views of the residents of Houghton and Wyton and the spirit of the submission neighbourhood plan.’ Whilst the Parish Council may not agree with the recommendations put forward by the Independent Examiner, the statutory framework for examination of neighbourhood plans sets out a singular and consecutive pathway by which independent examination takes place against the basic conditions. The Examiner’s recommendations and modifications proposed were necessary to ensure that the Neighbourhood Plan meets the basic conditions as required by primary legislation. It should be noted that modifications can only be made by two bodies; the independent examiner and the local planning authority, it does not allow a Parish Council to implement its own modifications subsequent to the examination process.</p> <p>Policy HWNP1 – Village Limits/Built Up Area</p> <p>The Examiner clearly recognised the inconsistencies of the policy proposed in the HWNP with the provisions established through the National Planning Policy Framework (the Framework) and the direction taken through the adopted Development Plan and the need to be supported by proportionate and robust evidence.</p> <p>The changes undertaken by the Parish Council to the Examiner’s recommendations in seeking to reverse the decision to delete the proposed policy is not considered appropriate. In that the introduction of a</p>			

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				<p>settlement boundary policy in a manner such as the one proposed is inconsistent with the provisions of the Framework, specifically the presumption in favour of sustainable development (paragraph 14) and the need to boost significantly the supply of housing (paragraph 47).</p> <p>Policy HWNP3 – Anti Coalescence</p> <p>Gladman reiterate the comments previously raised through the Regulation 16 consultation and consider that new development can often be delivered on the edge of settlements without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character.</p> <p>Whilst this policy largely reflects the Examiner’s proposed modification, we would question why the inclusion of the wording ‘which currently exists’ has been added to the proposed modification. The proposed modification would lead to a moratorium against development proposals in this location and counter to the examiner’s recommendations that would allow a decision maker to apply the planning balance when considering whether a development proposal would lead to the loss of visual and physical separation of settlements or lead to their coalescence.</p> <p>It should further be noted that no reasons for the justification of this inclusion has been provided as required by paragraph 13(1) of Schedule 4B (as amended). Gladman therefore question the ability to introduce modifications when no justification has been provided as to a ‘different view taken’ for the need for an alternative modification.</p>			

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				<p>Conclusion</p> <p>Gladman consider that some of the changes proposed have not been to the benefit of the HWNP. Whilst the changes may appear to be minor in scope (in some cases the inclusion of a few words) these will have significant implications and are in fact major changes which go to the overall suitability of the Plan.</p> <p>Gladman submit that the Examiner’s changes were those necessary to bring the HWNP in line with the basic conditions. However, the Council are now seeking to reverse these necessary changes and brings into question whether Plan is consistent with the basic conditions.</p> <p>Should the Council proceed with the proposed modifications which conflict with those modifications recommended by the Examiner, then this should be referred back to the Independent Examiner for further consideration, otherwise it will likely be an area of contention for those promoting land interests in the neighbourhood area.</p> <p>In this regard it is not permissible to appoint a different Examiner, paragraphs 7 to 11 of Schedule 4b identify a single examiner. Ann Skippers was appointed the sole Examiner of the HWNP, and if the Council progress on the proposed modifications then this matter should be referred back to the Examiner for further consideration.</p>			
H+W-AltMod:25	Mr James Holden	Alternative Modification 1 - HWNP1 Built Up Areas	Support	The changes to the Built Up Areas and Anti Coalescence policies have strengthened the plan considerably, particularly in providing a clearly defined and mapped boundary line for the built up areas which adds clarity to this important aspect of	No		

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				the report. In addition, the anti-coalescence policy does a very good job of defining the importance of the barrier between the village and St Ives and the centrality of the Thicket path (which is a much loved part of the village) to this buffer. I also wish to reiterate my support for the remainder of the Plan, which I commented on more fully during the original consultation.			
H+W-AltMod:26	Mrs Bridget Flanagan	Alternative Modification 1 - HWNP1 Built Up Areas	Support	<p>As one of the group who supported the designation of the part of the Ouse Valley between St Ives and Huntingdon - and beyond- as an Area of Outstanding Natural Beauty, and also as a local resident of 30 years who researches, publishes and campaigns for the protection and recognition of heritage matters in this area, I fully support Houghton & Wyton's Neighbourhood Plan and its subsequent amendments.</p> <p>The Plan is important, and will act as another tool to strengthen the preservation of the exceptional landscape of the Ouse Valley. This countryside is a precious, fragile asset for residents and the many tourists who enjoy its beauty. The views from and to the Houghton Hillside are an intrinsic part of the setting of the Hemingford and Houghton villages and also of the town of St Ives. It is very commendable that the Houghton & Wyton Plan seeks to defend them.</p>	No		
H+W-AltMod:27	Mr David Mead Partners In Planning on behalf of Mr William King	Alternative Modification 1 - HWNP1 Built Up Areas	Object	I object to proposed built-up area line as shown on the submitted plan. The previous Inspector made it clear that the such specifically defined built-up areas are not appropriate for this Neighbourhood Plan. However, if such a boundary is proposed then the proposed line on the plan should be amended. I have included a plan that shows the proposed change to make it acceptable (green on the plan). The current red line effectively follows the outside wall of the	Yes	Amend built-up area plan as proposed on the attached in green at The Moorings. The green line follows the existing flood bank line which is a defined physical feature.	Yes

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				<p>current dwelling at The Moorings and fails to include the residential curtilage. As proposed at the moment the red line does not follow the criteria set out in Appendix A HWNP Policy 1 Built Up Areas Methodology. This states that "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." The suggested boundary at The Moorings does not follow this criteria at all. Neither does it comply with the exceptions. The only one of any relevance is the one that refers to large curtilages that relate more to the open countryside. In this case that is not so as the garden land to The Moorings, particularly to the flood bank is clearly not related at all to the countryside. Furthermore the drawing of the line tight up against the dwelling itself contradicts the 15m rule applied to other properties. A site survey has been attached. The proposed amended built-up area line should follow the flood bank line, which is a clear defined physical feature.</p>			
H+W-AltMod:28	<p>David Carlisle, AECOM on behalf of Claire</p> <p>Hupton Specialist – Public Sector Land Team, South East Homes and Communities Agency</p>	Houghton and Wyton Neighbourhood Plan: Proposed Alternative Modifications	Object	<p>The Homes and Communities Agency (HCA) have appointed AECOM to provide multi-disciplinary services, including planning, in relation to the Houghton Grange site in St Ives, Cambridgeshire. The site was formerly under the ownership of BBSRC (Biotechnology and Biological Sciences Research Council) before being transferred to the HCA. As a major landowner within the Neighbourhood Plan area, the HCA's ability to meet its statutory objectives will be adversely affected by the proposed modifications in their current form and it objects to elements of the alternative modifications.</p> <p>The below comments concern detailed matters of policy interpretation and application and should not be interpreted as an objection against the</p>			4549086

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				<p>neighbourhood plan as a whole. The HCA are supportive of the emerging neighbourhood plan and it is clear a great deal of time and effort has gone into its production. The HCA look forward to working with the Qualifying Body (QB) as its plans for Houghton Grange are taken forward.</p> <p>1. Modifications permitted post examination and prior to referendum</p> <p>The Town and Country Planning Act 1990 Schedule 4b Section 10(3) states what modifications can be proposed by the examiner. The examiner in her report has suggested a number of changes based on errors or recommendations to secure that the plan meets the basic conditions as stipulated in the Act. Schedule 4b Section 12(6) of the Act states that the only modifications that the authority may make are:</p> <p>a) modifications that the authority consider need to be made to secure that the draft order meets the basic conditions mentioned in paragraph 8(2);</p> <p>b) modifications that the authority consider need to be made to secure that the draft order is compatible with the Convention rights;</p> <p>c) modifications that the authority consider need to be made to secure that the draft order complies with the provision made by or under sections 61E(2), 61J and 61L;</p> <p>d) modifications specifying a period under section 61L(2)(b) or (5); and</p> <p>e) modifications for the purpose of correcting errors.</p> <p>The alternative modifications proposed do not simply</p>			

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				<p>seek to 'secure that the plan meets the basic conditions'. Instead they are an attempt to introduce new policy and evidence that extend beyond the limits of the policy intent as originally submitted and examined. HWNP1 previously set out provisions for when development would be acceptable in the countryside, a policy to prevent development in high risk flood areas and a general presumption in favour of sustainable development in built up areas.</p> <p>The examiner was advised by Huntingdonshire District Council (HDC) that defining boundaries would be 'counterproductive', further the examiner considered the indicative boundary 'lacked evidence' for its justification and the plan included a 'very limited explanation' of the built up area boundary. This led the examiner to make the simple recommendation that the entire policy be deleted. The new boundary and accompanying methodology do not address the previous failings.</p> <p>Based on the legislation quoted above, there is no justifiable reason for the difference in approach put forward for consultation from HDC. The revised HWNP1 is not as a result of any new evidence. 'Appendix A HWNP Policy 1 Built Up Areas Methodology' is a series of guiding principles and a wish list from the QB and not an objective piece of evidence. There are no new facts that have come to light following the examination that could lead HDC to propose this modification in conflict with the examiner's recommendation and no obvious justification for the different view taken by the authority as to a particular fact.</p> <p>This raises significant procedural issues: firstly, the examiner has assessed the plan in good faith based upon the intent and policy context at the</p>			

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				<p>examination stage; and secondly, consultees are now being asked to comment on an entirely new policy with new supporting material only made available post-examination. The HCA would urge HDC to send all representations attached to this consultation back to the examiner so that a thorough analysis of the legal and planning implications can be considered. The correct stage for testing new policies is prior to submission of the plan; the thrust of the new policy did not feature at the Regulation 14 or Regulation 16 consultation stages (under The Neighbourhood Planning (General) Regulations 2012). It is unfair to introduce new policy at this late stage without full and proper consultation and analysis (including justifications detailed in the accompanying consultation statement and basic conditions statement).</p> <p>2. Alternative Modification 1</p> <p>The HCA welcome the deletion of Figure 3: Indicative Built Up area of Houghton and Wyton. Notwithstanding the points raised above, the HCA has the following issues with the proposed modification:</p> <p>i. The cluster of buildings on the Field site are erroneously excluded from the built up area, yet are approximately 100m from the other buildings within the HCA landholding. The buildings lie in the 'immediate surroundings' of Houghton Grange (as per the draft policy wording) and cannot be described as 'open countryside'. This is clearly 'built up' land containing buildings of the same character and lawful use as found on the Houghton Grange site.</p> <p>ii. The methodology set out in 'Appendix A HWNP</p>			

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				<p>Policy 1 Built Up Areas Methodology' states that: 'it is designed to be applied through a combination of Ordnance Survey mapping, aerial and ground photography, site visits and local knowledge.' Yet the paper excludes any photographic evidence or quantitative/qualitative analysis garnered from site visits or local knowledge to justify the boundaries in 'Map 1 Houghton and Wyton - proposed built up area'.</p> <p>iii. Appendix A states that: '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.' It is unclear how a partial inclusion of the HCA's landholding (including the south west corner of the Field) shall future proof the NP. The best way to future proof the plan would be to facilitate the comprehensive planning of the entire site. By ignoring the development potential of the Field (in particular the previously developed land) the neighbourhood plan may become out of date, for example if this approach conflicts with policies in the emerging Local Plan that is adopted after the making of the neighbourhood plan. In such cases, the more recent plan policy takes precedence. In addition, where a policy has been in force for a period of time, other material considerations may be given greater weight in planning decisions as the evidence base for the plan policy becomes less robust. As stated there is no objective evidence to support HWNP1 at present. The Planning Practice Guidance (PPG)¹ recommends that to avoid the likelihood of a neighbourhood plan becoming out of date once a new Local Plan is adopted, communities preparing a plan should take account of latest and up-to-date evidence of housing need. There have been recent consultations² that have highlighted the potential of</p>			

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				<p>the Field site. To exclude it from the built up area ignores the most up to date evidence and is contrary to national policy and guidance.</p> <p>iv. Page four of Appendix A advises that built up areas will exclude properties detached from the built area: 'to avoid areas of intervening countryside being unnecessarily included within the built up area properties which are physically or visually detached should be excluded.' This suggests the cluster of buildings on the Field site should (as a minimum) have been included as part of the built up area. A traffic light controlled junction (Figure 1) has been constructed on a widened section of Houghton Road which provides access to the Slepe Meadow development and which will also serve an allocated housing development within the grounds of Houghton Grange by means of a new access road across the Field. An upheld appeal from 2015 on Land at the former St Ives Golf Course also provides for future connections into to eastern edge of the Field. The Inspector considering the 2015 appeal³ remarked that: 'To the east and west that site [Houghton Grange] would not be contiguous with the present built up areas of either Houghton village or St Ives. However to the north east only the width of Houghton Road would separate the Houghton Grange housing site in Houghton and Wyton from the Slepe Meadow housing within the boundary of St Ives Town.' Previous consultations on the emerging Local Plan (see Figure 2) also recognised the importance of the new connections (shown as purple arrows) and the close functional relationship between the Field site and the land west of St Ives.</p> <p>(See attached for figures 1 and 2)</p> <p>3. Alternative Modification 2</p>			

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				<p>The HCA support the changes to the policy text recommended by the examiner and the deletion of Figure 7 Local Settlement Gap. However, the policy is now accompanied by a lengthy four pages of new text; the content of which will skew the application of the suggested policy wording and focus it almost exclusively back on to the Field site. As highlighted in the 'Consultation Note Consultation Notes for Alternative Modification 2 HWNP3 Anti Coalescence':</p> <p>'Supporting texts to planning policies are relevant in determining the proper application of planning policies, albeit that the supporting text is not itself policy' (R (Cherkley Campaign Ltd) v Mole Valley DC [2014] EACA Civ 567 at para 16).'</p> <p>It's clear the examiner was trying to avoid an occurrence where a gap location and size is fixed in the neighbourhood plan, hence the change in emphasis to an anti-coalescence policy and removal of Figure 7. The introductory text and justification are used as a means of circumventing the examiner's recommendations and maintaining the thrust of the original policy, which in the opinion of the examiner failed to meet the basic conditions. The intent of this additional wording is made clear in the following sentence on page 1 of the proposed modification: 'Whilst the BBSRC field together with the Thicket wood immediately to the south of it, remains the cornerstone of this policy'</p> <p>The examiner was clear that there was 'little evidence in the Plan to support the identification of the BBSRC field as a settlement gap' with no assessment dealing with the features of the 'landscape or for its visual importance and so on'. The landscape section of the PPG states that:</p>			

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				<p>'..where appropriate, landscape character assessments should be prepared to complement Natural England's National Character Area profiles. Landscape Character Assessment is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change and may be undertaken at a scale appropriate to local and neighbourhood plan-making.'</p> <p>The examiner did however support the intent of the policy (i.e. prevent physical and visual coalescence between St Ives and Houghton). The HCA's aims for developing the Field can be delivered in accordance with this aim through well-planned development and design. The HCA, like the previous landowner of the site, would argue that the best available strategic gap is located between St Ives and Houghton to the west of Houghton Grange.</p> <p>The plan is not supported by any landscape evidence, and therefore fails to have regard to national policies and advice contained in guidance issued by the Secretary of State or contribute to the achievement of sustainable development (the first two Basic Conditions). Paragraph 16 of the National Planning Policy Framework is concerned with neighbourhood planning. The application of the presumption in favour of sustainable development has implications for how communities should engage in neighbourhood planning. Critically, it means that neighbourhoods should:</p> <ul style="list-style-type: none"> ♣ 'develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; 			

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				<p>[and]</p> <p>♣ plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan’</p> <p>The proposed new text makes only a passing reference to the gap on the western edge of Houghton Grange: ‘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’.</p> <p>The HCA’s view is that this sentence underplays the significance of the last remaining undeveloped tract of land between St. Ives and Houghton in both directions north and south. The examiner recognised the importance of this land in her report:</p> <p>‘In addition the inclusion of an open area to the west of Houghton Grange seemed to me to be at odds with the community’s desire to ensure separation between Houghton and St Ives.’</p> <p>The Houghton and Wyton Conservation Area Character Appraisal (adopted November 2012) notes Houghton Hill House has the ‘open feel of informal parkland’ which ‘remains across a considerable area of the hill, despite the introduction of low density housing on the western and northern fringes of the park in the latter part of the C20th’.</p> <p>The QB commissioned a legal opinion from Landmark Chambers to inform the proposed modifications, relating to advice on the basic conditions, consistency with the development plan and whether the Field should be specifically allocated as a</p>			

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				<p>separation gap (summarised in the 'Consultation Notes for Alternative Modification 2 HWNP3 Anti Coalescence'). The note states that the 1995 extant Local Plan policies provide, as a starting point, explicit protection against development for the BBSRC Field. However, the note also concedes that (our emphasis): 'it is evident that, whatever the full extent of the policy's aims, it does confer protection on at least some of the BBSRC Field.'</p> <p>This matter was considered in detail by the Inspector during the 2015 St Ives Golf Course appeal decision. The Inspector was more critical of the saved policies and as a consequence attached minimal weight to them (our emphasis):</p> <p>'21... By including the word 'normally' [in policy EN15] it allows for exceptions but does not indicate in what circumstances they may arise.</p> <p>28. Notably, neither the policy nor its supporting text indicate that the intended role of the 'gaps for protection' is as a means of preserving the separate identities of settlements. Also it would be very unusual to define a policy gap only along one edge and to do so would seriously hinder its interpretation and implementation. Neither does the supporting text provide any clarification as to what is meant here by a gap and how it is to be defined. An alternative explanation is that Policy En15 refers instead to gaps made by open spaces within the built up area...</p> <p>29. At the Inquiry the Council acknowledged in closing that Policy En15 is 'not the easiest to interpret.' I consider that the policy is unclear in its application and aims...</p>			

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				<p>69... [the appeal scheme] would only reduce and not remove the physical gap between St Ives and Houghton.</p> <p>70. The appeal proposal has been designed to stand alone but its layout would also be compatible with the more comprehensive development of the adjoining land [Houghton Grange and Field] envisaged by the draft HLP2036...If the HLP2036 does reach adoption in its present format the effect would be that development on the south side of Houghton Road would be continuous between the existing edge of the built up area as far as (and including) the Houghton Grange land. However the HLP2036 does not propose development of the open farmland and large gardens to the west of Houghton Grange where an open gap would remain between Houghton Grange and the main body of this large village.'</p> <p>Policy EN15 inset map (Figure 3 overleaf) only includes the 'open spaces and gaps protection' notation for a third of the width of the Field site fronting Houghton Road. Whilst the Core Strategy saved those policies, it should not be interpreted as supporting no development whatsoever on the Field site. There are still a substantial number of homes ~200 to deliver on greenfield land in this broad location under strategic policy CS2. The overall greenfield target of 400 units cannot practically be achieved without the HCA's landholdings.</p> <p>EN15 read alongside the Inset Map notation and Core Strategy key diagram would suggest, as a minimum, that the western portion of the Field is entirely suitable for development based upon its shared characteristics with the Grange e.g. buildings, roads and hard standings. In addition, HDC has signaled that in a practical sense the principle of</p>			

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				<p>development is acceptable in this location following a grant of permission for Slepe Meadow and the accompanying junction delivered as part of that scheme. The junction was delivered with a view to providing adequate access and egress to a future substantial development of the Grange and Field site.</p> <p>(see attached for figure 3)</p> <p>The Consultation Note takes the position that CS2, read alongside its supporting evidence (i.e. Housing Land Availability Study (2007) / Strategic Housing Land Availability Assessment (2008)) did not envisage development on the Field. But it is not clear beyond any doubt that CS2 excludes the Field; neither the policy text nor supporting text excludes the Field. High-level land assessment (especially prior to the NPPF and its greater focus on viability) do not constitute planning policy. It is strongly disputed that HDC would be opposed to development on the Field (in its entirety) and in advance of more thorough and detailed assessment that would accompany masterplanning and a planning application. The fact that the target of 400 units has not been met in 8 years since adoption further highlights the critical role the HCA's land can play against this extant target and for the new emerging Local Plan strategy to meet objectively assessed housing need over the next plan period.</p> <p>Much is made of the references to the gap in the 2007 and 2008 SHLAAs, but neither document includes a detailed analysis or references to objective evidence describing its significance or practical implementation. Similarly, whilst the Core Strategy Inspector stated that: 'separation between St Ives and Houghton should be retained', no further details</p>			

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				<p>are discussed with regards to location or the quantity of land required. The Core Strategy pre-dates the NPPF, the decision to allow Slepe Meadow and emerging Local Plan work (conducted in the NPPF context) contradicts aspects of the earlier SHLAA assessments. Development since 2009 has built up around the north and east of Houghton Grange and Field. The consultation note does not reflect this change to the evidence base, increasing urbanisation or emerging policy position. The 2015 appeal Inspector acknowledged in his decision that the issue in relation to the Field might not finally be resolved until the forthcoming Local Plan reaches adoption since by reason of S38(5) that could potentially override the HWNP policy if there was 'to any extent' a conflict.</p> <p>The consultation note is predominantly concerned with the basic condition for general conformity with the strategic policies contained in the development plan. It is quite wrong for the note to make the assertion that (our emphasis):</p> <p>'On the basis of the Examiner's Report, it is clear that the sole impediment to finding Policy HWNP3 to comply with the basic conditions was the examiner's view that Policy HWNP3 does not comply with Core Strategy Policy CS2.'</p> <p>The examiner clearly discusses the Basic Conditions in relation to supporting sustainable development (including environmental constraints, patterns of development) and conformity with national policy:</p> <p>'A balance must be struck between the Government's support for localism and its drive to provide more housing. I have carefully considered</p>			

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				<p>this issue and have, on balance,</p> <p>reached the conclusion that the identification of a proposed gap cannot be considered</p> <p>to meet the basic conditions...Therefore designation of the gap would prevent,</p> <p>or, at the very least, make it harder for the District Council to plan for the strategic</p> <p>needs of the District, particularly given various constraints including flooding in the</p> <p>area. As a result I consider the proposed gap cannot be said to...pay sufficient regard to</p> <p>national policy and advice or would contribute to the achievement of sustainable</p> <p>development.'</p> <p>Ultimately neighbourhood plans must give sufficient clarity to enable a policy to do the development management job it is intended to do; or to have due regard to Guidance. For example, the Planning Practice Guidance⁴ explains that:</p> <p>'A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.'</p>			

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				The proposed new text for HWNP3, which describes the Field in great detail, is prejudicial to the achievement of sustainable development and predetermines the principle of development in this location in advance of the forthcoming Local Plan strategy and in contravention of CS2. By attempting to diminish the examiners recommendations the new wording shall create an additional layer of confusion and complexity in addition to extant policy and previous PINS decisions. The examiner's suggested policy should be incorporated with the originally submitted text (paragraphs 5.5 and 5.6) amended to refer to anti-coalescence and not a gap. In addition, paragraph 5.7 should be deleted as it describes an emerging Local Plan policy which is subject to change.			
H+W-AltMod:29	Edward James Historic England	Houghton and Wyton Neighbourhood Plan: Proposed Alternative Modifications	Have observations	<p>We provided comments on the draft Neighbourhood Plan in December 2014 and note that our concerns were addressed in the submission version in May 2015.</p> <p>We welcome the proposed modifications to the Neighbourhood Plan. We consider that they provide a greater level of clarity and understanding, with respect to identifying and managing development in and around the built up areas referred to in Policy HWNP1. It is, however, recommended that other maps within the neighbourhood plan (for instance figures 7 and 8) also are modified to include the updated built up area boundary lines.</p>			4549267
H+W-AltMod:30	Allan Witherick St Ives Town Council	Houghton and Wyton Neighbourhood Plan: Proposed Alternative Modifications	Support	See attached	No		4549273

