

Report of representations received on the Bury Village Submission Neighbourhood Plan and considered by the Examiner

Representations can also be found at: <http://consult.huntingdonshire.gov.uk/portal/>

Name	Organisation Details	Agent	Agent Name	Comment ID	Comment Type	Comment	Changes required?	Proposed Changes
	Burton Brothers		Chloe Ballentine	BYNP:6	Have observations	By way of background, our client is the owner of the Burton Brothers' site, located within the designated Bury Neighbourhood Area, inside the defined settlement boundary of Bury. A plan enclosed, identifies our client's site comprising of four different components: 1. Petrol filling station to the west of the site (edged red). 2. Car showroom to the east of the petrol filling station and occupied by Burton Brothers in the form of a self-contained showroom (edged blue). 3. Workshop and parts store within the south eastern part of the site, occupied by Burton Brothers and consisting of a workshop and separate parts store served by an independent access from the south of the site off the B1040 (edged purple). 4. Yard - within the eastern part of the site and used for open car storage (edged green). The site is in active use and therefore our client wishes to ensure that the emerging BNP is positively prepared to ensure its existing operations and future development opportunities are protected and supported.	Yes	Policy ISF5 (Community Assets) We consider this policy to be in general conformity with paragraph 92 of the National Planning Policy Framework (NPPF, 2019) and Policy LP22 - Local Services and Community Facilities - of the Huntingdonshire Local Plan to 2036, subject to our qualifications below. Under this policy, Burton Brothers Filling Station is referenced within a list of community assets whose loss will be resisted in the first instance, which we have no specific objections to at this time. However, its description has been expanded within the supporting policy text, at paragraph 29.4, with the following references being made: vehicle repairs and servicing is available at Burton Brothers, and Burtons Garage. As shown on the enclosed plan, the vehicle repairs and servicing (edged in purple) at our client's site are separate elements to the petrol filling station (edged in red). If reference to the petrol filling station is to be retained in Policy ISF5, the supporting text

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								<p>should be clear that this policy only relates to the petrol filling station. This is because the petrol filling station is the only operation on our client's site which is used on a daily basis, and the others are not key services and facilities on the local road network and as such should not be subject to the policy. Policy G1 (Definition of 'Built-up Area' Settlement Boundary) We strongly support the intention of this policy to permit development on non-allocated sites within the settlement boundary in principle to achieve the delivery of sustainable development, in line Huntingdonshire Local Plan's spatial strategy and NPPF. Policies ISF1 (Sustainable Transport), ISF2 (Highway Impact) and ISF4 (Infrastructure Provision) We are generally supportive of these policies with the qualification that policy wording should confirm that on individual sites, site-specific circumstances, feasibility and viability will need to be considered. This will ensure that development on sites (including development that has been strategically identified) is achievable and deliverable. To ensure conformity with the NPPF, it should therefore be made clear within these policies</p>

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								that developer contributions will only be sought if they meet all of the relevant national tests, as set out in paragraph 56 of the NPPF.
Local Plans Team	HDC			BYNP:12	Have observations	Land Ownership - The Council has assessed land in its ownership within the Parish of Bury and can confirm that the policies within the Neighbourhood Plan do not impact upon them.		
Local Plans Team	HDC			BYNP:14	Support	Sustainable Development - The Neighbourhood Plan responds well to the basic condition of sustainable development contributing to environmental, economic and social objectives. Key improvements and careful consideration to viability and the implementation of policies could be enhanced to ensure sustainable and deliverable policies.		
Local Plans Team	HDC			BYNP:16	Support	Policy G1 - Support - The Council confirms that the settlement boundary is compliant with the written built-up area definition in Huntingdonshire's Local Plan to 2036. Paragraph 19.1 of the supporting text usefully signposts readers to Local Plan strategic policy 'LP7 Spatial Planning Areas' which identifies Bury as part of the Ramsey Spatial Planning Area. This provides spatial context for Bury from a strategic spatial perspective and general conformity with the Council's Strategic policies.	No	

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Local Plans Team	HDC			BYNP:24	Support	Policy ISF 3 - Support The policy conforms to strategic policy 'LP3 Green Infrastructure'. The supporting text to the policy provides a local focus identifying areas for improvement and justification.	No	
Local Plans Team	HDC			BYNP:28	Support	Policy ISF 5 - Support This policy conforms to paragraphs 83d and 92a, c and d of the NPPF by guarding against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day to day needs. It also ensures that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community. The policy also allows for the expansion and improvement of community facilities, where land may not be currently available to do so.		
Local Plans Team	HDC			BYNP:30	Have observations	Policy NE1 - Have observations The Bury Village draft neighbourhood plan included a larger portion of land for the Ramsey Golf course Local Green Space which the Council believed did not meet the criteria in paragraph 100 of the NPPF. This area has been reduced in the Submission Plan. It is unclear whether the relevant landowners have been specifically contacted about proposals to designate their land. This evidence should be made clearly available as a		

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						supporting document. This is especially pertinent for the Golf Course in its role as an active business enterprise. (See National Planning Practice Guidance reference ID: 37-019-20140306). It may be beneficial to consider whether the designation of any Local Green Space may affect future plans for the potential expansion or relocation of community playing fields (see ISF 5).		
Local Plans Team	HDC			BYNP:34	Have observations	Monitoring and Review, paragraph 38.1 - Have observations It would be useful to include additional information detailing how the Parish will review the Plan and where this information can be found, even if this is reported annually at Parish Council Meetings. Including a list of monitoring indicators could also be beneficial to assess whether the plan is being implemented correctly, this would be the responsibility of the Parish Council to monitor annually. Ensuring a transparent monitoring process could assist in justifying whether the Neighbourhood Plan is still considered up-to-date.	Yes	It would be useful to include additional information detailing how the Parish will review the Plan and where this information can be found, even if this is reported annually at Parish Council Meetings. Including a list of monitoring indicators could also be proposed changes
Local Plans Team	HDC			BYNP:32	Have observations	Policy NE2 - Support The appeal decision APP/H0520/W/16/3155400 mentioned in supporting paragraph 36.5 notes that the material harm to the site's character, appearance and significance would outweigh	No	

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						any benefit that might be derived through development and therefore the Parish seems justified in their assessment that the site forms an important settlement break.		
Local Plans Team	HDC			BYNP:26	Have observations	<p>Policy ISF 4 - Have observations This policy supports paragraphs 83, 92, 96 and 97 of the NPPF by encouraging the retention of, and access to, local services and community facilities in rural areas and planning positively for social, recreational and cultural facilities.</p> <p>Paragraph One: The needs arising from development and meeting the statutory tests are a negotiable item (in line with SPD requirements and the Community Infrastructure Levy Regulations); improvements to Bury Village Hall can only be supported if it can be shown to be necessitated solely by the development. It should also be noted that developments are not liable for ensuring community infrastructure for the existing population. The Parish Council may wish to consider other forms of funding for this, where S106 (Section 106 agreements) would not be appropriate, as well as their CIL meaningful proportion. A list of priority projects allows a useful focus for developer contribution negotiations and would need justification through evidence. It may be helpful to mention if these priorities are in any particular order of need, due to the planned growth</p>	Yes	It may be helpful to mention if the priorities are in any particular order of need, due to the planned growth or an existing deficiency to assist in negotiations. Provision of 'a possible' sports hall, youth club and playing field should be reworded for clarification. Has the Parish considered the issue of digital infrastructure and whether this is a priority for the Parish considering its rural setting? Digital infrastructure and access to reliable internet connections can be an issue in rural areas. Notice boards are not something that should be highlighted as a requirement under planning obligations, so should not be included in the policy.

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						<p>or an existing deficiency to assist in negotiations. General comments on priorities and projects Provision of 'a possible' sports hall, youth club and playing field should be reworded for clarification. Evidence of need for sports facilities across the plan period can be found in INF/08 - Huntingdonshire Sports and Leisure Facilities Strategy 2016-21 (2016) . This has been usefully referenced in paragraph 28.7 of the supporting text. Has the Parish considered the issue of digital infrastructure and whether this is a priority for the Parish considering its rural setting? Digital infrastructure and access to reliable internet connections can be an issue in rural areas. The reference to satisfactory arrangements for ongoing management and maintenance would need to be agreed in line with the Developer Contributions SPD or successor document and cannot introduce requirements that are over and above what is stated in that document. It would be helpful to clarify this to ensure that the policy conforms with Local Plan strategic policy 'LP 4 Contributing to Infrastructure Delivery'. Notice boards are not something that should be highlighted as a requirement under planning obligations. If these are a priority it is suggested that they are referenced as such but funded via</p>		

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						the Parish Council precept with appropriate maintenance provided.		
Local Plans Team	HDC			BYNP:22	Support	<p>Policy ISF 2 - Support Paragraph Two: Informative: It should be noted that any additional strain on the transport network as a result of new development would need to be appropriately assessed by the Council and Cambridgeshire County Council as the highways authority and mitigated. Whilst it is hoped that design is a positive aspect, it must be remembered that a planning obligation requirement must meet the 3 statutory tests (paragraph 56 of the NPPF) and improving the attractiveness of the street scene or traffic calming, may not meet these tests. Paragraph Three: Should read 'In all proposals consideration should be given to how the development can contribute to the delivery of the transport strategy set out in the Neighbourhood Plan below;</p> <p>Paragraph Four: Suggest additional word as follows: ' Where developers want to promote alternative or innovative methods of storage such as underground bin storage where viability and operational practicalities allow this would be supported;</p> <p>The policy positively provides the opportunity for developers to promote alternative methods of storage such as underground bin storage on larger sites if viability and operational practicalities support</p>	Yes	<p>Paragraph Three: Should read: 'all proposals consideration should be given to how the development can contribute to the delivery of the transport strategy set out in the Neighbourhood PI an below;'</p> <p>Paragraph Four: Suggest additional word as follows: 'Where developers want to promote alternative or innovative methods of storage such as underground bin storage where viability and operational practicalities allow this would be supported</p>

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						this approach in a development. This has the added benefit of improving the visual aspects of recycling and waste management for the benefit of the community, particularly where the provision of wheeled bins maybe less desirable or restrict access.		
Local Plans Team	HDC			BYNP:20	Support	Infrastructure, Services and Facilities - General Comments - Support This section provides some useful tables to use as evidence for infrastructure need and requirements. To enable effective negotiations for the provision of planning obligations projects should be fully justified and evidenced signposting to this evidence would be a useful addition to this chapter. The supporting text at paragraphs 2 4.1, 24.3, 24.4 etc. references associated strategies and investments in order to align and ensure coordination of sustainable transport objectives across delivery organisations. This is in keeping with 104 b) of the NPPF. These references will ensure that the policies are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (Paragraph 16 d of the NPPF).		
Local Plans Team	HDC			BYNP:18	Have observations	Policy G3 - Have observations A positive policy to engage the community in shaping their village. This accords the National Planning Policy Framework's aim of	Yes	The word 'encouraged' may be too ambiguous, intimating that developers or landowners do not necessarily have to contact the Parish Council. It would be

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						encouraging effective early engagement with the community (paragraph 40). However, the word 'encouraged' may be too ambiguous, intimating that developers or landowners do not necessarily have to contact the Parish Council. It would be useful to consider some alternative wording in order to give the policy more weight.		useful to consider some alternative wording in order to give the policy more weight.
Ramsay Club Co. & Abbey Properties		The Abbey Group (Cambs) Limited	Andy Brand	BYNP:10	Object	Further to our letter dated 18th July 2019 this response to the Submission Plan consultation on the draft Neighbourhood Plan (the Draft NP) is made on behalf of the Ramsey Club Company Limited (RCCL) and Abbey Properties Cambridgeshire Limited (Abbey). RCCL own land to the north-east of 15 Meadow Lane, Bury for which Planning Permission for 38 dwellings has been sought (Huntingdonshire District Council ref: 18/02420/FUL) and Abbey are promoting that site for development. We will very shortly revise the scheme to reflect consultation responses received to date and to vary the application such that it is proposed as a Rural Exceptions Scheme which includes 29 affordable dwellings. Our previous response (dated 18th July) remains relevant and all of the points which were raised in that letter are considered to remain valid. Having regard to the basic conditions we consider the	Yes	Paragraph 8.2 We consider it would be beneficial here to list out the relevant strategic policies within the Local Plan. Sustainable Growth Paragraph 17.1 - We acknowledge that Bury is a separate village in its own right but in planning policy terms the village is aligned with Ramsey given it is within the overall Ramsey Spatial Planning Area. Additional growth in all sectors will therefore need to be planned for and we consider that the Draft NP should, as a minimum, identify where additional growth should be accommodated. Paragraph 18.2 - It would be helpful in our view to state in full Local Plan Policy LP2 here given that approximately three quarters of the objectively assessed need for housing and the majority of employment and retail growth is to be focused in the Spatial Planning Areas. Paragraph 19.1 - We disagree

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						<p>following: 1) Is it appropriate to make the Draft NP Given that the Draft NP does not allocate any land for new housing we do question whether the Draft NP is required as the adopted Local Plan Policies already provide the necessary spatial planning context for the location of and framework to new development. Whilst in principle we agree that the extent of the Neighbourhood Plan boundary is appropriate we do consider that it should include additional recognition that the parish falls within the Ramsey Spatial Planning Area. 2) Does the Draft NP contribute to the achievement of sustainable development We do not consider that sufficient evidence has been provided within the Draft NP (including the supporting documents) in order to demonstrate that this has been achieved. The plan purports to seek to provide new housing but in effect the Draft NP is seeking to constrain growth by placing a settlement area boundary around the village which will constrain the type of growth which is essential to the ongoing vitality and viability of the village and its community. Given that Bury is within the Ramsey Spatial Planning Area we consider that the use of a settlement boundary is unnecessary and that it provides an unnecessary restriction to</p>		<p>that speculative development has the potential to undermine the strategic policies of the Local Plan to 2036. Such applications can, to the contrary, deliver additional housing to support the ongoing need to supply new housing over at least a 5 year period and, as required by National Planning Policy Framework (NPPF) paragraph 59, to help to significantly boost the supply of homes. They also reflect the emerging prospectuses (being prepared by the District Council and the Cambridgeshire and Peterborough Combined Authority) for the market towns such as Ramsey (and the wider Spatial Planning Area). These proposals also indicate that developers and housebuilders consider that Bury is an attractive and viable location in which to develop. Policy G1 - Other than the introduction of a settlement boundary (to which we object as set out below) this policy merely reflects the Local Plan and as such it is unnecessary as currently presented. We consider that the introduction of a settlement boundary around the village has been proposed in order to constrain growth in a manner which is inappropriate particularly given that the village</p>

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						<p>acceptable growth within a location which, for planning policy purposes, is a sustainable location as identified through the District's settlement hierarchy. We further question the ability of the plan to deliver the suggested infrastructure. Whilst adopting the Draft NP would result in an increase in CIL receipts from new development we do not consider that the planned development would lead to sufficient expenditure being made available. Our view here is cognisant of the existing floorspace (which will reduce CIL payments accordingly) and the viability of the RAF Upwood development (there has already been an acceptance to the lower provision of affordable housing). This will mean that Section 106 obligations and CIL payments will be unable to deliver the infrastructure which is sought. We also have concerns over the deliverability of a proposed off-road path from Upwood School to the High Street and the Abbey school. We support the identification of the village's future Housing Needs and would clarify here that a Rural Exceptions (affordable housing led) scheme would be allowed for through the Local Plan and that any proposal would be an exception to development plan policies: in all likelihood such a scheme would be on land outside</p>		<p>is part of the Ramsey Spatial Planning Area. We note the District Council's reasons for using a criteria-based approach to defining the built-up area and we consider this to be a more appropriate and sustainable way in which to deliver ongoing growth. We consider that Map 3 should not include a settlement boundary and that it should also provide indicators for locations of future additional growth in order to highlight preferred options over the remainder of the plan period. One such location should be land to the north-east of 15 Meadow Lane, Bury where we consider that the land relates more to the built-up area than it does to the countryside owing to factors such as the robust boundary landscaping and the presence of utility buildings and apparatus which adjoin and cross the site. Paragraph 20.1 We agree that the Draft NP does not currently allocate any housing or employment sites. We consider that it should be revised to do so and that the land to the north-east of 15 Meadow Lane, Bury is a sustainable location on which to develop additional housing. The NPPF (paragraph 13) and the Planning Practice Guidance (paragraph 004: Ref ID 41-004-20190509) both state</p>

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						<p>of the settlement boundary/built-up area. We are not therefore persuaded that the Draft NP contributes to the achievement of sustainable development. We note that the Draft NP is not supported by a Sustainability Appraisal and consider that one should be produced to seek to demonstrate the Draft NP's position clearly in relation to this. 3) Is the Draft NP in general conformity with the strategic policies within the development plan? We consider that the use of a settlement boundary within the Draft NP is in conflict with the adopted Local Plan which favours a criteria-based approach. In particular the Draft NP conflicts with paragraph 4.82 and Policy LP7 in this regard. The Draft NP is not therefore in general conformity with the development plan. 4) Does the Draft NP breach EU obligations We have not found any conflicts in this regard.</p>		<p>that a Neighbourhood Plan should support the delivery of strategic policies in the Local Plan and should shape and direct development that is outside of those strategic policies. Paragraph 21.1 There is no law that we are aware of which makes pre-application consultation of planning applications compulsory. Paragraph 22.3 Local Plan Policy LP28 refers to the 60% of the net land area being available for affordable housing rather than necessarily 60% of housing. Having considered the response to our previous objections to policy G4 within the Neighbourhood Plan Consultation Statement we consider that the Draft NP approach here (60% of housing rather than land) is appropriate. We would suggest that the text from Page 91 of the Consultation Statement could be referenced in the text close to the policy in order to clarify this approach. We do not object to the policy given the justification which has been provided. cy G4 We do not object to this policy following the clarification provided. Paragraph 23.1 We would suggest quoting the relevant section of the Local planning policy which recognises that Bury, Ramsey</p>

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								<p>and the surrounding area has relatively poor transport infrastructure, is well off the primary road network and relatively remote. We do not consider that such a policy does exist and in any event this statement needs to be seen in the context of the fact that the adopted Local Plan (which has been the subject of Independent Examination) has identified the Ramsey Spatial Planning Area as one of the four Spatial Planning Areas within the District as a whole (i.e. Huntingdon, St Ives and St Neots) where the majority of new development is to be focused. There is no strategic policy distinction between the Ramsey Spatial Planning Area and the three others. We note also the intended transport linkages which are being suggested by the Mayor for Greater Cambridgeshire and Peterborough. Paragraph 24.6 We have been unable to locate the Parish Council's transport strategy and would suggest that this be uploaded to the Neighbourhood Plan section of the website if it is to be relied upon as part of the evidence base to the Draft NP. Paragraph 24.7 We would suggest quoting the relevant section of the Local planning policy. As with</p>

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								<p>paragraph 23.1 above this statement needs to be seen in the context of the fact that the adopted Local Plan (which has been the subject of Independent Examination) has identified the Ramsey Spatial Planning Area and insodoing there has been no planning policy which seeks to set this below the other Spatial Planning Areas within the District as a whole (i.e. Huntingdon, St Ives and St Neots). Paragraph 24.8 We are not aware of any planning policy which classes Ramsey and the surrounding villages as a 'rural area'. We are also not aware of any evidence which demonstrates that people who commute from Bury to work have a longer trip time than the national average. If there is such evidence this should be made available on the Neighbourhood Plan website. Paragraph 24.12 It would be helpful in our view for clarification to be given as to the term 'personal safety' in this paragraph. Paragraph 24.19 We query whether proposed off-road paths are deliverable both in terms of viability and deliverability with regard to land ownership. The views of the County Council should be sought. If this infrastructure is required to enable RAF Upwood</p>

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								<p>to be developed then it should be referenced in draft Policy G2. Paragraph 25.1 We consider that further evidence (such as speed surveys) could be used to seek to quantify traffic speeds. We consider this to be an issue that the County Council should address and question the relevance to the Draft NP in that context. Paragraph 25.4 We are not clear whether section 24 of the Draft NP is intended to be the transport strategy: if so it appears to be limited in its content and evidence base. Policy ISF2 Whilst some changes have been made to the policy (in response to District Council comments) it continues to apply a different threshold to that contained within paragraph 109 of the NPPF (2019). The test of harm needs to be severe for development to be prevented or refused on highway grounds. At present the policy is inconsistent with Government guidance in this regard. We also have concerns about whether the second and third bullet points would be relevant to new development proposals as they are more likely to apply to existing situations and conditions. Paragraph 27.9 There appears to be a word missing after 'of' on</p>

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								<p>the second line of this paragraph. This paragraph is also much more dismissive of secondary school capacity compared to paragraph 27.8 of the Draft NP in relation to primary school capacity. A more balanced and reasoned statement is appropriate in our view. Policy ISF4 Given that the only large scale major development (200 homes or more) which is likely to take place in the Draft NP area is that of RAF Upwood it would seem that the first paragraph of this policy would be better located within Policy G2. All non-large-scale major developments will be liable to CIL payments such that they will only provide Section 106 Obligations in order to deliver affordable housing, open space and site specific infrastructure. The items listed in Policy ISF4 will therefore only be delivered as part of the development under Policy G2. The priorities list within the policy should in our view be moved to the supporting text as many of these projects will not be fundable through Section 106 Obligations (as they are very unlikely to satisfy the legal tests) and will therefore need to be funded by CIL. Paragraph 30.4 We consider it unhelpful to say</p>

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								<p>that the requirement for special attention equates to 'considerable weight'. It would be correct to say that special attention should be given. We now comment on the evidence base and supporting documents to the Draft NP. Housing Need Survey Results Report for Bury (March 2019) The Report does not seek to justify the extent of the survey area we question whether it would have been sensible to widen the questionnaire to adjoining rural locations such as Upwood as it is likely that additional provision may be required. Within the public comments (pages 15 to 18) we comment as follows: Page 16 suggests that brownfield sites and/or the RAF Upwood redevelopment should be used to accommodate affordable housing for local people. In our view such development at RAF Upwood is very unlikely to come to fruition due to a number of factors: i) RAF Upwood is an allocated site for market housing with affordable housing required as per the Council's Local Plan policies. We are not aware of any surplus land being promoted for such a use; ii) Brownfield sites (such as RAF Upwood) typically require remediation which can be costly</p>

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								<p>and therefore they require higher valued housing stock (such as market housing): this in itself often leads to viability considerations and the lower delivery of affordable housing against the District Council's 40% Local Plan policy. By way of example Planning Permission 15/00029/FUL permitted the erection of 60 dwellings at RAF Upwood: an amendment to the Section 106 Agreement (16/00673/S106) permitted 8% affordable housing rather than the policy compliant level of 40%. As such the suggestion that RAF Upwood could deliver an exception site is very unlikely. We would note though that the land north-east of 15 Meadow Lane, Bury is previously developed given its former use by Ramsey Golf Club as a practice ground. That site has less ground based constraints and therefore could deliver new housing without generating the same viability concerns as RAF Upwood. The reference to Green Belt land is incorrect as none exists in or around Bury. The comments on pages 16 and 17 refer to the need to deliver infrastructure as part of or before housing development. Our experience of exception sites is that they are generally unable to offer such</p>

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								<p>substantial public benefits given that they are being delivered in order to address other requirements (i.e. affordable housing for local people). There are comments in respect of the land north-east of 15 Meadow Lane site on page 17. In relation to highway considerations the County Council does not object to the current planning application at the site on highway safety grounds. In relation to visual effects we consider that such impacts are acceptable. However it is important to note that any exception site would be just that an exception to the requirements of relevant planning policy would need to be made due to the local affordable housing needs. Settlement Boundary Methodology (September 2019) Having regard to the methodology we consider that the land to the north-east of 15 Meadow Lane relates more to the built-up area than it does to the countryside and should therefore be included within the settlement boundary. Please see our comments above in this regard. Basic Conditions Statement (September 2019). We do not consider that the Draft NP complies with the basic conditions such that the</p>

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								<p>plan should be 'made'. We note the lack on any significant evidence in paragraphs 37 to 40 in order to demonstrate how the Draft NP would contribute to the achievement of sustainable development. We would though specifically note the comments in respect of Policy G4. The comments state that the Housing Needs Survey will be used to inform the provision of affordable housing on sites within the Neighbourhood Plan area. This is not correct. The Survey captures the need within the study area for additional affordable housing need. The housing sites within the Neighbourhood Plan area are/will all be subject to affordable housing to satisfy the District's affordable housing need. The Housing Needs Survey will inform the delivery of a Rural Exception Scheme through Policy G4. This is an important point to correct.</p>
Paul Emms	Gladman Developments			BYNP:3	Object	<p>Key locally specific points relate to: - Policy G1 Definition of Built-up area as being too restrictive - Policy NE1 - Local Green Space that the evidence base is inadequate and Ramsey Golf Course is an extensive tract of land and so not compliant with the national definition Policy NE2 - Protected Settlement Break that the wording is ambiguous and</p>		

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						appears to be an attempt to preclude any development whatsoever coming forward in the remaining gap between Bury and Ramsey. In conclusion: Gladman is concerned that the plan in its current form does not comply with basic condition (a) in its conformity with national policy and guidance and is contrary to (d) the making of the order contributes to the achievement of sustainable development and is counter to (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the reasons set out above.		
Local Plans Team	HDC			BYNP:27	Have observations	Paragraph 29.4 - Have observations Suggest additional word for clarity in the fourth sentence e.g. Local community support facilities includes Honey Bumpkin Childminding;		Paragraph 29.4 - Suggest additional word for clarity in the fourth sentence e.g. Local community support facilities includes Honey Bumpkin Childminding;
Graham Moore	Middle Level Commissioners			BYNP:37	Have observations	Summary: For full response please see attached documents. For comments on the comprehensive Development of the former Airfield (pages 23-25 of the Neighbourhood Plan) please refer to the attached document: HELAA October 2017. The relevant RMA are also concerned about the piecemeal re-development of the site, the absence of infrastructure and would encourage, amongst other items the use of SuDS and water recycling. Sustainable Transport (Pages 28-30) Where	Yes	Policy ISF4- Infrastructure Provisions- The content of paragraph 3 is noted. The Parish Council may consider it appropriate to include water supply, resources and management to ensure that these issues are not detrimentally affected by development. Flood Risk (page 51) In view of the large extents of the Floodplain shown in Map 5 it is most surprising that nothing more is included in the text.

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						<p>possible footpaths, cycleways, street lighting, and/or other street furniture should be positioned outside of any protected watercourse and the associated maintenance access strip. The RMA prior written consent may be required and they will wish, when appropriate, to be involved in any discussions at the earliest possible stage. The RMA will only give consent for hard surfaced "pavements" where a formal hardened road exists and will require that the relevant structure is positioned away from the watercourse on the landward side of the road. Infrastructure Provision & Developer Contributions (Pages 41-43) See the attached response to the District Council's Developer Contributions Supplementary Planning Document (SPD) and Community Infrastructure Levy (CIL)- Developer Contributions Consultation document. Policy ISF4- Infrastructure Provisions- The content of paragraph 3 is noted. The Parish Council may consider it appropriate to include water supply, resources and management to ensure that these issues are not detrimentally affected by development. Flood Risk (page 51) In view of the large extents of the Floodplain shown in Map 5 it is most surprising that nothing more is included in the text. Current national and local policy is</p>		

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						<p>to steer new highly and more vulnerable development to areas with the lowest probability of flooding, in respect of the EA's Flood Map for Planning, with development only being permissible in areas at a higher risk of flooding in exceptional circumstances where it can be demonstrated that there are no reasonably available sites in areas of lower risk, and that the development provides wider sustainability benefits that outweigh the risk of flooding. Such development should incorporate mitigation/ management measures to minimise risk to life and property should flooding occur. It should be noted that the floodplain extents shown on the EA's Flood Map for Planning are indicative and not definitive. Whilst the water level and flood risk management systems provided by the RMA, including the EA, alleviate flooding to an acceptable standard, the risk of flooding, from whatever source, cannot be totally eliminated. With the exception of larger sites where the County Council may become involved, in its role as the Lead Local Flood Authority (LLFA), issues related to surface water disposal are rarely considered at the allocation or planning application stage. Significant problems have been experienced elsewhere due to the failure of the</p>		

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						development "promotor" to appropriately consider the disposal of ground, surface and treated foul effluent water on the receiving systems. Whilst the RMA concerned have particular duties, as discussed above, and will endeavour to achieve these in accordance with their policy statement, their powers are permissive and, ultimately, under "common law", landowners have the primary responsibility for draining their land, to ensure that they do not create a flood risk to others; managing the flood risk issues and taking appropriate action to protect their property.		
Local Plans Team	HDC			BYNP:35	Object	Paragraph 38.2 - Object Paragraph 38.2 should be reworded. From a monitoring perspective the Parish can obtain information on planning application decisions via Public Access and officer reports, this should provide adequate evidence to justify how decisions have been made using the Bury Neighbourhood Plan. The Parish Council could then use this information to ascertain whether their policies are effective. A weekly list of planning application decisions can be requested to help with this process.	Yes	Paragraph 38.2 should be reworded. From a monitoring perspective the Parish can obtain information on planning application decisions via Public Access and officer reports, this should provide adequate evidence to justify how decisions have been made using the Bury Neighbourhood Plan. The Parish Council could then use this information to ascertain whether their policies are effective. A weekly list of planning application decisions can be requested to help with this process.
Local Plans Team	HDC			BYNP:33	Have observations	Paragraph 37.7 - Have observations Reference to Regulation is useful, however if retained this text would have to be	Yes	Amend text to reflect The Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019

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						amended. Regulation 11 of The Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019 removes Regulation 123. The Regulations came into force on 1 September 2019.		
Local Plans Team	HDC			BYNP:31	Have observations	Paragraph 36.1 - Have observations Suggest rewording of third sentence as follows: 'The Parish boundary between Bury and Ramsey was established before much of the growth and development has had occurred.'	Yes	Paragraph 36.1 - Suggest rewording of third sentence as follows: The Parish boundary between Bury and Ramsey was established before much of the growth and development has had occurred.
Local Plans Team	HDC			BYNP:29	Have observations	Sections 30. Heritage Assets, 31. Local Distinctiveness and Public Realm, 33. Trees and Woodlands - Have observations These sections identify the local character of the Neighbourhood Plan area. Paragraph 31.1 notes that: 'All new development should respect the local character of the area, ensuring that the building height, size and choice of external materials complement the existing fabric and do not obscure important views into and out of the village.' This does not seem to be reflected in a neighbourhood plan policy, although Local Plan strategic policy LP11 Design Context reflects this aim and as such the text will provide useful evidence in the implementation of this policy. You may wish to consider using paragraph 31.1 as the basis for your own more locally distinct policy.		

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Local Plans Team	HDC			BYNP:25	Have observations	Paragraph 27.9 - Have observations - The paragraph is difficult to read and should be reworded for clarity.	Yes	Paragraph 27.9 -The paragraph is difficult to read and should be reworded for clarity.
Local Plans Team	HDC			BYNP:23	Have observations	Paragraph 26.3 - Have observations - The second sentence is difficult to read and should be reworded for clarity.	Yes	Paragraph 26.3 - The second sentence is difficult to read and should be reworded for clarity.
Local Plans Team	HDC			BYNP:21	Support	Policy ISF 1 - Support - The Council supports the Parish's intention to promote active lifestyles and encouraging links to school by walking. The policy accords with the Council's non-strategic policy 'LP 16 Sustainable Travel' which seeks to maximise opportunities for sustainable travel. The supporting text of this policy could be used to provide additional ideas and guidance on this subject area. The policy also meets parts of paragraphs 102, 104, 108 and 110 of the NPPF by promoting cycling and walking, creating patterns of movement and sustainable transport modes. Paragraph 91 of the NPPF is also enabled by supporting healthy lifestyles. Reference to the upcoming Ramsey Prospectus for Growth in the supporting paragraph 23.6 provides further information to applicants especially in relation to safer pathways into Ramsey from other settlements and potential funding sources. Paragraph Two: It would be helpful to include the word 'development' at the beginning of the paragraph for	No	Paragraph Two: It would be helpful to include the word 'development' at the beginning of the paragraph for clarity. Paragraph Four: Consideration should be given to how this requirement would affect small sites or single dwelling developments. It may be more practical to apply this requirement to major developments only e.g. 10 or more units.

Name	Organisation Details	Agent	Agent Name	Comment ID	Comment Type	Comment	Changes required?	Proposed Changes
						clarity. Paragraph Four: Consideration should be given to how this requirement would affect small sites or single dwelling developments. It may be more practical to apply this requirement to major developments only e.g. 10 or more units.		
Local Plans Team	HDC			BYNP:19	Support	<p>Policy G4 - Support This is a positive policy. The policy links to Local Plan non-strategic policy 'LP 28 Rural Exceptions Housing' by providing for local housing need. The policy also delivers additionality by prioritising 40% of housing for self-build and custom housing for the local community. This policy encourages pre-application engagement as noted in the NPPF. The Council's Self and Custom Build Register is referenced in the supporting text to evidence need, but could also be included in the policy. Paragraph one of the policy refers to 'successor documents' to the Bury Housing Needs Survey, this will enable flexibility in the policy requirement and provide up to date evidence across the plan period. The Housing Needs Survey suggests that 29 households with a local connection are in need "this could provide an opportunity for the Parish to identify land specifically to meet local need / and or be affordable. A Neighbourhood Development Order is another useful local tool which grants</p>	No	

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						<p>planning permission for development that the community wants to see in your area. It goes through the same process as a Neighbourhood Plan including community engagement and referendum. Recent examples include the Broughton: Neighbourhood Development Order (made October 2018) found at: https://www.kettering.gov.uk/info/20058/planning_strategies_and_policies/29/neighbourhood_planning/4. The policy departs from Local Plan policy LP26 which asks that 60% (net) of the site area is for affordable housing for people with a local connection as opposed to policy G4 which requires 60% of the housing. Local Plan policy LP26 is not a strategic policy.</p>		
Local Plans Team	HDC			BYNP:17	Have observations	<p>Policy G2 - Have observations General Comments This policy must be in conformity with the strategic policies in the Local Plan. It is important that any additional policy criteria in the Neighbourhood Plan minimises the impact upon development viability. The policies in Huntingdonshire's Local Plan to 2036 were set based on viability testing prior to the Bury Neighbourhood Plan. The 'headroom' available from the Council's generic viability testing accommodates future changes in assumption values (for example increases in build costs), but has</p>	Yes	The text in bullet five should be amended to reflect the intentions of paragraph 182 of the NPPF.

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						<p>not factored in additional requirements. As such, the addition of further policy criteria over and above the strategic and non-strategic policy requirements set out in the Local Plan may not have been viability tested. It is therefore unknown whether the masterplan requirements set out within this policy would impact on the viability of the site without further evidence. This 'unknown' could extend developer contribution negotiations increasing the time taken to determine planning applications and deliver the Councils housing target. This could impact upon strategic policy 'LP 1 Amount of Development' which aims to achieve at least 20,100 new homes by 2036 and the delivery of strategic policy 'RA 8 Former RAF Upwood and Upwood Hill House, Bury'. It is therefore important that infrastructure provision and masterplan requirements are adequately evidenced and that the bullet point requirements for the masterplan are worded to provide a balance between the costs of mitigating constraints on-site and delivering attractive, useable, long-lasting buildings and spaces without hampering delivery. This will enable the policy to conform to strategic policies LP 1, LP24 and RA8 and paragraph 13 of the NPPF which notes that Neighbourhood Plans should</p>		

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						<p>support the delivery of strategic policies. It should be of note however that some of the requirements of the neighbourhood plan policy may reflect Local Plan's non-strategic policies. Depending on the extent and similarity, these policy requirements could already be accounted for in the Council's viability testing of the Local Plan. Policy Specific Points Bullet one of Policy G2 recognises the balance between sustainable development and development viability, ensuring a balanced approach to development. Bullet Five The following sentence: The protection of the living conditions of future occupiers from existing and proposed employment development is contrary to N PPF paragraph 182 which reads: Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or</p>		

Name	Organisation Details	Agent	Agent Name	Comment ID	Comment Type	Comment	Changes required?	Proposed Changes
						<p>agent of change) should be required to provide suitable mitigation before the development has been completed. The text should be amended to reflect this. Bullet seven It should be noted that any new facility should be carefully considered to ascertain who will be undertaking the long term maintenance and management of the facility. Bullet Eight This requirement is covered by the Local Plan strategic policy 'LP 4 Contributing to Infrastructure Delivery'. Bullet Ten, Eleven and Twelve Existing evidence documents that could be used to justify infrastructure requirements in Bury (and Ramsey Spatial Planning Area) can be found in the Council's Infrastructure Delivery Plan (IDP) pages 101 to 104. This document was used to justify the viability of the Local Plan and its policies. Major infrastructure projects such as those identified in bullets 10 to 12 would require consultation with Cambridgeshire County Council to identify priority infrastructure projects, deliverability, costings and whether this would be an on-site or financial contribution. Infrastructure requirements identified in the Bury Neighbourhood Plan would also need to be in conformity with paragraph 56 of the National Planning Policy Framework (NPPF) which states that planning</p>		

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						obligations must meet the 'three tests' of: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. This is mentioned later on in supporting text 25.5 to support policy ISF2 Highway Impact.		
Local Plans Team	HDC			BYNP:15	Have observations	Evidence base documents The Housing Need Survey Results Report for Bury needs updating to reflect the policy numbers in the now adopted Huntingdonshire's Local Plan to 2036. For example, LP 30 referenced on page 3 is now LP28. Both the HRA Screening Report and SEA Screening Report mention in paragraph 15 that Huntingdonshire's Local Plan to 2036 was adopted on 15 June 2019; this is incorrect. The Local Plan was adopted on 15 May 2019.	Yes	The 'Housing Need Survey Results Report for Bury' needs updating to reflect the policy numbers in the now adopted Huntingdonshire's Local Plan to 2036. For example, LP 30 referenced on page 3 is now LP28. Both the HRA Screening Report and SEA Screening Report mention in paragraph 15 that Huntingdonshire's Local Plan to 2036 was adopted on 15 June 2019; this is incorrect. The Local Plan was adopted on 15 May 2019.
Local Plans Team	HDC			BYNP:13	Have observations	Comments on the Basic Conditions Statement Paragraph 3, page 16 refers to the Core Strategy, this has been superseded by Huntingdonshire's Local Plan to 2036 and so reference to this is no longer required. It may be useful to check throughout the document to ensure that references to Development Plan Documents are up to date.	Yes	Comments on the Basic Conditions Statement Paragraph 3, page 16 refers to the Core Strategy, this has been superseded by Huntingdonshire's Local Plan to 2036 and so reference to this is no longer required. It may be useful to check throughout the document to ensure that references to Development Plan Documents are up to date.
Jenny Keen	Larkfleet Homes	Marrons Planning	J Keen	BYNP:8	Object	Summary. The Neighbourhood Plan currently does not meet the	Yes	Removal of a restrictive settlement boundary and the

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						<p>basic conditions test. Policy G1: Definition of Built-up Area (Settlement Boundary). By drafting a settlement boundary the Neighbourhood Plan deviates from the criteria approach set out in the Local Plan. Drafting of the boundary has been undertaken under a different methodology to that set out in the Local Plan. The Neighbourhood Plan is not in general conformity with the strategic policies contained in the development plan for the area. The lack of clarity and policy tension caused by having a different approach to Bury to that appropriately taken under the local plan for Ramsey does not contribute to the achievement of sustainable development. Policy G4: Local Housing Needs: Insufficient evidence to justify the prioritisation of self-build homes. Potential for the policy to restrict the delivery of rural exceptions homes. Potential for the policy to fail to contribute to the achievement of sustainable development Policy NE2: Protected Settlement Break Settlement Break Policy does not respond to the immediate spatial policy context for Bury and Ramsey Local Green Space designations allow communities to identify and protect green areas of particular importance to them No evidential consideration of the benefits and</p>		<p>intended settlement break. Also revisions to some of the proposed Local Green Spaces and the wording of Policy G4.</p>

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						disadvantages that would arise from protection or development Insufficient regard to national policies and advice contained in guidance issued by the Secretary of State Potential for the policy to fail to contribute to the achievement of sustainable development NE1: Local Green Spaces Strict approach to the protection of local green space. May unwittingly prevent future expansion of school to meet capacity needs Please see attached full representations.		
			Paul Rowland	BYNP:4	Have observations	The text at paragraph 20.6 indicates that the majority of the land comprising Upwood Airfield is owned by Strawsons Property. Evera would like the Neighbourhood Plan Group to know that the land subject of outline planning permission 12/01274OUT is now owned by RAF Upwood LLP, a wholly owned subsidiary of Evera LLP. In relation to the wording of Policy G2 our clients are pleased to see that the amended wording to proposed Policy G2 - Comprehensive Development of Former Airfield, now acknowledges the existing planning permission for development of the southern portion of the site allocated as RA8 in the Huntingdonshire Local Plan. Our clients are keen to engage with the local community in advance of finalising a master plan that shows	No	

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						how, in relation to Phase 2, the approved scheme for phase 1 and the principles for development of the balance of the allocation will combine to deliver a successful and popular addition to Bury. This approach seems to be what the Neighbourhood Plan Group has in mind and the proposed policy wording should not be a reason to delay approval of reserved matters for phase 1 and the early commencement of much-needed redevelopment of the site.		
Stewart Patience	Anglian Water			BYNP:2	Support	Anglian Water is supportive of the requirement for development proposals to make improvements where necessary within the water supply and foul sewerage networks.	No	
Edward James	Historic England			BYNP:38	Support	Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan. We welcome the production of this neighbourhood plan, but do not wish to provide detailed comments at this time. We would refer you to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: < https://historicengland.org.uk/advice/planning/plan-making/improve-yourneighbourhood/ > I would be		

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						grateful if you would notify me if and when the Neighbourhood Plan is made by the district council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed NP, where we consider these would have an adverse effect on the historic environment. Please do contact me, either via email or the number above, if you have any queries.		
Local Plans Team	HDC			BYNP:36	Have observations	Appendix 2 - Have observations It is suggested that evidence is provided to illustrate that landowners of the proposed Local Green Spaces have been consulted and support the designations. See paragraph: 019 Reference ID: 37-019-20140306 of the National Planning Practice Guidance. Comments from land owners as a result of this consultation should be clearly recorded and addressed.		
Local Plans Team	HDC			BYNP:11	Have observations	Strategic Policies in Huntingdonshire's Local Plan to 2036 (HLP): Strategic policies are those which are essential to the delivery of the Local Plan strategy. These include: 1. All policies in Chapter 4 'The Development Strategy' of Huntingdonshire's Local Plan to 2036 2. All policies that allocate land for development in 'Section D: Allocations' as they are required to achieve the strategy		

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						as set out in Chapter 4 'The Development Strategy' 3. The policies on 'Design Context' and 'Affordable Housing Provision'. Legislation sets out basic conditions which neighbourhood plans (and neighbourhood development orders) must satisfy. To meet the basic conditions, neighbourhood plans must be prepared in general conformity with the strategic policies contained within the Local Plan as set out above.		
Abbey Group and Trustees of C R East	Abbey Group and Trustees of C R East	The Abbey Group (Cams) Limited	Andy Brand	BYNP:9	Have observations	Our response to the consultation on the draft Neighbourhood Plan (the Draft NP) is made on behalf of the Trustees of C R East (The Trustees) and The Abbey Group Cambridgeshire Limited (Abbey). The Trustees are the landowners of allocation RA7 within the Draft NP and Abbey are promoting that site for residential development. We have recently undertaken initial consultation with the Parish Council and local residents in respect of allocation RA7: the land is of course allocated for residential development (of around 90 houses) within the Huntingdonshire District Council Local Plan to 2036 (adopted 2019). Our observations on the Draft NP are set out below against relevant sections and paragraphs within the Draft NP. Many of the observations were made within our previous letter dated 16th July 2019.	Yes	Paragraph 8.2 - We consider it would be beneficial here to list out the relevant strategic policies within the Local Plan. Policy G1- We support the approach of including allocation RA7 within the built-up area (settlement boundary) of the village. We note the Consultation Statement suggests that we support the policy more widely which is not the case. We do not support in-principle the use of settlement boundaries but if one is proposed then it is evidently sensible to include allocation RA7 in the built-up area. Paragraph 21.1- There is in fact no law that we are aware of which makes pre-application consultation of planning applications compulsory. Paragraph 24.6 We have been unable to locate the Parish

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								<p>Council's transport strategy and would suggest that this be uploaded to the Neighbourhood Plan section of the website or clearly referenced. Paragraph 24.7 We would suggest quoting the relevant section of the Local Plan. This statement needs to be seen in the context of the fact that the adopted Local Plan (which has been the subject of Independent Examination) has identified the Ramsey Spatial Planning Area and insodoing there has been no planning policy which seeks to set this below the other Spatial Planning Area's within the District as a whole (i.e. Huntingdon, St Ives and St Neots). Paragraph 24.8 - We are not aware of any evidence which demonstrates that people who commute from Bury to work have a longer trip time than the national average. Paragraph 24.12 - It would be helpful in our view for clarification to be given as to the term 'personal safety' in this paragraph. Paragraph 24.19 - We query whether the delivery of the off-road paths are deliverable both in terms of viability and deliverability with regard to land ownership. The views of the County Council should be sought. If this infrastructure is required to enable RAF Upwood to be</p>

Name	Organisation Details	Agent	Agent Name	Comment ID	Comment Type	Comment	Changes required?	Proposed Changes
								<p>developed then it should be referenced in draft Policy G2. Policy ISF2 - Whilst some changes have been made to the policy (in response to District Council comments) it continues to apply a different threshold to that contained within paragraph 109 of the National Planning Policy Framework (2019). The test of harm needs to be severe before unacceptable harm would result. At present the policy is inconsistent with Government guidance in this regard. We also have concerns about whether the second and third bullet points would be relevant to new development proposals as they are more likely to apply to existing situations and conditions.</p> <p>Paragraph 27.9 – There appears to be a word missing after 'of' on the second line of this paragraph. Policy ISF4 Given that the only large scale major development (200 homes or more) which is likely to take place in the Draft NP area is that of RAF Upwood it would seem that the first paragraph of this policy would be better located within Policy G2. Any developments below 200 homes would provide Community Infrastructure Levy (CIL) contributions together with site specific infrastructure. The</p>

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								<p>items listed in Policy ISF4 will therefore only be delivered as part of the development under the allocation at policy G2. The priorities list within the policy should in our view be moved to the supporting text as many of these projects will not be fundable through Section 106 Obligations (but could be funded under CIL) and will therefore need to be funded by CIL. Basic Conditions Statement. Page 19 of the Basic Conditions Statement refers to draft policy G4. It suggests that the Housing Need Survey Results Report for Bury is intended to inform the provision of affordable housing on sites within the Neighbourhood Plan area. This statement is not correct as any sites which are allocated within the Local Plan will deliver affordable housing in order to address the District-wide affordable housing need. The purpose of a Housing Need Survey is to inform draft policy G4 which relates to an exception site.</p>
Lucy Bartley	Wood PLC (on behalf of National Grid)			BYNP:7	Have observations	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. National Grid has identified that it has no record of such apparatus within the		

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						Neighbourhood Plan area. The electricity distribution operator in Huntingdonshire District Council is UK Power Networks. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk Appendix 1 provides a map of the National Grid network across the UK.		
Pete Brindley				BYNP:5	Support	I support this document in it's current for even though some developers do not, but that is understandable. The document is in the interest of the community in its current state and I fully expect the community to support it.	No	
Stewart Patience	Anglian Water			BYNP:1	Support	We note that changes have been made to Policy G2 in response to comments made by Anglian Water as part of the earlier consultation. Anglian Water supports the requirement for the masterplan for the Former Airfield site to include reference to use of Sustainable Drainage Systems and water re-use.	No	