

Report of representations received on the Buckden Submission (Reg 16) Neighbourhood Development Plan and considered by the Examiner

Representations have been ordered alphabetically by name.

Representations can also be found at: <https://consult.huntingdonshire.gov.uk/portal/pp/nps/bunp>

Name	Organisation	Organisation	Agent Name	Comment ID	Support/ Object/ Observations	Type	Comment	Changes required?	Proposed changes
Ben Jones	Natural England			BUNP:4	Support	E-Mail	Natural England does not have any specific comments on this neighbourhood plan. Natural England notes that the Buckden Neighbourhood Plan does not make any site-specific allocations and seeks to guide development in the village. The Plan includes good policies to protect and enhance the natural environment and biodiversity across the parish, including the Great Ouse Valley, which we fully support. On this basis we support the conclusions of the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report (June 2020) that the Buckden Neighbourhood Plan will not have significant effect on the environment, including adverse effect on the integrity of internationally designated sites, hence SEA and HRA are not required. In our attached response to the Draft Buckden Neighbourhood Plan consultation, dated 17 December 2019 (ref. 299690), we advised that Plan policies could be strengthened by the inclusion of requirements for development to protect nearby statutorily designated wildlife sites such as Brampton Wood SSSI, Portholme SSSI, SAC and Grafham Water SSSI. For example, a requirement for housing development to incorporate adequate informal greenspace provision would help to ensure recreational pressure impacts are diverted away from more sensitive designated sites.		
Edward James	Historic England			BUNP:70	Support	E-Mail	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/		

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Gladman Developments	Gladman Developments			BUNP:10	Have observations	E-Mail	See attached documents from Gladman Developments. Housing Need 3 - Housing Mix In principle, Gladman support the inclusion of the above policy which seeks to provide a range of housing types, mix and tenures to meet the local needs identified in the HNA or any subsequent evidence of housing needs. However, Gladman do not consider that the policy should contain a provision that states proposals for residential development should provide the minimum of 4 bedroom or larger dwellings to achieve viability. The BNP should not be setting out policies that could potentially lead to adverse outcomes on development viability. This would be contrary to national policy and the delivery of sustainable development.		
Gladman Developments	Gladman Developments			BUNP:12	Have observations	E-Mail	See attached documents from Gladman Developments. Building Design 2 - Implementation Whilst Gladman acknowledge the importance for planning policies relating to quality design measures, and the documents sitting behind them, these should not be overly prescriptive and should allow for flexibility in order for schemes to respond to site specifics and the character of the local area. There will not be a "one size fits all" solution in relation to design and sites will need to be considered on a site by site basis with consideration given to various design principles. In combination with Building Design 1, these two policies create a long and prescriptive list of design standards built into policy that do not always give a clear indication on how a decision maker should respond at the decision taking stage. For example, within Building Design 2, there is a requirement for all dwellings to have off-street parking for 2 family sized cars, however, there is no reference point as to what the expected dimensions are for these parking spaces. There is also a requirement for proposals to include people friendly principles to streets but no further detail on what this means. It is also noted that the policy cross refers to other policy and guidance, e.g. the Huntingdonshire Design Guide and Local Plan that produces unnecessary replication. For simplicity, and to avoid repetition, it is suggested that the two policies should be amalgamated and simplified so that quantifiable elements are contained within the policy and prescriptive elements are left for the design guidelines document or supporting text.		
Gladman Developments	Gladman Developments			BUNP:14	Object	E-Mail	See attached documents from Gladman Developments. Flood Risk and Drainage Policies 3 The policy seeks to impose specific requirements on information to inform a flood risk and drainage assessment that go beyond Policy LP 5 of the adopted Local Plan. For the reasons set out above, it is considered the policy is not in accordance with basic condition (a) and should be deleted.		

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Gladman Developments	Gladman Developments			BUNP:16	Object	E-Mail	See attached documents from Gladman Developments. Transport 2 - Traffic Impact Mitigation Gladman do not consider it the role of the neighbourhood plan to determine what should be deemed a satisfactory resolution to potential traffic impacts on local roads. Through this policy the BNP is seeking to replace the role of the County Council's Highways team whose responsibility it is to determine whether a development proposal would have unacceptable impact on the highways network in line with the requirements of the through the NPPF 2019. This policy should therefore be deleted in its entirety.		
Gladman Developments	Gladman Developments			BUNP:18	Object	E-Mail	See attached documents from Gladman Developments. Biodiversity 1 - Protecting Gladman has concerns with both the Policy and evidence that sits behind this policy, particularly references to land east of the settlement at Mill Road. Gladman has interests in this land and is promoting the site for residential development, with a live planning application currently pending consideration with Huntingdonshire District Council ³ . In terms of the evidence base, it is noted that the Parish Council has commissioned a Mr Ward, a resident of Buckden to prepare a Biodiversity and Ecological Appraisal. For the most part, the document provides statements on ecological findings, with limited detail on the timing of surveys and the location in which they were undertaken. For example, it identifies that the land east of Greenway is a 'biodiversity hotspot' and refers to species type that have been recorded on site; however, no permission has ever been given to undertake on-site survey work. Notwithstanding this, the ecological value of this site has already been considered in detail as part of the planning process (application reference 18/01395/OUT) and the findings of the biodiversity and ecological appraisal are in conflict with the professional ecological evidence submitted as part of the outline planning application and consultation responses issued by both the Wildlife Trust and Natural England - the government's adviser for the natural environment (see Appendix 2). As will be noted, Natural England's final consultation response issued in January 2019 raised no objection to proposals for residential development on site. Specifically, the consultation response stated that "Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection". Similarly, and while undated, the Wildlife Trust's final consultation response acknowledged the proposals would result in a net gain in biodiversity and that there were no outstanding species conservation issues that would provide grounds for refusing development. This extended to the proposals impact on the wider ecological network of the Ouse Valley, which also could not be categorised as significant or as grounds to refuse development. Thus, despite the claims made in the		

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							Neighbourhood Plan about the site's ecological status, Gladman has demonstrated that there are no ecological constraints that would prohibit development. Indeed, the net biodiversity calculations submitted and accepted by the Wildlife Trust demonstrate that there would be a net gain over the existing site conditions. These gains would be captured by an ecological and green infrastructure management plan that could be secured through either planning conditions or a S106 agreement. Referring to biodiversity 1, this states that "Sites of biodiversity value and importance for Priority Species in Buckden Parish, as identified and mapped in the Neighbourhood Plan, will be protected from development", which includes land east of the Greenway and North of Mill Road. It is considered that this requirement unnecessarily restricts development on this land, relying on unsubstantiated ecological claims that are contradicted by both Natural England and The Wildlife Trust. It is therefore suggested that this element of the policy should be deleted as it is erroneous and could hinder sustainable development. 3 - Planning Application Reference: 18/01395/OUT		
Gladman Developments	Gladman Developments			BUNP:20	Have observations	E-Mail	See attached documents from Gladman Developments. Green Space 1 - Local Green Space The designation of land as Local Green Space (LGS) is a significant and restrictive policy tool. To designate land as LGS the Parish Council must ensure that it is able to demonstrate robust evidence to meet national policy requirements as set out in the Framework. The Framework makes clear at paragraph 99 that the role of local communities seeking to designate land as LGS should be consistent with the local planning for sustainable development. Further guidance is provided at paragraph 100 which sets out three tests that must be met for the designation of LGS. As was noted in Gladman's Regulation 14 representations, we have been unable to locate the evidence that supports the identification of the LGS sites. It is suggested that before these designations can be confirmed, there should be an opportunity to consider and scrutinise the evidence that has informed their identification.		
Gladman Developments	Gladman Developments			BUNP:22	Have observations	E-Mail	See attached documents from Gladman Developments. Great Ouse Valley 3 - Landscape Character and Views The policy states that developments will be supported provided they do not impact on landscape character and the unrestricted views to the village and from the village to the Great Ouse Valley and signpost to an appendix of the Plan. In the first instance, Gladman acknowledge the inclusion of the Buckden Landscape Appraisal commissioned by the Parish Council as part of the NP evidence base and note that this was published in 1995, some 25 years ago. In the intervening period between the publication of the appraisal and Regulation 16 Plan, best practice methods, technique and guidance on how to carry out a landscape appraisal has evolved, a point acknowledged by the Landscape Institute.		

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							<p>Gladman would therefore question the validity of relying on this document to inform any policy in the Neighbourhood Plan and would recommend that it be confirmed that the methodology that was deployed in the 1995 appraisal is in line with up to date methods. This aside, the policy states that development should not impact on landscape character. It is suggested that this creates too high a bar for any development to pass, as development of any scale will have an impact. The balance should be to ensure the proposals for sustainable development demonstrate how they respond to local context and how they can successfully integrate into the landscape, which is akin to the approach set out in Policy LP12 of the adopted Local Plan. To determine the land around Buckden is impacted by this policy, readers are directed to Appendix 5 of the Plan that includes a yellow buffer that circles the entire settlement and pinpoints that depict the 'valued viewpoints'. However, the evidence that has informed these valued viewpoints is dated and slim and provides no clear guidance as to their attributes and features, why they are valued and which aspects and elements of views should be preserved. The Map in Appendix 5 is also unclear. The title of this Map is "Landscape - Protected Views, Gateways, Transition Zones, Scenic Quality and Sense of Arrival", which mirrors text in the policy Great Ouse Valley 3. However, the Plan only denotes a Village Edge Zone, which is the yellow buffer zone (that includes land for the Silver Street allocation). As read, the policy presumes that any development that has an impact on the land within the yellow buffer or identified viewpoints would not be supported, which from the Plan would include the silver street allocation, contradicting the adopted Local Plan. However, the evidence to support this prohibition is lacking and in any event, the policy does not follow the approach to decision making set out in the Framework that states "planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area" (Paragraph 9 - under added).</p>		
Gladman Developments	Gladman Developments			BUNP:24	Have observations	E-Mail	<p>See attached documents from Gladman Developments. Landscape 2 Gladman's primary concern with this policy stems from its reliance on the Buckden Landscape Appraisal, the issue of which has previously been discussed. This aside, Gladman notes that the policy requires Landscape and Visual Assessments to include details of measures to be taken to protect existing trees and hedgerows during construction and after development. Such details would generally only be included in Arboricultural Assessments, and where protection measures were necessary, they would be required and controlled by planning condition.</p>		

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Gladman Developments	Gladman Developments			BUNP:26	Have observations	E-Mail	See attached documents from Gladman Developments. Gladman recognises the Government's ongoing commitment to neighbourhood planning and the role that such Plans have as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the BNP must be consistent with national planning policy and needs to take account of up-to-date evidence. If the Plan is found not to meet the Basic Conditions at Examination, then the Plan will be unable to progress to referendum. Through this consultation response, Gladman has sought to clarify the relation of the Buckden Neighbourhood Plan as currently proposed with the requirements of national planning policy and the strategic policies for the wider area. Gladman have submitted our development proposal for the land south of Mill Road, Buckden as a suitable and sustainable site that to provide residential development within the Parish. We hope you have found these representations helpful and constructive. If you have any questions do not hesitate to contact the Gladman team.		
Gladman Developments	Gladman Developments			BUNP:9	Object	E-Mail	See attached documents from Gladman Developments. Housing Need 1 - Development outside the existing built up area Gladman are concerned with the approach of this policy and the conflict this creates with the adopted development plan. Designated as a Key Service Centre, strategic Local Plan Policy 8 applies to Buckden. Under this policy a development proposal that is on land well-related to the built-up area may be supported where it was to accord with the specific opportunities allowed for through other policies of the Local Plan. Stating that development outside of the LP and the existing built area of Buckden shall only be supported in the case of Rural Exception Sites is a direct conflict with the strategic policies of the adopted development plan and therefore basic condition (d). Gladman do not consider it possible to erase this conflict without repeating policies contained in the adopted Local Plan which in turn would conflict with Paragraph 16(f) of the Framework, therefore this policy should be deleted.		
Gladman Developments	Gladman Developments			BUNP:11	Have observations	E-Mail	See attached documents from Gladman Developments. Housing Need 5 - Lifetime Homes In principle, Gladman supports policy that ensures the delivery of accessible and adaptable homes. However, it is suggested that the policy as drafted, should be either deleted or converted to supporting text. This is because the policy largely only replicates the requirements of Policy LP25 albeit that it does not allow divergence from standards where site specific considerations make them impractical or unviable, creating tension with adopted Policy. By converting the policy to supporting text, it would allow greater scope for the BNP to explain the importance of adaptable and accessible homes in the neighbourhood plan area.		

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Gladman Developments	Gladman Developments			BUNP:13	Object	E-Mail	See attached documents from Gladman Developments. Flood Risk and Drainage Policies 1 - Surface Water As we set out in Gladman Regulation 14 Consultation response, it is considered that the requirements of this policy go beyond the Written Ministerial Statement 2015, by including technical standards for new dwellings that should not be used within a neighbourhood plan ² . As such, this policy is not in accordance with basic condition (a) and should be deleted. Notwithstanding this, this matter will still be considered through the development management process on the advice of the Environment Agency and Fenland Internal Drainage Board. 2 - Planning Update: Written Statement - HCWS488		
Gladman Developments	Gladman Developments			BUNP:15	Object	E-Mail	See attached documents from Gladman Developments. Transport 1 - Traffic Impact Assessment Gladman consider that the requirements of the above policy are too onerous. It is not the responsibility of the neighbourhood plan to set the scope for consideration of a Traffic Impact Assessment. Traffic mitigation measures will be considered through the determination of development proposals through the decision-making process on the advice of the County Council's Highways team.		
Gladman Developments	Gladman Developments			BUNP:17	Object	E-Mail	See attached documents from Gladman Developments. Community Services 1 - Provision of Infrastructure Capacity The policy supports proposals where they demonstrate infrastructure capacity meets the needs generated by the proposals. Gladman would first note that to a large extent the requirements of the policy would already be considered as part of the planning application process, when statutory consultees respond as part of the application consultation process. For this reason, it is unnecessary for the policy to refer to consultation with the education authority and CCG as these bodies would be consulted in any event. It is also unnecessary for the policy to require proposals of more than 100 dwellings to submit a Health Impact Assessment as this is already required by Policy LP 29 of the adopted Local Plan. It is recommended that both these references are deleted. Notwithstanding this, Gladman would add that any requirement to provide contributions would only be lawful when compliant with tests as set out in paragraph 56 of the NPPF 2019, these being: - Necessary to make the development acceptable in planning terms; - Directly related to the development; and - Fairly and reasonable related in scale and kind to the development. As the Parish Council is not the decision taker, it would be for the Local Planning Authority to determine whether a contribution satisfied CIL tests. For this reason, the requirement in policy for proposals to contribute toward the cost of infrastructure should be deleted as it creates unnecessary duplication with Policy LP 4 of the Local Plan. Finally, the policy states in its final paragraph "Also of concern are recreational facilities for children and teenagers, cycle and footpaths and public		

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							transport.” As this reads as a statement and provides no indication as to how a decision maker should respond to a proposal it is recommended this should be deleted or alternatively converted to supporting text.		
Gladman Developments	Gladman Developments			BUNP:19	Have observations	E-Mail	See attached documents from Gladman Developments. Biodiversity 2 - Net Gains The policy states that all development will be expected to provide significant net gains at both habitat and species level focusing on priority species and wildlife sites identified in the plan. Gladman considers that this goes beyond paragraph 170(d) of the Framework that simply states planning policies and decisions should minimise impacts and provide net gains in biodiversity. It is suggested this policy may soon be overtaken in content by the Environment Bill 2019-21 that will impose a mandatory requirement for qualifying development to achieve a net gain in biodiversity.		
Gladman Developments	Gladman Developments			BUNP:21	Have observations	E-Mail	See attached documents from Gladman Developments. Great Ouse Valley 1 - Protection of Ouse Valley The policy aims to restrict development in the Ouse Valley to the east of the settlement. In the first instance, it is noted that Figure 2, which appears to be the only plan to identify the boundary of the Ouse Valley is of poor quality and difficult to interpret. It is suggested that any plan that shows the extent of the Great Ouse Valley correspond to the Local Plan Policies Map. This aside, the policy states that it is expected development proposals do not take place in or encroach into the Great Ouse Valley. It is suggested this should be deleted or amended so that decision makers can carry out an assessment of a development’s effects on the landscape characteristics of the Great Ouse Valley. Without this, the current policy could be interpreted as presuming against development on the Local Plan allocated site BU1 - East of Silver Street and South of A1, Buckden, which is clearly in conflict with the adopted Local Plan.		
Gladman Developments	Gladman Developments			BUNP:23	Object	E-Mail	See attached documents from Gladman Developments. Landscape 1 As with Policy Great Ouse Valley 3; Policy Landscape 1 relies on the 1995 Buckden Landscape Appraisal, which Gladman consider is dated and not suitable to inform up to date policy. Notwithstanding this, the policy includes six bullet points that development should be ‘sensitive’ to. Considering some of the issues with these in turn: <ul style="list-style-type: none"> • Bullet one requires the preservation and conservation of features identified in Figure 35 and recommended for protection in the landscape appraisal. This raises several issues. First and foremost is the age of the evidence document. A 25-year-old landscape appraisal is not an appropriate document to derive features of landscape importance that should be “preserved” or “conserved”. Secondly, the 		

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							<p>requirement for preservation or conservation is too high a policy bar and not in line with the more balanced approach set out in the Framework. Thirdly, the reference to Figure 35 is confusing as this is a photograph of a hedge on Mill Road. It is assumed the policy is meant to refer to section 14.6 of the Plan, which identifies features that it considers are of importance including the roadside hedge at Mill Road and Brampton Road. However, it is unclear whether the Plan expects the entire length of these hedges to be preserved or conserved or just certain sections. If it is the former, then Gladman would point out this goes beyond Local Plan Policy 31 that permits loss of or damage to hedges if alternative measures such as reinstatement of features are included as part of a proposal.</p> <ul style="list-style-type: none"> • Bullet two states that locations where the landscape extends into the village will be protected. It is unclear what 'landscape extends into the village' means. The policy lacks precision and as a result will lead to inconsistent decision making. • The policy refers to strategically important gaps between Buckden and a number of surrounding settlements and presumes that these should be maintained. It is suggested that it is beyond the remit of a Neighbourhood Plan to attempt to allocate land as a strategically important gap, particularly as there is no such support for this approach in the adopted Local Plan. There is also no Plan that designates which land is affected by this designation, nor up to date evidence that assesses for example, what the attributes of each gap is, what their function is, what their sensitivity to change is etc. It is important to note that commonly, when Plans identify gaps, they are supported by policy that draw from evidence to enable decision makers to determine whether development would diminish a the gap and its function, acknowledging that not all would be harmful. • Bullet five requires development to conserve landscape features. To align with Local and National policy it is suggested this strand of the policy requires tempering so that it not only seeks to conserve, but also requires any losses to be minimised or mitigated. • Bullet six refers to the key views. As noted earlier in these representations, Gladman's main concern with the identification of key views is the evidence that has been used to designate and support why these are key views that require particularly consideration in the development management process. 		
Gladman Developments	Gladman Developments			BUNP:25	Have observations	E-Mail	<p>See attached documents from Gladman Developments. Landscape 3 Broadly speaking, the policy has some duplication with Landscape 2, as an assessment of the landscape effects of development would be considered in a LVA. That said, it is suggested that the policy should include reference to effects being able to be mitigated, as well as minimised.</p>		

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Local Lead Flood Authority	Cambridgeshire County Council			BUNP:67	Have observations	E-Mail	<p>General</p> <p>Would it be possible to include the Cambridgeshire Flood and Water Supplementary Planning Document (SPD) within the neighbourhood plan? This document is adopted by Huntingdonshire and therefore any surface water designs should be in line with the document. Section 6.3.7 of the SPD requires the use of source control on all new developments. It may be worth mentioning in Section 5.7 about the fact that SuDS should be building a management train to manage and treat surface water across the site, spreading the pollution load across the site. SuDS designs are moving away from the pipe to basin approach and other features such as source control and sustainable conveyance (such as swales) are implemented to treat this runoff before it enters any attenuation feature. This reduces the pollution build up in one feature and increases the longevity of the drainage network across the site. Para 5.7.3 - The plan alludes that SuDS are only reducing the risk of groundwater flooding and sewers becoming overwhelmed by flood waters. However, the SuDS have a wider impact on developments, such as intercepting and managing surface water close to the source to help manage and mitigate downstream flows from the site. This is done by mimicking the natural drainage systems as opposed to the traditional piped systems. The effective use and appropriate design of SuDS will likely reduce the risk of surface water flooding not only to the site but also downstream due to the retention of water on site and cycling it back to the environment where possible. So the focus of SuDS is around the management of surface water flows, so it would be worth drawing more on the surface water flood risk around Buckden within the Neighbourhood Plan. Unfortunately there is not much that SuDS can do to prevent groundwater flooding and groundwater will more likely fill the basins and reduce the capacity in times of higher groundwater levels. Therefore the design of the SuDS should be to ensure the site can still drain surface water runoff from sites while there are high groundwater levels. This often means lining the features where groundwater may encroach the base of the SuDS feature, or if there is crate attenuation, ensuring it does not start floating and uplifting.</p>		
Local Lead Flood Authority	Cambridgeshire County Council			BUNP:69	Have observations	E-Mail	<p>Flood Risk and Drainage 3</p> <p>It may be worth mentioning the fact that there must be a 1m clearance between the base of any proposed infiltration feature and peak groundwater levels for infiltration to be feasible. The reason for this is to provide an unsaturated zone for water treatment and safeguard against encroachment of groundwater into the base of SuDS features.</p>		

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Local Lead Flood Authority	Cambridgeshire County Council			BUNP:68	Have observations	E-Mail	Flood Risk and Drainage 1 Ideally surface water discharge from sites will be limited to the natural greenfield runoff rate, also known as the Qbar rate. Alternatively, the developer may choose to match the runoff rates through complex source controls which ensure the discharge is no greater than the greenfield runoff for the equivalent storm which passes through. For example, the post-development discharge rate in the 30 year storm is no greater than the greenfield equivalent for the natural overland flows from the site during a 30 year storm pre-development. The EA's 2 l/s/ha is usually used where the greenfield runoff rates are not feasible to discharge at due to issues such very small flow controls which would provide a high risk of blockage.		
Local Plans Team	Huntingdonshire District Council			BUNP:28	Have observations	Web	See attached document for all HDC comments in plan order. Overall, Huntingdonshire District Council (HDC) is supportive of the Buckden Neighbourhood Plan and welcomes the more detailed guidance it will provide to supplement Huntingdonshire's Local Plan to 2036. The Neighbourhood Plan meets basic condition (f) as the conclusion of the Strategic Environmental Assessment and Habitat Regulations Assessment Screening Report: Buckden Neighbourhood Plan (June 2020) states that the Buckden Neighbourhood Plan will not have significant effects on the environment, nor will it have an adverse effect on the integrity of any internationally designated sites either on its own or in combination with any other plans. Therefore, a Strategic Environmental Assessment or Habitats Regulations Assessment were not necessary. Several observations and proposed amendments have been made in the sections below which HDC consider to be necessary to ensure the neighbourhood plan meets the basic conditions of having (a) regard to national policy and advice, (d) contributing to the achievement of sustainable development and (e) being in general conformity with the strategic policies within the Huntingdonshire Local Plan to 2036 which are essential to the delivery of the Local Plan strategy. The strategic policies within the Huntingdonshire Local Plan to 2036 are: <ul style="list-style-type: none"> • All policies in Chapter 4 'The Development Strategy' • All policies that allocate land for development in 'Section D: Allocations' as they are required to achieve the strategy as set out in Chapter 4 'The Development Strategy' • The policy LP11 'Design Context' and LP24 'Affordable Housing Provision'. 		
Local Plans Team	Huntingdonshire District Council			BUNP:30	Support	Web	Housing Need 1 This policy accords with national policy, strategic policy LP10 The Countryside and non-strategic policy LP28 Rural Exception Housing by supporting proposals for affordable housing and any opportunities that are suitable in a countryside location. This supports sustainable development and accords with national and local policy.		

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Local Plans Team	Huntingdonshire District Council			BUNP:32	Support	Web	Housing Need 3 The production of the Buckden Housing Needs Assessment and its use to evidence the types of homes required accords with non-strategic policy LP25 Housing Mix criteria e. It also accords with paras 61 and 62 of the NPPF as the type of affordable homes are identified and an assessment of housing need has been carried out evidencing the requirement.		
Local Plans Team	Huntingdonshire District Council			BUNP:29	Support	Web	Section 4.2 The grouping of the aims and objectives relates well to the subsequent chapters and policies in the Plan and provides the Plan with structure moving forward.		
Local Plans Team	Huntingdonshire District Council			BUNP:31	Have observations	Web	Housing Need 2 Have observations regarding basic condition: National policy/guidance To aid clarity as required by NPPF para 16d it would be useful to include a definition within the neighbourhood plan of almshouses within the supporting text to ensure consistent application of this policy. The suggested definition below is from the Almshouses Association.	Yes	Suggested change Following para 5.3.10 - add: <u>~An almshouse is a unit of residential accommodation (usually a house or flat) which belongs to a charity and is provided exclusively to meet the charity's purpose such as but not limited to the relief of financial need or infirmity and is occupied or is available for occupation under a licence by a qualified beneficiary who may be required to contribute a weekly sum towards its maintenance. An almshouse charity is a charity which is established to provide one or more almshouses."</u>
Local Plans Team	Huntingdonshire District Council			BUNP:33	Object	Web	Housing Need 4 Object regarding basic condition: National policy/guidance HDC are supportive of the Parish Council's aspirations to boost affordable housing provision within the Neighbourhood Plan focusing on local need. However, it is noted that bullets two, three, four replicate criteria b, c and d of strategic policy LP24 Affordable Homes and bullet five replicates the requirements of LP8 and so they provide no additional value contrary to the guidance in NPPF para 16f. Bullet six is superfluous as all policies should be taken into account where relevant in determining a planning application.	Yes	Suggested change Bullets two, three and four - delete Bullet five - delete Bullet six - delete

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Local Plans Team	Huntingdonshire District Council			BUNP:34	Have observations	Web	Housing Need 5 Have observations regarding basic condition: National policy/guidance HDC support the objectives of this policy to promote provision of flexible, adaptable homes. In accordance with national guidance the optional Part M4 higher accessibility standards were introduced into non-strategic Local Plan Policy LP25 with all new homes being required to be built to M4(2) where practical and viable. This is delivered through national building regulations. Whilst the policy recognises LP25 it leaves scope for uncertainty over what additionality it is seeking which puts it in conflict with NPPF 16d. Alternative wording is suggested to try to resolve this whilst retaining the objectives of the submitted policy.	Yes	Suggested change Amend to say: <u>'A proposal that includes housing will be supported where it is:</u> <ul style="list-style-type: none"> <u>in accordance with Local Plan policy LP25; and</u> <u>meets the requirements of the Lifetime Homes Standards and the Housing our Ageing Population Panel for Innovation's design standards where these exceed or are additional to the above.'</u>
Local Plans Team	Huntingdonshire District Council			BUNP:36	Support	Web	Building Design 1 The principles identified to ensure appropriate and well-designed places conform with strategic policy LP11 Design Context.		
Local Plans Team	Huntingdonshire District Council			BUNP:38	Object	Web	Flood Risk and Drainage supporting text Object regarding basic condition: National policy/guidance Substantial guidance on surface water flooding and SuDS is provided in the Cambridgeshire Flood and Water Supplementary Planning Document (2017). This is referenced in strategic policies LP5 Flood Risk and LP6 Waste Water Management and non-strategic policy LP15 Surface Water. Cambridgeshire County Council is the Lead Local Flood authority for the area and has published a countywide Surface Water Management Plan (2014) which identifies Buckden as a surface water flooding wetspot. It is considered that an additional paragraph would assist in ensuring unambiguous guidance is provided in line with NPPF para 16d, to enable consistent implementation of the policies and to provide applicants with information on which to base proposals to respond to the risk of any flooding in the neighbourhood plan area.	Yes	Suggested change After para 5.7.4 - add a paragraph to say: <u>'Detailed guidance on flood assessments and provision of SuDS within developments is provided in the Cambridgeshire Flood and Water Supplementary Planning Document. The Cambridgeshire Surface Water Management Plan (2014) identifies Buckden as a surface water flooding wetspot and should be referred to for specific information.'</u>
Local Plans Team	Huntingdonshire District Council			BUNP:40	Support	Web	Flood Risk and Drainage Policies 2 HDC supports the inclusion of this policy to mitigate flood risk and to support sustainable development in response to climate change.		
Local Plans Team	Huntingdonshire District Council			BUNP:43	Support	Web	Conservation Area 2 This supports non-strategic policy LP34 Heritage Assets and their Settings.		

Name	Organisation	Organisation	Agent Name	Comment ID	Support/ Object/ Observations	Type	Comment	Changes required?	Proposed changes
Local Plans Team	Huntingdonshire District Council			BUNP:45	Object	Web	<p>Transport 2</p> <p>Object regarding basic condition: National policy/guidance and Strategic policies in the Local Plan</p> <p>The first sentence of the policy refers to Policy BU1 which is a strategic site specific allocation within Buckden yet the policy is to be applied to all development proposals. It is considered that this is unclear and gives rise for potential ambiguity in conflict with NPPF para 16d. If the threshold of 15 vehicles at peak times is intended as the threshold by which an application should be refused, the policy should be amended to the following enabling conformity with NPPF para 109 and para 7.4.3 of the neighbourhood plan to ensure its unambiguous interpretation. The second sentence of the policy currently excludes consideration of allocated sites which do not yet have planning permission. Anticipated traffic flows from the outstanding allocation BU2 should also be taken into account in any assessment to ensure conformity with the strategic policies of the Local Plan. Similarly, para three omits reference to full planning applications.</p>	Yes	<p>Suggested change</p> <p>Para one, first sentence - simplify to say: <i>'Development proposals are expected to provide....'</i></p> <p>Para one, second sentence - amend to say: 'Any development which, taken with all existing , allocated and permitted but unbuilt development will have...'</p> <p>Para one, second sentence - amend to say: '...an average of more than 15 vehicles at peak times shall be considered <u>to represent a severe impact to the road network.</u>'</p> <p>Para three - amend to say: '...at the time of the <u>full or</u> outline planning application...'</p>
Local Plans Team	Huntingdonshire District Council			BUNP:47	Support	Web	<p>Conservation Area 1</p> <p>Support</p>		
Local Plans Team	Huntingdonshire District Council			BUNP:49	Have observations	Web	<p>Footpath and Cycling 2</p> <p>Have observations regarding basic condition: National policy/guidance</p> <p>The expectation to maintain current alignments may result in reduced design quality of new developments and does not seek the enhancement of public rights of way where possible in conflict with the Rights of Way Circular (01/09) which supports their enhancement, particularly for greater enjoyment for a variety of users. Use of the phrase 'there is every expectation' does not provide adequate clarity for determination of a planning application in conflict with NPPF para 16d.</p>	Yes	<p>Suggested change</p> <p>Amend to say: <i>'A development proposal which affects an existing public right of way should seek to retain the existing route unless an alternative would significantly enhance the public enjoyment of using the route.'</i></p>
Local Plans Team	Huntingdonshire District Council			BUNP:51	Support	Web	<p>Community Services 2</p> <p>Support</p>		
Local Plans Team	Huntingdonshire District Council			BUNP:53	Have observations	Web	<p>Biodiversity 1</p> <p>Have observations regarding basic condition: National policy/guidance</p> <p>HDC are supportive of the aspirations of the Parish Council to conserve, enhance and protect biodiversity. To avoid confusion for decision makers reference to the Figure showing sites of biodiversity value and importance should be added to accord with NPPF para 16d.</p>	Yes	<p>Suggested change</p> <p>Para one - amend to say: 'Sites of biodiversity value and importance for Priority Species in Buckden Parish, as identified and mapped <u>in Figure 23</u> of the Neighbourhood Plan,....'</p>

Name	Organisation	Organisation	Agent Name	Comment ID	Support/ Object/ Observations	Type	Comment	Changes required?	Proposed changes
Local Plans Team	Huntingdonshire District Council			BUNP:55	Support	Web	Green Spaces 1 The proposed designations meet the criteria set out in NPPF para 100 as they are of a proportional size located within the village that are used for community and recreational uses. Their identification also supports the aims of LP32 Protection of Open Space. The policy has sufficient flexibility whereby development that retains and supports their Green Space designation can be made ensuring that changing needs over time can be met.		
Local Plans Team	Huntingdonshire District Council			BUNP:57	Have observations	Web	Supporting text para 13.2.6 Have observations regarding basic condition: National policy/guidance and Strategic policies in the Local Plan Within para 13.2.6 there are incorrect references to the Local Plan including LP2 instead of LP3 (Green Infrastructure) and para 4.23 which relates to Wyton airfield rather than para 4.26 which forms the introduction to LP3. The correct references to strategic policy LP3 should be made to enable clarity for decision makers when using the subsequent policies to accord with NPPF para 16d.	Yes	Suggested change Para 13.2.6 - correct to say: 'From the HDC Local Plan to 2036 Green Infrastructure Section <u>starting from para 4.26 and including policy LP 3: A proposal within the Ouse Valley Landscape Character Area,</u> '
Local Plans Team	Huntingdonshire District Council			BUNP:59	Support	Web	Great Ouse Valley 2 The policy is broadly in line with non-strategic policy LP14 Amenity.		
Local Plans Team	Huntingdonshire District Council			BUNP:61	Have observations	Web	Landscape 1 Have observations regarding basic condition: National policy/guidance, Sustainable development and Strategic policies in the Local Plan There is a lack of evidence to justify why the undeveloped gaps between the Buckden and the settlements identified in bullet four should be protected raising conflict with NPPF para 170a. Their identification for the protection of the countryside for its own sake could be seen as an attempt to prevent sustainable development and take a "preventative stance" towards development. This is contrary to strategic LP2 Development Strategy, LP8 Key Service Centres and LP10 The Countryside. In addition, the boundaries are not mapped anywhere giving rise to a lack of clarity impeding effective interpretation of the policy in conflict with NPPF para 16d.	Yes	Suggested change Bullet one - Correct to say '...identified in Figure 36...' Bullet four - delete
Local Plans Team	Huntingdonshire District Council			BUNP:63	Have observations	Web	Landscape 3 Have observations regarding basic condition: National policy/guidance The first sentence duplicates the last element of Landscape 1. The second sentence is unclear as the protected areas are undefined and no mechanisms are proposed for implementation and ongoing delivery of the management regimes mentioned in conflict with NPPF para 16d; it is however addressed in policy Biodiversity 1.	Yes	Suggested change That this policy is deleted.
Local Plans Team	Huntingdonshire District Council			BUNP:65	Support	Web	This is a positive addition to the Neighbourhood Plan and has taken on board previous HDC comments made during earlier consultations.		

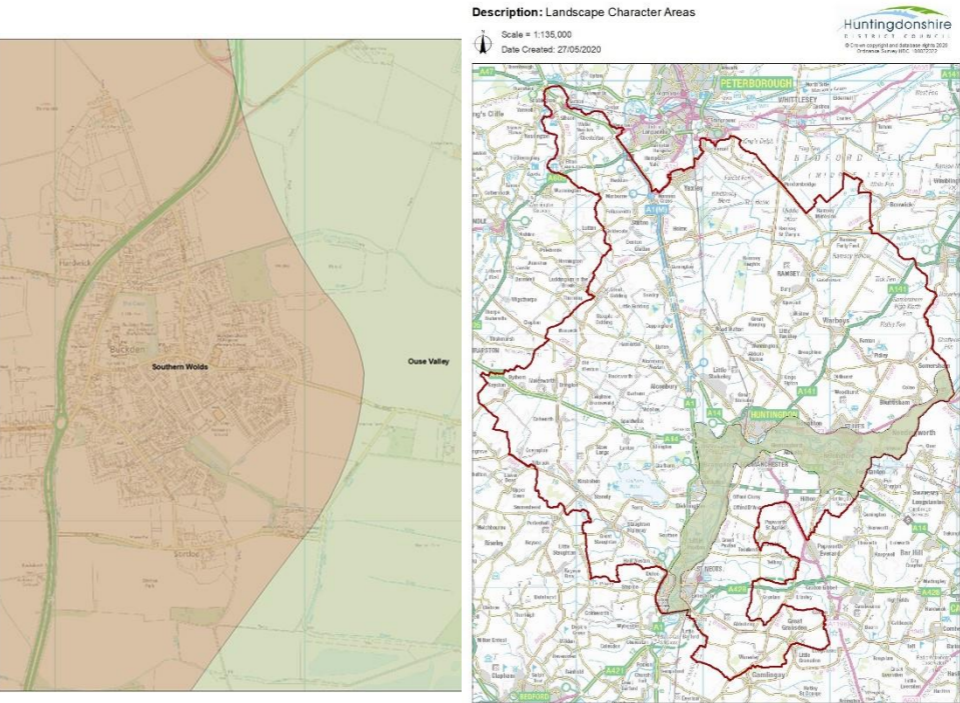
Name	Organisation	Organisation	Agent Name	Comment ID	Support/ Object/ Observations	Type	Comment	Changes required?	Proposed changes
Local Plans Team	Huntingdonshire District Council			BUNP:35	Have observations	Web	Building Design supporting text Generally supportive of the aspirations of the Parish Council to add localised detail towards design policies. HDC note that within the supporting text, several small changes must be made to ensure the correct evidence base documentation is referred to.	Yes	Suggested change Para 5.5.9 - correct to refer to Doc 8 instead of Doc 12
Local Plans Team	Huntingdonshire District Council			BUNP:37	Object	Web	Building Design 2 Object regarding basic condition: National policy/guidance This policy supports para 125 of the NPPF by setting out local aspirations towards design. Additionally, the production of the Buckden Design Guidelines (May 2019) supports NPPF para 126. Bullet one under the sub-heading ' Ease of getting around ' raises issues of clarity though. If read literally it would be impossible to access any shared usage roads as they are not permitted to link to any other streets. An amendment to this is suggested to ensure conformity with NPPF 16d. The bullet is also contrary to Cambridgeshire County Council Highways' adoption standards where a minimum of 5 dwelling units would be required for the road to be considered for adoption, otherwise being designated as a private drive which then restricts pedestrian permeability.	Yes	Suggested change Bullet one under the sub-section 'Ease of getting around' - reduce to say: <i>'Shared usage roads are expected to be built to adoptable standards and used only for the lowest order of roads.'</i>
Local Plans Team	Huntingdonshire District Council			BUNP:39	Object	Web	Flood Risk and Drainage Policies 1 Object regarding basic condition: Strategic policies in the Local Plan HDC have concerns over the clarity with which the policy is worded, and omission of locally produced guidance resulting in potential conflicts with strategic policies LP5 Flood Risk and LP6 Waste Water Management and non-strategic policy LP15 Surface Water.	Yes	Suggested change Amend to say: <i>'The design of any new development should reflect the fragile nature of Buckden's drainage network and minimise surface water flood risk. Where use of a sustainable drainage system is appropriate this should be discussed with Anqlian Water and the Lead Local Flood Authority to ensure it is designed to adoptable standards and is in accordance with guidance in the Cambridgeshire Flood and Water SPD and Anqlian Water's Surface Water Policy.'</i>
Local Plans Team	Huntingdonshire District Council			BUNP:41	Object	Web	Flood Risk and Drainage 3 Object regarding basic condition: National policy/guidance To remove the potential for conflict with national Building Regulations we suggest that this policy be applied to major development (10 or more homes or if site has an area of 0.5 hectares or more; or 1,000m ² for non-residential development or is on a site of 1 hectare or more).	Yes	Suggested change Para one - add to the end, the phrase: <i>'... for proposals which are categorised as major development'</i> .

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Local Plans Team	Huntingdonshire District Council			BUNP:44	Object	Web	<p>Transport 1 Object regarding basic condition: National policy/guidance The policy does not conform with the requirements of NPPF para 111 due to the inconsistent use of terminology throughout the policy, "Transport Impact Assessment", "Transport Assessment" and "Traffic Impact Assessment" are different things and reference to "Transport Assessment" and "Transport Statement" should be made in accordance with national guidance. The policy appears very onerous for smaller scale development proposals as it appears to apply to all proposals regardless of scale or distance from any of the junctions listed. The final paragraph relates to inclusion within any Traffic Impact Assessment of consideration of the potential impact on heritage assets and their settings. This is beyond the nationally intended scope of a Transport Assessment/ Statement and it is considered that this would be better addressed in any Heritage Impact Assessment submitted alongside a planning application.</p>	Yes	<p>Suggested change Para one - amend the beginning to say: 'Proposals which will have a significant impact on the highways network must submit a Transport Assessment or Transport Statement as appropriate to the scale of development proposed. This should specifically include...' Para two - amend to include the word '<i>significant</i>' in the first sentence to say: '...is likely to have a significant impact upon...' Para three - in the second sentence the phrase 'Traffic Impact Assessments' should be replaced with '<i>Transport Assessment or Transport Statement</i>' That the final paragraph be moved and slightly reworded as a separate additional policy in the Conservation area and heritage assets section. Suggested text for this is: '<i>Conservation Area 3 - Heritage Statements</i> <i>The location and relationship of heritage assets to the existing road network is of key importance to the village. Where required, a Heritage Statement should specifically assess and report on the potential impact of any proposal on the heritage assets affected and their settings.</i>'</p>

Name	Organisation	Organisation	Agent Name	Comment ID	Support/ Object/ Observations	Type	Comment	Changes required?	Proposed changes
Local Plans Team	Huntingdonshire District Council			BUNP:46	Object	Web	<p>Transport 3</p> <p>Object regarding basic condition: National policy/guidance, Sustainable development and Strategic policies in the Local Plan</p> <p>The Conservation Area boundary immediately adjoins the road junction from the A1 Buckden roundabout with High Street and covers a substantial proportion of the village. Preventing construction traffic from using the main access route into the village would render many planning permissions undeliverable or force traffic to approach from alternative routes into smaller residential streets around the village outskirts. It would also prevent construction of any relevant permitted scheme within the Conservation Area. This is considered to be a 'preventative stance' against sustainable development conflicting with NPPF para 11 and to conflict with strategic policies LP2 Development Strategy and LP8 Key Service Centres by undermining the strategic approach taken in the Local Plan to support sustainable development.</p>	Yes	Suggested change Delete.
Local Plans Team	Huntingdonshire District Council			BUNP:48	Have observations	Web	<p>Footpath and Cycling 1</p> <p>Have observations regarding basic condition: National policy/guidance</p> <p>The Council is supportive of the ambitions of the Local Cycling and Walking infrastructure Plan and the aspiration of the Parish Council to improve, enhance and conserve public rights of way and active and healthy lifestyles. This supports paras 91, 98, 102c and 104d of the NPPF. However, it should be clarified within the policy that only initiatives or sections of proposed routes located within the Neighbourhood Plan Area fall within this policy.</p>	Yes	Suggested change Para one - amend the introductory sentence to say: <i>'In so far as they fall within this neighbourhood plan area proposals that enhance...'</i>

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Local Plans Team	Huntingdonshire District Council			BUNP:50	Have observations	Web	<p>Community Services 1 Have observations regarding basic conditions: National policy/guidance and Strategic policies in the Local Plan To improve clarity and ensure conformity with strategic policy LP4 Contributing to Infrastructure Delivery and NPPF para 16d also NPPG reference 041 Reference ID: 41-041-20140306 HDC suggest the bullet points are amalgamated and simplified. Para five conflicts with the requirements in LP29 Health impact Assessment of the Local Plan by raising the minimum threshold at which a health impact assessment is required from 50 to 100 dwellings. It is acknowledged that LP29 is not a strategic policy, however, amendment to align the two would reduce conflict and be more closely aligned with the emphasis of the neighbourhood plan. Para seven cannot be applied to determination of a planning application and may be better removed to the supporting text.</p>	Yes	<p>Suggested change Para two - amend to say: ‘...community facilities made necessary by the development <u>including but not limited to primary and early years educational facilities and GP Services within the village.</u> Where this is not provided through the Community Infrastructure Levy it will be through on or off-site provision or through financial payments and secured via planning conditions or planning obligations <u>in accordance with HDC’s Developer Contributions Supplementary Planning Document (2011) or successor documents.</u>’ Para three and four - delete as a consequence of the above amendment. Para five - amend to say: ‘<u>Large scale developments and large-scale major developments as defined in the Huntingdonshire Local Plan must submit a Health Impact Assessment.</u>’ Para six - at the end, add ‘<u>subject to compliance with other policies.</u>’ Para seven - delete.</p>
Local Plans Team	Huntingdonshire District Council			BUNP:52	Have observations	Web	<p>Business 1 Have observations regarding basic condition: Strategic policies in the Local Plan The policy overall supports the strategic approach in LP8 Key Service Centres but should reference the built-up area to enable conformity with strategic policy LP10 The Countryside to ensure development required in a countryside location is supported outside of the built-up area.</p>	Yes	<p>Suggested change Para one - amend to say: ‘Proposals for business development within <u>the built-up area of Buckden or on land well related to the built-up area</u> and the surrounding countryside...’</p>

Name	Organisation	Organisation	Agent Name	Comment ID	Support/ Object/ Observations	Type	Comment	Changes required?	Proposed changes
Local Plans Team	Huntingdonshire District Council			BUNP:54	Have observations	Web	<p>Biodiversity 2</p> <p>Have observations regarding basic condition: National policy/guidance To conform with NPPF para 170d the policy should remove the word 'significant'. This would assist in accommodating the emerging Environment Bill which is looking to set a specific net gain requirement. To avoid an additional burden being placed upon developers it is suggested that the request in the second para for biodiversity Implementation and Management Plans be incorporated into Landscape and Ecology Management Plans as already required to accompany planning applications where appropriate.</p>	Yes	<p>Suggested change</p> <p>Para one - amend to say: <u>'All developments will be expected to provide net gains at both habitat and species level...'</u></p> <p>Para two - amend to say: <u>'...particularly rich biodiversity as evidenced in a Landscape and Ecology Management Plan.'</u></p>
Local Plans Team	Huntingdonshire District Council			BUNP:56	Have observations	Web	<p>Green Space 2</p> <p>Have observations regarding basic condition: National policy/guidance Identification of the 'Other Green Spaces' is supported due to their contribution to the setting, character and habitat value they provide to the village and its residents. However, the policy would benefit from being strengthened as stating that <i>"it is expected that they be preserved as green spaces"</i> does not accord with the requirement in NPPF para 16d to provide clarity on how a decision maker should react to development proposals.</p>	Yes	<p>Suggested change</p> <p>Amend to say: <u>'.....the character of the village and development will not be supported in these areas unless the proposal preserves the openness of the important green space.'</u></p>
Local Plans Team	Huntingdonshire District Council			BUNP:58	Have observations	Web	<p>Great Ouse Valley 1</p> <p>Have observations regarding basic condition: Sustainable development and Strategic policies in the Local Plan</p> <p>There are internal inconsistencies between the policy and supporting text such as at para 13.2.6 and Figure 27 giving rise to ambiguity over which boundary of the Ouse Valley the Parish Council are using to apply to this policy. To ensure the policy accords with strategic Local Plan policy LP3 amendment should be made to align with this. The boundary is shown below for information. See attached for a map of the Great Ouse Valley Green Infrastructure Priority Area. Also see attached for a map showing an extract of the Great Ouse Valley Green Infrastructure Priority Area showing its boundary in relation to Buckden. Para two is contrary to strategic policy LP3 Green Infrastructure by limiting exceptions to this policy solely to proposals put forward by Anglian Water. This would impede other sustainable forms of development which are appropriate in the countryside or within the Great Ouse Valley. This could serve to undermine conservation efforts and the aspirations of greater footpath and cycling provision in the neighbourhood plan.</p>	Yes	<p>Suggested change</p> <p>Figure 27 - replace with the detailed extract above to show the boundary used within strategic policy LP3.</p> <p>Para one - amend to say: <u>'It is expected that development proposals do not take place in, or encroach into, the Great Ouse Valley as defined in LP3 of the Huntingdonshire Local Plan and surrounding land and habitats, to the east of the existing built area of the village.'</u></p> <p>Para two - amend to say: <u>'Exceptionally, development proposals to support Anglian Water's infrastructure, footpath and cycle provision or conservation projects may be supported.'</u></p>

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Local Plans Team	Huntingdonshire District Council			BUNP:60	Support	Web	Great Ouse Valley 3 Support		
Local Plans Team	Huntingdonshire District Council			BUNP:62	Support	Web	Landscape 2 Support		
Local Plans Team	Huntingdonshire District Council			BUNP:64	Have observations	Web	Support the inclusion of this chapter and the aspirations to review and monitor the progress of the plan and its policies. HDC note that not all policies have clear criteria or indicators in which to monitor them, in producing a monitoring report, consideration should be given to understand how data can be collected for each policy to assess whether it is having the intended effect or not to enable an effective review.		
Local Plans Team	Huntingdonshire District Council			BUNP:66	Support	Web	Positive action has been taken to identify priority projects that could be funded by CIL through the Parish Council's "meaningful proportion".		
Matt Verlander	Avison Young (National Grid)			BUNP:3	Have observations	E-Mail	An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.		
Mr des foster				BUNP:6	Support	Web	I am supportive of the plan. In particular: It is essential that any further growth in population of the village is supported by adequate infrastructure. In particular traffic volumes have to be addressed because Buckden is severely restricted in terms of entry and exit routes, the school is already at full capacity as is the local surgery. It is essential that	No	

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							the housing needs of the village are recognised and its character is not compromised.		
Mr Jonathan Chitty				BUNP:2	Support	Web	I have no recommendations to make.	No	
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:71	Have observations	E-Mail	See attached document from Deloitte LLP. The Commissioners are broadly supportive of the intention of the Vision and Objectives set out at section 4 of the Submission Plan. However, we do have specific comments around how these objectives have been translated into individual policies, and address these subsequently.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:73	Have observations	E-Mail	See attached document from Deloitte LLP. Housing Need 3 In order to support the objective of promoting a sustainable, inclusive and mixed communities it is not appropriate or justified to require residential development to only provide 4 bedroom properties or larger unless it is necessary for the viability of the scheme. A mix of dwellings to support existing and future community requirements should be sought. To accord with Policy LP25 - Housing Mix of the HLP19, proposals for major scale development should provide a mix of sizes, types and tenures to help achieve sustainable, inclusive and mixed communities. The HNA (Produced by AECOM, June 2019) commissioned by the Parish Council has limitations, as recognised in the Submission Plan, and it is one of a collection of documents prepared at the local, district, and county level that will form a material consideration in determining planning applications. Paragraph 7.17 of HLP19 states that Neighbourhood Plans may set policies relating to housing mix, however it makes clear that these should be expressed as local aspirations, which provide a useful indication of local opinion on a desirable mix of housing types and sizes. We therefore suggest that the Neighbourhood Plan should require proposals to take into account the HNA or subsequent surveys and should not be required to meet the local needs identified in the HNA. This update to the policy will ensure that Draft Policy Housing Need 2 is in line with HLP19.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:75	Have observations	E-Mail	See attached documents from Deloitte LLP. Housing Need 5 Draft Policy Housing Need 5 requires properties to be fully adaptable with the Lifetime Homes Standards Design Criteria and the design standards developed by the Housing our Ageing Populations Panel for Innovation, however this is not compliant with HLP19 Policy LP25. Firstly, neither HLP19 Policy LP25 nor any other policy with the HLP identify the need to comply with the Lifetime Homes Standards Design Criteria and the Housing our Ageing Populations Panel for Innovation. Secondly, HLP		

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							Policy LP25 identifies that there may be instances where it is impractical or unviable to meet the requirements of the policy and where this is the case, this should be demonstrated. Draft Policy Housing Need 5 is not consistent with HLP19 and should be amended.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:77	Have observations	E-Mail	See attached document from Deloitte LLP. Building Design 1 Paragraph 126 of the NPPF states that design guides and codes should be used as a framework for creating distinctive places with a high quality standard of design, however "...their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow for a suitable degree of variety". This should be appropriately reflected within the wording of Draft Policy Building Design 1. Therefore, the policy should provide flexibility and seek to ensure the preparation of proposals demonstrate consideration for the principles.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:79	Have observations	E-Mail	See attached document from Deloitte LLP. Flood Risk and Drainage 1 As part of future planning applications, the Environment Agency and Internal Drainage Board (IDB) will assess proposals on a site by site basis and will advise on the required run-off rates at the date the application is being considered. To include specific rates within the policies is too specific and can become outdated; as set out at paragraph 31 of the NPPF, "... all policies should be underpinned by relevant and up-to-date evidence". The above reference section of the policy should be removed.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:81	Have observations	E-Mail	See attached document from Deloitte LLP. Conservation Area 1 As previously highlighted, Paragraph 126 of the NPPF promotes flexibility in the drafting of policy and design codes. Therefore, the policy should provide flexibility and seek to ensure the preparation of proposals demonstrate consideration for the principles. The draft wording of Conservation Area 1 should be amended so that this is reflected.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:83	Object	E-Mail	See attached document from Deloitte LLP. Transport 1 HLP19 states at Paragraph 5.49 that "the need for a Transport Assessment, Transport Statement or Travel Plan will be determined on a case by case basis". Additionally, Paragraph 5.49 outlines that applicants are encouraged to contact a Transport Assessment Officer at Cambridgeshire County Council and engagement with Highways England may be required, to agree the scope of the Transport Assessment required to accompany any planning application. It is not therefore necessary for this policy to seek to define the scope of all transport assessments and statements. This should be a matter determined on a case by case basis in discussion with the County Council and, if required, Highways England. The draft policy therefore requires re-drafting.		

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Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:85	Object	E-Mail	See attached document from Deloitte LLP. Transport 3 Construction Management Plans must outline safe and efficient access and egress for personnel and vehicles in and around the site, minimising disruption to neighbours and existing users of the surrounding roads and pedestrians. There is no requirement for construction traffic to avoid a village's Conservation Area, unless it can be evidenced that this is not a safe and efficient access and egress route. Policy Transport 3 should be deleted.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:87	Have observations	E-Mail	See attached document from Deloitte LLP. Biodiversity 2 Policy Biodiversity 2 states that all developments will be expected to provide "significant net gains at both habitat and species level", however this is not compliant with paragraph 175(d) of the NPPF which identifies that "opportunities to incorporate biodiversity improvements in and around developments should be encouraged [our emphasis], especially where this can secure measurable net gains for biodiversity" or HLP19 Policy 30 (Biodiversity and Geodiversity) which identifies that development will "provide a net gain where possible". It is therefore suggested that the wording of the Submission Plan is amended to ensure consistency with national and local policy requirements.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:89	Have observations	E-Mail	See attached document from Deloitte LLP. Great Ouse Valley 3 Where it is considered necessary to prepare a landscape visual impact assessment (LVIA) to support a planning application, the scope of the views to be assessed should be agreed in consultation with the Landscape Officer at the District Council. It is the impact upon these views which should then be assessed as part of the planning balance in the determination of the application. To include a restriction such as that included within Great Ouse Valley 3 prematurely precludes development from taking place without being fully assessed in the context of the planning balance. The policy should therefore be reworded.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:91	Have observations	E-Mail	See attached document from Deloitte LLP. Landscape 2 For many outline planning applications, it will not be possible to prepare and submit a landscape strategy to accompany the application as matters such as layout, appearance and landscaping may be reserved for consideration at a subsequent reserved matters stage. It is anticipated that such a strategy would be prepared and agreed via a planning condition attached to a grant of consent. The policy should be updated accordingly.		

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Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:72	Have observations	E-Mail	See attached document from Deloitte LLP. Development of BU 1 (land to the east of Silver Street) Paragraph 5.3.8 of the Submission Plan states that the Parish Council will support the development on the allocated site BU1 (land to the east of Silver Street), provided that there is a plan developed in collaboration with the community. The submitted application (reference: 18/02753/OUT) proposals for Silver Street was subject to a comprehensive public consultation exercise, including two public exhibitions in the village prior to its submission. Consultation has therefore already been undertaken with the local community and this should be acknowledged in the Submission Plan. Additionally, the Submission Plan states that the Silver Street application must demonstrate how it will meet the policies set out in the Neighbourhood Plan. The current planning application precedes the Submission Plan and therefore does not include an assessment of the development against the policies. Should a Neighbourhood Plan be adopted then any future applications in the village will at that point need to consider the Submission Plan. Parish Council commissioned Housing Needs Assessment Paragraph 7.17 of HLP19 outlines that neighbourhood plans "...may set out local aspirations for housing supply and provide a useful indication of local opinion on a desirable mix of housing sizes and types". The Submission Plan has sought to do this through the preparation of a Housing Needs Assessment (HNA) which underpins the related policies. The limitations of this assessment have been set out within Paragraph 5.3.10 of the Submission Plan and it is important that these are recognised in the Neighbourhood Plan housing policies. In order to ensure the Aim supports the achievement of sustainable development, it should acknowledge that the needs of Buckden are not static and will change over time.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:74	Have observations	E-Mail	See attached documents from Deloitte LLP. Housing Need 4 HLP19 Policy LP24 states that affordable housing provision should be based on "...the latest evidence from the Housing Register, the Cambridge sub-region Strategic Housing Market Assessment and other local sources". Therefore, the draft policy should be amended to acknowledge primacy of established metrics in assessing affordable requirements and the development plan policy.		

Name	Organisation	Organisation	Agent Name	Comment ID	Support/ Object/ Observations	Type	Comment	Changes required?	Proposed changes
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:76	Have observations	E-Mail	See attached document from Deloitte LLP. Building Design supporting text Paragraph 5.5.6 of the Submission Plan states that "housing development must also comply with the design principles set out on the Huntingdonshire Design Guide". Paragraph 126 of the NPPF states that design guides and codes should provide a framework for a high quality standard of design, however their level of detail and degree of prescription "...should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified". This flexibility should be reflected within the wording of the Submission Plan and therefore, rather than requiring developments to comply with a set of prescribed design principles, it should seek to ensure the preparation of proposals demonstrate consideration for the principles. Paragraph 5.5.9 of the Submission Plan states that "all new development should demonstrate it meets the industry-endorsed Building for Life (Doc 12) initiative". The reference to the Building for Life 12 initiative should be deleted from the wording. A proposal should have regard to relevant guidance which promotes high quality design, the specific reference to this document is too prescriptive as, at the time of a planning application being made, it may no longer be relevant.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:78	Have observations	E-Mail	See attached document from Deloitte LLP. Building Design 2 The policy states that proposals should positively respond to the identified principles contained within Buckden Design Guide. As has previously been highlighted, as detailed within the NPPF, Design Guides should be used as a framework tool and not a document against which the design of a development should be rigidly assessed. Therefore, the policy should be amended to ensure the role of the Design Guide is correctly applied. In addition to the above, the requirements of the above policy are overly prescriptive. What is considered acceptable for a proposed development in relation to its layout, internal circulation and accessibility, areas of publically accessible spaces, landscaping, ecology and sustainability are all matters that need assessing having regard to the context, constraints and opportunities of that particular site. The proposals themselves need to be developed in this way too, as what is appropriate will vary from site to site. The policy should be reworded to ensure that consideration is had for the aforementioned matters in the preparation and assessment of applications, rather than set out as detailed list of pre-requisite requirements for every housing development within the area.		

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Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:80	Object	E-Mail	<p>See attached document from Deloitte LLP.</p> <p>Flood Risk and Drainage 3</p> <p>There is no national or local policy requirement for BRE Digest 365 to be used for the pretesting. HLP19 requires sustainable drainage systems (SuDS) to be considered in accordance with the Cambridgeshire Flood and Water SPD or successor documents and advice from the Cambridgeshire County Council as Lead Local Flood Authority. Additionally, the Cambridgeshire Flood and Water SPD outlines that developers should ensure that the required management and maintenance of all site features has been clearly set out as part of the drainage strategy with initial agreements in place to cover management funding for the lifetime of the development. There is no requirement for the developer to provide the maintenance, inspection and monitoring as currently stated by the Submission Plan.</p>		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:82	Have observations	E-Mail	<p>See attached document from Deloitte LLP.</p> <p>Transport supporting text</p> <p>Buckden Roundabout Exit Paragraph 7.3.1 references the Pell Frischmann Traffic Assessment which has been submitted in support of the development of land east of Silver Street and is currently subject to a planning application (reference: 18/02753/OUT). Reference to this assessment should be removed as the specific traffic generation levels referenced within Paragraph 7.3.1 are specific to a point in time. As set out at as set out at paragraph 31 of the NPPF, "...all policies should be underpinned by relevant and up-to-date evidence".</p> <p>Other Transport Challenges</p> <p>Paragraph 7.5.6 states that proposed developments should consider the impact of traffic on protected heritage assets. It is not clear what is meant by this and clarification should be provided. Measurement Paragraph 7.7.2 of the Submission Plan outlines specific measures that will define a 'severe' residual cumulative impact on Buckden's roads. These definitions should be removed as it is not for the Neighbourhood Plan to define what a 'severe impact' is. It will vary considerably on a case by case basis. For this reason there is no definition proposed in the NPPF. It is also noted that the Principal Transport Officer for Cambridgeshire County Council stated in an email, dated 29 October (referenced in Paragraph 7.7.4 of the Submission Plan), that "Cambridgeshire County Council does not define impact in its transport assessment guidelines". Paragraphs 7.7.2.3 and 7.7.3 require traffic impacts to be measured against the Highway Capacity Manual, Sixth Edition: A Guide for Multimodal Mobility Analysis (TRB, October 2016) ('HCM'). However, the HCM is not a relevant publication for the assessment of traffic impact in the UK. It's a publication from the United States of America. HLP19 Policy LP16 requires potential impacts on the strategic road network to be addressed in line with Department for Transport Circular 02/2013, being one of a</p>		

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							number of relevant UK publications. Paragraphs 7.7.2.3 and 7.7.3 should be amended to remove the requirement to consider the HCM.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:84	Object	E-Mail	See attached document from Deloitte LLP. Transport 2 Policy BU1 is a site specific allocation and is not a policy for considering all potential developments in Buckden. The reference to Policy BU1 in Policy Transport 2 should be removed. It is not a requirement of national policy that all impacts of proposed developments are negated. A consideration of impact and the need for mitigation should be considered on a case by case basis as part of a planning application. Paragraph 108 makes this point clear: "...Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree." [Deloitte emphasis] Furthermore, it is not appropriate for the policy to prescribe what is deemed to be an acceptable or unacceptable impact on the local road network. That must be a matter that is considered on a case by case basis, reflecting changes in traffic conditions, the impact of future developments and changes in planning and transport policy. This policy requires considerable re-drafting for it to accord with relevant legislation and national policy.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:86	Object	E-Mail	See attached document from Deloitte LLP. Biodiversity 1 National policy does not prohibit the development of ecologically "high value" sites or those which are important for Priority Species. The policy as currently worded is not consistent with national policy and it is recommended that this part of the policy is reworded to have consideration for paragraphs 175, 176 and 177 of the NPPF. With regards to the second paragraph within the policy, it is identified that development will not be supported if it has an adverse impact on biodiversity. However, this is not consistent with the test contained at paragraph 175(a) of the NPPF which identifies that if "significant harm to biodiversity resulting from a development cannot be avoided...adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused". Given the significant difference between the requirements of the Submission Plan and NPPF, this element of the policy should be reworded to be consistent with national policy.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:88	Have observations	E-Mail	See attached document from Deloitte LLP. Great Ouse Valley 1 Paragraph 4.33 of the HLP19 identifies that, "where possible proposals within the Great Ouse Valley should seek to contribute to wildlife value...through the inclusion of green infrastructure, sustainable drainage systems and other measures", it does not preclude development from		

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							taking place within the area. Policy Great Ouse Valley 1 should be updated to reflect this.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:90	Have observations	E-Mail	See attached document from Deloitte LLP. Landscape 1 It is noted that the Landscape Appraisal that is referenced within the Submission Plan dates back to 1995. Being 25 years old, the document is now significantly out of date, does not reflect recent developments and does not have consideration for development as allocated within the HLP19. As such, it cannot be relied upon as evidence to underpin new policy. It is therefore suggested that a new updated Landscape Assessment is prepared and used to inform this section of the Submission Plan.		
Mr Nolan Tucker	Deloitte LLP	Deloitte LLP	Mr Nolan Tucker	BUNP:92	Have observations	E-Mail	See attached document from Deloitte LLP. These representations have been prepared by Deloitte LLP as instructed by the Church Commissioners for England. They provide a response to the proposed policies set out within the Final Submission Buckden Neighbourhood Development Plan 2019 - 2036, which is the subject of public consultation until 1 September 2020. These representations are framed against the requirements of the National Planning Policy Framework (NPPF), which states at Paragraph 37 that neighbourhood plans must meet certain 'basic conditions' and other legal requirements (as set out in Paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended)) before they came into force. We have set out where it is considered necessary to prepare further evidence to support the policies in the Submission Plan and have suggested amendments to the Submission Plan policies to ensure consistency with national and local planning policy. Once again, the Commissioners welcome the opportunity to comment on the Submission Plan and look forward to continuing to engage positively in the plan-making process.		
Mr Stewart Patience	Anglian Water			BUNP:93	Support	E-Mail	Building Design 1 In our previous comments we had asked for reference to be made to Sustainable Drainage Systems being applicable to all development proposals and not limited to housing within the Parish. Therefore we fully support the requirement for all development proposals to include the provision of Sustainable Drainage Systems (SuDS) so as not to increase flood risk and to reduce flood risk where possible and which have wider community and environmental benefits.		
Mr Stewart Patience	Anglian Water			BUNP:95	Have observations	E-Mail	Flood Risk and Drainage 3 Anglian Water are generally supportive of the policy as drafted but would make the comment that BRE 365 does not apply to smaller soakaways as outlined in Part H of the Building Regulations.		

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Mr Stewart Patience	Anglian Water			BUNP:94	Have observations	E-Mail	<p>Flood Risk and Drainage 1</p> <p>We welcome the inclusion of reference made to developers contacting Anglian Water where it is intended we would adopt a SuDs feature (which meets the legal definition of sewer) or a surface water pumping station as raised as part of the previous consultation. The policy as drafted refers to a surface water discharge rate from the Environment Agency and cross refers to national standards for SuDs from 2011. However the document being referred to is no longer current and the responsibility for commenting on surface water management was passed from the EA to Cambridgeshire County Council as Lead Local Local Flood Authority. The standards referred to have been replaced by non-statutory technical standards in 2015 but it would be helpful to reference the locally produced guidance.</p>	Yes	<p>It is therefore proposed that the policy and related footnote is amended as follows:</p> <p>It is expected that, as a pre-condition to development, the design of each development respects the fragile nature of Buckden's drainage network and minimises surface water flood risk by reducing demonstrating that the surface water run off rate is consistent with the guidance outlined in the Cambridgeshire Flood and Water SPD and Anglian Water's Surface Water Policy. With Sustainable Drainage Systems being designed to meet the standards identified by the adopting body. by reducing all surface water run-off rates to within the Environment Agency's maximum design run-off rate of 2 litres / second / hectare by using an adequately sized and controlled</p> <p>*Ref: National Standards for sustainable drainage systems Designing, constructing, operating and maintaining drainage for surface runoff—December 2011</p>
Mr Stewart Patience	Anglian Water			BUNP:96	Have observations	E-Mail	<p>Great Ouse Valley 1</p> <p>We note that this policy has been amended to address Anglian Water's previous comments that it placed an unintended restriction on any future development of our existing infrastructure including Buckden Water Recycling Centre located where it is located within the Ouse Valley as designated.</p>	Yes	<p>The policy as drafted refers to established uses but not Anglian Water's infrastructure more generally. It is therefore proposed that the policy is amended as follows:</p> <p>'A limited exception to this policy and in particular, in relation to established uses, would be development proposals relating to Anglian Water's infrastructure which</p>

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									would be supported in principle subject to other development plan policies.'
Mrs Bronwen Angel				BUNP:7	Have observations	Web	<p>Transport: 7.9 Transport Policies: I believe that transport assessments should also include the junction of Leadens Lane and Mill Road as this would capture the increased level of traffic using Stirtloe as an access route not just up to the A1 junction but out of the village to the Offord Crossing. At the moment the list of junctions would not capture increased usage of the very narrow lane and tight turn that runs between the Stirtloe hamlet and Mill Road.</p> <p>Environmental: The Lucks Lane development has shown that Developers do not abide by agreements/commitments regarding trees and ancient hedgerows. Can there not be some stronger wording or commitment required of Developers set in stone in this plan rather than polite wording in 11.4.2: 'This Plan will enable and facilitate the above by requesting that Developers consult with Buckden Parish Council? The current wording used in 11.4.2 suggest that developers would do the same as with Lucks Lane ie consult with the Parish Council and give assurances and then completely disregard them? 20 Appendix 5: Landscape " Protected Views, Gateways, Transition Zones, Scenic Quality and Sense of Arrival: I believe that one of the photographs that should be included here is the view of Buckden from the Stirtloe end of Lucks Lane to emphasise the 'physical separation and social identity between Buckden and Stirtloe' that is referred to in reference to picture no 10 'Stirtloe Lane Public Footpath leading to Cranfield Close'. I appreciate that this has already been somewhat amended but the planning approval for the Lucks Lane development required that the gap between Stirtloe and Buckden was maintained so houses were not built near to the Stirtloe end. Historic photos are available to show the view that should be preserved albeit altered by the new development and the wrongful removal of the old hedgerow and trees but once the hedgerow has been allowed to grow, the sense of 'rural landscape' should return and be allowed to remain.</p>	Yes	

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Mrs Linda Upham				BUNP:1	Have observations	Web	We are in full agreement with the broad outline of the plan which seeks to preserve the strong identity of the village setting, whilst acknowledging the need for increased housing for underrepresented groups. In particular, the need for suitable housing for retirees wishing to down size from large 4 bedroom homes thus creating a pool of suitable houses for families with children. The greatest reservation has to be the lack of coherent transport planning - the bottleneck situations on the A1 and the Offord crossing have been noted for many years - indeed with an increased number of trains planned, British Rail proposed a bridge to allow the Crossing to close completely which was subsequently suspended indefinitely. Traffic flow is of great concern, and seeing the inadequate entrance/exit supplied for the current Luck's Lane development heightens concerns that traffic problems with the A1 will not be taken into sufficient account when plans are submitted. No weighting is given to the ACCUMULATIVE effect of increased traffic moving an and out of the village via the roundabout and crossing exits. The subsequent rise in air pollution with queuing cars is not given sufficient weight.	Yes	More than a 'note' made of traffic issues and a firm commitment that no further building is allowed until a proper transport plan is submitted with Highways England and British Rail involved in planning and building a bridge/bypass.
Sport England				BUNP:5	Have observations	E-Mail	Thank you for consulting Sport England on the above neighbourhood plan. Government planning policy, within the National Planning Policy Framework (NPPF), 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. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications Sport England works with local authorities to ensure their Local Plan is underpinned by robust		

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							<p>and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/ Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place. In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals. Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and</p>		

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							physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved. NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing Sport England's Active Design Guidance: https://www.sportengland.org/activedesign (Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)		
Tarmac Trading Ltd	Tarmac Trading Ltd	Heatons	Georgina Illsley	BUNP:27	Have observations	E-Mail	See attached letter for further details, a summary has been provided below: This letter is being submitted in response to publication of the Submission version (Regulation 16) of Buckden Neighbourhood Plan (the Plan). We have been instructed on behalf of our client, Tarmac Trading Ltd, to promote their landholding at the site of former Buckden Quarry for residential development. This letter follows previous representation made to the Pre-Submission Draft (Regulation 14) of Buckden Neighbourhood Plan which was submitted to Buckden Parish Council on the 10th January 2020. The purpose of this letter is to outline the sustainability of our site against local and national planning policy and guidance following the updated position of nearby applications for residential development within the parish of Buckden at land east of Silver Street and land off Mill Lane. The relationship between our site the two application sites is illustrated by the map at Appendix 1. The letter also outlines how the position of our site has altered in light of proposed changes to the current planning system. As set out within the previous representation letter, it is considered that the site is in a sustainable location with the local services and community facilities of Buckden accessible by pedestrian and cycle connections. The design and layout of the built element ensures a low impact development that prioritises the natural environment whilst offering a variety of house types and sizes. In light of the above, we would appreciate collaborative working with the Parish Council to create a scheme with clear community involvement that is responsive to both local needs and national requirements.		