

## Great Staughton Neighbourhood Plan Examination – Matters and Questions responses

### Question for Huntingdonshire District Council

1. **Policy GSNP 6 / Comment ID: GSNP 29: Please confirm the number of affordable housing properties at Jewells Close that are, or could be, subject to a 'local connection' requirement.**

20/01915/FUL permits 12 new homes, the S106 accompanying it secures 9 of these homes are for social rent and 3 are for shared ownership. All 12 units are for those with a local connection.

### Questions for Great Staughton Parish Council

2. **Policies GSNP 1 and 3: Should the healthcare site be referred to as Brook Farm or Brook Farmyard?**

The Healthcare site should be referred to as Brook Farm.

3. **Policy GSNP 3: Does the allocation boundary include the 0.2 ha of land referred to in paragraph 5.44? If not, please provide a plan showing the totality of the land that could, potentially, be developed.**

The allocation boundary shown blue on Map 4 does not include the 0.2 ha parcel of land referred to in paragraph 5.44. For clarity, the map below was submitted in response to the Regulation 14 consultation on the Neighbourhood Plan and identifies the potential extension to the allocation at that time in yellow hatching. This land has an area of 0.2 hectares.

The landowner, stakeholders and the district council are continuing to develop a scheme for the site which addresses the criteria within the Neighbourhood Plan allocation policy. As part of the development of an appropriate and viable doctors' surgery scheme, supported by the necessary infrastructure and car parking, the extent of the site area is likely to change further.

The Parish Council would wish to support the extension of the allocated site where it secures a viable doctors' surgery and meets the needs of stakeholders. In view of the more recent discussions, the Parish Council would recommend that the Examiner consider amending paragraph 5.44 to remove the specific reference to 0.2 hectares.

Amend paragraph 5.44 to read

There is flexibility on the land uses proposed on the site and also the possibility of extending development beyond the Built Up Area Boundary ~~into the field to the rear (0.2 hectares)~~ if demonstrated to be needed through the site viability assessment.

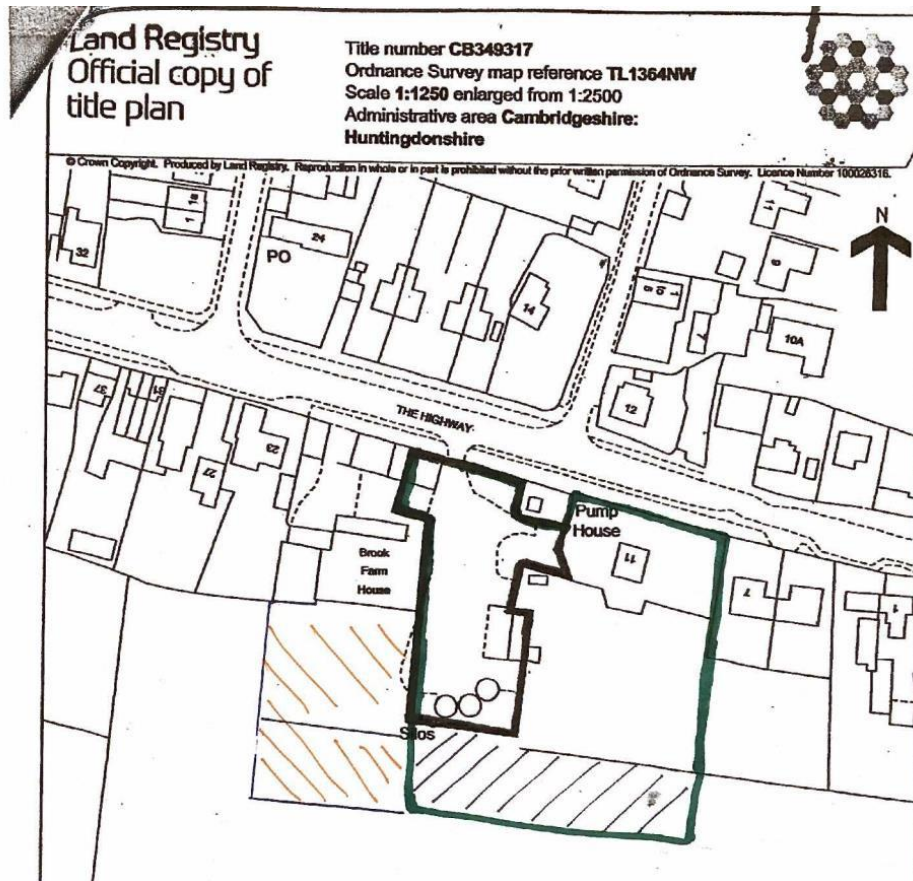
In the Parish Council's view this would support the provisions of Local Plan Policy LP22 which states:

LP 22 Local Services and Community Facilities

Local services and community facilities include, but are not limited to, shops, public houses, places of worship, cemeteries, health centres, libraries, fuel filling stations and public halls.

A proposal for a new local service or community facility within a built-up area, or the extension of an existing local service or community facility on land immediately adjoining the built up area, will be supported where it:

- a. is of a scale to serve local needs;
- b. comprises up to a maximum of 600m<sup>2</sup> net internal floorspace for a main town centre use; and
- c. provides for a new service or facility or it retains or enhances an existing service or facility, including through the provision of premises suitable for mixed use or multiple community functions.



**4. Policy GSNP 3: Where is an applicant to find details of the ridge and furrow earthwork remains, remains that are to be preserved intact (link required)?**

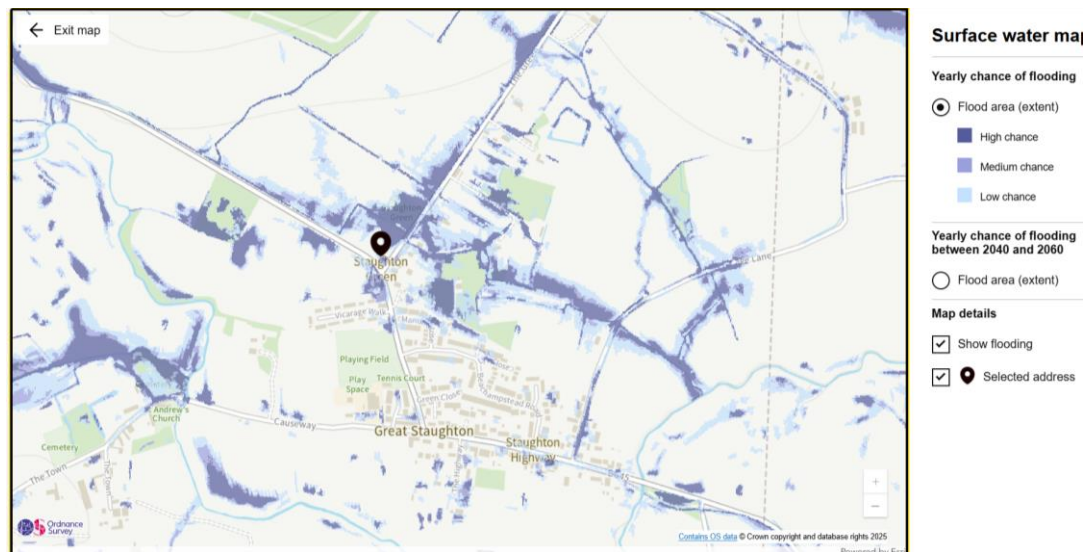
The details of the ridge and furrow remains are available from Cambridgeshire County Council – Historic Environment Records Team who provide advice on archaeological matters. The team has commented that to the east, the site partially contains the extant earthwork remains of Medieval ridge and furrow (CHER 00424) – see page 83 of the Consultation Statement. Historic Environment Records may be available to view on-line via the Heritage Gateway - [www.heritagegateway.org.uk](http://www.heritagegateway.org.uk).

Other ridge and furrow sites are detailed in policy GSNP10 – Designated and Non Designated Heritage Assets and Map 8.

**5. Policy GSNP 4: For the benefit of applicants, please provide a link to a plan showing the surface water flow path across the site.**

An extract of a surface water flood risk map is extracted from the Government website. The latest available data is available on Government website:

<https://check-long-term-flood-risk.service.gov.uk/surface-water>



**6. Policy GSNP 4 – ‘suitable access for the maintenance of foul drainage infrastructure’: Is this a reference to the Anglian Water sewer that crosses the site? Where can an applicant find appropriate details (link required)?**

Yes, the statement refers to the Anglian Water sewer crossing the site as detailed in paragraph 5.49. However, as advised by Anglian Water, it would be pertinent to safeguard access for maintenance of any additional foul drainage infrastructure. The specific criterion was worded and requested by Anglian Water at Regulation 14 consultation (see page 86 of the Consultation Statement). The Parish Council are pleased to see Anglian Water’s support for GSNP4 in the most recent consultation.

Anglian Water advises that further advice can be sought on their website and engagement with their pre-development team is strongly recommended.

The link is available here - [Large and complex developments](#)

**7. Policy GSNP 4 – ‘views associated with the heritage asset’: Are these defined anywhere? Is there clarity over what views need to be safeguarded?**

The allocation site is located within 35m of one listed building – Grade II 31 and 33 The Green. Whilst it is possible that developing this site could impact on the setting of this listed building, the site is screened by dense vegetation (including trees); therefore, impacts to the setting of this designation are considered to be unlikely (Table 4.3 SEA Assessment).

Historic England, in response to the Regulation 14 consultation (see page 87 of the Consultation Statement) seeks any proposal to consider the height of any development so as to not impact the views or experience associated with a heritage assets within a rural setting.

The policy reflects the responses from Historic England and the SEA Assessment. For clarity, the Neighbourhood Plan's supporting text could be amended to more specifically include the comments from Historic England.

**8. Please comment on both the representations made by the Environment Agency (Comment ID: GSNP 17 and 18).**

Firstly, the Environment Agency's comments and concerns are fully addressed in the Consultation Statement. The Parish Council has worked constructively with the landowners, Environment Agency, Local Lead Flood Authority and Anglian Water in understanding the surface water constraints and the necessary mitigation measures to address concerns. The landowner has prepared a Site Specific Flood Risk Assessment and more recently an addendum to that report in preparation for the development proposals being advanced on the site.

The Parish Council considers that the Neighbourhood Plan policy addresses the flood risk in the Great Staughton Neighbourhood plan area and provides the appropriate safeguards for the district council, working with the statutory authorities to ensure that appropriate schemes come forward and where appropriate the necessary mitigation measures.

Secondly, Anglian Water have advised, during the Regulation 14 consultation (page 87 of the Consultation Statement) that it considers there is currently sufficient capacity at Kimbolton water recycling centre to accommodate the proposed development within Great Staughton. However, this is subject to any other growth within the WRC catchment area, including at Kimbolton. Further investment at the WRC is proposed in AMP8 (2025-2030) subject to the regulators' approval of our PR24 business plan. Several schemes at WRCs, including Kimbolton, have been identified through collaborative working with the Environment Agency, for Phosphorous removal, which is based on the most up to date understanding of the Water Industry National Environment Programme.

However, if appropriate to meet the Basic Conditions, the Parish Council would support the following addition to Policy GSNP1 - Spatial Strategy.

Development proposals will only be supported if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to meet all the necessary requirements arising from a proposed development. Where appropriate, development may need to be phased spatially and chronologically to ensure the provision of infrastructure in a timely manner with conditions or planning obligations to be used in securing any phasing arrangements.

**9. Policy GSNP 6: Given the views of Huntingdonshire District Council (not necessary for any local connection criteria to be applied to any other remaining social rented properties in the Parish), is there adequate justification for half of all new affordable housing to be allocated to occupants with a strong local connection? Please direct me to the relevant evidence.**

Jewell Close was developed as a Rural Exception Scheme (affordable housing outside the built up area boundary) and as such the S106 agreement sets out how the properties are first allocated to those with a local connection, to those with a connection to nearby parishes and then to the district. The Parish Council recognises that as the families move on from Jewell Close there will be an element of 'churn' allowing those properties to be available to those with a local connection.

However, it is clear from the data provided at paragraphs 5.69 and 5.70, the need for housing for those with a local connection far exceeds the available properties at Jewell Close. It is important

to note that the level is likely to exceed the numbers in the report as it reflects only those who were asked for evidence of a local connection.

The Demographic Economic and Social Report in 2021 states that the average and lower quartile house prices in Great Staughton are high. The average (median) price paid for a residential property in Great Staughton was 30% above the Huntingdonshire average.

At lower quartile levels, anyone seeking to buy a property in Great Staughton would require an annual income of £57,071 for a semi-detached property and £86,821 for a detached home. To put this into context, a household with two people working full-time (35 hours/week) and earning the National Living Wage (£8.91/hour) will only earn around £32,432 per annum. Even a couple both earning the median salary for Great Staughton would struggle to reach the threshold for a lower quartile semi-detached property.

Throughout the community engagement, local residents were clear. The parish wished to support new housing and play its part in meeting the local housing requirement provided that housing met the needs of local people. As such, given the high house prices, the demonstrated need for affordable housing for those with a local connection and the demonstrated community support, the Parish Council consider that the first opportunity for 50% of any affordable housing should be offered to those with a local connection.

The local criteria proposed is entirely consistent with the Community Land Trust and the S106 for Jewell Close.

The District Council suggests that the local need for affordable housing can be monitored and reassessed when an application comes forward. It suggests that the mechanism would be for the applicant to submit a housing needs assessment. However, the Local Plan policy does not require a housing needs assessment; it simply requires 40% affordable housing provision. The proposed mechanism is not aligned with the Local Plan policy and would be ineffective.

It is important to note that the local connection offers a 'triage' system. If at any point no household comes forward who meets the local connection criteria, the property can then be offered to an adjacent parish and finally to those in the rest of the district. A property is not empty, waiting for a person or household with a local connection to arrive. The proposed approach is an effective mechanism which will reflect the needs of local households in need at the time of the development completion whilst ensuring the property is triaged to the district if needed.

As a principle, there is nothing in this approach that would be contrary to the Basic Conditions and, indeed, it supports the broader aim of sustainable communities.

The Parish Council would refer you to Policy WAT 23 – Allocation of affordable housing at Waterbeach New Town on page 121 of the Waterbeach Neighbourhood Plan which is within South Cambridgeshire. The Plan is available here: [Waterbeach Neighbourhood Development Plan 2020 to 2031 Regulation submission version \(scambs.gov.uk\)](https://www.cambs.gov.uk/planning-and-building-control/planning-policy-and-proposals/waterbeach-neighbourhood-development-plan-2020-to-2031-regulation-submission-version)

The approach is used widely. You may also wish to review a Neighbourhood Plan in Solihull which similarly includes the allocation of affordable housing to those households with a strong local connection. See Policy H2 to the Solihull Neighbourhood Plan on page 38. The plan is available here: [Planning\\_KDBH\\_NP\\_Final\\_webversion.pdf \(solihull.gov.uk\)](https://www.solihull.gov.uk/planning-and-building-control/planning-policy-and-proposals/solihull-neighbourhood-development-plan-2020-to-2031-regulation-submission-version)



More recently the policy has been adopted in Policy SBNP3 of the Soham and Barway Neighbourhood Plan which was adopted on 24<sup>th</sup> October 2024. The plan is available here: [Plan cover image 2023](#)

**10. Policy GSNP 9 – ‘non-listed buildings that make a positive contribution to the Conservation Area’: Where are these identified?**

Paragraph 220 of NPPF states that the loss of a building which makes a positive contribution to the significance of the Conservation Area should be treated either a substantial harm or less than substantial harm as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area.

The Parish Council recognises that proposals which include the demolition or part demolition of a listed building are dealt with appropriately in NPPF and the Local Plan. The policy seeks to amplify the provisions of national policy but does not consider it appropriate to identify all buildings that make a contribution to the Conservation Areas. Such an assessment will be made at the time of a planning application.

The Parish Council has identified Non designated Heritage Assets (GSNP10) but there is not an exclusive list of all buildings that make a positive contribution to the Conservation Area.

**11. Policy GSNP10: On Maps 7 and 8, please advise to which asset the numbers refer. Please provide plans showing the extent of the curtilages of the assets (or provide a link to such information). Please also clarify why six assets are referenced in Paragraph 7.11 but there are seven numbered assets on Maps 7 and 8.**

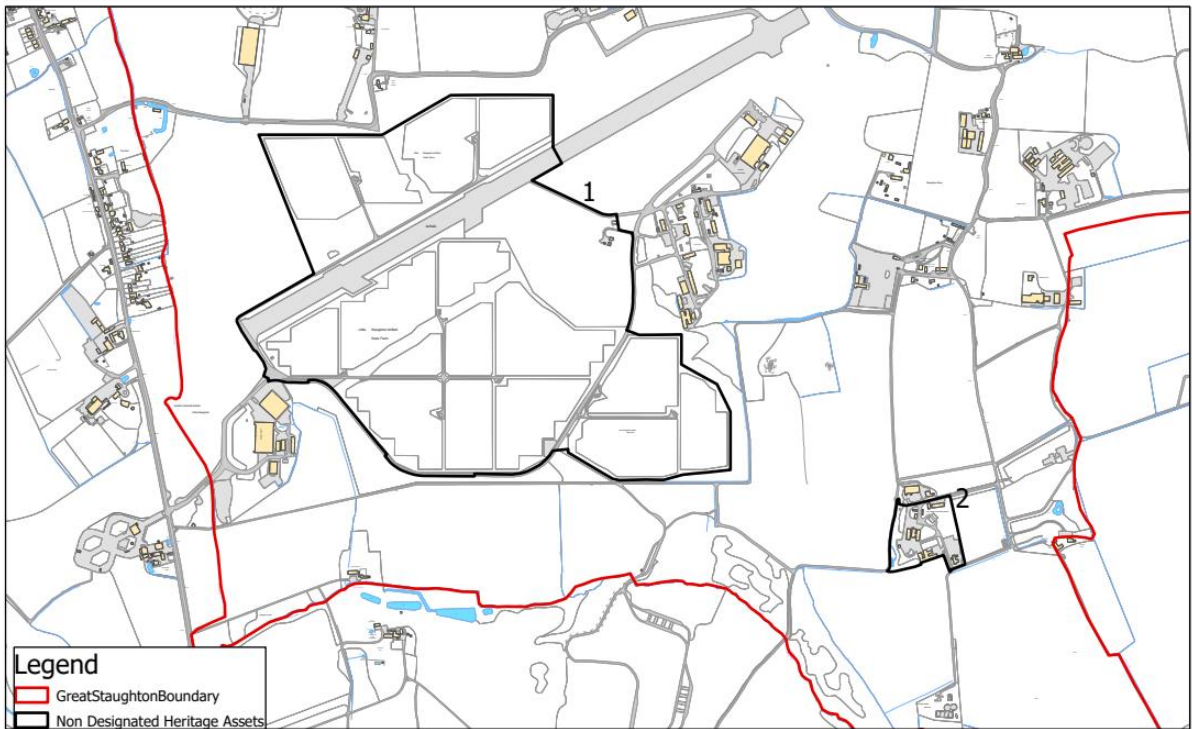
For clarity, the bullet points are renumbered to reflect the references on Maps 7 and 8. The details of the non-designated heritage assets are included in the Topic Paper – Non Designated Heritage Assets.

1. Control Tower at Little Staughton Airfield and Little America Industrial Site
2. Cookhouse, theatre, washroom and ancillary buildings at Little Staughton Airfield and Little America Industrial Site
3. The Old School and Headmasters House
4. The Snooty Tavern Pub
5. The Manse, The Causeway
6. 2-8 The Causeway
7. Ridge and Furrow Fields

Revised Maps 7 and 8 have been provided.

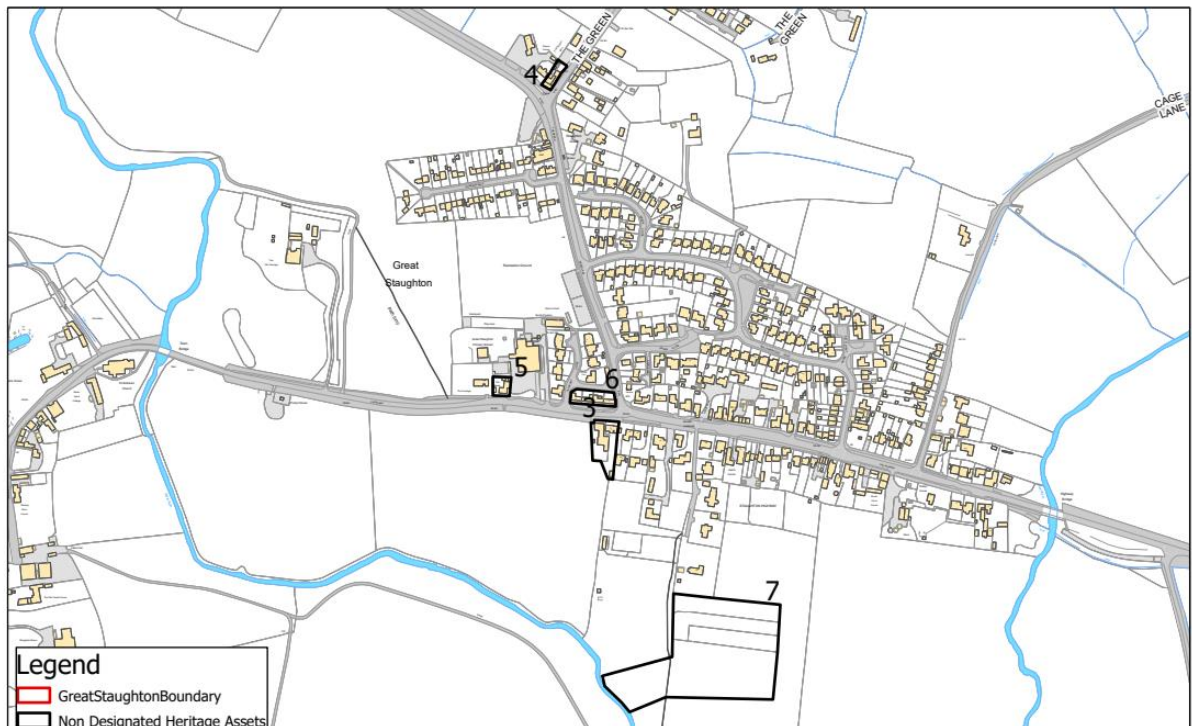
**Description: Non Designated Heritage Assets 1 and 2**

Scale = 1: 10,000  
Date Created: 06/03/2025



**Description: Non Designated Heritage Assets 3 to 7**

Scale = 1: 5,000  
Date Created: 06/03/2025



**12. Policy GSNP 10: Is it the intention that the non-designated heritage assets should be specifically designated under this policy?**

Yes, the intention is to identify the 7 sites listed above as non-designated heritage assets in Policy GSNP10. For clarity the policy could helpfully include the list of 7 non-designated heritage assets.

**13. Policy GSNP 11: For the purposes of the policy, are sites of biological importance the same as sites of ecological importance?**

For consistency it is acknowledged that 'Biodiversity' in the second paragraph of the policy is amended to 'ecological'.

**14. Policy GSNP 11 and Map 9A: What is the large site just north of the centre of the plan area? Is this A7, 'Closed Churchyard'? Is the numbering in the policy the same as the numbering on the plan?**

The large site just north of the centre of the plan area is Agden Woods. For clarity, map 9A could be modified to list and show Agden Woods separately to Perry Woods. A suggested revised map 9A has been provided.

Yes – A7 is the closed Churchyard

Yes – the numbering in the policy is the same as shown on the plan. However, the policy includes a prefix indicating the plan reference A. For clarity, the annotation on Plan 9A could be amended to include the same prefix.

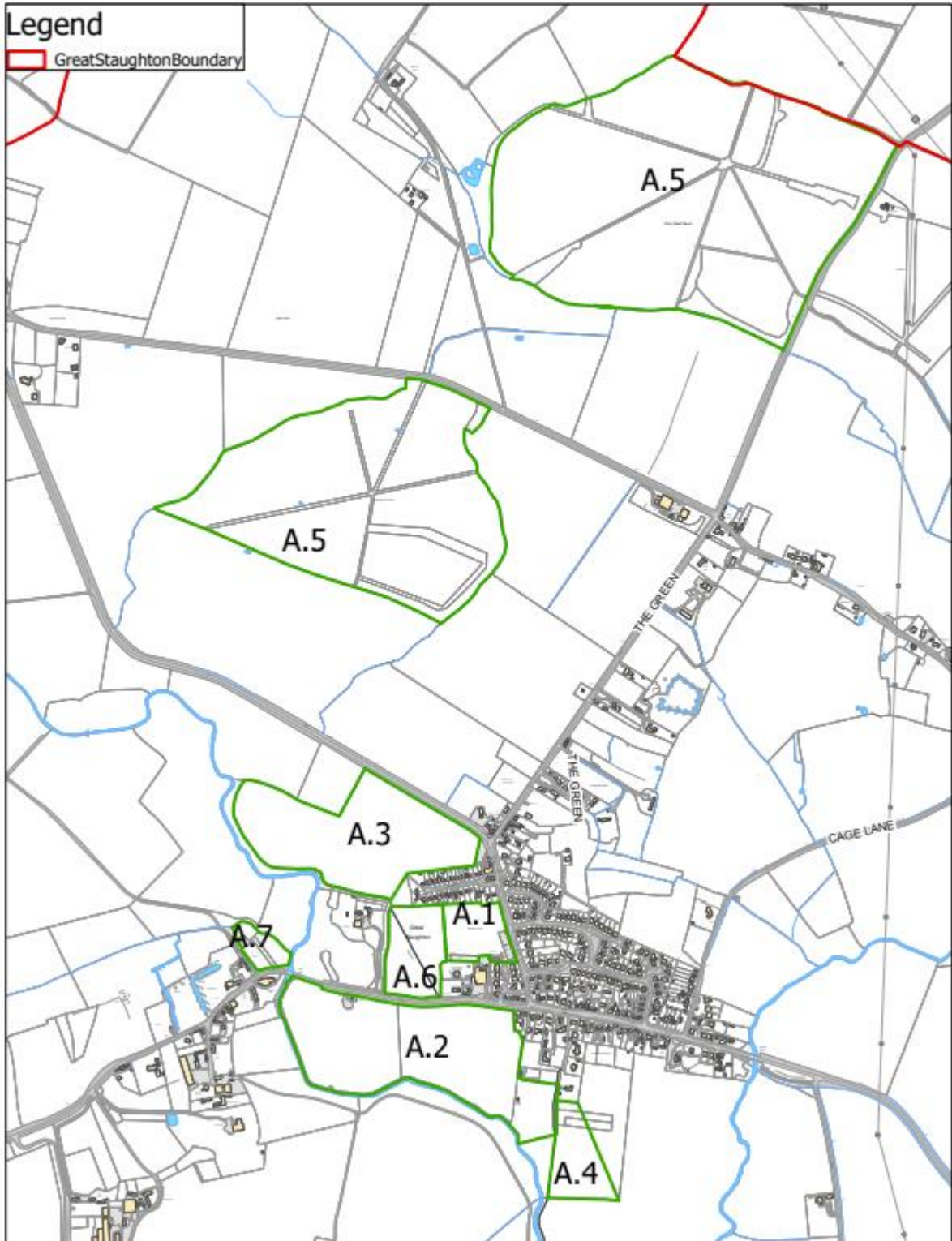


**Description: Map 9A**



Scale = 1:11,000

Date Created: 04/03/2025



**15. Policy GSNP 11 and Map 9B: Is there clarity over the extent of the land within the river valley that needs to be the subject of the policy? Is there mapping that shows the roadside verges that are also subject to the policy?**

For clarity, it is recommended that the third paragraph of policy GSNP11 is amended to state – ‘Map 9B shows the path of the River Kym...’

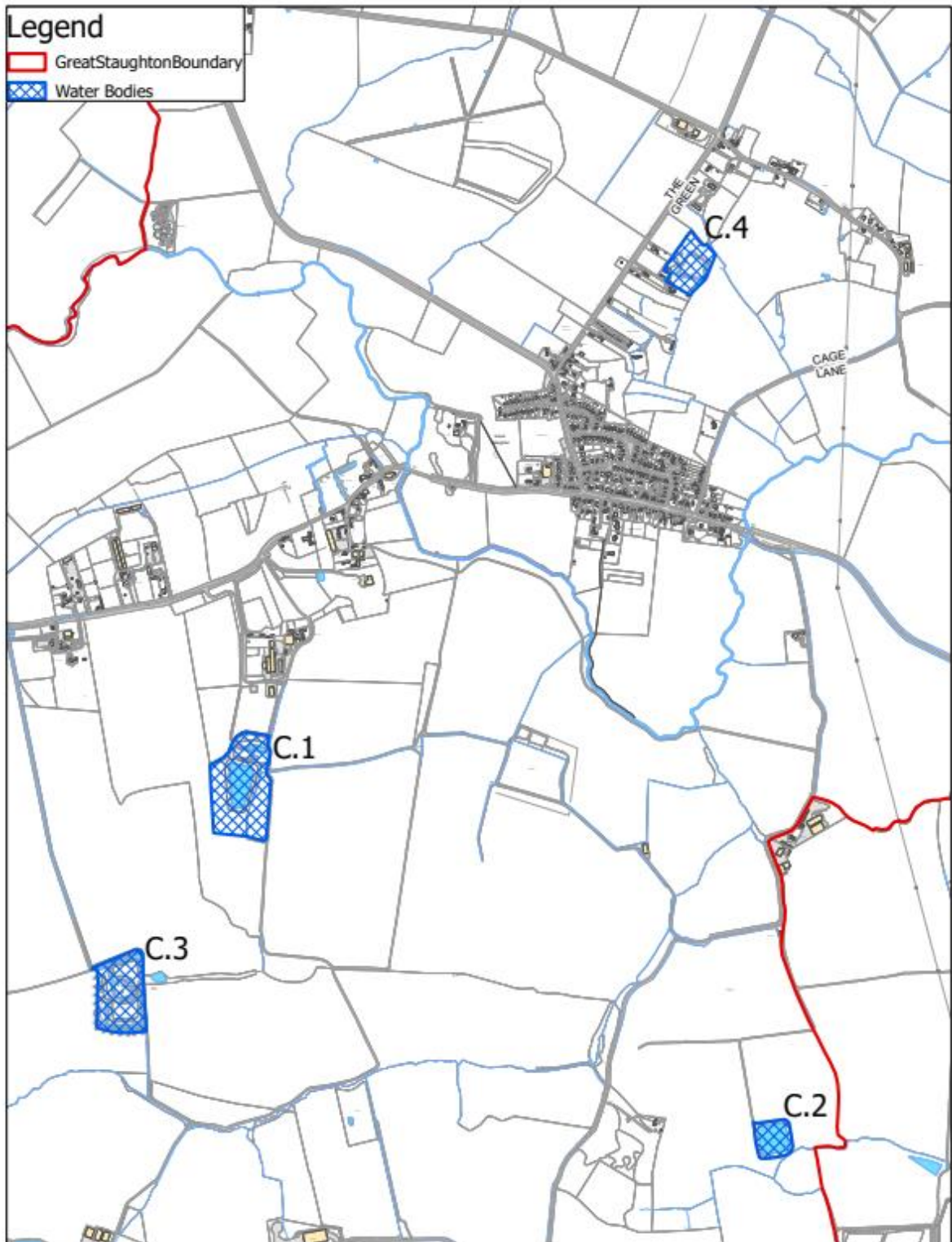
The Parish Council has not prepared a map of important or valued roadside verges. A distinctive feature of Great Staughton is the wide grass verges between pavements and the roads which are important to the character of the village and are important for biodiversity. As such, if considered appropriate to meet the Basic Conditions the reference to roadside verges could be moved to the supporting text.

**16. Policy GSNP 11 and Map 9C: Please clarify what are the ecology features to which C1 to C4 in the text refer.**

C1 and C4 refer to local ponds and water bodies supporting a habitat for wildlife and biodiversity as indicated on the Map heading. ‘Map 9C shows’ could be amended to ‘Map 9C shows ponds and waterbodies which are considered important for wildlife and biodiversity. A suggested revised map 9C has been provided.

**Description: Map 9C Water Bodies**

Scale = 1:15,000  
Date Created: 04/03/2025



**17. Policy GSNP 11 and Map 9C: Are the “ponds for irrigation” the same as the ponds that are shown on Map 9C?**

No, the ponds and waterbodies shown on Map 9C are those listed in the policy at Section C. In response to submissions made by members of the community during the Regulation 14 consultation, the policy has been amended to clarify that there are other areas of water, specifically ponds for irrigation which may be important for wildlife. (See page 99 of the Consultation Statement)

**18. Policy GSNP 11 and Map 9D: Is there mapping (not just numbers on a small-scale plan) that shows the geographical extent of the features that are to be the subject of the policy?**

The submission plan represents the current extent of the mapping for those sites. Detailed mapping could be provided if required as a modification to the plan.

**19. Policy GSNP 11: Please direct me to the evidence specific to Great Staughton Parish that supports biodiversity net gain at 20%? What is the justification for applying the higher rate?**

As set out in the supporting text setting out the Parish Council’s evidence on BNG, Cambridgeshire County Council is a partner organisation of Natural Cambridgeshire who have adopted the strategy ‘Doubling Nature 2018 – A Vision for the Natural Future of Cambridgeshire and Peterborough to 2050’. Increasing biodiversity and natural capital is a key district wide policy of the Council’s climate change strategy adopted in February 2023.

Huntingdonshire District Council’s Biodiversity For All project, which is set out in the District Council’s Climate Strategy, Action Plan and Corporate Plans commits to delivering the Plan for Nature. Biodiversity for All aims to accelerate the delivery of measurable biodiversity net gain delivering the aspiration of Doubling Nature through engagement with the local community and delivering pilot projects to roll out similar projects.

The Parish Council note that HDC are in principle supportive of the policy’s approach to biodiversity net gain seeking a 20% increase over the mandatory 10% for qualifying developments where it is shown to be viable to do so. The evidence within the supporting text demonstrates that the uplift from 10% to 20% BNG is unlikely to impact the viability of the development proposal. The policy appropriately addresses this issue by stating that 20% BNG is required unless demonstrated in a viability assessment that it would make the development unviable.

With the addition of Cambridgeshire and Peterborough Combined Authority funding, and this policy, Huntingdonshire District Council can accelerate the delivery of measurable biodiversity net gain in Huntingdonshire, delivering the aspiration of Doubling Nature.

Other Council’s in Cambridgeshire have also considered how they can influence what happens on land that they do not control. Cambridge City Council and South Cambridgeshire District Council, in reviewing the policies for their Local Plan Review, and as partners to Natural Cambridgeshire have concluded in their Doubling Nature Strategy 2021 that it should seek to achieve 20% biodiversity net gain through development<sup>1</sup>. Within East Cambridgeshire, a recently adopted Neighbourhood Plan for Soham and Barway has successfully included a policy requiring 20% Biodiversity Net Gain<sup>2</sup>.

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<sup>1</sup> [Doubling Nature Strategy](#)

<sup>2</sup> [Plan cover image 2023](#)



As part of its contribution to Natural Cambridgeshire, development in Great Staughton should equally make its contribution to and influence planning decisions to secure the necessary BNG uplift.

**20. Policy GSNP 11: Please comment on the District Council's suggestion of including details of the section of the Grafham-Brampton-River Kym Habitat Network to the north of Great Staughton.**

The District Council's suggestion appropriately updates the Neighbourhood Plan policy, maps and supporting text to take on board the most recent policy position. The network details strategic locations within the district best placed to deliver biodiversity net gain and to inform implementation of biodiversity net gain planning policies. One of these is the Grafham-Brampton-River Kym Habitat Network which extends into the north of Great Staughton (within red line below) highlighting additional areas of core and stepping stone habitats of biodiversity importance to the landscape.

It is recommended these are included as sites of biodiversity importance to the village and to ensure compliance with strategic policy LP30 'Green Infrastructure'.

**21. Policy GSNP 12: How is it intended to ensure that buildings use a low carbon heat source?**

The Neighbourhood Plan has limited powers to require developments to meet energy saving standards, especially in the construction of new homes. However, that does not stop the encouragement of the incorporation of measures in development that meet the energy hierarchy. If considered appropriate to meet the Basic Conditions, the term ensure should be amended to maximise.

**22. Policy GSNP 13: Is the policy intended to be supportive of more than one community led energy project if more than one came forward?**

Yes, it is intended to be supportive of more than one community led energy project.

**23. Policy GSNP 15 – on-site storage and run off rates: Are there any 'other relevant codes of practice' that you would wish to identify?**

The phrase which has been accepted in other Neighbourhood Plans recognises that the list is not exclusive, that relevant statutory agencies will continuously provide the most up-to-date information and those documents may be superseded by documents with a new title. If appropriate add the term 'including' to demonstrate the list is not exclusive and retain the recognition that documents will be updated.

Proposals for appropriate on-site storage and run off rates will be expected to meet the standards set in technical guidance including advice set out in the Cambridgeshire Flood and Water Supplementary Planning Document, DEFRA's Non-Statutory Standards for Sustainable Drainage, the CIRIA SuDS Manual or successor documents.

The approach and use of technical documents has been successfully adopted for Jewell Close.

**24. Policy GSNP 17: Please comment on the representations of Cambridgeshire County Council (Comment ID: GSNP 9).**



The policy is clear and in line with national policy, specifically paragraph NPPF paragraph 116. Proposals which have an unacceptable impact on highway safety should be refused. The policy provides advice that is distinctive to Great Staughton. The policy provides examples of where there are known highway safety issues and includes B2 and B8 developments without direct access to B Roads.

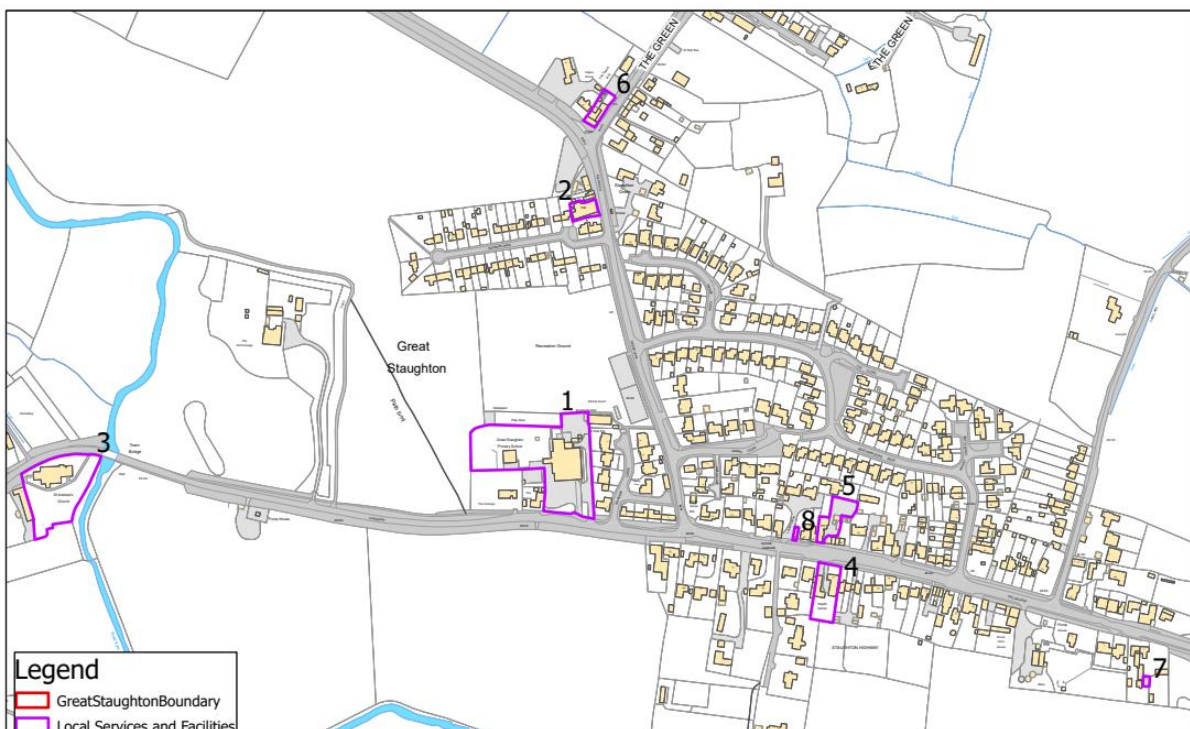
The junction of The Moor and The Highway including the rural roads leading into Great Staughton from the industrial area at the Moor, and Little Staughton are not suitable for heavy traffic. Five accidents have been recorded by Cambridgeshire County Council, including one fatal accident at the junction with the Moor and Staughton Highway between 2017 and 2022. The supporting text amplifies developments falling within Use Class B2 or B8, which are likely to require HGV and delivery vehicles should have direct access to a road designated with a 'B' classification.

**25. Policy GSNP 19: Please provide me with a plan that locates all the facilities listed in the policy and also shows their curtilage.**

For clarity the plan could be amended to number the services in the sequence they appear in the plan narrative and referenced to and correspond to a new map. A potential new map (Map 11) has been provided.

**Description:** Local Services and Facilities

Scale = 1: 4,000  
Date Created: 06/03/2025



**26. Please comment on representation Comment ID: GSNP 44 (Lauren May / A Newman).**

The Neighbourhood Plan has been robustly prepared in accordance with the adopted Huntingdonshire Local Plan to 2036. The Parish Council has sought to positively address its housing requirement as advised by the District Council. The Neighbourhood Plan meets its needs over the plan period by allocating sites and by anticipated windfalls. Any additional housing over

and above the currently identified need will need to be part of the Local Plan or Neighbourhood Plan Review.

The Parish Council is acutely aware that the District Council is in the process of preparing a new Local Plan which will address the future housing needs of the district beyond the lifetime of the Neighbourhood Plan. It is appropriate for the Local Plan, rather than the Neighbourhood Plan, to address the strategic needs of the district and any increase in the overall housing requirement for the district. It is not appropriate for the Neighbourhood Plan to individually respond to the unknown and ambiguous strategic requirements beyond 2036.

Part of the site, now identified in the submissions at land east of B661, The Green, was submitted as part of the Neighbourhood Plan's call for sites and was assessed by AECOM as part of its site assessment process. The report concluded:

'a greenfield site, close to, but not within or adjacent to the continuous built-up area. The site could be suitable for a small amount of development under policy LP 9 as a site which is well related to the built-up area. There is development to the east of site which means that views will not be interrupted. The site is long and narrow so may be difficult to accommodate more than 2-3 homes and access would need to be upgraded to facilitate development. There are powerlines on site which may need to be relocated. The south eastern boundary of the site is within an area of high surface water flood risk. A sequential test and if necessary, an exception test may be necessary to demonstrate development is appropriate. The site is potentially suitable for a small amount of development if the identified constraints can be resolved or mitigated'.

The site as submitted to the call for sites is considered too small to make any significant development possible. However, importantly in respect of the now larger site, it also is separated from the rest of the village and therefore would not comply with the strategic objectives of the Local Plan.

**27. Please comment on the representations of the Local Lead Flood Authority (Comment ID: GSNP 45).**

From the details of the Flood Risk included in the Neighbourhood Plan, the evidence submitted including the Sites Assessment, the SEA Assessment, the Sequential Report and a site specific flood risk assessment, it is clear that the Parish Council has robustly considered the impact of flood risk in the Great Staughton area.

The Parish Council equally consider that it is important that there is a policy in place to address the flood risk in the Great Staughton which provides guidance to new developments of the minimum expectations in terms of drainage and aid to prevent developers from installing inadequate drainage systems. The Parish Council has worked closely with stakeholders during the development of the plan and ensured that their comments have been included in the plan where appropriate.

The Cambridgeshire Flood and Water SPD provides advice and guidance on surface water management in development. This SPD is referred to and included in policy and supporting text. If appropriate a link to the document could be added. The Parish Council would have no objection to an additional reference being made to the LLFA's Surface Water Planning Guidance document June 2021 ([cambridgeshire.gov.uk](http://cambridgeshire.gov.uk)) or to Local Plan Policy LP15 – Surface Water.