

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

Representations can also be found at: <https://consult.huntingdonshire.gov.uk/kse/event/38476>

Full Name	Organisation Details	Comment ID	Comment relates to	Comment Type	Comment	Are changes required?	Proposed changes
Cambridgeshire County Council LLFA Kathryn Reading	Cambridgeshire County Council	ANP:1	Policy AL 6 - ~Addressing flood risk appropriately when development is proposed via a planning application	Support	The LLFA have reviewed the Neighbourhood Plan submitted for review under Regulation 16 and have the following comments: The LLFA are pleased with the holistic approach taken to promote surface water management, SuDS, water quality, biodiversity, and climate change. We appreciate the level detail presented with reference to surface water flood risk in the report. The LLFA support Policy AL 6 ~Addressing flood risk appropriately when development is proposed via a planning application . This policy places emphasis on how new developments should demonstrated flood risk from all sources has been avoided or managed with specific consideration to existing flood risk and constraints of Alconbury.	No	
Ms Alice Lawman	Spatial Planner National Highways	ANP:2	Overall comment on the Neighbourhood Plan	Have observations	Thank you for consulting National Highways on the abovementioned Neighbourhood Plan. National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly. Notwithstanding the above comments, we have reviewed the document and note the details of set out within the draft document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.		
Community Campaigner David Barton		ANP:3	Overall comment on the Neighbourhood Plan	Have observations	Please find attached my PDF Umbrella Representation which comprises a key part of my submission for the aforementioned Huntingdonshire Alconbury Neighbourhood Plan. Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Huntingdonshire Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	Yes	Substantial support an defence against avoidable decline and pursuit of demolition of histroic buildings whether listed, non-designated heritage assets or possessing unclassified status.

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Environment Agency	Environment Agency	ANP:4	Overall comment on the Neighbourhood Plan	Have observations	Thank you for consulting us on the Submission Publication for the Alconbury Neighbourhood Plan. We aim to reduce flood risk, while protecting and enhancing the water environment. Having commented previously on this plan we are pleased to see that our previous comments have been taken on board. We therefore have no further detailed comments to make in relation to this plan. In focusing our engagement to those areas where the environmental risks are greatest, we note that based on the environmental constraints within the area, we have previously not submitted detailed comments relation to this Neighbourhood Plan. We therefore have no further detailed comments to make in relation to this plan. We trust that this advice is useful.		
Robert Wickham	Diocese of Ely Ely Diocesan Board of Finance	ANP:5	Policy AL 1 - "A spatial strategy for Alconbury	Object	We object to policy AL1 in its current form due to it's lack of compliance with the emerging Huntingdonshire Local Plan. It therefore fails the basic conditions due to this lack of compliance and the related failure to support sustainable development. The Preferred Options Local Plan proposed two allocations in Alconbury, known as Alconbury 1: South of Great North Road and Alconbury 2: East of Globe Lane. Our clients the Diocese of Ely own the land at Alconbury 1: South of Great North Road and support its allocation for residential development. The site is deliverable within 5 years. The Draft Neighbourhood Plan currently includes a map of the indicative built up area of the village (Map 4 at page 36). This is tightly drawn around the existing built form. Combined with criteria 2 of Policy AL 1, which restricts development beyond the built up area to rural exception sites, this serves as an overly restrictive policy which is in direct conflict with the emerging Local Plan strategy. Alconbury is a sustainable location for growth (Local Service Village) and the current drafting of the Neighbourhood Plan actively restricts development beyond the existing developed area, in conflict with the National Planning Policy Framework's clear aim to boost the delivery of homes in such locations, and the emerging Huntingdonshire Local Plan which specifically allocates land at Great North Road and Globe Lane for a total of around 90 homes. The current drafting of the Neighbourhood Plan would serve to undermine the delivery of these much needed homes.	Yes	The Neighbourhood Plan should either re-allocate or allow for the emerging allocations in the Huntingdonshire Local Plan Review. The following sites should be acknowledged as suitable housing sites and allocated in the Neighbourhood Plan: Alconbury 1: South of Great North Road (owned by our clients the Diocese of Ely) Alconbury 2: East of Globe Lane If the Neighbourhood Plan does not allocate sites it should at least avoid prejudicing their development with the existing restrictive policy. The built up area map could be changed to include the allocations, and/or the policy could be re-worded to allow for the development proposed in the Huntingdonshire Local Plan, rather than only exceptions sites.
Jo Challis	Cambridgeshire County Council	ANP:6	Overall comment on the Neighbourhood Plan	Have observations	Following a review of the draft Neighbourhood Plan it was noted that development will be accepted subject to size and location. Any planning applications for such developments will be subject to consultation with the Local Highway Authority (LHA) who will determine if the development is compliant with Cambridgeshire County Councils General Principles for Development policy document to ensure that it does not create a hazard for highway users and that it adheres to Paragraphs 115, 117 and 118 of the NPPF. The LHA will also ensure that, where required, any additional highway infrastructure is provided to ensure that Non-Motorised Users (NMUs) can access local facilities.		

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Historic England See: 1021479	Historic Environment Planning Adviser, East of England Historic England	ANP:7	Overall comment on the Neighbourhood Plan	Have observations	Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan. Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide additional comments at this time. We would refer you if appropriate 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 a neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/ We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.		
Natural England	Consultations Team Natural England	ANP:8	Overall comment on the Neighbourhood Plan	Have observations	Thank you for your consultation on the above dated 13 May 2026. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.		
Local Plans Team	Huntingdonshire District Council	ANP:9	Overall comment on the Neighbourhood Plan	Have observations	Overall HDC are supportive of the work undertaken and the efforts of the Alconbury Neighbourhood Plan Group in the production of their neighbourhood plan and its supporting documentation. 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:  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'. In addition, the Neighbourhood Plan meets basic condition (f) as the conclusion of the Strategic Environmental Assessment and Habitat Regulations Assessment Screening Report concludes that the 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. Consultation was undertaken with the statutory environmental bodies who supported the outcomes of the report (see Appendix 1 of the SEA/HRA Screening Report). Therefore, it is considered that the Neighbourhood Plan has met this basic condition.		

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Local Plans Team	Huntingdonshire District Council	ANP:10	Chapter 1 - Introduction	Have observations	Paragraph 1.5.2 Have observations in regard to basic condition: National policy/ guidance Here the supporting evidence base is listed, there are a few documents such as the open spaces assessment not listed. For clarity, the Plan should have a comprehensive list of the evidence base and links if possible, to support the implementation of the policies in the neighbourhood plan.	Yes	
Local Plans Team	Huntingdonshire District Council	ANP:11	Chapter 4 - Key Issues	Support	HDC supports this chapter and welcome the detail provided in setting out the key issues facing the neighbourhood plan area and the link these then have in shaping the vision, objectives, themes and policies.	No	
Local Plans Team	Huntingdonshire District Council	ANP:12	Chapter 5 - Vision, themes and objectives	Support	Paragraph 5.1 HDC supports the vision of the Alconbury Neighbourhood Plan. Paragraph 5.1.1 Supportive of the six identified broad themes. Also supportive of the objectives of the Neighbourhood Plan and that this table includes the relevant policies that will help deliver each objective.	No	
Local Plans Team	Huntingdonshire District Council	ANP:13	Policy AL 1 - ~ A spatial strategy for Alconbury	Have observations	Policy AL1: A spatial strategy for Alconbury Have observations in regard to basic condition: Conformity with strategic policies Overall, supportive of this policy as it broadly aligns with strategic policy LP9 Small Settlements. The bullet points within section 2 addressing proposals outside the built-up area provide localised detail. In relation to the first bullet point in Section 2, it is noted that the reference to LP28 'Rural Exceptions Housing' appropriately acknowledges the rural exception site provision. To strengthen the policy further and ensure full alignment with the strategic Local Plan policy, it is suggested that the bullet point also acknowledges the wider range of policies applicable to development in small settlements as it currently does not do so or cross refers to local plan policies. The relevant policies are LP10 'The Countryside', LP19 'Rural Economy', LP22 'Local Services and Community Facilities', LP23 'Tourism and Recreation', LP33 'Rural Buildings', and LP38 'Water Related Development'.	Yes	Add an additional bullet point to section 2 of the policy: Proposals for development on land well-related to the built-up area will be considered subject to the provisions of policies LP 10 'The Countryside', LP 19 'Rural Economy', LP 22 'Local Services and Community Facilities', LP 23 'Tourism and Recreation', LP 33 'Rural Buildings' and LP 38 'Water Related Development'. These should also add these policies to the list in paragraph 6.1.11
Local Plans Team	Huntingdonshire District Council	ANP:14	Policy AL 2 - ~ Protecting and enhancing Alconburys landscape and settlement character	Have observations	Policy AL 2: Protecting and enhancing Alconburys landscape and settlement character Have observations in regard to basic condition: National policy/ guidance; Conformity with strategic policies Section 1 bullet point 2 “ Paragraph 15 of NPPF (December 2024) states policies øshould provide a positive vision for the future of each area" In this context, the current wording in bullet 2 of ~ avoid development should be revised to reflect a positive and proactive approach consistent with this national policy.	Yes	Avoid d D evelopment at Sensitive Settlement Edges and Important Village Gateways (see Map 6) must demonstrate how they do not adversely impact and where possible enhance where the development would undermine their contribution to rural character and Alconburys distinctive landscape and settlement character Within section 3 and bullet four, after ~ HDCs Landscape and Townscape Supplementary Planning Document 2022 add or successor documents to ensure that if this SPD is updated this part of the policy can still be implemented.
Local Plans Team	Huntingdonshire District Council	ANP:15	Policy AL 3 - ~ Conserving and enhancing Alconburys non designated heritage assets	Support	Policy AL 3: Conserving and enhancing Alconburys non-designated heritage assets Supportive of the identification of Non-designated Heritage Assets and the policies for conserving and enhancing non designated heritage assets. Support that these have been shown on a map too with Appendix 2 providing justification for their identification.	No	

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Local Plans Team	Huntingdonshire District Council	ANP:16	Policy AL 4 - Alconburys Local Green Spaces	Have observations	Policy AL 4: Alconburys Local Green Spaces Supports the proposed local green spaces and the policies for their protection. HDC note the two other green spaces and the policy intention that while not designated as LGS they are expected to stay as green spaces. OGS 2 Sparrow Drive/Blackbird Way Green site is owned by Huntingdonshire District Council and is identified as an "Other Green Space". This will not be afforded the same level of protection as Local Green Spaces. HDC are in principle supportive of this approach as the site is a small amenity area with local recreational value.	No	
Local Plans Team	Huntingdonshire District Council	ANP:17	Policy AL 5 - "Delivering high quality design sensitive to Alconburys distinctive character"	Support	Policy AL 5: Delivering high quality design that is sensitive to Alconburys distinctive character Supportive of the list of design principles and the policies that support a design-led approach to planning applications.	No	
Local Plans Team	Huntingdonshire District Council	ANP:18	Policy AL 6 - "Addressing flood risk appropriately when development is proposed via a planning application"	Have observations	Policy AL 6: Addressing flood risk appropriately when development is proposed via a planning application Have observations in regard to basic condition: Achievement of sustainable development; National policy/ guidance; Conformity with strategic policies In principle supportive of this policy and the additional localised detail it provides. However, HDC have some concerns over its implementation and compliance with local and national policies as set out below: ¶ Criteria 1b "this means that new buildings within the village centre will not be supported" HDC consider that this does not support sustainable development opportunities where it can be demonstrated that they meet national and local plan tests on flood risk. This is also in conflict with strategic policy LP9 Small Settlements. ¶ Bullet 2, in section 3, the requirement for all development proposals even householder extensions no matter the location or is an onerous requirement that exceeds national and local policy.	Yes	
Local Plans Team	Huntingdonshire District Council	ANP:19	Policy AL 7 - Maintaining well connected neighbourhoods and addressing barriers to moving around the village more safely using active travel choices	Have observations	Policy AL 7: Maintaining well connected neighbourhoods and addressing barriers to moving around the village more safely using active travel choices Have observations in regard to basic condition: National policy/ guidance; Achievement of sustainable development While the intention of this policy supported in providing a walkable neighbourhood, HDC have some concerns over its implementation. Further clarity on how the initiatives in section 4 could be delivered is required as it is unclear how these new routes will be funded; will these be from CIL money, S106 obligations or funding from external agencies and partners, and over what timeframe? Not all development proposals will have a direct impact or relationship on these routes so it would not be appropriate to require them to contribute to these enhancements.		
Local Plans Team	Huntingdonshire District Council	ANP:20	Policy AL 8 - protecting and improving our valued network of rural routes.	Have observations	Policy AL 8: Protecting and enhancing the provision of rural routes for non-motorised users in the parish Have observations in regard to basic condition: National policy/ guidance In principle, the intentions of the policy and the delivery of linkages to the right of way network are supported, however HDC consider that further clarity on how these projects could be delivered is required as it is unclear how these new routes will be funded. For example, is it expected that CIL money, S106 obligations or funding from external agencies and partners will be used and over what timeframe? Not all planning applications in the neighbourhood plan area		

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					will have a direct impact or relationship with these routes so it would be unrealistic to require them to contribute towards these.		
Local Plans Team	Huntingdonshire District Council	ANP:21	Policy AL 9 - Alconburys local services and community facilities	Have observations	Support, but have observations regarding basic condition: Conformity with strategic policies; Achievement of sustainable development Overall support the intention of the policy and the identification of valued facilities and services within Alconbury. These services and facilities should also be identified on a map that can sit alongside the policy. For section 3 of the policy, suggest the following wording for consistency with Local Plan policy LP22, see required change below. HDC also consider beneficial to include an additional element to the policy regarding new or enhanced community services and facilities.	Yes	Amend section 3: "Development proposals requiring planning permission and resulting in the loss of the pub (Use Class Sui Generis), or the shop, the Memorial Hall (Use Class F.2) will only be supported where the criteria within LP22 are met not be permitted unless the parish would remain suitably provided for following the loss or if not, it is no longer viable or feasible to retain the premises in their current use . Add criterion 4 to read: "Development proposals that result in the provision of new or enhanced community assets will be supported subject to their compliance with other development plan policies .
Local Plans Team	Huntingdonshire District Council	ANP:22	Policy AL 10 - Alconbury Community Infrastructure Priorities	Have observations	Policy AL 10: Alconbury Community Infrastructure Priorities Have observations in regard to basic condition: Conformity with strategic policies In principle supportive of the infrastructure priorities set out in this policy which are localised to Alconbury. A list of projects that could be funded by CIL and/or S106 could be provided here or in appendix to provide clarity on where contributions may be sought and the scale of development that these would apply to. Priorities set out in other policies of the plan such as policies AL7, AL8 and AL11 could also be listed here. The policy should also reference compliance with strategic policy LP4 Contributing to Infrastructure Delivery and the Developer Contributions SPD (or successor documents).	Yes	Amend section 2 to read: "All development proposals should contribute towards infrastructure priorities, where they are necessary to make the development acceptable and where they are directly, fairly and reasonably related in scale and kind to the development in compliance with strategic policy LP4 Contributing to Infrastructure Delivery and the Developer Contributions SPD (or successor documents).
Local Plans Team	Huntingdonshire District Council	ANP:23	Policy AL 11 - Protecting and enhancing Alconburys natural environment	Have observations	Policy AL 11 "Protecting and enhancing Alconburys natural environment Have observations in regard to basic condition: National policy/ guidance; Achievement of sustainable development In principle supportive of the localised locations and measures identified within the policy for biodiversity protection and enhancement including Alconburys contributions to providing a network of biodiversity corridors to connect habitats set out in strategic documents such as the Local Nature Recovery Strategy. Section 3 - HDC supports the intention of this policy in relation to biodiversity and surface water management. However, the following concerns are raised regarding accordance with NPPF paragraph 16(d) of the NPPF: ¢ The requirement applying to "all proposals" is considered overly broad and may raise viability concerns, particularly for minor scale development. It is suggested that the policy be refined to specify the types or scales of development to which it applies. ¢ The sentence "Integrated living, brown or green roofs are considered particularly suitable for slowing water run-off from buildings and on brownfield sites to accommodate invertebrates that are displaced through the development" is more explanatory than policy in nature. It is suggested this sentence be moved to the supporting text, where it can serve as justification and provide necessary definition		

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					of these measures, rather than forming part of the policy itself, or if it is retained within the policy, it forms a fourth criterion to the policy		
Local Plans Team	Huntingdonshire District Council	ANP:24	Chapter 7 - Community Action Points	Support	Chapter 7 “ Community Action Points Supportive of the identification of community actions that can be undertaken.	No	
Local Plans Team	Huntingdonshire District Council	ANP:25	Chapter 8 - Monitoring the implementation of the NP policies.	Have observations	Chapter 8 “ Monitoring the implementation of the NP policies This is supported in principle; however, a general observation is that no monitoring indicators are identified for any of the policies. While the neighbourhood plan sets qualitative indicators, and this is not necessarily a requirement, it is considered best practice to include more specific indicators, comprising a policy-by-policy monitoring table with specific, measurable indicators that could be used to monitor the progress of policies. This can then be used in future monitoring reports to analyse what impact policies are having and therefore shape any future updates to the Neighbourhood Plan. Also, there is no Implementation and Delivery plan to set out how the objectives in the Neighbourhood Plan will be achieved and consideration on priorities will be given, particularly in terms of infrastructure provision and spending of additional CIL money. There is limited detail on how the Parish Council will work with which partners on each matter, what will be done, who will lead actions, how it will be funded and if there is a time frame for delivery.		
Local Plans Team	Huntingdonshire District Council	ANP:26	Appendix 1: Locally Important Views	Support	Appendix 1 “ Locally Important Views Supportive of the list of Locally Important Views, the maps showing location and direction of these views and supporting photographs and text to aid implementation of the policy.	No	
Local Plans Team	Huntingdonshire District Council	ANP:27	Appendix 2: Non-Designated Heritage Assets	Support	Appendix 2 “ Non-designated heritage assets Supportive of the appendix relates directly to Policy AL 3 to aid implementation of the policy.	No	
Local Plans Team	Huntingdonshire District Council	ANP:28	Appendix 3: Design Guidance	Have observations	Appendix 3 “ Design Guidance Have observations in regard to basic condition: Conformity with strategic policies; Achievement of sustainable development In principle HDC are supportive of the design guidance but have some specific comments as follows on elements of this guidance: ¢ Page 121 - first bullet point under B3 “ please provide a source for the 90%, HDC would encourage all buildings to have active frontage onto the street and on both frontages of corner plots. ¢ Page 121 - second bullet point under B3 “ part of the sentence is missing: œWhere setbacks are less than 12m, boundaries should generally be less than 1m in height in line with guidance provide within the [?], to prevent them obstructing natural surveillance onto the street. Suggested change: here setbacks are less than 12m, boundaries should generally be less than 1m in height in line with guidance provide	Yes	Suggested change: here setbacks are less than 12m, boundaries should generally be less than 1m in height in line with guidance provide within the HDC Design Guide SPD 2017

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					within the HDC Design Guide SPD 2017 Please also see related comments for the Alconbury Design Guide below.		
Local Plans Team	Huntingdonshire District Council	ANP:29	Appendix 4: Design Checklist	Have observations	Appendix 4 -Design Checklist Have observations in regard to basic condition: Conformity with strategic policies; Achievement of sustainable development In principle HDC are supportive of the design checklist but have a specific comment as follows on elements of this checklist: ¢ Page 126 Household extension ¹ suggest new bullet point “ ~ is the extension subservient to the main dwelling in terms of height and overall scale and massing.		
Local Plans Team	Huntingdonshire District Council	ANP:30	Appendix 3: Design Guidance	Have observations	This comment relates to the Alconbury Design Guide supporting document. Have observations in regard to basic condition: Conformity with strategic policies Officers welcome the provision of a detailed design guide that is specific to the neighbourhood plan area and complimentary to the more broader design requirements set out in the HDC Design Guide. Key recommendations are set out below: Page 16 ¢ Concern the categories ~ should “ reflects design principles that are strongly encouraged and ~ could “ reflects design principles that are suggestions are open to interpretation. Suggest guidance with the term ~ should is strengthened to note that these form mandatory design fixes that cannot be varied. Page 46 Suggest insert text ~ As a general rule, a maximum of one third of the front garden space should be dedicated to parking, while two-thirds of the front garden should remain as green space to reinforce the aim of providing garden space. Figure 27 ¢ Shows on-plot tandem parking to the side of the dwelling, another example is recommended showing parking to the front of the dwelling, illustrating this 1/3 parking and 2/3 garden rule. ¢ Recommend include guidance limiting the number of continuous frontage parking spaces. Experience has shown that developments comprising rows terrace housing often features large dominate areas of frontage parking. Recommend frontage parking is broken up into a maximum of 4 continuous spaces separated by minimum 1.5m landscape breaks. Figure 28 ¢ The 4m x 7m measurements of the garage exceed minimum dimensions for single garages (3m x 6m) but fall short of minimum requirements for double garages (5.5m x 6) as set out within the HDC Design Guide SPD page 95. Recommend figure 28 reflects the HDC guidance. ¢ Recommend indicate the depth of the driveway “ garages should be setback a minimum of 6m from the highway to allow parking in front and space for the garage door to be opened. Page 50 ¢ B2 “ Plot Layout: 2nd bullet point - suggest add ~ and front gardens to the end of ~ ¹ leaving space for grass verges. ¢ B3 “ Feelings of safety and surveillance: 1st bullet point “ unclear why only 90% of building to have a primary frontage which faces the street, is this in relation to the entire development, any one street frontage or a single plot? “ recommend this is changed to all buildings to face the street to avoid ambiguity. ¢ B3 “ Feelings of safety and surveillance: 2nd bullet point “ the sentence ~ boundaries should generally be less than 1m in height in line with guidance provide within the, is incomplete. Recommend that where higher boundaries are	Yes	Page 16 Concern the categories ~ should “ reflects design principles that are strongly encouraged and ~ could “ reflects design principles that are suggestions are open to interpretation. Suggest guidance with the term ~ should is strengthened to note that these form mandatory design fixes that cannot be varied. Page 46 Suggest insert text ~ As a general rule, a maximum of one third of the front garden space should be dedicated to parking, while two-thirds of the front garden should remain as green space to reinforce the aim of providing garden space. Figure 27 Shows on-plot tandem parking to the side of the dwelling, another example is recommended showing parking to the front of the dwelling, illustrating this 1/3 parking and 2/3 garden rule. Recommend include guidance limiting the number of continuous frontage parking spaces. Experience has shown that developments comprising rows terrace housing often features large dominate areas of frontage parking. Recommend frontage parking is broken up into a maximum of 4 continuous spaces separated by minimum 1.5m landscape breaks. Figure 28 The 4m x 7m measurements of the garage exceed minimum dimensions for single garages (3m x 6m) but fall short of minimum requirements for double garages (5.5m x 6) as set out within the HDC Design Guide SPD page 95. Recommend figure 28 reflects the HDC guidance. Recommend indicate the depth of the driveway “ garages should be setback a minimum of 6m from the highway to allow parking in front and space for the garage door to be opened. Page 50 B2 “ Plot Layout: 2 nd bullet point - suggest add ~ and front gardens to the end of ~ ¹ leaving space for grass verges. B3 “ Feelings of safety and surveillance: 1 st bullet point “ unclear why only 90% of building to have a primary frontage which faces the street, is this in relation to the entire development, any one street frontage or a single plot? “ recommend this is changed to all buildings to face the street to

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					permitted where there are larger than 12m setbacks, then these comprise hedge planting / soft landscaping to reflect B4 Boundary treatments. Figure 35 ¢ The tall timber fence is an example of a poor-quality frontage boundary treatment. Page 65 ¢ Household Extensions Checklist “ recommend include “is the extension subservient to the main dwelling in terms of height and overall scale and massing.		avoid ambiguity. B3 “ Feelings of safety and surveillance: 2 nd bullet point “ the sentence “boundaries should generally be less than 1m in height in line with guidance provide within the, is incomplete. Recommend that where higher boundaries are permitted where there are larger than 12m setbacks, then these comprise hedge planting / soft landscaping to reflect B4 Boundary treatments. Figure 35 The tall timber fence is an example of a poor-quality frontage boundary treatment. Page 65 Household Extensions Checklist “ recommend include “is the extension subservient to the main dwelling in terms of height and overall scale and massing.
Local Plans Team	Huntingdonshire District Council	ANP:31	Policy AL 2 - “Protecting and enhancing Alconburys landscape and settlement character	Have observations	Map 6 Have observations in regard to basic condition: National policy/ guidance The Important Village Gateways should be clearly referenced on Map 6 with labels to improve visual clarity. This is to ensure consistent application when determining planning applications. This is required to conform with the basic conditions, specifically, NPPF paragraph 16d. The village gateways should be numbered to link with Important Village Gateways identified on page 45-49.		

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Tessa Saunders	Spatial & Strategic Planning Lead Anglian Water Services Ltd	ANP:32	Chapter 4 - Key Issues	Have observations	Observation: 4.5.4 The Alconbury Water Recycling Centre has limited capacity to accommodate wastewater flows from future growth. Anglian Water is liaising with Huntingdonshire District Council on the emerging Local Plan and supporting evidence, including the Water Cycle Study, to ensure that development is phased to align with future investment in wastewater infrastructure. Anglian Water is currently preparing the next iteration of the Drainage and Wastewater Management Plan (DWMP28), which will address the 25-year period 2030-2055, going beyond the neighbourhood plan period to 2041. Throughout this process we will be engaging with local planning authorities to update and seek views on these plans and the growth scenario best aligned to our region. DWMP28 will inform our investments in the next Business Plan (Price Review 2029 “ PR29) for the Asset Management Period 2030-2035 (AMP9) and must set out how we will manage and develop our drainage and sewerage systems to meet our obligations under Water Industry Act 1991. This includes understanding how to deal with challenges such as asset health, climate change and population growth. Using this information, we will conduct a risk assessment for three different timescales: the short- (5yr), medium- (15yr) and long- (25yr +) term. The outputs from these will allow us to develop best value investment solutions to meet our obligations.	Yes	Reference the emerging Drainage and Wastewater Management Plan that will inform future strategies and investment.
Tessa Saunders	Spatial & Strategic Planning Lead Anglian Water Services Ltd	ANP:33	Policy AL 6 - Addressing flood risk appropriately when development is proposed via a planning application	Have observations	Anglian Water is supportive of the policy aims and particularly supports clause 3, that required the incorporation of sustainable drainage systems (SuDS) for all new development, and any positive contribution or betterment that development proposals could have in terms of reducing overall flood risk. Clause 2 “ As Anglian Water is responsible for sewerage and drainage, and is also identified as a Risk Management Authority in respect of flooding, we would request that Anglian Water is also included in the list of relevant stakeholders.	Yes	Request that Anglian Water is also included in the list of relevant stakeholders in Clause 2.
Tessa Saunders	Spatial & Strategic Planning Lead Anglian Water Services Ltd	ANP:34	Chapter 6 - The Planning Policies	Have observations	6.5.22 Anglian Water would request that our Surface Water Risk Management Guidance is referenced in the supporting text. The guidance is for new and redeveloped sites and explains how we ensure the risk posed from surface water drainage is clearly understood, and roles and responsibilities are clarified. https://www.anglianwater.co.uk/developing/planning--capacity/surface-water-risk-management Anglian Water needs to ensure the surface water hierarchy has been followed “ with the preference being sustainable drainage systems (SuDS). We require developers to liaise with the relevant Lead Local Flood Authority (LLFA) as they are the Statutory Consultee for all surface water drainage strategies on major development sites and are required by law to advise on the broader area drainage constraints. LLFA approval is an essential pre-requisite to Anglian Water accepting a surface water drainage strategy.	Yes	Include reference to our Surface Water Risk Management Guidance https://www.anglianwater.co.uk/developing/planning--capacity/surface-water-risk-management
Tessa Saunders	Spatial & Strategic Planning Lead Anglian Water Services Ltd	ANP:35	Policy AL 10 - Alconbury Community Infrastructure Priorities	Have observations	Anglian Water recommends that the policy includes reference to development proposals demonstrating that infrastructure capacity exists to accommodate the development or can be made available in time to serve the development. This reflects our comments in relation to paragraph 4.5.4.	Yes	Consider including a clause that requires development proposals to demonstrate that infrastructure capacity exists to accommodate the development or can be made available in time to serve the development.

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Mr Henry Asson	c/o agent Endurance Estates Land Promotion	ANP:36	Policy AL 1 - "A spatial strategy for Alconbury	Object	The policy states that development proposals outside of the built-up area will be supported where (inter alia) ☐ Development respects and does not undermine Alconbury villages identity as a rural settlement that is visually and physically distinct and separate from Alconbury Weston and ☐ Alconburys defining characteristic as a rural village distinct from other settlements and development in the wider area including Alconbury Weald and employment uses remains intact. Comment Against the criteria of the policy and the aspirations of the Objective, there is a risk that the Brampton Cross project may be considered to be in conflict with the Neighbourhood Plan. Brampton Cross, as stated above, is a strategic employment site which is recognised in the draft Huntingdonshire Local Plan, and whose development is explicitly supported in the Cambridgeshire Growth Strategy. The provision of policy and objectives within the Neighbourhood Plan which may restrict / resist the site coming forward therefore risks undermining the authority of the Neighbourhood Plan in the context of both adopted and emerging policy at a local and regional level. The policy ought to be recognise the aims and objectives of both the Local Growth Strategy and the HDCs draft Local Plan, and provide suitable caveats that support development coming forward under these documents. EELP agrees with the settlement identity objectives of the submission Neighbourhood Plan, and believes that the Policy would be more robust if it recognised sites identified within emerging policy“ this will ensure that the Neighbourhood Plan can remain in force and shape development within the Parish for its identified Plan period up to 2036.		

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Mr Henry Asson	c/o agent Endurance Estates Land Promotion	ANP:37	Policy AL 2 - ~ Protecting and enhancing Alconburys landscape and settlement character	Object	The policy states that development should ~ respect locally important views (ensure that proposals do not detract from the significant features of each view). The BX site is covered by View 9, which looks northwest from the junction of the A1 / A14 / A141). Comment It is noted that several viewpoint images within the draft Neighbourhood Plan are either cropped from a larger image or ~ zoomed in. As part of the technical work being undertaken to inform the Brampton Cross project, a number of viewpoints have been agreed with HDC for assessment. This viewpoint photography has been taken in accordance with the approved Guidelines for Landscape and Visual Impact Assessment (GLVIA3), following which all assessment work, which will be included within the Environmental Impact Assessment and Environmental Statement submitted as part of a planning application, will be undertaken in accordance with the same guidance. This guidance was prepared by the Landscape Institute in collaboration with the Institute for Environmental Management and Assessment. We would suggest that for the purpose of a robust draft Neighbourhood Plan, that the same approach is followed. We note that the submission draft includes comment on the views in Appendix 1, but there is nothing with the submission draft to indicate the approach which has been used. Regarding View 9, the submission draft notes: This viewpoint is the opposite side of Weybridge Farm as seen in View 8 above. It is taken from Woolley Road looking northwest beside the junction of the A1 and A14 crossing at Brampton Hut roundabout. This is the southern boundary of the Parish which is bounded by the A14 and A1. The well-managed arable land on the southern side of the Parish is a major flood mitigation resource of the Alconbury Brook, which frequently floods Alconbury village, through to Brampton and further on to the Ouse Valley. This is largely a factual description, though the suggestion that the arable land operates as a ~ major flood mitigation resource is strongly contested. Portions of this land are within Flood Zones 2 & 3, but the area covered by View 9 (which lie within the Brampton Cross site) are not considered to serve as active flood mitigation. Beyond this, any role that the land within the view plays with regards flooding is not considered relevant to its status as a Locally Important View. The descriptions of all other Locally Important Views provide comment as to why they are locally important. View 7, for example, offers œThe topography is another example of the arable fields surrounding the Village defined by hedgerows and pockets of woodland; View 5 includes œa ridge and furrow monument appearing as crop marks running SSW-NNE, directly north of School Lane. There is no such detail in the description of View 9 “ and nothing within the assessment of the View to explain its local significance. In the absence of such evidence, the Plan should consider the removal of View 9 from the schedule of Locally Significant Views.		
Mr Henry Asson	c/o agent Endurance Estates Land Promotion	ANP:38	Policy AL 5 - ~ Delivering high quality design sensitive to Alconburys distinctive character	Object	The policy requires buildings that are in harmony with the prevailing one-to-two storey dwellings, and adopt materials / layout that is appropriate to the rural character of the area (such as red brick, clay tiles, and low stone wall boundaries. Comment The policy seems to be related to residential development within / adjacent to the settlement boundary, but as worded risks jeopardising the delivery of non-residential development such as schemes to deliver industrial and logistics (I&L) development, where institutional standards require building heights in excess of one-to-two storeys. The policy should be updated so that it specifically relates to residential development, and particularly those close to and within the settlement boundary.		

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Mr Henry Asson	c/o agent Endurance Estates Land Promotion	ANP:39	Policy AL 6 - ~Addressing flood risk appropriately when development is proposed via a planning application	Have observations	AL6 (Flood Risk) The policy states that proposals must be in line with current guidance, and take into account flood risk and scope for attenuation. They should also consider ~any positive contribution the development could have in terms of leading to an overall reduction to flood risk). Comment EELP recognise the local concerns about flood risk in Alconbury, and support the intent of the policy. Significant technical work has been undertaken and is ongoing to inform the approach to surface water drainage and flood risk associated with the Brampton Cross project. The Brampton Cross team area engaging with the Alconbury Flood Group as well as the Lead Local Flood Authority and Environment Agency to ensure a collaborative approach is taken to the emerging proposals. Whilst mitigating the full extent of potential flood risk from the site is the minimum standard to be achieved, work is currently ongoing to explore the potential for betterment by increasing the amount of surface water storage on the site and slowing the discharge beyond that required. We are also exploring how offsite flood mitigation projects might be supported. The technical work involved will take some time to complete, however we will provide updates when they are available.		
Mr Henry Asson	c/o agent Endurance Estates Land Promotion	ANP:40	Policy AL 7 - Maintaining well connected neighbourhoods and addressing barriers to moving around the village more safely using active travel choices	Have observations	AL7 (Active Travel) The policy supports active travel options, particularly in specific areas. Comment EELP recognise that promoting active travel is an important factor to deliver truly sustainable development. The Brampton Cross project has shared ambitions with this objective and it is intended the development will deliver active travel upgrades to enable people from Alconbury to travel to and from the Brampton Cross site without using a car. These active travel upgrades, principally along Globe Lane, are being designed to respect the local rural character. The active travel routes will be unrestricted and open to all, providing improved connectivity not only between the Village and Brampton Cross, but also with other villages and services and facilities.		
Mr Henry Asson	c/o agent Endurance Estates Land Promotion	ANP:41	Policy AL 10 - Alconbury Community Infrastructure Priorities	Have observations	The policy states that infrastructure improvements coming forward under development schemes should be informed by local priorities: flooding, pedestrian travel, active travel, and habitats. The policy states that all development proposals should contribute towards these. Comment EELP recognise and support the delivery of Community Infrastructure as part of development proposals within Alconbury, and welcome the prioritisation of infrastructure provision in line with local priorities. The Brampton Cross project has the potential to deliver infrastructure improvements that respond to these priorities. There is also scope to deliver improvements outside of these priorities. If, for example, through the delivery of off-site mitigation measures, improvements or upgrades, it is possible to enhance the Villages access to infrastructure, such as Broadband, then this can be looked at collaboratively at the appropriate time. EELP suggests that the Neighbourhood Plan considers what can be provided by Brampton Cross when it comes forward including enhanced pedestrian access and through the site to the existing public rights of way network, bus services, and amenities. EELP has also committed to Active Travel upgrades on Globe Lane.		

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Mr Henry Asson	c/o agent Endurance Estates Land Promotion	ANP:42	Policy AL 11 - Protecting and enhancing Alconburys natural environment	Object	The policy states that proposals with the potential to impact on identified areas (including areas of deciduous woodland) should respond positively to the value of the area (Brampton Cross is almost entirely in this area). All proposals should seek to integrate biodiversity measures within buildings (bird / bat / insect boxes for protected species). Integrated living, brown or green roofs are particularly suitable for slowing water run-off. Comment The Brampton Cross site is identified as being within an area of deciduous woodland, despite the fact that it is currently an intensive arable farm. The identification of the Site as being within a deciduous woodland ought to be removed. The policys requirement for green / brown roofs, relates to flooding /design, and is not considered appropriate to a natural environment policy. Equally, the policy requires aspects that are not considered to be appropriate for I&L development (for example integration of bird / bat / insect boxes within buildings). The Brampton Cross proposals will include the creation of a significant area of open space and landscaping. Through this commitment EELP is aiming to deliver at least 20% Biodiversity Net Gain. This significantly exceeds the Governments legislative minimum of 10% but supports Natural Cambridgeshires Doubling Nature aspirations. In addition, as part of the proposals, EELP are committed to retaining and enhancing significant areas of the site as large landscaped areas including the ridge running through the centre of the Site as part of a landscape led approach to masterplanning. These areas of landscaping and open space will link into the surrounding green infrastructure to create new and reinforce existing linkages and corridors.	Yes	We therefore request that the policy states: All proposals should where appropriate take opportunities to integrate biodiversity measures within a building. This can include through the provision of integrated bird and bat or insect boxes to be targeted at protected species known to be in the parish. Integrated living, brown or green roofs are considered particularly suitable for slowing water run-off from buildings and on brownfield sites to accommodate invertebrates that are displaced through the development
Mr Henry Asson	c/o agent Endurance Estates Land Promotion	ANP:43	Overall comment on the Neighbourhood Plan	Have observations	We are instructed by our client Endurance Estates Land Promotion Ltd (~EELP) to submit representations to Huntingdonshire District Council (~HDC) regarding the Regulation 16 consultation of Alconbury Parish Councils Neighbourhood Plan, which is out for consultation between 11 May to 23 June 2026. The Parish carried out a Regulation 14 consultation on their draft Neighbourhood Plan between 06 June and 15 August 2025, in response to which we also issued representations. As HDC will be aware, EELP are promoting land at Brampton Cross as a major employment site within Huntingdonshire, the proposal is set out in the attached. The site is located within the Parishes of Alconbury and Ellington. The draft Alconbury Neighbourhood Plan is being prepared in the context both of a wider need for co-operation with Huntingdonshire District Council (currently undertaking a Local Plan Review) and imminent Local Government Reorganisation (LGR) and Devolution. These are discussed in the attached. These representations set out feedback from EELP to the submission Neighbourhood Plan, structured around the key themes and objectives of the Plan, to provide constructive feedback that ought to be incorporated into the version submitted for Examination. We recognise the aspiration of the Alconbury Parish to progress the submission Alconbury Neighbourhood Plan to become a Development Plan document for non-strategic policies, and look forward to continuing ongoing dialogue with both the Parish and the District Council through the parallel processes of promoting Brampton Cross and communicating updates about the projects progress. We have set out a few comments relating to specific policies within the draft Neighbourhood Plan that we believe are advisable to ensure that it is consistent with emerging and recently adopted development strategies and plans, including through the provision of flexibility where appropriate, and through the recognition of the Brampton Cross project.		

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Emma Williams	Church Commissioners for England	ANP:44	Policy AL 1 - "A spatial strategy for Alconbury	Have observations	Overall approach to growth and sustainable development The Commissioners recognise the importance of safeguarding the character of Alconbury. However, the Submission Version contains a number of specific provisions which, in the Commissioners view, do not align with the NPPF or with the proper role of neighbourhood plans in the plan-led system, instead seeking to constrain sustainable growth in a manner not justified by national policy or supported by appropriate evidence. The following section details the specific policies and policy wording the Commissioners consider not to be sound. If the Plan is to align with the NPPF and meet the basic conditions, those parts of the Submission Version should be amended so that they manage the form and quality of development through evidence-based policy criteria, rather than imposing locally distinctive restrictions which are not supported by national policy or strategic plan making. Policy AL1 " A Spatial Strategy for Alconbury The Commissioners acknowledge that the Submission Version has amended Policy AL1 and now identifies an indicative built-up area. This provides greater clarity than the Regulation 14 version. It is also noted that criterion 2 now refers expressly to rural exception housing, which is a helpful change. However, the specific wording of Policy AL1 is not considered sound. Criterion 2 states: "Development proposals outside the built-up area of Alconbury Village that are on land well related to the built-up area or are acceptable in a countryside location will be supported where: i. It provides affordable housing on a rural exception site which meets the requirements of village residents and is in accordance with identified housing needs; and i. Development respects and does not undermine Alconbury villages identity as a rural settlement that is visually and physically distinct and separate from Alconbury Weston; and i. Alconburys defining characteristic as a rural village distinct from other settlements and development in the wider area remains intact." The Commissioners consider that this wording reads as though development outside the built-up area is only capable of support where it is rural exception housing, with additional testing on the effect of coalescence with Alconbury Weston and acceptability in terms of Design. This does not align with paragraph 13 of the NPPF or with the requirement for general conformity with strategic policy. It narrows the scope of potentially acceptable development outside the built-up area in a way which is not supported by the adopted development plan and does not properly reflect the range of development which may be brought forward through strategic policy, including site allocations and other forms of sustainable growth through the emerging Huntingdonshire Local Plan. Although the emerging Huntingdonshire Preferred Options Draft Local Plan to 2046 is not adopted and can only carry limited weight at this stage, it is nevertheless relevant as the Councils latest expression of strategic policy direction. In particular, the emerging plan adopts a criteria-based approach to built-up areas under which well-contained open land and paddocks that are physically, visually and functionally related to existing buildings, and which provide infill or rounding-off opportunities, may properly form part of the settlement rather than being treated as countryside by default. If the intention is simply to confirm support for rural exception housing, the policy should say so without implying that it is the only acceptable form of development beyond the built-up area. As drafted, criterion 2 risks being read as a restrictive policy filter which excludes other development that may be sustainable and acceptable in principle under the wider development plan and applies a narrower view of the built-up area than is envisaged by the emerging	Yes	It is therefore suggested that the following text is included within Policy AL1: "Other forms of development outside the built-up area may also be supported where they accord with strategic policy and the statutory development plan, including any future site allocations, sustainable development proposals or development strategies established through the Huntingdonshire Local Plan process or other emerging regional planning policy."

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					Huntingdonshire strategy. The Commissioners therefore recommend that criterion 2 be amended to avoid any implication that rural exception housing is the sole category of development that may be supported outside the built-up area. At minimum, the policy should state expressly that other forms of development outside the built-up area may also be supported where they accord with strategic policy and the statutory development plan, including any future site allocations, sustainable development proposals or development strategies established through the Huntingdonshire Local Plan process or other emerging regional planning policy.		

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Emma Williams	Church Commissioners for England	ANP:45	Policy AL 2 - Protecting and enhancing Alconburys landscape and settlement character	Object	Policy AL2 “ Protecting and enhancing Alconburys landscape and settlement character The Commissioners remain concerned with draft Policy AL 2, particularly criterion 1 and supporting text paragraphs 6.2.18 and 6.2.19. While it is entirely appropriate for the neighbourhood plan to seek high quality design responses which conserve and, where possible, enhance local landscape and settlement character, the policy as drafted goes materially further than that. Draft Policy AL 2 introduces a restrictive policy approach to particular edge-of-settlement locations. Notably both the land north of School Lane is identified as a Sensitive Settlement Edge and the southern approach at Globe Lane is identified as an Important Village Gateway. This approach is not adequately supported by evidence and does not reflect the NPPFs positive approach to shaping sustainable development or the draft policies set out in the emerging Huntingdonshire Local Plan to 2046. In particular, the second and third bullet points of criterion 1 require development to avoid Sensitive Settlement Edges and Important Village Gateways where development would undermine their contribution to the rural landscape and settlement character of Alconbury. The Commissioners consider this policy wording is not simply a design-led requirement to respond appropriately to local context in these locations. Rather the policy as worded operates as a policy filter against development at identified locations, elevating selected parts of the settlement edge into areas where development is, in effect, presumed to be unsuitable for development. This is materially different to requiring development to respond positively to landscape character through layout, built form, planting and mitigation. With regard to the land north of School Lane, this is identified as the only Sensitive Settlement Edge, with the ‘Cow Field’ being described as making a substantial contribution to rural character, the setting of the Conservation Area and the Grade I listed church, and the rural backdrop to that part of the village. In the Commissioners view, those conclusions are not borne out by the technical evidence. In particular, the BMD landscape note (Appendix A) concludes that the School Lane site makes, at most, a limited contribution in landscape and visual terms; that it does not materially contribute to the setting of the Conservation Area in the manner suggested; and that it is capable of accommodating development within a strong and appropriate landscape framework, including targeted planting, a softened settlement edge and retention of key visual relationships. The effect of the policy and the supporting text confers a level of sensitivity on the site which is not proportionately evidenced. As is the theme within this Neighbourhood Plan, the Commissioners remain concerned with the approach towards evidence that has been prepared and presented through each round of consultation, and whether this has been considered robustly. The policy wording of criterion 1 also acts in a similarly restrictive way to land along the southern approach into the village from Globe Lane, identified in the plan as an Important Village Gateway. Land east of Globe Lane has a draft allocation within the emerging Huntingdonshire Local Plan. Although the plan is not yet adopted, the neighbourhood plan should avoid policy wording that could operate as an indirect policy barrier to strategic growth allocations. If the purpose of the village gateway designation is to secure a high quality transition into the village, that objective can and should be achieved through a design-led policy wording requiring appropriate landscape treatment, settlement integration and protection of key features, rather than using language which seeks to deter development at the location in principle. The Commissioners also consider	Yes	The Commissioners therefore request that Policy AL2 be amended by: i., Removing the School Lane Sensitive Settlement Edge designation; i., Deleting or materially softening the wording requiring development to be avoided at Sensitive Settlement Edges and Important Village Gateways and making the policy more designed focussed; and i., Clarifying that Locally Important Views are to be treated as material design considerations to be addressed through proportionate site-specific assessment rather than as an absolute policy constraint. Based on the above, it is also requested that the supporting plans, Map 6 and Images 12, 13, 14 and 15 within the draft Neighbourhood Plan are amended to exclude the School Lane Sensitive Settlement Edge designation.

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					the wording of criterion 4 of Policy AL 2 should be reviewed. It is reasonable for the plan to identify views as a material consideration in the design of new development. However, the present wording, particularly when read alongside the supporting material for View 5, risks treating the identified view as a basis for substantive policy restriction rather than as a design parameter to be addressed through scheme evolution. As the BMD landscape note (Appendix A) explains, View 5 is experienced by a relatively limited number of receptors; the eastern end of School Lane is a dead end; and suitably designed development could retain the principal characteristics of the view, including the rising landform, through a strong landscape framework and an open space corridor running north“south through the site. The policy should therefore distinguish more clearly between recognising a view as an important local characteristic and using it to justify an effective constraint on otherwise sustainable development. The Commissioners consider that Policy AL2 should be reviewed to ensure it performs an appropriate design and character function. It should require development to respond positively to settlement edge conditions, conserve important landscape features and, where necessary, provide mitigation and enhancement. It should not adopt language which has the effect of resisting development in principle at selected locations absent of a robust and proportionate evidential basis. As presently drafted, criterion 1 is overly restrictive in operation, and its application both to School Lane as a Sensitive Settlement Edge and to Globe Lane as an Important Village Gateway is not adequately justified.		

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Emma Williams	Church Commissioners for England	ANP:46	Policy AL 3 - ~Conserving and enhancing Alconburys non designated heritage assets	Have observations	Policy AL3 “ Conserving and enhancing Alconburys non-designated heritage assets Policy AL3 has changed materially since Regulation 14 and now identifies a list of non-designated heritage assets on Map 7 and in Appendix 2. The Commissioners earlier concern as to the absence of specificity has therefore been addressed in part. However, the inclusion of ridge and furrow as a non-designated heritage asset remains objectionable insofar as it relates to the School Lane site. The heritage evidence prepared by RPS and submitted with the Commissioners response to the Regulation 14 consultation (see Appendix B) concludes that the ridge and furrow within the School Lane land is severely eroded, of low local significance, and of very limited to no archaeological interest beyond its value as a visual trace of medieval ploughing. The report further concludes that there are no designated heritage assets within the site, that the site makes only a very minor contribution to the wider setting of the Church of St Peter and St Paul, and that development can likely be undertaken without harm to the significance of that listed building. The same evidence confirms that the site is physically and visually separated from the Conservation Area by modern development and vegetation and does not make an appreciable contribution to the way in which the Conservation Area is experienced or understood. In those circumstances, the inclusion of ridge and furrow on the School Lane site as a non-designated heritage asset is not supported by proportionate evidence and materially overstates its significance. Whilst the wording of Policy AL3 broadly reflects the NPPF requirement for a balanced judgement to be applied where proposals affect non-designated heritage assets, that judgement depends on the significance of the asset being accurately identified. The evidence shows that the ridge and furrow is severely eroded, of low local significance and of very limited archaeological interest. It is considered that the evidential basis for the School Lane designation does not justify its inclusion and therefore the policy risks operating as a blanket constraint on development, rather than allowing decision makers to weigh any limited harm against the assets limited significance and the scope for appropriate mitigation.	Yes	The Commissioners therefore request that any non-designated heritage asset designation affecting the School Lane site be removed from the Plan, or, at the very least, amended so that it accurately reflects the limited significance of the remains and the scope for development to proceed subject, if necessary, to proportionate recording.

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Emma Williams	Church Commissioners for England	ANP:47	Policy AL 4 - Alconburys Local Green Spaces	Have observations	Policy AL4 “ Local Green Spaces and Other Green Spaces Criterion 3 of Policy AL4 states that the map shows those areas classed as “ Other Green Spaces represent areas that are important to the character of the village, or as an informal space for children to play away from traffic, and that it is expected that they be preserved as green spaces. OSG1 Old Cow Field, the land north of School Lane owned by the Commissioners is identified within this category. This is private land not open to the public and therefore should not be an informal space for children to play or other local residents to use. The phrase in criterion 3 that such land is “expected” to be preserved as green space is a policy restraint. The NPPF provides a specific basis for the designation of Local Green Space through paragraph 107 but does not provide for a parallel category of open land which attracts similar protective treatment without satisfying those tests. If land does not meet the paragraph 107 criteria, it should not be subject to a bespoke neighbourhood plan designation that nonetheless seeks to preserve it as green space in principle. In the Commissioners view, criterion 3 therefore lacks a proper basis in national policy and introduces unnecessary uncertainty as to how the designation is intended to operate in development management terms. Supporting text paragraph 6.3.17 states that the Old Cow Field is located at the northern edge of the village, that its elevation and sloped nature ensure it is dominant over the rest of the village, that it contributes to the setting of the Conservation Area and the Grade I listed church, and that it is a site of archaeological interest due to the presence of ridge and furrow. Paragraph 6.3.18 then confirms that this space has been categorised as an “ Other Green Space. In the Commissioners view, those statements materially overstate the contribution of the site and are not supported by suitable evidence. In particular, the BMD landscape note (Appendix A) concludes that the site is not essential to the setting of the Conservation Area, forms only a small part of the wider network of farmland and hedgerows to the north-west of the village and does not justify the elevated landscape sensitivity attributed to it in the draft Plan. Landscape, heritage and ecology assessments prepared by professionally qualified consultants on behalf of the Church Commissioners have shown that the proposed designation has no robust evidential basis to support it. The effect is to use unsupported narrative as the basis for an unsupported designation. These concerns were raised previously at Regulation 14 stage, with supporting evidence (attached as Appendix B to this report), but there is no clear sign that this evidence has been properly considered or addressed. In the Commissioners view, the Alconbury Neighbourhood Plan therefore lacks a robust evidence base and fails the basic conditions, including consistency with sustainable development and general conformity with the development plan. The Commissioners support the designation of the Memorial Hall Green as Local Green Space (LGS 7), reflecting its established community role and relationship to the Memorial Hall. However, in relation to OGS1 Old Cow Field, criterion 3 of Policy AL4 and the supporting text at paragraphs 6.3.17 and 6.3.18 should be amended to remove this designation. If the Parish Council wishes to recognise the contribution of the land to local character, that matter should be addressed through a properly framed landscape policy. It should not be achieved through an “ Other Green Space category which is not supported by national policy or ownership.		

Full Name	Organisation Details	Comment ID	Comment relates to	Comment Type	Comment	Are changes required?	Proposed changes
Emma Williams	Church Commissioners for England	ANP:49	Overall comment on the Neighbourhood Plan	Have observations	Deloitte LLP is instructed by the Church Commissioners for England (~ the Commissioners) to submit representations to Huntingdonshire District Council on the Alconbury Neighbourhood Plan Submission Version, published for Regulation 16 consultation. The Commissioners are a significant landowner within the neighbourhood area and are thus keen to continue to engage positively in the plan making process. The Commissioners welcome the opportunity to comment on this document. The Commissioners have a number of landholdings within Alconbury. In particular, the Commissioners owns land north of School Lane and land north of Alconbury Memorial Hall, proposed as ~ Other Green Space and ~ Local Green Space respectively in the draft Neighbourhood Plan. These are identified as LGS1 and LGS9 respectively in the draft Neighbourhood Plan. In addition, The Commissioners land at the following sites is being promoted through the emerging Huntingdonshire Local Plan process: i, Land to the east of Globe Lane, Alconbury ii, Land to the north of School Lane, Alconbury iii, Land to the north of B1043 of Alconbury A portion of the site east of Globe Lane, Alconbury has been identified as a draft allocation in the emerging Huntingdonshire Local Plan for 60 homes. The Commissioners submitted detailed representations to the Regulation 14 consultation in August 2025 (see Appendix B). While some changes have been made in the Submission Version, a number of the principal concerns remain unresolved. In several respects the plan continues to rely on restrictive or insufficiently evidenced policy drafting that risks conflicting with the National Planning Policy Framework 2024 (NPPF), particularly the basic conditions that a neighbourhood plan must have appropriate regard to national policy, contribute to the achievement of sustainable development, and be in general conformity with the strategic policies of the development plan. Notwithstanding the concerns set out below, the Commissioners recognise that the Submission Version includes a number of constructive amendments from the Regulation 14 draft, notably refinement to Objective 4 and greater specificity in parts of the policy framework. These changes are welcomed where they improve clarity and precision.	Yes	The principal modifications sought are as follows: i, Amend Policy AL1 so that it does not imply that rural exception housing is the only acceptable form of development outside the built-up area and instead makes clear that sustainable proposals which are acceptable in policy terms with the Local Plan or are supported by strategic policy, including future allocations, are not precluded. ii, Amend Policy AL2, Map 6 and Images 12, 13, 14 and 15 by removing the School Lane Sensitive Settlement Edge designation and deleting or substantially softening the wording that requires development to be avoided at Sensitive Settlement Edges and Important Village Gateways. iii, Amend Policy AL2 so that locally important views operate as design considerations informed by proportionate site-specific assessment, rather than as a basis for unjustified restrictions on development. iv, Remove from Policy AL3 and Map 7 the proposed ~ ridge and furrow non designated heritage asset designation or amend the plan to reflect the limited significance of the ridge and furrow and the scope for proportionate recording, noting also that the BMD landscape note (Appendix A) does not identify this feature as a basis for attributing heightened landscape sensitivity to the School Lane site. v, Remove OGS1 Old Cow Field from Policy AL4 and Map 8, as the ~ Other Green Space category is unsupported by national policy and unjustified in relation to the School Lane land, particularly having regard to the conclusions of the BMD landscape note (Appendix A) on the sites limited landscape value and its capacity to accommodate development with appropriate mitigation. vi, Ensure the plans treatment of Globe Lane and other edge-of-settlement locations does not conflict with the strategic planning process or frustrate sustainable growth that may be supported through the emerging Huntingdonshire Local Plan. Subject to these changes, the Commissioners would be pleased to continue to engage positively with the Parish Council and Huntingdonshire District Council as the neighbourhood Plan progresses through examination.