

Godmanchester Submission Neighbourhood Plan – consultation comments (8 May – 19 June 2017)

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
GMC-NP:1	Professor Marcial Echenique		Godmanchester Neighbourhood Plan (Whole document)	Have observations	<p>1. The settlement boundary doesn't make sense. It should incorporate all existing buildings.</p> <p>2. Conservation areas should be delineated including open spaces to be preserved.</p>	<p>Proper definition of settlement boundary.</p> <p>Conservation areas should be defined as well as private open spaces to be conserved.</p>	
GMC-NP:2	Patricia Lynch		Play areas and recreation spaces	Have observations	<p>I've read the plan, most of which I am very happy with. My only concern was re GMC7 - I agree that it might be a good idea to have a designated off the leash area for dogs, but I would hate it if the existing parks became on the leash areas only (e.g. The Rec, Betts Close, Judith's field and cricket pitch). In particular I feel dog owners are attracted to visit the town by the riverside setting, but this would be less attractive if we restricted where the dogs could go. In fact getting pubs and cafes to state clearly if they welcome dogs would probably encourage more business to come their way.</p>		
GMC-NP:3	Mrs K Pauley		Godmanchester Neighbourhood Plan (Whole document)	Have observations	<p>GMC8 - "where public and allotment space is lost through re-development for housing or other uses...". An assurance that existing public and allotment space, including the nursery, will not be lost to redevelopment.</p> <p>GMC17 - "general support for the provision of such community facilities...". General support seems a bit weak. Surely the town should be insisting on support for community facilities?</p> <p>GMC8 - Education. Is it not time that the town, given the general increase in population and the timeframe covered by the Plan, should be putting forward proposals for a secondary school, especially as Hinchingsbrooke is already over subscribed?</p>	<p>GMC8 - "where public and allotment space is lost through re-development for housing or other uses...". An assurance that existing public and allotment space, including the nursery, will not be lost to redevelopment.</p> <p>GMC17 - "general support for the provision of such community facilities...". General support seems a bit weak. Surely the town should be insisting on support for community facilities?</p> <p>GMC8 - Education. Is it not</p>	

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
						time that the town, given the general increase in population and the timeframe covered by the Plan, should be putting forward proposals for a secondary school, especially as Hinchingsbrooke is already over subscribed?	
GMC- NP:4	Ms Louise Copper		Godmanchester Neighbourhood Plan (Whole document)	Have observations	Page 74 has an omission in sections of 25 - there is an additional green square of land at the rear of comben drive between the social housing and where the show house was this should be included along with the other recorded number 25 spaces	Page 74 has an omission in sections of 25 - there is an additional green square of land at the rear of comben drive between the social housing and where the show house was this should be included along with the other recorded number 25 spaces	
GMC- NP:5	Miss wendy oldfield		Godmanchester Neighbourhood Plan (Whole document)	Have observations	<p>Section 9 Traffic & Transport there is no mention that any Environmental surveys have been carried out in relation to traffic and noise pollution. Tests should be carried out now to establish the current levels of Nitrogen Dioxide and Airbourne Particulates before further traffic is added to this area.</p> <p>Also, in the section regarding flooding, my observations are as follows. With all the extra run off from housing planned in this area we WILL more than likely suffer from flooding if the rivers are not maintain on a more regular basis, i.e dredging to remove silt build up. We do not want another Somerset Levels situation in this area.</p>	<p>Environmental surveys to be carried out Nitrogen Dioxide and Airbourne Particulates along with noise pollution.</p> <p>More dredging of the rivers.</p>	Yes
GMC- NP:6	Mr Stewart Patience	Anglian Water	Townscape: Flooding and surface water flood risk	Support	<p>Policy GMC16 (Reducing Surface Water Flood Risk:</p> <p>Anglian Water is supportive of the requirement for development proposals to provide Sustainable Drainage Systems (SuDs) which will help to address sewer flooding and surface water flooding.</p>		

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
GMC-NP:7	Janet Nuttall	Planning and Conservation Advisor Natural England	Godmanchester Neighbourhood Plan (Whole document)	Support	<p>Natural England is generally supportive of the Godmanchester Draft Neighbourhood Plan as this includes policies to protect and enhance the countryside, landscape and green infrastructure whilst promoting sustainable small scale development. The Plan recognises the importance of protecting and enhancing the natural environment, including designated sites such as Portholme Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC) and Eastside Common SSSI, for people and wildlife. We are satisfied that Plan policies do not appear to pose any risk to these designated sites.</p> <p>We particularly welcome policies GMC1, GMC6, GMC7 and GMC14 and their requirements to protect and enhance the natural environment including wildlife, green infrastructure and best and most versatile (BMV) land.</p> <p>The lack of further comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may be able to make comments that will help the Local Planning Authority (LPA) to fully take account of the environmental value of areas affected by this plan in the decision making process.</p>		Yes
GMC-NP:8	Mr Paul Belton	Senior Planner The Fairfield Partnership	Godmanchester Neighbourhood Plan (Whole document)	Object	<p>As set out within our previous representations, (copy attached), The Fairfield Partnership supports a number of the policies contained within this Submission Version of the Godmanchester Neighbourhood Plan. A number of the development aspirations of the town are also noted and agreed. These development aspirations include delivering further employment opportunities, reducing traffic congestion, enhancing local infrastructure and facilities, including provision of a doctor's surgery, providing improved availability and accessibility for education facilities and providing improved community facilities, open space and recreation facilities.</p> <p>As set out within the attached representations, we however object to Policy GMC1 as this policy seeks to restrict any</p>	The Fairfield Partnership remains of the view that this Neighbourhood Plan should heed the advice given in the National Planning Practice Guidance (NPPG). As set out within our earlier representations, the NPPG advises that where Neighbourhood Plans come forward in advance of an up to date Local Plan, a proactive and positive approach should be	Yes

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					<p>development within Godmanchester to sites falling within the defined settlement boundary. The reason for our objection is as follows:</p> <p>The Neighbourhood Plan has regard to the planned growth for Godmanchester as set out within the Adopted Huntingdonshire Core Strategy. The Core Strategy was adopted in 2009 and provides the strategic development strategy for the District up until 2026. The adopted Core Strategy included an allocation of land now known as Romans' Edge and this "committed development" is reflected within the growth strategy for Godmanchester set out within this Neighbourhood Plan. The Neighbourhood Plan is however seeking to set the development strategy for the town up until 2036. As a result of the extended lifespan of the Neighbourhood Plan, relative to the Adopted Core Strategy, regard has also been given to the emerging Stage 3 Huntingdonshire Local Plan 2036, published in 2013. This Stage 3 version of the Local Plan seeks to allocate a further 120 dwellings within Godmanchester, over and above the already committed (and partly built out) Romans' Edge development.</p> <p>The Fairfield Partnership has, within its representation to the Council's recently published Housing and Employment Land Availability Assessment, expressed significant concerns with regards to the policy direction set out within the Stage 3 Local Plan. Godmanchester is one of the most sustainable locations for growth within the District, it being a "Service Centre". The draft Local Plan is however seeking to allocate very little additional development within the town over and above that envisaged to be delivered up until 2026 by the Adopted Core Strategy. Huntingdonshire District Council has deemed this approach to be appropriate having regard to its wider development strategy.</p> <p>Since publishing the Stage 3 Local Plan in 2013 it has however been confirmed that Wyton Airfield, a planned location to accommodate 3,750 houses within the Stage 3 Plan, is no</p>	<p>taken. To ensure no conflict of policies arises between the Local Plan and the Neighbourhood Plan, the Neighbourhood Plan should consider providing indicative delivery timetables and allocating reserve sites to ensure that emerging evidence on housing need is addressed. Such an approach, the NPPG advises, ensures that policies contained within a Neighbourhood Plan are not subsequently overridden by a new Local Plan. Given the amount of housing development needed within the District, and given the sustainable nature of Godmanchester, allocations should be made within the Godmanchester Neighbourhood Plan to provide additional sites for housing. Alternatively, if specific allocations are not to be made within the Neighbourhood Plan, reserve locations where additional housing could be provided, if deemed necessary by the emerging Huntingdonshire Local Plan, should at least be set out.</p>	

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					<p>longer to be brought forward. With a revised edit of the Local Plan, following the announcement on Wyton Airfield, yet to be published, it is not clear how the development needs of the District are now to be satisfied. Public Consultation on the Proposed Submission Draft of the Huntingdonshire Local Plan 2036 is expected this summer. While it is our understanding that additional allocations at Godmanchester are not to be included within this shortly to be published Submission draft, the Council's development strategy clearly needs to be confirmed, reviewed and commented upon during the public consultation process. The soundness of the Local Plan will then need to be considered within the Examination in Public.</p> <p>There remains therefore significant uncertainty regarding the soundness of the District Council's development strategy for the period up until 2036. As such, The Fairfield Partnership remains of the view that this Neighbourhood Plan should heed the advice given in the National Planning Practice Guidance (NPPG). As set out within our earlier representations, the NPPG advises that where Neighbourhood Plans come forward in advance of an up to date Local Plan, a proactive and positive approach should be taken. To ensure no conflict of policies arises between the Local Plan and the Neighbourhood Plan, the Neighbourhood Plan should consider providing indicative delivery timetables and allocating reserve sites to ensure that emerging evidence on housing need is addressed. Such an approach, the NPPG advises, ensures that policies contained within a Neighbourhood Plan are not subsequently overridden by a new Local Plan.</p> <p>In this instance it is The Fairfield Partnerships opinion that given the amount of housing development needed within the District, and given the sustainable nature of Godmanchester, allocations should be made within the Godmanchester Neighbourhood Plan to provide additional sites for housing. Alternatively, if specific allocations are not to be made within the Neighbourhood Plan, reserve locations where additional housing could be provided, if deemed necessary by the</p>		

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					<p>emerging Huntingdonshire Local Plan, should at least be set out.</p> <p>As the Town Council will be aware, The Fairfield Partnership consider that land east of Romans' Edge is suitable for future development. Having regard to other policies contained within this emerging Neighbourhood Plan it is considered that developing land east of Romans' Edge could help deliver many of the stated aims and aspirations of this Submission draft of the Neighbourhood Plan. Land east of Romans' Edge could for example deliver the following:</p> <ul style="list-style-type: none"> • Retention of the gap to adjacent settlements by ensuring development does not extend beyond the existing ridgeline with planting around the built form strengthened to deliver a definitive edge to the settlement, together with a high quality landscape strategy for the development (Policies GMC2 and GMC5). • Enhanced provision of green spaces and increased provision of parks and gardens for the public, together with the provision of extensive areas of open space, formal sports pitches and open spaces to expand the amount, type and range of facilities provided locally. (Policies GMC7 and GMC10) • Provide landscaped walks and extended footpaths with off leash dog walking areas (Policy GMC8) • A development that reflects and responds to the local character in terms of its grain, scale, density and architectural distinctiveness (Policy GM12) • Enhanced community facilities within the town that could include enhanced health care facilities, new education facilities (pre-school, primary and/or secondary) (Policies GMC18 and GMC19). • Employment opportunities for small scale, micro businesses 		

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					<p>or community based facilities (Policy GMC20)</p> <ul style="list-style-type: none"> • Through the provision of a bypass and associated improvements to local roads, the development could also reduce local congestion and could deliver an enhanced local highway network with enhanced connectivity to facilities and services on foot, by bicycle and by Public Transport. Existing and emerging facilities would also not be separated from one and other by the A1198 (policies GMC21, GMC22, GMC23,, GMC24) <p>In summary therefore, we consider that the Neighbourhood Plan provides a positive framework on a wide range of topics. As set out above however, it is considered that the draft Neighbourhood Plan is overly rigid and fails to provide the level of flexibility that might be required to balance the emerging needs of the Huntingdonshire Local Plan with the local development aspirations hereby set out. We therefore object to the wording of Policy GMC1 and invite the Town Council to positively consider potential locations for growth should the final adopted Spatial Strategy for Huntingdonshire up until 2036 deems that further growth within and around the town is necessary.</p>		
GMC-NP:9	Local Plans Team	Huntingdonshire District Council	The importance of the countryside setting	Have observations	The Council suggests that there is a potential conflict between GMC 1 and GMC2, in terms of the strong protection given to land outside of the settlement boundary in 1 and the support for development, seemingly including outside of the settlement boundary, in 2. This is not consistent with NPPF para 17 which requires that plans should provide a practical framework for decision making.	We would suggest this could be remedied with supporting text explicitly acknowledging the potential conflict, but explaining why visitor and tourist facilities are necessary and appropriate in particular locations.	
GMC-NP:10	Local Plans Team	Huntingdonshire District Council	The importance of the countryside setting	Have observations	It's unclear exactly what "be sustainable; have minimal impact upon their environment" mean in this context. This is not consistent with NPPF para 17 which requires that plans should provide a practical framework for decision making.	This needs to be explained in the supporting text.	

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
GMC-NP:11	Local Plans Team	Huntingdonshire District Council	Preserving the semi-rural village 'feel' within the Town	Have observations	This is inconsistent with NPPF para. 17 (provide a practical framework for decision making) in that for a decision maker, it's not clear how you would treat the two categories of Local Green Space and Other Green Space differently. Secondly, the policy is inconsistent with NPPF para 77 in that such strong protection for the Other Green Spaces is unjustified (ie the policy tries to imply they have the same protection as Local Green Spaces, but they don't meet the requirements in NPPF para 77).	The level of protection for Local Green Spaces and Other Green Spaces needs differentiating, providing clarity about what the lower level of protection for Other Green Spaces is.	
GMC-NP:12	Local Plans Team	Huntingdonshire District Council	Greener Streets	Have observations	The phrasing of "It will be important to maintain and extend linked habitats for wildlife" does not currently provide clarity for a decision maker.	To provide a practical framework for decision-making (NPPF para 17), it needs to be clearer what actions a developer should take (eg opportunities should be taken to.../proposals will be expected to demonstrate that they...). More detailed supporting text justifying the importance of green corridors should also be included.	
GMC-NP:13	Local Plans Team	Huntingdonshire District Council	The River	Have observations	"Public access and use will be prioritised over private access and use". It is unclear how this statement should affect a planning decision.	To provide a practical framework for decision-making (NPPF para 17), it needs to be clearer either what actions a developer should take (eg opportunities should be taken to.../proposals will be expected to demonstrate that they...), or how a decision taker should assess an individual proposal.	
GMC-NP:14	Local Plans Team	Huntingdonshire	Play areas and recreation	Have observations	It is unclear whether this policy refers to Local Green Spaces, Other Green Spaces, or both.	To provide a practical framework for decision-making (NPPF para 17),	

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
		District Council	spaces			whether this policy refers to Local Green Spaces, Other Green Spaces, or both needs to be clarified.	
GMC-NP:15	Local Plans Team	Huntingdonshire District Council	Heritage	Have observations	It's unclear what "have low-impact and enhance their environment" means in this context. For example, is this visual impact/or minimising the impact of carbon emissions? Similarly regarding the phrase "enhance their environment", is this visual or something else?	"Have low-impact and enhance their environment" need to be explained in the supporting text to provide a practical framework for decision-making (NPPF para 17).	
GMC-NP:16	Local Plans Team	Huntingdonshire District Council	The built environment	Have observations	It is currently unclear what the term 'historic buildings' means when this is differentiated from listed buildings.	To provide a practical framework for decision making (NPPF para 17) the term 'historic buildings', as differentiated from listed buildings, needs to be defined.	
GMC-NP:17	Local Plans Team	Huntingdonshire District Council	Improve parking in the town: parking standards for new development	Have observations	<p>The Council has the following concern in relation to whether the policy is "supported by appropriate evidence", as required by Planning Practice Guidance paragraph 41-041-0140306:</p> <ul style="list-style-type: none"> Higher space requirements for larger dwellings need further justification <p>The Council has the following concern in relation to whether the policy as worded will contribute to sustainable development:</p> <ul style="list-style-type: none"> While the concern regarding the loss of public parking in the historic core being resisted is understood unless it is replaced elsewhere, the Council considers that this requirement may be too restrictive. If a proposal was to be made that improved the situation, linked to sustainable principles in all their forms, and could justify lesser parking in the historic core, this could be challenged by the policy as currently worded. 	<p>Higher space requirements need further justification.</p> <p>The policy should be made more flexible to ensure that proposals improving parking issues in the historic core but not necessarily providing parking equivalent to current levels are not refused.</p>	

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
GMC-NP:18	Local Plans Team	Huntingdonshire District Council	Protection of existing and provision of new community facilities	Have observations	It is not currently clear how it should "be demonstrated there is no...reasonable hope of services being sustained".	This should be clarified in supporting text, in order to provide a practical framework for decision-making (NPPF para 17).	
GMC-NP:19	Local Plans Team	Huntingdonshire District Council	Education	Have observations	"and are or the benefit" does not make sense.	The wording of this policy needs revising to make sense and therefore provide clarity to the decision maker.	
GMC-NP:20	Local Plans Team	Huntingdonshire District Council	Making the roads in the Town safer	Have observations	The policy as worded will be difficult to implement. It would be very difficult to measure the cumulative impact of a single development proposal. This policy as worded does not provide a practical framework for decision making (NPPF para 17). In addition, the wording of the second sentence is not very clear in stating what the requirements for developers are.	The policy needs to be able to be applied to an individual proposal- it is suggested that reference to cumulative impacts is removed.	
GMC-NP:21	Local Plans Team	Huntingdonshire District Council	Improve physical access for pedestrians	Have observations	It is unclear what "development will not have an unacceptable impact on Walkway Routes" means in terms of being not being stated as a requirement for proposals to meet, and in not being clear what impacts would be considered to be acceptable or unacceptable.	To provide a practical framework for decision-making the clause "development will not have an unacceptable impact on Walkway Routes" needs to be reworded as a requirement. In addition, it is suggested that what would be considered acceptable or unacceptable is defined in the supporting text.	
GMC-NP:22	Dr Josephine Becker		The importance of the countryside setting	Have observations	"4.3 To the north, east and west of the town a crescent of river and floodplain habitats studded with open water, wetland woodland, scrub and grassland provide significant wildlife value much of which is in the process of being proposed as the Ouse Valley Area of Outstanding Natural Beauty ⁸ . This strategically important ecological network forms a core component of the green infrastructure within the county and beyond. There is		

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					<p>significant potential to further enhance the varied habitats present."</p> <p>There needs to be greater protection for this newly established area, which is at present under threat.</p>		
GMC-NP:23	Dr Josephine Becker		The importance of the countryside setting	Have observations	<p>"4.12 It is imperative that development which may take place along the new A14 does not reduce the 'open countryside' gap between Godmanchester and the new A14. Similarly, it is important that growth in all local settlements, including Godmanchester, does not see the currently separate Towns and villages merge or the 'open countryside' gap reduced. The particular gaps of relevance are between Godmanchester and Hilton, Papworth, Papworth St Agnes, The Graveleys, The Offords and The Hemmingfords."</p> <p>This form of development has already destroyed many older towns. I note that there is already a development organisation lobbying to build yet more adjacent to Bearscoft.</p>		
GMC-NP:24	Dr Josephine Becker		The built environment	Have observations	<p>"5.11 Godmanchester has two Conservation Areas: Post Street37 and Earning Street38.</p> <p>These are important nationally, as well as locally, as they demonstrate the history and heritage of the Town. (See Appendix 3 for a link to the list of all Grade I and II listings.)"</p> <p>Traffic is already having an adverse effect on older buildings in Godmanchester and on enjoyment of these parts of the town. Closing the bridge between Huntingdon and Godmanchester, with rising bollards for some vehicles, could improve this.</p>		
GMC-NP:25	Dr Josephine Becker		Residential infill and back land development	Have observations	<p>"6.6 The combined, cumulative impact of back land and infill development is that it can change the character of a settlement: here that would mean from a semi-rural character to a much more urban character. This would not be appropriate in Godmanchester."</p>		

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					This has already happened in many parts of Godmanchester without any interventions from planning authorities.		
GMC-NP:26	Dr Josephine Becker		Education	Have observations	<p>"7.14 There is no secondary school in Godmanchester: Year 7 – 11 pupils travel to Huntingdon. The majority of secondary school age children attend Hinchingsbrooke. St. Peters and the new secondary school that will be built as part of the Alconbury Weald development are the only two other state secondary schools within a five- mile radius. Some secondary pupils travel to Peterborough, Kimbolton or Cambridge to access religious or private (fee paying) schools. A recent survey indicated that parents would prefer to see school pupils travel less distance."</p> <p>As stated above, while some pupils may travel less distance, other parents may be happy to ferry their children in to Godmanchester, adding to traffic problems.</p>		
GMC-NP:27	Dr Josephine Becker		Making the roads in the Town safer	Have observations	<p>"8.9 The Town suffers from severe congestion at peak times. This causes concern for residents in terms of pollution, ease of access and enjoyment of the Town. It will be important that solutions are sought to reduce existing issues and that new developments do not make things worse."</p> <p>New developments in the form of Bearscroft/Romans Edge have already created more traffic.</p>		
GMC-NP:28	Dr Josephine Becker		Improve physical access for pedestrians	Have observations	<p>"8.28 The Godmanchester Neighbourhood Plan consultations regarding walking in the Town concluded that walking should be encouraged as much as possible for pleasure and for practical needs. Walking is a cheap and easy way to remain fit and healthy and encourages residents to leave their cars at home. Being able to walk to services and community facilities enables the community to be sustainably connected and helps to support a strong community feel. "</p> <p>Walking in Godmanchester can be a pleasant activity, but is affected by traffic, particularly during busy times of day, and by parking. The areas of green space in the town must be</p>		

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					preserved as peaceful recreation facilities.		
GMC-NP:29	Richard Agnew	Gladman Developments Ltd	The importance of the countryside setting	Have observations	<p>This policy seeks to determine a settlement boundary for Godmanchester, however the emerging Local plan seeks to use a criteria based approach for determining where development will be permitted. This is to resolve problems encountered with delineated boundaries of the previous Local Plan. The use of a settlement boundary is considered to be unnecessarily restrictive as opposed to a criteria based approach, as this is the approach advocated by paragraph 14 of the Framework.</p> <p>Instead of aligning with the emerging Local Plan, this policy will restrict development outside the settlement boundary. This conflicts with the basic conditions of neighbourhood plans, as the Framework is clear that development which is sustainable should go ahead without delay. The use of a settlement boundary to arbitrarily restrict suitable development coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework.</p> <p>Further, Gladman question the use of a policy that would be superseded upon adoption of the Local Plan, as Section 38(5) of the Planning and Compulsory Purchase Act 2004 states:</p> <p>'If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be).'</p> <p>As such, upon the adoption of the emerging Local Plan, development would be permitted outside the built-up area where it could be demonstrated to be sustainable. Gladman suggest the policy be amended to reflect the Framework's presumption in favour of sustainable development by supporting demonstrably sustainable development beyond or adjacent to the settlement boundary.</p>	<p>The following wording is put forward for consideration:</p> <p><i>' The Godmanchester Neighbourhood Plan will take a positive approach to development proposals outside the existing built up area in accordance with the presumption in favour of sustainable development. Development proposals adjoining existing built up areas will be supported provided that the adverse impacts of development do not significantly and demonstrably outweigh the benefits of development.'</i></p>	Yes

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
GMC-NP:30	Richard Agnew	Gladman Developments Ltd	Preserving the semi-rural village 'feel' within the Town	Have observations	<p>Gladman have previously raised concerns with this policy of the plan and reiterate these previous concerns. It is not considered appropriate for Local Green Spaces (LGS) and Other Green Spaces to be contained within the same policy where development would be permitted in the same circumstances. LGS is a designation equal to that of Green Belt, where development should only be permitted in the same circumstances as Green Belt policy contained within the Framework, 'in very special circumstances.'</p> <p>Paragraphs 76 through to 78 set out the requirements for designating Local Green Spaces (LGS) with paragraph 77 stating:</p> <p>'The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</p> <ul style="list-style-type: none"> • Where the green space is in reasonably close proximity to the community it serves; • Where the green area is demonstrably special to a local community and holds a particular local significance for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • Where the green area concerned is local in character and is not an extensive tract of land <p>Gladman raise concerns with some of the proposed LGS designations suggesting that some of the proposed designations may be extensive tracts of land. Further, it is noted that some of the proposed designations are already covered by the national designations of Sites of Special Scientific Interest (SSSI) and Special Areas for Conservation (SAC) and question whether this additional level of protection would add any extra benefit and suggests these are deleted as designations.</p>		Yes

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					<p>The issues surrounding LGS designations have been considered in a number of other Examiner's reports across the country and we highlight the following decisions:</p> <ul style="list-style-type: none"> - The Seldlescombe Neighbourhood Plan Examiner's Report¹ recommended the deletion of a LGS measuring approximately 4.5ha as it was found to be an extensive tract of land. - The Oakley and Deane Neighbourhood Plan Examiners Report² recommended the deletion of a LGS measuring approximately 5ha and also found this area to be not local in character. Thereby failing to meet 2 of the 3 tests for LGS designation. - The Alrewas Neighbourhood Plan Examiner's Report³ identifies that both sites proposed as LGS in the neighbourhood plan 'in relation to the overall size of the Alrewas Village' to be extensive tracts of land. The Examiner in this instance recommended the deletion of the proposed LGSs which measured approximately 2.4ha and 3.7ha. - The Freshford and Limpley Neighbourhood Plan Examiner's Report⁴ identified that the six LGS proposed did not meet the criteria required by the Framework either collectively or individually. Indeed, the Examiner identified that the combination of sites comprised of an extensive tract of land. The Examiner also considered that the protection of fields to 'prevent agglomeration between the settlement areas... is not the purpose of Local Green Space designation'. <p>1 http://www.rother.gov.uk/CHttpHandler.ashx?id=22996&p=0</p> <p>2 https://www.basingstoke.gov.uk/content/doclib/1382.pdf</p> <p>3 https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Neighbourhood-plans/Downloads/Alrewas/Alrewas-Neighbourhood-Plan-</p>		

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					<p>Examiners-Report.pdf</p> <p>4 http://www.wiltshire.gov.uk/freshford_limpley_examination_final_report.pdf</p> <p>- The Eastington Neighbourhood Plan Examiner's Report⁵ recommended the deletion of three LGS (16ha and 2ha) considered to be extensive tracts of land. The third proposed LGS was deleted due to the lack of evidence demonstrating its importance and significance to the local community.</p> <p>- The Tattenhill and Rangemore Neighbourhood Plan Examiner's Report⁶ recommended the deletion of 2 LGS comprising of 4.3ha and 9.4ha.</p> <p>- The Norley Examiner's Report⁷ identified a total of 13 parcels of land to be designated as LGS. The Examiner recommended at §4.98 that the identification of these extensive tracts of agricultural land was contrary to NPPF policy and recommended that the policy should be deleted. The proposed LGS measured in the range of 1ha – 4.3ha.</p>		
GMC-NP:31	Kerry Harding	Estates Advisor NHS England (East)	Health Services	Have observations	<p>We have reviewed the information available and note that there is reference to the access of local healthcare services for the current and future population of Godmanchester. It is also noted that there is ambition for the provision of assisted living developments or nursing/care homes to cater for an aging population, the provision of such services will have an increased impact on primary care services in the area. Godmanchester is currently serviced by Roman Gate surgery, a branch of Charles Hicks GP Practice; in terms of premises space this practice is currently at capacity.</p> <p>The plan identifies preference for housing developments with smaller numbers of dwellings rather than large developments. Please bear in mind that the planning obligations that can be gained from larger number of smaller developments will not</p>		Yes

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					<p>always have as much benefit as one large development. This will limit the options available for the provision of additional community infrastructure to be delivered as part of a scheme and NHSE have limited funding available to invest in creating additional capacity as a result of development growth.</p> <p>We would welcome the addition of a simple statement, to confirm that Godmanchester Town Council will support NHSE and the CCG in ensuring suitable and sustainable provision of Primary Healthcare services for the residents of Godmanchester. NHSE and the CCG would welcome the opportunity to discuss with the Town Council potential solutions to ensure sustainable Primary Care services for the local community.</p>		
GMC-NP:32	Jen Hadland Associate Planner	Savills UK, on behalf of Church Commissioners	The importance of the countryside setting	Have observations	<p>Whilst we support Policy GMC1 in principle, it is considered that further consideration should be given to accommodating future housing development in and around Godmanchester during the Plan period. Therefore further amendments should be made to the settlement boundary around the Town.</p> <p>The consented scheme for 753 dwellings at Romans' Edge / Land North West Of Bearscroft Farm has been incorporated into the redefined settlement boundary (to the east of Godmanchester- east of the A14), as set out on Map 6 'Settlement Boundary' (page 65) of the consultation document. Whilst this is fully supported, this scheme was granted outline consent in 2014. As such, further consideration should also be given to additional future development opportunities in the Town, particularly to the west/ south west of the settlement to meet future needs. Land to the south / south west of Godmanchester is in close proximity to the wide range of local services and facilities in Godmanchester. As such would lead to sustainable development.</p> <p>One site in particular which would be suitable for development is within our client's ownership and is located to the rear of Corpus Christ Lane. Please see the enclosed Location Plan for</p>	We therefore seek further changes to the settlement boundary of Godmanchester to ensure that the housing need and demand for the Town is met during the Plan period; in particular it is proposed that the settlement boundary at Corpus Christi Lane is amended to incorporate our client's land as set out in the enclosed plan.	Yes

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					<p>further details.</p> <p>This site lies within Godmanchester which is defined as a Key Service Centre in the adopted Core Strategy and forms part of the Huntingdon Spatial Area in the Draft Local Plan to 2036. Local Policy seeks to locate appropriate residential development in the built up areas.</p> <p>Furthermore, development in this direction from the centre of Godmanchester would comply with the Spatial Strategy set out in the adopted Core Strategy which supports residential development in a south-westerly direction of the Town. Please see an excerpt from the Core Strategy below for reference (see attached letter).</p> <p>When considering the context of the site, its surroundings and the definition of the built up area, the above site is considered to lie within the built up area of Godmanchester. It is also well screened by an existing tree belt which forms a physical boundary to the west of the site. The principle of residential development is therefore considered acceptable, subject to other material considerations. It is therefore considered that the development limits around this site should be amended to formally acknowledge that the site is both within the Historic Core, Conservation Area and the built up environment.</p> <p>Development of this site for small scale housing will help enhance the Town and assist with providing a mix of houses for all residents within Godmanchester. It would also comply with Policy GMC25 of the Neighbourhood Plan which seeks for all new developments should ensure safe pedestrian access to link up with existing footways to allow residents to be able to walk safely to the historic core, public transport facilities, schools and other important facilities serving Godmanchester town.</p>		
GMC-NP:33	Jen Hadland Associate	Savills UK, on behalf	The built environment	Have observations	Whilst we agree that the Historic Core should be taken into consideration when assessing planning opportunities, the designation should not preclude future development in the local		Yes

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
	Planner	of Church Commissioners			<p>vicinity. As set out in the consultation document, Godmanchester's "historic core and rich architecture is important to its character and is part of what makes it unique. This aspect of Godmanchester will need to be protected as the Town changes with time. However, what makes the Town special is its residents. To make our Town an even better place to live it needs to meet the needs of its residents".</p> <p>Many of Godmanchester's historic and heritage assets are covered by national protection under legislation (Listed Buildings and Conservation Areas Act 1990), therefore we support the assertion that there is no need to duplicate provision under planning law that already provide protection. As set out in the consultation document, it is vital that historic buildings remain in use and are well-maintained. Flexibility in respect of future use is therefore vital.</p> <p>We therefore support, in principle, Policy GMC11 as it does not preclude future development; it only seeks that proposals are sympathetic to the existing buildings with design reinforcing local character. It is, however, proposed that this is emphasised future within the policy to make this clear to both residents, developers and other stakeholders.</p>		
GMC-NP:34	Jen Hadland Associate Planner	Savills UK, on behalf of Church Commissioners	6. Housing	Have observations	<p>Infill development involves the development of a small gap in an otherwise built up area. Whilst this can include frontage plots and comprise of developing in side gardens of existing houses, there are other infill opportunities which would not inappropriately increase the density of existing development in the Town. It is therefore suggested that the definition is amended to reflect this.</p> <p>The development of land at Corpus Christi could be classified as infill development as it would help round off development in line with Allen Farm Close and West Street (to the south west of Godmanchester). The established tree line along the western boundary of the site, as mentioned above, is considered to provide a suitable new boundary line for the settlement</p>		Yes

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					<p>boundary in this area as it is physically delineated. Development of this site, as infill/ rounding off of the area, is not considered to be so substantial that it would have an adverse impact on the area. Any planning application would have to be considered on its own merits and a future proposal would need to take into consideration the Conservation Area and Historic Core, as set out above.</p> <p>Infill development should be supported if it helps meet the local housing need whilst ensuring that each proposal is considered on its own merits and that a scheme does not adversely impact on existing development from an overlooking, overshadowing or amenity perspective.</p>		
GMC-NP:35	Jen Hadland Associate Planner	Savills UK, on behalf of Church Commissioners	Townscape: Flooding and surface water flood risk	Support	We support this policy in principle, as it is considered in accordance with the National Planning Policy Framework which seeks to reduce flood risk for existing and proposed development.		Yes
LATE REP: GMC-NP:37	David Allat	Cambridgeshire County Council	Godmanchester Neighbourhood Plan (Whole document)	Have observations	<p>From a transport perspective, the document provides a useful articulation of key transport challenges and opportunities in the area and will be useful in helping developers identify transport solutions for their proposals that are in keeping with the vision and objectives of Godmanchester.</p> <ul style="list-style-type: none"> The County Council broadly supports the overarching vision and objectives of this neighborhood plan. However, the Neighbourhood Plan should reflect the policies and objectives of the Cambridgeshire Local Transport Plan and Huntingdon and Godmanchester Market Town Transport Strategy. 		Yes
LATE REP: GMC-	David Allat	Cambridgeshire	Vision for Godmanchester	Have observations	Traffic from new developments: As new developments are proposed it will be important that they assess their impacts and mitigate accordingly through the planning process, this is		Yes

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
NP:38		County Council			<p>reflected in the vision.</p> <ul style="list-style-type: none"> It is important that local and strategic road networks continue to operate within acceptable limits but in parallel it is important that sustainable modes are attractive and accessible. The vision should include the Godmanchester ambition regarding sustainable transport. 		
LATE REP: GMC-NP:39	David Allat	Cambridgeshire County Council	Neighbourhood Plan Objectives	Have observations	As set out previously, the objectives are broadly supported, but alignment should be demonstrated to the Cambridgeshire Local Transport Plan and Huntingdon and Godmanchester Market Town Transport Strategy.		Yes
LATE REP: GMC-NP:40	David Allat	Cambridgeshire County Council	Improve parking in the town: parking standards for new development	Have observations	<p>Parking standards are set by the Local Planning Authority. CCC would encourage that the use of sustainable modes by not over-providing and encouraging the provision of cycle parking.</p> <ul style="list-style-type: none"> The NPPF clearly states that in setting local parking standards for residential and non-residential development, LPA's should take into account 1.the accessibility of the development, 2. the type, mix and use of development, 3. the availability and opportunities for public transport, 4. local car ownership levels and 5. an overall need to reduce the use of high emission vehicles. It is essential that development is designed to incorporate appropriate levels of car parking commensurate with local car ownership levels. These considerations should be used to generate a bespoke level of parking for each development that comes forward, rather than provide the figures given in this policy. The type of the parking to be provided by all future developments will be determined by the location and nature of the proposed development. This means that for some developments parking provided at the rear of dwellings or on 		Yes

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					<p>street, if designed appropriately, could represent the most effective method for provision of car parking.</p> <ul style="list-style-type: none"> • This policy also needs to specifically mention the level and type of cycle parking that is to be secured in residential developments in order that this mode of transport is adequately encouraged and catered for. 		
LATE REP: GMC-NP:41	David Allat	Cambridge County Council	Providing for the needs of new and existing businesses	Have observations	<p>8.2: Through the Transport Assessment process, new developments will need to identify and mitigate the specific impacts associated with their proposals.</p> <ul style="list-style-type: none"> • 8.4: Rather than refer to a 'lack of suitable public transport' the plan should refer to the public transport services available and highlight that these services do not currently represent viable options for a large proportion commuters. • Policy GMC21 – Recommend adding 'and improve the provision of sustainable transport throughout the town' to the policy wording. • Policy GMC21 – Rather than using the terminology 'prevent detrimental impacts' it is suggested that the NPPF wording is used 'to mitigate the impacts of development' • All major development proposals must undertake a Transport Assessment (the level of detail required depends on the size and location of the proposed development). The assessments undertaken should identify the impact of the development on the surrounding transport network and identify measures which are required to mitigate that impact, ensuring that opportunities for sustainable transport have been taken up to reduce the need for major transport infrastructure. The measures put forward can require the developer to either undertake improvements themselves or give a contribution to the County Council. Developments should also be supported by a Travel Plan to set out how the use of sustainable modes will be 		Yes

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					<p>facilitated and encouraged,</p> <ul style="list-style-type: none"> The Transport Assessment document (along with accompanying planning conditions and s106 agreement) will clearly set out how any required enhancements will be delivered. 		
LATE REP: GMC-NP:42	David Allat	Cambridgeshire County Council	Make the Town safer for cyclists	Have observations	<p>We welcome the fact that commuter journeys by bicycle is already above the national average and agree that there are opportunities to build on this base. The significant benefits of having a town with high levels of cycling should be set out in this section.</p> <ul style="list-style-type: none"> The Plan does not refer to the approach to cycle parking. The provision of covered, secure cycle parking at key destinations such as outside public buildings and shops, complemented by high quality cycling infrastructure will increase the attractiveness of cycling. Policy GM22 – Proposed rewording... We strongly support contributions from new developments to improving the network of cycle routes in the Town, or access to them. This includes the provision of safe crossing of roads for cyclists. 		Yes
LATE REP: GMC-NP:43	David Allat	Cambridgeshire County Council	Ensure appropriate public transport service to the Town	Have observations	<p>8.20: It would be useful to provide an indication of current service provision.</p> <ul style="list-style-type: none"> Policy GM22 – Proposed rewording...Proposals to improve public and community transport services will be strongly supported. This may also include the provision of associated infrastructure such as bus gates, laybys and shelters. 		Yes
LATE REP: GMC-NP:44	David Allat	Cambridgeshire County Council	Improve physical access for pedestrians	Have observations	<p>Policy GMC24 – Supported</p> <ul style="list-style-type: none"> The Plan does not appear to make any reference to public rights of way, this needs to be addressed. Public rights of way are an important part of the transport 		

ID	Full Name	Organisation Details	I am commenting on	Support/ Object/ Observations - Please say whether you	Comment	Proposed changes - What changes would address the issue(s) that you have identified?	Supporting documents.
					<p>network and need to be considered at an early stage in development proposals. This will ensure that the needs of both existing and future communities can be adequately catered for in accordance with the County Council's Rights of Way Improvement Plan – which forms a key part of the LTP suite of policy documents.</p> <ul style="list-style-type: none"> • In addition, responsibility for any public open space especially where adjacent to a highway in all development proposals should be clearly defined (e.g. district council, highway authority, local residents' association etc). This will mean that developers consider the issue at an early stage in their development and define proposed responsibilities on their plans for negotiation/ approval by County/District as appropriate. This will ensure that DC/County Council legal asset records are accurate and reliable, so that there is no question at a point in the future. 		