

## Report of representations received on the Great Staughton Submission Neighbourhood Plan and considered by the Examiner

Representations are listed in alphabetical order. Representations can also be found using our [online consultation portal](#).

Name	Comment ID	I am commenting on	Comment Type	Changes required?	Proposed changes	Proposed changes - What changes would address the issue(s) that you have identified?
Josh Twigden	GSNP:1	3. Great Staughton Future	Support	Brook Farm, The Highway and Land south of 29 The Green are both supported for development and new GP Surgery / NHS Healthcare facility should be secured via s106 or Cil funding from the developments. I would not hold up adopting the plan but do consider the below sites required to meet future needs. Support housing at West of Cage Lane & North of Croft Close, Great Staughton and Between 20 Cage Lane and Averyhill, Great Staughton for the remaining units required to meet 60 dwellings to be developed in the Neighbourhood Plan area between 2011 and 2036.	No	
Aaron Cook	GSNP:2	Overall comment on the Neighbourhood Plan	Object		No	
Active Travel England	GSNP:3	Overall comment on the Neighbourhood Plan	Have observations	There is guidance available for neighbourhood groups that are developing a Neighbourhood Plan. This explains which transport matters a neighbourhood plan can address, including planning for active travel (walking, cycling and wheeling). You can access this on Locality's Neighbourhood Planning website: <a href="https://neighbourhoodplanning.org/toolkits-and-guidance/transport-matters-can-neighbourhood-plan-address/">https://neighbourhoodplanning.org/toolkits-and-guidance/transport-matters-can-neighbourhood-plan-address/</a>		
Louise Blood	GSNP:4	Overall comment on the Neighbourhood Plan	Support			
D W	GSNP:5	Overall comment on the Neighbourhood Plan	Have observations	NPs 1 & 5 if not implemented thoughtfully can very negatively impact villagers living in existing dwellings that are in close proximity. These dwellings and their inhabitants enjoy views of the surrounding countryside which can be easily destroyed by thoughtless development. Most of the NPs are developing greenfield or similar sites. As more of these are lost, the area is increasingly less resilient to inevitable environmental and climatic changes. Even more short sighted is the increasing loss of agricultural land to housing development. As a country, we become ever more unable to withstand global shocks to food supply and may at some point be unable to produce even minimum quantities of basic foods for our population. On a wider note, housing development really should occur on brownfield sites or similar. These are costly to rescue and build on but benefits our country in the longer term. Should we not subjugate excessively profit driven housing developers such that they would have little choice but to rescue these sites should they be given no other option? Ideology in previous governments has destroyed our waterways. Ideology in this current government looks to destroy our green spaces. At what point does this stop?	Yes	Reduce the number of dwellings to be built and constrain the development. 60 new dwellings in a settlement having only 250+ existing dwellings is excessive and cannot be sensible. Ideological dictates to build more housing facilitates corporate greed destroying our green spaces.

National Highways	GSNP:6	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 that the details set out within the document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.		
North Herts DC	GSNP:7	Overall comment on the Neighbourhood Plan	Have observations	Thank you for your email, dated 11 December 2024 about the Great Staughton Neighbourhood Plan (Regulation 16 version). We have reviewed the content of the Neighbourhood Plan and can confirm that North Herts Council has no formal comments to make in respect of the proposed policies or the supporting text in the plan.		
Cambridgeshire County Council Robin Hobbs	GSNP:9	Policy GSNP 17 “ Road Safety and Parking	Object	The principle of any proposed development within the Plan Area and any associated access arrangements will be assessed with due regard to local and national standards, and in accordance with Para 109 – 118 of the NPPF. It should be noted that any transport mitigation sought in relation to a given development must meet the relevant tests in planning. Further, proposed policy GNSP 17 indicates that B2 and B8 developments without direct access to B Roads are unacceptable. The Highway Authority could not this proposed policy where each development will be assessed on its own merits. Similarly, any works undertaken within the Highway will be constructed with due regards to CCC specification documents and materials that are specified within.	Yes	Policy amending in line with NPPF

Marine Planner East Marine Management Organisation Char Lewis	GSNP:10	Overall comment on the Neighbourhood Plan	Have observations	<p>Please see below suggested policies from the East Inshore and East Offshore Marine Plans that we feel are most relevant to Great Staughton Neighbourhood Plan. These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation, and we would suggest your own interpretation of the East Marine Plans is completed: i. EC1: Proposals that provide economic productivity benefits which are additional to Gross Value Added currently generated by existing activities should be supported. ii. EC2: Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas. iii. SOC2: Proposals that may affect heritage assets should demonstrate, in order of preference: a) that they will not compromise or harm elements which contribute to the significance of the heritage asset b) how, if there is compromise or harm to a heritage asset, this will be minimised c) how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against or d) the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate compromise or harm to the heritage asset iv. SOC3: Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference: a) that they will not adversely impact the terrestrial and marine character of an area b) how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them c) how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts v. ECO1: Cumulative impacts affecting the ecosystem of the East marine plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation. vi. BIO1: Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas (marine, terrestrial). vii. BIO2: Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests. viii. CC1: Proposals should take account of: i. how they may be impacted upon by, and respond to, climate change over their lifetime and ii. how they may impact upon any climate change adaptation measures elsewhere during their lifetime Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts. ix. CC2: Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration should also be given to emissions from other activities or users affected by the proposal. x. GOV2: Opportunities for co-existence should be maximised wherever possible. xi. GOV3: Proposals should demonstrate in order of preference: a) that they will avoid displacement of other existing or authorised (but yet to be implemented) activities b) how, if there are adverse impacts resulting in displacement by the proposal, they will minimise them c) how, if the adverse impacts resulting in displacement by the proposal, cannot be minimised, they will be mitigated against or d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts of displacement xii. TR1: Proposals for development should demonstrate that during construction and operation, in order of preference: a) they will not adversely impact tourism and recreation activities b) how, if there are adverse impacts on tourism and recreation activities, they will minimise them c) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts xiii. TR2: Proposals that require static objects in the East marine plan areas, should demonstrate, in order of preference: a) that they will not adversely impact on recreational boating routes b) how, if there are adverse impacts on recreational boating routes, they will minimise them c) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with the proposal if it is not</p>		
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Neil Childerley	GSNP:12	Policy GSNP 4 - Housing Allocation at The Green	Support	<p>As one of the owners of the land South of 29 The Green, Great Staughton that is allocated in the Draft Neighbourhood Plan as Site NP4 I would like to make the following comments. I confirm that we are committed to bringing the proposed development forward and are fully supportive of the proposed Great Staughton Neighbourhood Plan. With the preparation of the Neighbourhood Plan we promoted our land for development and to assist the consideration of the allocation, and in response to drainage issues affecting the land, commissioned a topographical survey of the land and preparation of a Flood Risk Assessment, which form part of the Neighbourhood Plan supporting documents. From the Neighbourhood Plan supporting documents, it is evident consultation with several bodies has taken place, including the Environment Agency and the Lead Local Flood Authority in respect of the site's drainage issues. The Environment Agency has advised that it did not wish to comment on the proposed allocation as the site sits in fluvial flood zone 1 (the lowest fluvial flood risk) and that the drainage issues relate to surface water that falls under the remit of the Lead Local Flood Authority. The Lead Local Flood Authority has advised that it is overall supportive of the proposed allocation, subject to measures comprising swales running around the site along with appropriate surface water attenuation and floor levels for properties being incorporated into the development. To provide further comfort that the surface water can be appropriately managed, we have commissioned MTC Engineering Limited to prepare an Addendum that builds on the findings of the original Flood Risk Assessment in relation to surface water, and demonstrates with greater clarity the measures available to ensure that the surface water flood risk is adequately mitigated should a planning application come forward on the site. I am enclosing the Addendum and highlight that this concludes the surface water flood risk associated with flow coming across The Green can be appropriately mitigated by using open features such as swales to take flows around the edges of the site and ensure the main body remains free from flooding in an extreme surface water flood event. The outline design and calculations that are included in the Addendum demonstrate how this can be achieved without adversely impacting the risk of flooding elsewhere by maintaining existing flood volumes on the site itself. For information and completeness, I am also including the supporting submission made to Huntingdonshire District Council in respect of the Land Availability Assessment relating to the Local Plan update. The Flood Risk Assessment referred to in the submission is that mentioned above forming part of the Neighbourhood Plan supporting documents.</p>	No	
Avison Young (National Gas)	GSNP:13	Overall comment on the Neighbourhood Plan	Have observations	<p>National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Gas Transmission</p> <p>National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>Proposed sites crossed or in close proximity to National Gas Transmission assets:</p> <p>An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.</p> <p>National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p> <p>National Gas Transmission provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> <li>• <a href="https://www.nationalgas.com/land-and-assets/network-route-maps">https://www.nationalgas.com/land-and-assets/network-route-maps</a></li> </ul> <p>Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.</p>		

Matt Verlander Director Avison Young (National Grid)	GSNP:14	Overall comment on the Neighbourhood Plan	Have observations	<p>National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid Electricity Transmission</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.</p> <p>National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.</p> <p>National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.</p> <p>Proposed development sites crossed or in close proximity to NGET assets:</p> <p>An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure.</p> <p>NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p> <p>NGET provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> <li>• <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files">www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files</a></li> </ul> <p>Please also see attached information outlining guidance on development close to NGET infrastructure.</p> <p>Distribution Networks</p> <p>Information regarding the electricity distribution network is available at the website below: <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a></p>		
Anglian Water	GSNP:15	Overall comment on the Neighbourhood Plan	Have observations	<p>Anglian Water made previous representations on the Regulation 14 version of the draft neighbourhood plan. We welcome the amendments in the submission version, following our comments and recommended changes regarding Policies GSNP3; GSNP4; GSNP14; GSNP15 and the supporting text. We have no further comments to make on this occasion. We wish to be kept informed on further stages of the plan's preparation.</p>		
Natural England	GSNP:16	Overall comment on the Neighbourhood Plan	Have observations	<p>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.</p>		
Central Bedfordshire Council	GSNP:8	Overall comment on the Neighbourhood Plan	Support	<p>Publication of the Submission Version of the Great Staughton Neighbourhood Plan 2024 - 2031 Town and Country Planning Act 1990; Planning and Compulsory Purchase Act 2004; Localism Act 2011, Regulation 16 – The Neighbourhood Planning (General) Regulations 2012</p> <p>On behalf of Central Bedfordshire Council (CBC) thank you for consulting with us on Great Staughton neighbourhood plan submission version.</p> <p>CBC has no comments to make at this stage.</p> <p>CBC would like to continue to be notified of updates and any further consultations in relation to the Great Staughton neighbourhood plan to ensure that where there may be cross-boundary implications into Central Bedfordshire Council that these have the necessary input from CBC services.</p> <p>Yours sincerely Neighbourhood Planning Officer CBC</p>	No	

Environment Agency	GSNP:17	Policy GSNP 4 - Housing Allocation at The Green	Have observations	<p>Our previous responses to consultations on the proposed Plan have set out our concerns regarding the allocation of Site NP4 – south of 29 The Green due to surface water flood risk. These concerns are referenced in the Sequential Test Report completed by Cambridgeshire ACRE in support of the Plan. Nevertheless, the report also states that the Parish Council has re-affirmed its decision to continue with this allocation following careful consideration of all the additional information. We are not able to advise whether other material considerations outweigh the flood risk to the site.</p> <p>POLICY GSNP 4 – Housing Allocation at The Green, as set out in the submitted draft Plan, includes the requirement for:</p> <p>“a site specific flood risk assessment and mitigation strategy, demonstrating that the surface water flow path across the site is maintained and all flood risk, both on the site and elsewhere, can be managed safely over the lifetime of the development, considering the impact of climate change to the satisfaction of the Environment Agency, Local Lead Flood Authority and the District Council.”</p> <p>As stated in our response to the Neighbourhood Plan SEA Scoping Report, the required mitigation measures may be extensive due to the high levels of flood risk on this site, potentially restricting the level of development possible within the allocated area. However, this should be assessed in consultation with the Lead Local Flood Authority (LLFA) as they are the statutory authority on surface water flood risk. We understand that the LLFA has already provided specific recommendations regarding possible mitigation measures. It should be noted that we are unlikely to be consulted on planning applications at this allocation site, given its location in fluvial Flood Zone 1.</p>		
Environment Agency	GSNP:18	Overall comment on the Neighbourhood Plan	Have observations	<p>Water Quality We have identified that the Plan area boundary includes the Kimbolton Waste Water Treatment Works (WWTW), which is currently operating close to or exceeding its permitted capacity. There is potential for there to be a barrier to growth across the Plan Period and delivery of site allocations. Consideration for phasing of development in line with infrastructure improvements may be required. The Plan should have consideration to the Huntingdonshire District Council Water Cycle Study and any relevant water quality policies, and advice should be sought from Anglian Water Services (AWS) regarding how growth could be accommodated within the local WWTW catchment. It may be appropriate to include a policy requiring consultation with AWS to ensure that the waste water flows from proposed development can be accommodated and that meeting the requirements of the Water Framework Directive would not be compromised.</p>		
Historic England	GSNP:19	Overall comment on the Neighbourhood Plan	Have observations	<p>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 detailed 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: <a href="https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/</a></p>		

Local Plans Team Huntingdonshire District Council	GSNP:20	Overall comment on the Neighbourhood Plan	Have observations	<p>Overall, Huntingdonshire District Council (HDC) is supportive of the Great Staughton Neighbourhood Plan and welcomes the more detailed guidance it will provide to supplement Huntingdonshire's Local Plan to 2036.</p> <p>The Neighbourhood Plan meets basic condition (f) as the conclusion of the Strategic Environmental Assessment and Habitat Regulations Assessment Screening Report: Great Staughton Neighbourhood Plan (September 2023) was undertaken. It concluded 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, of which Historic England considered that due to the potential impact of the allocation at Brook Farmyard on designated heritage assets that an SEA would be appropriate. The Environment Agency highlighted the surface water risk on the proposed allocation at land south of 29 The Green and Natural England considered that significant impacts on the environment and habitats were unlikely. Taking into consideration this specialist advice an SEA was undertaken but a HRA was not necessary. The Strategic Environmental Assessment (SEA) for the Great Staughton Neighbourhood Plan (November 2024) concluded that <i>'overall, no potential significant negative or positive effects have been identified through the policy appraisal of the GSNP. However, the policy appraisal has identified a number of broad positive effects associated with all five SEA themes. This reflects the strong focus that the GSNP has on supporting sustainable development which is sensitive to the environmental constraints within the neighbourhood area, and which is intended to meet specific housing requirements or other community objectives.'</i> Therefore, it is considered that the Neighbourhood Plan has met the basic conditions.</p> <p>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.</p> <p>The strategic policies within the Huntingdonshire Local Plan to 2036 are:</p> <ul style="list-style-type: none"> <li>• All policies in Chapter 4 'The Development Strategy'</li> <li>• 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'</li> <li>• The policy LP11 'Design Context' and LP24 'Affordable Housing Provision'.</li> </ul>		
Local Plans Team Huntingdonshire District Council	GSNP:21	3. Great Staughton Future	Have observations	<p>HDC are supportive of Great Staughton's vision for the neighbourhood plan area to 2036.</p> <p>The grouping of subsequent objectives relates well to the subsequent chapters and policies in the Neighbourhood Plan and provides the Plan with a clear structure moving forward. The identification of the relevant policies to each objective are also very useful to see how these will be implemented through the neighbourhood plan. The SWOT analysis identifying the strengths, weaknesses, opportunities and threats for the neighbourhood area is also used effectively to shape the objectives and subsequent policies.</p>		



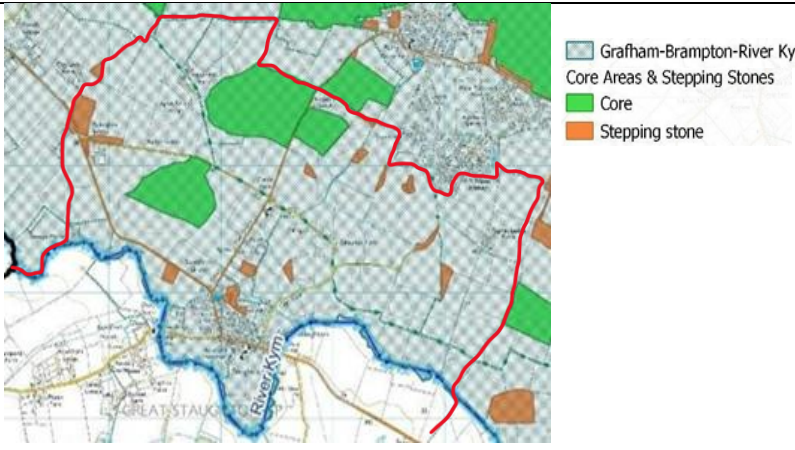
Local Plans Team Huntingdonshire District Council	GSNP:22	Policy GSNP 1 – Spatial Strategy	Have observations	<p>Have observations in regard to basic condition: National policy/ guidance, Conformity with strategic policies</p> <p>HDC are supportive of the proactive way in which the Neighbourhood Plan sets out how its indicative housing need will be met. It proactively identifies two sites to do as this as well as provides policy support for further opportunities within the built-up area. The policy should however also recognise that opportunities on land well related to the built-up area can also provide opportunities for sustainable development as set out in strategic policy LP9 'Small Settlements'. This policy enables development proposals on land well related to the built-up area where it accords with the specific opportunities allowed through in the Local Plan (policies LP 10 'The Countryside', LP 19 'Rural Economy', LP 22 'Local Services and Community Facilities', LP 23 'Tourism and Recreation', LP 28 'Rural Exceptions Housing', LP 33 'Rural Buildings' and LP 38 'Water Related Development'.) This addition would also provide greater consistency with policy GSNP2.</p>	Yes	<p><b>Required change</b></p> <p>Add an additional criterion to the policy:</p> <p><i><u>v. “windfall” sites on land well related to the Built Up Area Boundary identified on Map 3 that come forward during the Plan period that are in accordance with local and national policy;</u></i></p>
Local Plans Team Huntingdonshire District Council	GSNP:23	Policy GSNP 2 - Defining the Built up Area Boundary	Have observations	<p>Have observations: National policy/ guidance, Conformity with strategic policies</p> <p>Achievement of sustainable developmentThe identification of the built up area using the methodology from the Huntingdonshire Local Plan (pages 53-55) supports the implementation of strategic policies LP9 'Small Settlements' and LP10 'The Countryside' and as such conforms to NPPF paragraph 13. HDC consider that the methodology has been applied correctly and that the built up area is consistent with the Local Plan methodology and implementation guidance. Map 3 clearly show the extent of the built up area for Great Staughton.</p> <p>However, HDC have concerns of only allowing infill development of up to 2 dwellings may result in inefficient use of land, this could be replaced with 'small scale infill' rather than a specific number. Development is caveated at the end of the sentence “will be supported where development would not adversely affect the character of the existing settlement and the undeveloped nature of the surrounding rural areas; and would respect its landscape setting”.</p>	Yes	<p><b>Required change</b></p> <p>Within the Built Up Area Boundary, infill development for <b>small scale development up to 2 dwellings</b>, windfall development appropriate to the scale of the village, a GP / NHS healthcare facility at Brook Farm and housing at The Green, will be supported where development would not adversely affect the character of the existing settlement and the undeveloped nature of the surrounding rural areas; and would respect its landscape setting.</p>
Local Plans Team Huntingdonshire District Council	GSNP:24	5. Spatial Strategy and Housing	Have observations	<p>Have observations in regard to: Conformity with national policy; Achievement of sustainable development</p> <p>Paragraph 5.12 should be amended to remove “2 dwellings” and replace with “small scale development” as this could lead to an inefficient use of land.</p>	Yes	<p><b>Required change</b></p> <p>Development proposals on windfall sites and infill development for <b>small scale development up to 2 dwellings</b>, within the Built-Up Area Boundary, will be supported subject to the location, size and design of the development respecting the character in the immediate area and the settlement as a whole.</p>

Local Plans Team Huntingdonshire District Council	GSNP:25	Policy GSNP 3 - NHS Healthcare Facility at Brook Farmyard	Have observations	Have observations in regard to: Conformity with national policy; Achievement of sustainable development In principle, allocation of this site is supported subject to some alterations to the supporting text and policy criteria to add greater clarity for decision makers on how to implement the allocation and to achieve sustainable development:	Yes	<p>In principle, allocation of this site is supported subject to some alterations to the supporting text and policy criteria to add greater clarity for decision makers on how to implement the allocation and to achieve sustainable development:</p> <p><b><u>Required changes</u></b></p> <ul style="list-style-type: none"> <li>• Criterion ii – should be supported by an arboricultural assessment</li> <li>• It is unclear from the policy whether access will still be required to the field to the south and if so, how an access will be incorporated into proposals. This should be added as an additional criterion so that a future masterplan can incorporate it.</li> <li>• Additional criterion requiring any development to retain a views from the Conservation Area frontage of the Highway through to the countryside to the south.</li> <li>• Additional criterion requiring a bus stop outside the site to aid sustainable travel to this important village facility.</li> <li>• More detail on the type of medical facility and the benefits of the proposal would provide to the community would be useful in order to clearly define the public benefits of the proposal. This would assist in the Council in determining if any future planning application is delivering this public benefit as well as the criteria of the policy and also assist in the assessment of any harm to heritage assets.</li> <li>• The allocation map could also include heritage assets so that the relationship between them and the site is clearer.</li> <li>• Paragraph 5.31 states that a draft plan of the surgery has been prepared with supporting housing and parking. This has not included been included within</li> </ul>
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						<p>the neighbourhood plan or in its supporting documents. This seems to contradict later in the policy and in paragraph 5.42 the Plan states that residential development is only supported on the basis of it enabling the development to provide a medical facility on the site. It should be clarified if the scoping, viability and promotion of a new medical facility has already determined that housing is required to make a scheme viable or not.</p> <ul style="list-style-type: none"> <li>Paragraph 5.34 states that the site is previously developed land – this should be amended to reflect that the site also contains part of agricultural field and is not all completely previously developed.</li> </ul> <p>Paragraph 5.44 states that additional land could be used to extend development if demonstrated through a viability assessment – it is unclear what land this may include. For clarity in decision making, this additional land should also be identified on map 4, potentially using a dotted line.</p>
Local Plans Team Huntingdonshire District Council	GSNP:26	Policy GSNP 4 - Housing Allocation at The Green	Have observations	Have observations in regard to: Conformity with national policy; Achievement of sustainable development In principle, allocation of this site is supported subject to some alterations to the supporting text and policy criteria:	Yes	<p>In principle, allocation of this site is supported subject to some alterations to the supporting text and policy criteria:</p> <p><b><u>Required changes</u></b></p> <ul style="list-style-type: none"> <li>A criterion should be added reflecting the need to assess impact on the nearby listed building whose setting could be impacted by the proposal.</li> <li>The allocation map could also include heritage assets so that the relationship between them and the site is clearer.</li> </ul> <p>This policy is absent in the overhead electricity wires crossing the site – this may be a development constraint. The site could potentially be development for around 20 smaller dwellings however there are notable trees on the boundaries which will have to be carefully considered in any site</p>

						layout, along with vehicle turning requirements.
Local Plans Team Huntingdonshire District Council	GSNP:27	5. Spatial Strategy and Housing	Have observations	Paragraph 5.52 states that 40% of the dwellings on site would be required to be affordable housing, this conforms with LP24 'Affordable Housing Provision'. This is to meet a general affordable housing need as the site is not a rural exception policy so LP28 'Rural Exceptions Housing' would not apply. The supporting text then identifies that the affordable housing will be allocated in line with policy GSNP6 which gives priority to those with a Great Staughton connection. Please see comments on policy GSNP6.		
Local Plans Team Huntingdonshire District Council	GSNP:28	Policy GSNP 5 - Housing Mix	Support	In principle supportive of this policy providing greater local focus on the size of houses that would be supported to meet an identified need.		
Local Plans Team Huntingdonshire District Council	GSNP:29	Policy GSNP 6 - Allocation of Affordable Housing	Have observations	<p>The development at Jewell Close completed in 2023 already has S106 agreement that explains how relets on these properties should be prioritised. For these properties Policy GSNP 6 should make reference to this S106 agreement and the mechanism it contains.</p> <p>For any other social rented housing in the Parish, it will be let in line with HDC's lettings policy as these properties are not governed by a S106 agreement. This will prioritise prospective tenants through the HDC's lettings policy's priority banding system. This will not give additional priority for these properties based on local connection.</p> <p>Given the availability of properties at the Jewell Close development where local connection does apply, HDC does not feel that it is necessary for any local connection criteria to be applied to any other remaining social rented properties in the Parish. However, it is recognised from paragraph 5.69 the interest and local connections identified when applications for spaces at the Jewell Close development opened. This should be monitored so that if an application is brought forward, it can be reassessed at that time whether any affordable homes should be provided for those with a local connection. To do this an application should be supported by an up to date housing needs assessment showing local need.</p>	Yes	<p><b><u>Required change</u></b></p> <p>Add a link to the S106 Agreement for Jewells Close development to paragraph 5.72. A redacted version can be found on Public Access:  <a href="https://www.huntingdonshire.gov.uk/Document/00206B46B8FB210616143854">00206B46B8FB210616143854</a></p>
Local Plans Team Huntingdonshire District Council	GSNP:30	Policy GSNP 7 - Landscape and Townscape Characteristics	Support	<p>HDC support the intentions of this policy and consider that they relate well to the valued characteristics identified in the HDC Landscape and Townscape SPD (2022) for the Southern Wolds character area by providing additional localised detail to aid the neighbourhood plan. The further clarification with regards to valued views and vistas including the key features of each view that should be respected together with photographs and plans in Appendix 1 showing the important viewpoints are supported and assist in the implementation of the policy when determining planning applications.</p> <p>Also, HDC are supportive of the guidance provided within the Great Staughton Landscape and Townscape Assessment (April 2023) to shape future development proposals within the parish.</p>		
Local Plans Team Huntingdonshire District Council	GSNP:31	Policy GSNP 8 - Local Green Space	Support	The Neighbourhood Plan proposes one local green space. This is the recreation ground, the supporting text to the policy sets out the justification for this and how the site meets the criteria of the NPPF for such a designation. HDC consider that this site does meet the criteria set out in national policy and support its designation as local green space.		

Local Plans Team Huntingdonshire District Council	GSNP:32	Policy GSNP 9 “Great Staughton Conservation Areas	Support	Overall, consider that this policy compliments LP34 ‘Heritage Assets and their Setting. This policy supports non-strategic policy LP34 Heritage Assets and their Settings. It also in conformity with strategic policy LP11 ‘Design Context’ and national policy regarding conserving and enhancing the historic environment. Also, HDC are supportive of the guidance provided within the Great Staughton Landscape and Townscape Assessment (April 2023) to shape future development proposals within the parish.		
Local Plans Team Huntingdonshire District Council	GSNP:33	Policy GSNP 10 - Designated and Non Designated Heritage Assets	Support	Overall, consider that this policy compliments LP34 ‘Heritage Assets and their Setting. This policy supports non-strategic policy LP34 Heritage Assets and their Settings. It also in conformity with strategic policy LP11 ‘Design Context’ and national policy regarding conserving and enhancing the historic environment.  The identification of non-designated heritage assets is a welcome addition to the Neighbourhood Plan reinforcing the history and special characteristics of Great Staughton. The supporting document Non Designated Heritage Sites (April 2023) is also a valuable evidence base document.		
Local Plans Team Huntingdonshire District Council	GSNP:34	Policy GSNP 11 - Biodiversity and Wildlife Habitats	Have observations	Supportive of this policy to enhance biodiversity and the natural environment. These aspirations are in line with the Huntingdonshire Local Plan, sustainable development and national policy and the Environment Act. HDC are supportive of the policy as it reinforces that adverse impacts on environment must be at first avoided, and if this is not possible minimised as far as possible and then mitigated. This is in accordance with non-strategic policy LP30 Biodiversity and Geodiversity’ and national policy. HDC are in principle supportive of the policy’s approach to biodiversity net gain seeking a 20% increase over the mandatory 10% for qualifying developments where it is shown to be viable to do so. It is already a statutory requirement that the landowner be legally responsible for creating or enhancing habitat, and managing that habitat for at least 30 years to achieve the target condition. The policy identifies 10years which does not align with the statutory requirements and also duplicates already statutory requirements. Maps 9A, 9B, 9C and 9D identify sites of biodiversity importance to the village. In October 2024, the Huntingdonshire Priority Natural Landscapes report formally recognises the priority landscapes identified in the Nature Recovery Network for Huntingdonshire: <a href="#">Decision - HUNTINGDONSHIRE'S PRIORITY NATURAL LANDSCAPES - Huntingdonshire.gov.uk</a> - it details strategic locations within the district best placed to deliver biodiversity net gain and to informs implementation of biodiversity net gain planning policies. One of these is the Grafham-Brampton-River Kym Habitat Network which extends into the north of Great Staughton (within red line below) highlighting additional areas of core and stepping stone habitats of biodiversity importance to the landscape. It is recommended these are included as sites of biodiversity importance to the village and to ensure compliance with strategic policy LP30 ‘Green Infrastructure’.	Yes	<b>Required change</b> Delete the following paragraph of policy GSNP11: <del>“As appropriate to their scale, nature and location, development proposals (except householder applications) must provide clear and robust evidence setting a BNG implementation and management strategy securing the BNG for a period of 10 years from the commencement of the development.”</del> Either add an additional map or add to Maps 9A, 9B, 9C and 9D the section of the Grafham-Brampton-River Kym Habitat Network which extends into the north of Great Staughton as shown above and refer to in the policy.

						
Local Plans Team Huntingdonshire District Council	GSNP:35	Policy GSNP 12 - Sustainable Construction and Energy Efficiency	Support	HDC are overall supportive of this policy and the plan's positive approach towards moving toward a net zero future for Great Staughton. In particular, Urban Design Officers noted their support for this policy encouraging sustainable construction and greater energy efficiency.		
Local Plans Team Huntingdonshire District Council	GSNP:36	Policy GSNP 13 - Community Led Renewable Energy Projects	Support	HDC are overall supportive of this policy and the plan's positive approach towards moving toward a net zero future for Great Staughton.		
Local Plans Team Huntingdonshire District Council	GSNP:37	Policy GSNP 14 - Water Efficiency	Have observations	<p>HDC are overall supportive of this policy in seeking to increase water efficiency, however we note that it goes beyond the current national optional standard of 110 litres per day as such HDC have concerns on the impact of requiring a standard of 85 litres on the viability and achievability of proposals.</p> <p>It is recognised that Huntingdonshire is in an area of water stress and evidence from the Council's Water Cycle Study (March 2024) which has been produced to support the updated Local Plan has highlighted the need to lower this level in paragraph 9.3.2:</p> <p>'Evidence presented in the Stage 1 study shows that Huntingdonshire is in an area of serious water stress and there is sufficient justification for the tighter water efficiency target currently allowed for under building regulations of 110l/p/d. The direction of travel for water resources in the UK is to go further than this and achieve tighter standards. The Government's Environmental Improvement Plan (EIP) shows a target of 100l/p/d is being considered in water stressed areas...'</p> <p>Considering the above and the likely change to the optional standard, the policy should be amended to require developments to meet a standard of 100 litres per day, unless the Parish Council can provide further evidence on why 85 litres is necessary for Great Staughton.</p>	Yes	<p><b>Required change:</b></p> <p>Development proposals, including household applications, are required to be designed to maximise water efficiency, such as water efficient fittings and appliances, rainwater harvesting and reuse, greywater recycling, and storage features. Development proposals are encouraged to meet a water efficiency standard of <b>100 85</b> litres per person per day.</p>
Local Plans Team Huntingdonshire District Council	GSNP:38	Policy GSNP 15 - Surface Water Flood Risk	Support	HDC supports the inclusion of this policy to mitigate flood risk and to support sustainable development and resilient development.		
Local Plans Team Huntingdonshire District Council	GSNP:39	Policy GSNP 16 - Walkable Neighbourhoods	Support	Overall, supportive of this policy. It supports sustainable development. However, the supporting text should reference LP12 'Design Implementation' and LP16 'Sustainable Travel'.		

Local Plans Team Huntingdonshire District Council	GSNP:40	Policy GSNP 17 - Road Safety and Parking	Have observations	Overall, supportive of this policy, however the supporting text should reference LP16 'Sustainable Travel' and LP17 'Parking Provisions and Vehicle Movement.		
Local Plans Team Huntingdonshire District Council	GSNP:41	Policy GSNP 18 - New Pedestrian and Cycle Routes	Have observations	Overall, supportive of this policy, however the supporting text should reference LP16 'Sustainable Travel'.		
Local Plans Team Huntingdonshire District Council	GSNP:42	Policy GSNP 19 - Protect Local Services and Facilities	Support	Overall supportive of this policy to support community facilities within Great Staughton.		
Local Plans Team Huntingdonshire District Council	GSNP:43	12. Monitoring and Review	Support	Supportive of the Parish Council's intention of actively monitoring the policies of the Neighbourhood Plan. This will be beneficial if a review of the Neighbourhood Plan is undertaken.		
Cambridgeshire County Council Local Lead Flood Authority	GSNP:45	Overall comment on the Neighbourhood Plan	Have observations	I have reviewed the Great Staughton Neighbourhood Plan and have the following comments: It was noted that the group has acknowledged the flood risk in the Great Staughton area. It is important that there is a policy in place to address the flood risk in the Great Staughton Neighbourhood plan, this would be used to advise new developments of the minimum expectations in terms of drainage and aid to prevent developers from installing inadequate drainage systems. It is recommended to include reference to the Cambridgeshire Flood and Water SPD to seek advice and guidance on surface water management in development. This document is adopted by Huntingdonshire District Council. The SPD can be found on the following link: Cambridgeshire Flood and Water Supplementary Planning Document. Reference can be made to our Surface Water Planning Guidance document which can be found at: Surface Water Planning Guidance - June 2021 ( <a href="http://cambridgeshire.gov.uk">cambridgeshire.gov.uk</a> ). Policy LP15 is of particular importance in the Huntingdonshire District Council local plan (or any subsequent version of this plan) which can be found at: Huntingdonshire District Council Local Plan Reference can be made to Chapter 14 of the NPPF also, this can be found at: National Planning Policy Framework ( <a href="http://publishing.service.gov.uk">publishing.service.gov.uk</a> )		

NHS Property Services Ltd Hyacinth Cabiles	GSPN:46	Overall comment on the Neighbourhood Plan	Have observations	<p>The following representations are submitted by NHS Property Services (NHSPS) for and on behalf of Cambridgeshire &amp; Peterborough Integrated Care System (C&amp;P ICS). [Draft Policy GSPN1: Spatial Strategy and GSPN3: NHS Health Care Facility at Brook Farmyard] Draft Policy GSPN1 identifies 0.8 hectares allocated for a GP Surgery and NHS health facility to support the delivery of residential development at Brook Farm, The Highway. Draft Policy GSPN3 provides further detail regarding the allocation and sets out criterion which development proposals will be expected to meet. C&amp;P ICB note the allocation and, welcome continued engagement with all stakeholders to explore delivery. [Promoting Healthy Developments] The overall vision of the Huntingdonshire Local Plan seeks to support the health and wellbeing of all residents. This is aimed to be achieved through a series of objectives including facilitating opportunities for people to pursue a healthy lifestyle and have a high quality of life, and in promoting residential neighbourhoods in which people can meet their day-to-day needs, including those for health. In line with Paragraph 13 of the NPPF (2024), which states that Neighbourhood Plans should support the delivery of strategic policies within local plans or spatial development strategies, we seek to recommend ways in which the Great Staughton Neighbourhood Plan can be better reflective of this in promoting healthy developments. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health. In line with our previous comments during the Regulation 14 stage, we continue to recommend consideration of health design requirements within the Neighbourhood Plan and would encourage engagement with the NHS on this matter. Paragraph 96 of the NPPF states that “Planning policies and decision should aim to achieve healthy, inclusive and safe places”. NHSPS and Cambridgeshire &amp; Peterborough ICB support the “Health First” principles (The Healthy City, Key Cities, 2022). In supporting a healthier population and prioritising good mental, physical and social health, it is necessary to recognise that healthy places and environments are underpinned by a number of factors. Wherein a holistic vision and approach to health in the built environment needs to be adopted with the purpose of encompassing the central vision of the principle for places which are “Healthy, Attractive, Accessible, Adaptive, [and] For All”. We recognise that the Neighbourhood Plan seeks to support health and wellbeing in the community through the provision of a new healthcare facility (Policy GSPN 1 and 3 and promoting active design principles (Policy GSPN 16). However, identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities, in line with the NPPF and wider local strategic objectives. On this basis, we continue to welcome consideration of healthy design requirements within the Neighbourhood Plan and continue to encourage engagement with the NHS on this matter. Specific policy requirements to promote healthy developments should include: “Proposals should consider local health outcomes “Provide access to healthy foods, including through access to shops and food growing opportunities (allotments and/or providing sufficient garden space) “Design schemes in a way that encourages social interaction, including through providing front gardens, and informal meeting spaces including street benches and neighbourhood squares and green spaces. “Design schemes to be resilient and adaptable to climate change, including through SUDs, rainwater collection, and efficient design. “Consider the impacts of pollution and microclimates, and design schemes to reduce any potential negative outcomes. “Ensure development embraces and respects the context and heritage of the surrounding area. “Provide sufficient and high quality green and blue spaces within developments</p>		
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Michael Priaulx	GSNP:47	Policy GSNP 11 “ Biodiversity and Wildlife Habitats	Have observations	<p>The reference in POLICY GSNP 11 - Biodiversity and Wildlife Habitats to "swift bricks" is welcome but this is only for developments exempt from Biodiversity Net Gain. These minor developments will only rarely be suitable for swift bricks which are excluded from the mandatory Biodiversity Net Gain calculation. In summary, please consider building-dependent wildlife such as red-listed bird species which inhabit buildings in Great Staughton, especially significant here due to the number of unmodernised older buildings which have a greater tendency to host these species. Therefore, please add: Swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist. Also please add: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in Great Staughton return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected. In more detail for supporting evidence, the reason for this is that nest sites in buildings and bird boxes/ bricks and other species features are excluded from the DEFRA Biodiversity Net Gain metric, so require their own clear policy. The Government's response in March 2023 to the 2022 BNG consultation stated that: "We plan to keep species features, like bat and bird boxes, outside the scope of the biodiversity metric... [and] allow local planning authorities to consider what conditions in relation to those features may be appropriate" (page 27, <a href="https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation_biodiversitymetric/">https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation_biodiversitymetric/</a>). NPPF December 2024 Paragraph 187 (d) (page 54) states: "planning policies should... incorporate features which support priority or threatened species such as swifts". Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance, along with bat boxes and hedgehog highways (NPPG Natural Environment 2019 paragraph 023). The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26). Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: <a href="https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf">https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf</a> ). Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have better thermal regulation with future climate change in mind. Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (<a href="https://cieem.net/resource/the-swift-a-bird-you-need-to-help/">https://cieem.net/resource/the-swift-a-bird-you-need-to-help/</a>)). The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery &amp; Climate Resilience Playbook" (Version 1.0, November 2022) <a href="https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/">https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/</a> This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document: "Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways." Many local authorities are including detailed swift brick requirements in their plans, such as Tower Hamlets Local Plan Regulation 19 stage (paragraph 18.72, page 328 - <a href="https://talk.towerhamlets.gov.uk/local-plan">https://talk.towerhamlets.gov.uk/local-plan</a> ), which follows the exemplary swift brick guidance implemented by Brighton &amp; Hove since 2020, and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals:</p>	Yes	<p>Please add: Swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist. Also please add: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in Great Staughton return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.</p>
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				1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;" <a href="https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19">https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19</a> ), and Cotswold District Council are proposing three swift bricks per dwelling in their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4, <a href="https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/">https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/</a> ), so such an enhanced level should also be considered.		
Lauren May on behalf of A Newman	GSNP:44	Overall comment on the Neighbourhood Plan	Have observations	Given the changes to Huntingdonshire's overall housing need (after changes published within the new NPPF 2024) there is a significant increase in the amount housing required. We therefore consider that it is important for villages going through the Neighbourhood Plan process to allocate additional sites to help meet this need. In this regard we consider that the parcel of land immediately to the north of the settlement boundary would provide an excellent location for development. The site has been considered suitable for development by Huntingdonshire Council's planning policy team and therefore would provide an excellent opportunity for development. The site is referred to as Land East of B661, The Green, Great Staughton within the emerging local plan documents.	Yes	see above. A location plan of the proposed allocation is provided within the below attached documents section.