

Report of representations received on the Great Gransden 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	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
Anna Walsh		GGNP:13	Policy G1 - A Built-Up Area Boundary Strategy for Great Gransden	Object	I felt the entire curtilage of my home should be included within the built up area. Please see attached letter with detailed comments.	Yes	
Cambridgeshire Local Access Forum		GGNP:12	Overall comment on the Neighbourhood Plan	Have observations	The Cambridgeshire Local Access Forum (CLAF) was established through the statutory provisions of the Countryside and Rights of Way Act 2000 and its remit is to advise relevant bodies as defined in Section 94(4) of the Countryside and Rights of Way Act 2000 on matters relating to access to the countryside. Section 94(4) bodies are required by the legislation to take the views of the Local Access Forum into account. The Cambridgeshire LAF welcomes this opportunity to provide input into the Great Gransden Neighbourhood Plan and how it might be revised and improved to better reflect the existing and potential future use of the non-motorised transport network across the Parish of Great Gransden We recognise that it's a very comprehensive plan, with a lot of concern for biodiversity, historical sites, and conservation. We are also pleased to see and support policies that aim to protect, enhance and develop the rights of way network providing a network of routes to promote walking, cycling and riding and to point out that circular routes, or routes that link with others, are particularly recommended. We would ask them to give high importance to access to open green space, public footpaths and bridleways, so that the highest possible quality of life is ensured for the future. The CLAF would be happy to discuss further our concerns and how we might resolve these issues.	Yes	We would ask them to give high importance to access to open green space, public footpaths and bridleways, so that the highest possible quality of life is ensured for the future.
DWTA Merrill	Mr Martin Page - Director Brown & Co Barfords	GGNP:18	Policy G1 - A Built-Up Area Boundary Strategy for Great Gransden	Object	Further to our recent email exchanges I am writing in the circumstances that we are instructed by D W T A Merrill to submit the accompanying representation of OBJECTION in respect the proposed Great Gransden built-up area boundary. Referring to the representation you will note the points made relate specifically to land comprising our clients' ownership. We would be grateful to receive confirmation of receipt of the attached representation and to be kept advised on the progress of the Neighbourhood Plan. Summary 1. The Neighbourhood Plan proposes to designate a built-up area boundary for the village; however, the proposed boundary omits an established business area and a residential property with its associated curtilage land Eltisley Road, and therefore the following OBJECTION is submitted on behalf of the landowners, D W T A Merrill. Explanation 2. Paragraph 7.1.6 of the proposed Neighbourhood Plan references paragraphs 4.80 to 4.85 of the adopted Huntingdonshire Local Plan to 2036, which provides guidance on the interpretation of frequently arising situations for the built-up area, and this is set out within a table at pages 53 to 55 of the Local Plan document. The identification of built-up areas forms part of the strategic policy of the Local Plan for managing new development within and around settlements, with the objective of ensuring sustainable growth and safeguarding the character of settlements. 3. Paragraph 7.1.7 of the proposed Neighbourhood Plan further clarifies "The GGNP proposes to designate a Built-Up Area Boundary around the built-up area of the village of Great Gransden. The methodology used to define the boundary is consistent with the ten principles and guidance provided in paragraphs 4.80 to 4.85 of the Local Plan to identify the built-up area..." 4. The guidance on the interpretation of the built-up area within the table at pages 53 to 55 of the Local Plan document confirms buildings on the edge of settlements which relate closely to the economic function of the settlement are included within the built-up area definition and it	Yes	Proposed Amendment To ensure the proposed plan will meet the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004, the Neighbourhood Plan village built-up area boundary should be amended to include the established business area and residential property, as edged yellow above.

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					clarifies Industrial buildings are an integral part of the social and economic success of a settlement and are considered as much part of the built-up area as residential properties. The guidance further clarifies buildings and any associated hardstanding, such as surfaced car parking, are also part of the built-up area. 5. Despite the interpretation, the proposed Neighbourhood Plan built-up area boundary omits an established business area and a residential property and its associated curtilage off Eltisley Road. 6. The business area has a history of planning permissions dating back to the early 1990s and within the site there is a range of industrial and warehouse buildings, and the whole area is hard surfaced. To the north of the access road serving the business area stands the residential property Highbury Fields and its associated curtilage. The residential property was originally constructed as an agricultural dwelling, however in 2006 a certificate of lawful use was issued by the District Council confirming the house and its associated curtilage can be occupied as a dwelling without complying with the agricultural occupation restriction (LPA ref. 0603326CLED). 7. Given the developed nature of the business area with the permanent buildings and associated hardstanding, this is an integral part of the village built-up area and consistent with the Local Plan definition the Neighbourhood Plan built up area boundary should include this land, as it does the Kingspan Potton factory site. With its proximity the residential property is equally part of the village built-up area, as seen below. 8. As the Neighbourhood Plan document confirms the methodology used to define the boundary is consistent with the principles and guidance provided in the Local Plan, the omission of the established business area and a residential property is inconsistent with the Local Plan definition and not in conformity with the built-up area strategic policy contained in the development plan. 9. For consistency, and to meet the basic condition of being in general conformity with the strategic policies contained in the development plan, the proposed Neighbourhood Plan village built-up area boundary should be amended to include the area identified edged yellow above.		
Edward James (Historic England)		GGNP:75	Overall comment on the Neighbourhood Plan	Have observations	Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan. Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide 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: https://historicengland.org.uk/advice/planning/plan-making/improve-yourneighbourhood/		
James Catmur		GGNP:1	Overall comment on the Neighbourhood Plan	Support	Excellent plan, with a wealth of information on the Parish and some good ideas on its future	No	

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Joely Norris		GGNP:42	Overall comment on the Neighbourhood Plan	Have observations	<p>Dear Planning Services team,</p> <p>Thank you for consulting us on the Great Gransden Neighbourhood Plan 2021 - 2036 (dated 16th August 2022).</p> <p>Overall, it is positive to see surface water flood risk considered as part of the draft Neighbourhood Plan. With information provided in relation to flood risk and development, and the following policies and documents referenced:</p> <ul style="list-style-type: none"> • Cambridgeshire Supplementary Planning Document • Policies LP5 and LP15 of the Huntingdonshire District Council (HDC) Local Plan (2019) • National Planning Policy Framework • National Planning Policy Guidance <p>Upon reviewing the plan, I have the following comments:</p> <ul style="list-style-type: none"> • With reference to Paragraph 4.33, it is noted that the surface water flood risk map extract has been sourced from the 2017 Huntingdonshire District Council Level 1 and 2 Strategic Flood Risk Assessment (SFRA). The LLFA recommends using the surface water flood risk mapping from GOV.uk website, as this is updated on a regular basis and would supersede that of the mapping included in the 2017 SFRA. • The neighbourhood plan should particularly reference water quality, to protect chalk streams, and to ensure development does not increase flood risk within the parish. Policy LP 15 of the HDC Local Plan should be referenced in relation to not adversely impacting the quality of water resources. • In relation to the Cambridgeshire Flood and Water SPD, which has been adopted by Huntingdonshire District Council, reference should be made regarding the principle of designing surface water drainage into a development. • With reference to the flood risk, it is noted that the Parish of Great Gransden is made up of areas of low, medium and high risk of surface water flood risk. There is some useful information on the gov.uk website on surface water flood risk, as well as in the 2017 Huntingdonshire District Council Level 1 and 2 SFRA. <p>In addition to the above, links to documents referenced and other useful information have been included below:</p> <ul style="list-style-type: none"> • Surface water and sustainable drainage systems (SuDS) planning webpage: https://www.cambridgeshire.gov.uk/business/planning-and-development/flood-and-water/flood-risk-management/sustainable-drainage-systems-suds • Surface Water Drainage Guidance for Developers: https://www.cambridgeshire.gov.uk/asset-library/imported-assets/SWGFD%20FINAL%20-%20November%202019.pdf • Surface water flood maps: https://flood-warning-information.service.gov.uk/long-term-flood-risk/map • Non-Statutory Technical Standards for SuDS: Sustainable drainage systems: non-statutory technical standards - GOV.UK (www.gov.uk) <p>Kind regards, Joely Norris Senior SuDS and Flood Risk Officer Flood Risk Team Cambridgeshire County Council</p>	Yes	
Jonathan Severn		GGNP:8	Overall comment on the Neighbourhood Plan	Support	I have read the Neighbourhood Plan and I agree with the policies therein.	No	

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Kirstin Rayner		GGNP:43	Policy G10 - A walkable village and reducing village car use	Support	Gamlingay Parish Council are encouraged and support the creation of new cycle route access to neighbouring parishes and linking to the wider cycle network, to enable our residents to access to public transport at Cambourne, St Neots and Cambridge. Great Gransdens plan also promotes improving rights of way network for access to the countryside and providing better pedestrian access within the village. There is good synergy with our Gamlingay Neighbourhood plan- in particular policies G10 G11 and G12 all are compatible and support the wider theme of improving access for cyclists, pedestrians and horse riders.	No	
Lesley Golding (Access & Bridleways Officer British Horse Society International UK Ltd)		GGNP:74	Overall comment on the Neighbourhood Plan	Have observations	Comments and information from the British Horse Society This is my 2nd report regarding this plan. My new comments are shown in red. The BHS very much appreciates the changes made to the previous NP which now include horse riders. There are, however, several points which still mention cyclists/cycle path/safe route for cyclists etc where horse riders are still not included. Improvements, changes and new additions to existing infrastructure should always be inclusive, as that is best expenditure of public money and is not discriminatory to any group, especially in a rural situation we would expect to see equestrians included. I welcome the opportunity to comment on the Great Gransden Neighbourhood Plan, and to be able to put forward an equestrian point of view which can often be overlooked by Councils when considering Active Travel proposals. Safe routes for equestrians are desperately needed because the accident statistics in respect of horses on the roads are horrific. There have been 5,784 incidents reported to the British Horse Society since 2010, 44 people have lost their lives, 1350 have been injured, 441 horses have been killed, 1,198 horses injured, and 75% of these incidents involved vehicles passing too close to the horse and/or too fast. The British Horse Society is the UK's largest equestrian Charity, with over 119,000 members representing the UK's 3 million equestrians. Nationally horse riders have access to just 22% of the rights of way network and carriage drivers to just 5%. This network has become increasingly fragmented by roads, which were once safe rural routes, but have now often become busy thoroughfares. Whilst the Society supports the national initiative to encourage more cycling and walking as part of Active Travel Plans, it is imperative that the Council recognises that Active Travel also includes equestrians.	Yes	See attachment.
Local Plans Team (Huntingdonshire District Council)		GGNP:19	Overall comment on the Neighbourhood Plan	Have observations	Overall, Huntingdonshire District Council (HDC) is supportive of the Great Gransden Neighbourhood Plan and welcomes the more detailed guidance it will provide to supplement Huntingdonshire's Local Plan to 2036. The Neighbourhood Plan meets basic condition (f) as the conclusion of the Strategic Environmental Assessment and Habitat Regulations Assessment Screening Report: Great Gransden Neighbourhood Plan (August 2022) states that the Great Gransden Neighbourhood Plan will not have significant effects on the environment, nor will it have an adverse effect on the integrity of any internationally designated sites either on its own or in combination with any other plans. Therefore, a Strategic Environmental Assessment or Habitats Regulations Assessment were not necessary. Several observations and proposed amendments have been made in the sections below which HDC consider to be necessary to ensure the neighbourhood plan meets the basic conditions of having (a) regard to national policy and advice, (d) contributing to the achievement of sustainable development and (e) being in general conformity with the strategic policies within the Huntingdonshire Local Plan to 2036 which are essential to the delivery of the Local Plan strategy. The strategic policies within the Huntingdonshire Local Plan to 2036 are: <ul style="list-style-type: none"> • All policies in Chapter 4 'The Development Strategy' • All policies that allocate land for development in 'Section D: Allocations' as they are required to achieve the strategy as set out in Chapter 4 'The Development Strategy' • The policy LP11 'Design Context' and LP24 'Affordable Housing Provision'. 		

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Local Plans Team (Huntingdonshire District Council)		GGNP:21	3. The Plan Area	Support	This is a useful summary of the key characteristics of Great Gransden parish and village providing beneficial context to subsequent policies.		
Local Plans Team (Huntingdonshire District Council)		GGNP:23	3. The Plan Area	Have observations	In paragraph 3.29 reference is made to a proposal for the A428 upgrade. This has now been granted development consent by the Secretary of State and so this paragraph may want to be updated to reflect the most up to date position. There is the opportunity for a judicial review to be submitted within a six week window, which ends on 29th September 2022.		
Local Plans Team (Huntingdonshire District Council)		GGNP:20	1. Introduction	Have observations	The first sentence of paragraph 1.5 should be updated to reflect that Regulation 14 draft Plan consultation has been undertaken and that the neighbourhood plan has been amended following consultation responses.		
Local Plans Team (Huntingdonshire District Council)		GGNP:22	3. The Plan Area	Have observations	Paragraph 3.21 and Figure 5 HDC are partially supportive of the intent behind the Parish Council's ambition to support an arc-shaped corridor known as the Gransden Brook Corridor as a priority area to maintain connectivity and encourage wildlife protection and habitat enhancements. HDC also note that this is being brought forward through the Community Action Plan and local engagement and is outside the scope of the policies within the neighbourhood plan. The value of identifying the land along the Gransden Brook is recognised is the brook forms a natural wildlife corridor. Data available on environmental databases (such as magic maps) supports the neighbourhood plan proposals to encourage habitat connectivity along the arc around the Gransden Brook corridor (as illustrated in figure 5 of the draft document). Areas within the arc have been identified by the Forestry Commission as Woodland Priority Habitat Network and possessing areas for Woodland Improvement. However, HDC question the northern section of this as it does not follow the Brook corridor.		
Local Plans Team (Huntingdonshire District Council)		GGNP:24	4. The Key Issues	Have observations	This is using the development threshold for major development found within Article 2 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 as the upper threshold. Reference to this legislation should be made to avoid any ambiguity over where this definition has originated.	Yes	<p><u>Suggested change</u></p> <p>Add a footnote to the end of paragraph 4.7:</p> <p><i><u>'This uses the development threshold for major development found within Article 2 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 as the upper threshold.'</u></i></p>
Local Plans Team (Huntingdonshire District Council)		GGNP:25	6. Design Guide for Great Gransden	Support	The Great Gransden design guide and design policy G3 accord with Local Plan policies LP11 and LP12 and broadly the advice set out within the HDC Design Guide SPD (2017). The guidance relating to build materials, house design and roofs will encourage sensitive development that complements existing adjacent development. HDC notes and supports the revised text in para 6.2, bullet 5 regarding developments being designed to integrate with the existing settlement.		

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Local Plans Team (Huntingdonshire District Council)		GGNP:27	Policy G2- Affordable Housing on Rural Exception Sites	Have observations	Have observations regarding basic condition: National policy/guidance Conformity with strategic policies of the Local Plan HDC commend the Parish Council’s supportive approach to affordable housing for those with a local connection to Great Gransden and the willingness to reflect this within the Neighbourhood Plan. However, this policy adds little additional detail regarding rural exception sites to that which is already provided within policy LP28 of the Local Plan. Moreover, it states support for sites for small scale affordable housing on rural exception sites ‘on the edge of the built-up area’ this is inconsistent with LP28 which states support for sites on land well-related to the built-up area. This conflicts with policy LP28 and the strategic policies LP9 Small Settlements and LP2 Development Strategy. HDC are concerned that this may cause conflict within securing rural exception schemes in the parish. This is contrary to the basic condition of national policy whereby paragraph 16(d) states that plans should contain policies that are clearly written and unambiguous and paragraph 16(f) states that plans should avoid unnecessary duplication of policies that apply to a particular area. It is suggested that this policy is shortened to provide the support in principle for a rural exceptions scheme but that the details a scheme will be assessed are cross referred to LP28 of Huntingdonshire’s Local Plan. It is also suggested for the sake of clarity that the term ‘small scale’ is amended to ‘minor scale’ for consistency with paragraph 4.7 under Key Issue 1.	Yes	<p><u>Suggested change</u></p> <p>Amend policy G2 as follows:</p> <p>Proposals for minor scale affordable housing on rural exception sites on land <i>well-related to the edge of the Built-Up Area Boundary</i> would be supported in principle for people with a Great Gransden connection provided that <i>the criteria within policy LP28 of Huntingdonshire’s Local Plan are met.:</i></p> <ul style="list-style-type: none"> the proposed development, by virtue of their size, scale and type, will not exceed the identified needs of people with a Great Gransden connection for affordable housing. the types of dwellings proposed meet the required needs in Great Gransden, as identified in an up to date housing needs survey. the homes are located within easy pedestrian and cycle access to Great Gransden village centre and amenities, the affordable housing is provided in perpetuity; and no significant harm would be caused to the character of the village, its setting or the countryside. <p>Market housing on rural exceptions sites will be supported where it is financially necessary in order to secure and deliver the required affordable housing units and consistent with the provisions set out in the HDC Local Plan (Policy LP28) with respect to market housing and custom/self-build homes.</p>

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Local Plans Team (Huntingdonshire District Council)		GGNP:29	Policy G4 - Development, Landscape Character and Valued Views	Support	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 South East Claylands character area by providing additional localised detail to aid the neighbourhood plan. The further clarification with regards to valued landscape views including the key features of each view that should be respected together with photographs and plans showing the important viewpoints are supported and assist in the implementation of the policy when determining planning applications.		
Local Plans Team (Huntingdonshire District Council)		GGNP:31	Policy G5 - Conserving and Enhancing Great Gransden's Conservation Area	Support	This policy complements LP34 Heritage Assets and their Settings and the Heritage Strategy set out in Huntingdonshire's Local Plan to 2036. Also, HDC are supportive of the guidance provided within the Great Gransden Character Assessment to shape future development proposals within the parish.		
Local Plans Team (Huntingdonshire District Council)		GGNP:33	Policy G7 - Local Green Space and Other Valued Green Spaces	Have observations	The Local Green Space Rationale document provides a good assessment and justification for the reasons for the designation of each Local Green Space and how each site meets the criteria in NPPF paragraph 102. Some are some distance from the village centre but as the supporting document highlights they are in accessible distance and important to the social fabric of the village. HDC note that the document identifies the Parish Council as being either the landowners or those who maintain these four sites. The Local Green Space designations are not land allocated for housing or employment development or in areas identified as part of Green Infrastructure Priority Areas within the Local Plan. One site, Mill Weir, is however located within an Established Employment Area (EEA). This land is designated Common Land and falls outside of the operational boundaries of the EEA. There is fencing around the site and no walkway through to the employment site. Considering this, designating this part of the EEA as a Local Green Space would not undermine the EEAs viability and continued use as a source of employment. Therefore, the proposed designations do not conflict with strategic policies of the Local Plan or policy LP18. HDC note that seven Other Valued Green Spaces are also identified within policy G7. These do not benefit from the level of protection of Local Green Spaces but have been identified as having a particular value to the parish that the neighbourhood plan wishes to maintain. This approach in principle is supported as having such sites supports a sustainable community with access to areas of open and valued spaces. However, HDC note that the policy identifies seven specific parcels of land as Other Valued Green Spaces and states that non-strategic Local Plan policy that LP32 will be applied to them. LP32 seeks to protect against the loss of open space, outdoor recreation facilities, allotments and areas of garden land that provide amenity value. HDC are not convinced that all of the proposed Other Valued Green Spaces could be defined as open space as per LP32 as several (A, B and C) appear to be privately owned agricultural land, these spaces could not be considered 'semi-natural' and it is unclear from the supporting document 'Rationale for Local Green Spaces and Other Valued Green Spaces' whether there are public assess arrangements to enhance their public value in addition to the identified value they provide in enhancing the landscape character of the village.		

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Local Plans Team (Huntingdonshire District Council)		GGNP:35	Policy G9 - Public Rights of Way	Object	Object regarding basic condition: National policy/guidance HDC supports the principle of this policy but consider that several amendments are required to make it implementable. Firstly, sentence 1 needs to clarify the policy covers the whole PROW network in the parish. Secondly, reference to the policy applying to any development visible from a public right of way should be removed as this could be at a significant distance and therefore it would be unreasonable to require provision of links to the network and so not accord with NPPF paragraph 57. Finally, bullet no.2 needs to ensure clarity in implementation and accordance with national policy on plan making (paragraph 16(d)) as the phrase 'in and around the village' is ambiguous. Any enhancements or extensions to existing PROW should be taken forward with the support and, where available, funding from the Cambridgeshire County Council as Local Highways Authority. The Cambridgeshire Local Cycling and Walking Infrastructure Plan (LCWIP) forms part of the Government's ambition to increase walking and cycling, particularly to school, in the UK by 2025 as outlined in the first Cycling and Walking Investment Strategy (CWIS, 2017) and this work is led by the County Council.	Yes	<p><u>Suggested change</u></p> <p>Amend sentence 1 as follows:</p> <p>'The existing PROW <u>network</u> should be protected or enhanced,'</p> <p>Amend sentence 2 as follows:</p> <p>'Any new development on or adjacent to an existing Public Right of Way or Permissive Path, or which is clearly visible from a Public Right of Way must:'</p> <p>Amend bullet 2. As follows:</p> <p>'2. provide links to the network. in and around the village.'</p>
Local Plans Team (Huntingdonshire District Council)		GGNP:37	Policy G11 - Roads and new development	Support	Policy G11 has been revised following concerns that the requirement for roads being wide enough to allow for two-way traffic may pose an unnecessary constraint to development where a one-way road layout maybe preferable on design grounds to reduce the width of the road. Policy G11 has been revised to include '...unless one-way movement of traffic has been deliberately designed-in as part of the scheme-wide movement strategy addressing all users across the scheme' which provides more flexibility and is supported. The additional paragraph ~The design and layout of roads should enable ease of access for service vehicles which should have ready access to all properties and open areas when all on-street parking areas are occupied. This will not prejudice the introduction of low order shared surface private drives and mews streets if required', is supported.		
Local Plans Team (Huntingdonshire District Council)		GGNP:39	Policy G13 - Barnabas Oley Primary School and Parish pre-school provision	Have observations	Have observations regarding basic condition: Conformity with strategic policies of the Local Plan The requirement for the need to assess primary school and pre-school provision in line with the Local Plan is supported. The policy should be more specific and identify policy LP4 Contributing to Infrastructure Delivery and the Developer Contributions Supplementary Planning Document (SPD) (2011) or any successor document as the mechanism and method in which to apply and calculate appropriate contributions. Supportive of the additional localised policy guidance regarding any future development proposals or expansion of Barnabas Oley Primary School.	Yes	<p><u>Suggested change</u></p> <p>Amend the first sentence of the policy as follows:</p> <p>'....and required, as per the Local Plan <u>policy LP4 and the Developer Contributions SPD (2011) or any successor documents</u>, to....'</p>
Local Plans Team (Huntingdonshire District Council)		GGNP:41	Overall comment on the Neighbourhood Plan	Have observations	Support, have observations Supportive of the Parish Council identifying community actions that are to be pursued. HDC's Implementation team consider that more detail on indicative timing, lead partners, cost, sources of funding etc would be helpful in order to achieve the delivery of these community actions. Additionally, the Community Action Plan refers to policy G12 - Financial Contributions for Great Gransden Infrastructure Priorities. The actual policy name in the submission plan is policy G12 - Great Gransden Infrastructure Priorities. For clarity the reference in the Community Action Plan should be updated.	Yes	<p><u>Suggested change</u></p> <p>On page 81 of the Neighbourhood Plan, amend policy name for G12 to the following:</p> <p>'Policy G12 – Great Gransden Infrastructure Priorities'</p>

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Local Plans Team (Huntingdonshire District Council)		GGNP:26	Policy G1 - A Built-Up Area Boundary Strategy for Great Gransden	Have observations	Have observations regarding basic condition: National policy/guidance Conformity with strategic policies of the Local Plan Reviewing the proposed built-up area boundary for the village, HDC consider that it accords with the built-up definition and the principles and detailed implementation guidance provided on pages 53 - 55 of the Local Plan. In the first bullet point, the term 'edge of the development boundary' should be clarified as it unclear if this intended to only include sites that have an adjoining boundary with a part of the built-up area or not. It is inconsistent with the wording of strategic policy LP9 Small Settlements within Huntingdonshire's Local Plan. Thus, the lack of clarity may lead to inconsistent implementation of the policy and strategic policies in the Local Plan, conflicting with the basic conditions. Also, the first bullet only stipulates 'in safe walking distance to village amenities.' There are also other criteria that a rural exceptions housing scheme should meet. HDC are concerned that by mentioning just one in this policy may give rise to ambiguity over implementation of the policy and policy G2 and LP28 of the Local Plan.	Yes	<p><u>Suggested change</u></p> <p>Amend the first bullet point of criteria a. of policy G1 so that it reads:</p> <p>'the development comprises a rural exceptions housing scheme referred to in Policy G2, located on <i>land well related to the edge of the Built-Up Area Boundary</i> and meeting the criteria set in LP28 of the Huntingdonshire Local Plan. in safe walking distance to village amenities.'</p>
Local Plans Team (Huntingdonshire District Council)		GGNP:28	Policy G3 - Local Character and Design	Have observations	Have observations regarding basic condition: National policy/guidance Conformity with strategic policies of the Local Plan Sustainable development HDC support the positive approach of policy G3 towards design that reflects local character and proposals being design-led. The changes and further clarification relating to G3 part a.iii boundary treatments, a.v building materials, b.ii requirement for private amenity space and b.iii house design, sustainable materials and on site energy generation are supported. The reference to the HDC Design Guide SPD 2017 section 3.5 Parking and Servicing is also supported and will improve the design quality of future schemes. However, HDC consider that the last sentence of criterion a.iv which states that 'Ribbon or greenfield development will not be supported' may lead to potential conflict with local and national policies and sustainable development. This element is not written in a positive way (conflicting with paragraph 16(f) of the NPPF) and conflicting with the exceptions identified in the neighbourhood plan (policy G2) and in the Local Plan (LP10, LP19, LP22, LP23, LP28, LP33 and LP38). This would undermine the strategy for development set in Huntingdonshire's Local Plan and undermine sustainable development opportunities.	Yes	<p><u>Suggested change</u></p> <p>Amend the last sentence of criterion a.iv so that is reads:</p> <p>'Ribbon or greenfield development will not <i>only</i> be supported <i>where is accords with the specific opportunities available in local and national policy.</i>'</p>
Local Plans Team (Huntingdonshire District Council)		GGNP:30	Overall comment on the Neighbourhood Plan	Have observations	Paragraph 7.5.3 Have observations regarding basic condition: National policy/guidance Within paragraph 7.5.3, the last sentence refers to the NPPF. This should be clarified as being paragraph 190. It also states that it has three elements when in fact there are four (a-d). 190(d) should be added to paragraph 7.5.3 for accuracy and conformity with national policy.	Yes	<p><u>Suggested change</u></p> <p><i>Paragraph 190 of the</i> NPPF requires Local Planning Authorities to take account of three <i>four</i> elements when assessing development proposals:</p> <p>a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;</p> <p>b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and</p>

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							c) the desirability of new development making a positive contribution to local character and distinctiveness.; <i>and</i> <i>d) opportunities to draw on the contribution made by the historic environment to the character of a place.</i>
Local Plans Team (Huntingdonshire District Council)		GGNP:32	Policy G6 - Protecting and enhancing biodiversity in the parish at Gransden Woods	Have observations	Have observations regarding basic condition: National policy/guidance Conformity with strategic policies of the Local Plan Supportive of the positive approach the policy has towards biodiversity net gain and the potential ways in which this could be achieved. This accords with paragraph 174(d) of the NPPF, policy LP30 Biodiversity and Geodiversity of the Local Plan and the ambitions of HDC and partners in doubling nature across Cambridgeshire by 2050. The policy references that contributions may be sought towards measures to protect or enhance the biodiversity value of Gransden Woods, it is however unclear how such a contribution would be calculated or how it has been assessed to consider the impact on development viability. Reference to LP4 of the Local Plan and the Community Infrastructure Levy (2012) or successor documents could be made in the policy text to provide guidance to applicants on this matter and be unambiguous according with NPPF paragraph 16(d) and also ensuring compliance with the strategic policy LP4 of the Local Plan.	Yes	<u>Suggested change</u> Amend the third paragraph as follows: ‘Contributions may be sought, where this would be compliant with tests set out in paragraph 57 of the NPPF, <i>LP4 of the Local Plan, Community Infrastructure Levy, and the Developer Contributions SPD (2011) (or successor documents), towards....’</i>
Local Plans Team (Huntingdonshire District Council)		GGNP:34	Policy G8 - Development and Open Space Requirements	Have observations	Have observations regarding basic condition: National policy/guidance Conformity with strategic policies of the Local Plan HDC support the neighbourhood plan identifying shortfalls in existing informal open space, dog walking opportunities and access to the countryside. It is noted that it is not the intention of the policy to undermine delivery of necessary on-site play or open space infrastructure that is designed-in or triggered by particular schemes but to complement these. Reference to LP4 of the Local Plan and the Developer Contributions SPD (2011) or successor documents could be made in the policy text to provide guidance to applicants on this matter and be unambiguous according with NPPF paragraph 16(d) and also ensuring compliance with the strategic policy LP4 of the Local Plan.	Yes	<u>Suggested change</u> Amend the opening sentence as follows: ‘All development schemes will be expected to contribute (subject to Paragraph 57 of the NPPF), <i>and in accordance with LP4 of the Local Plan, Community Infrastructure Levy and the Developer Contributions SPD (2011) (or successor documents))</i> to the provision....’
Local Plans Team (Huntingdonshire District Council)		GGNP:36	Policy G10 - A walkable village and reducing village car use	Support	Overall supportive of this policy. It supports sustainable development and conforms with paragraphs 92(c) and 130(f) of the NPPF.		

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
Local Plans Team (Huntingdonshire District Council)		GGNP:38	Policy G12 - Great Gransden Infrastructure Priorities	Support	The Neighbourhood Plan sets out priorities for the Parish, which include a number of infrastructure projects, this is supported. It is considered that the document will provide a realistic and useful framework for growth in the Parish. In particular, it is noted that the Parish acknowledges the role of developer contributions in meeting its planned objectives. The inclusion of monitoring in relation to CIL is also welcomed. The Infrastructure Team at HDC can further support the Parish by facilitating support, where appropriate, with infrastructure providers such as Cambridgeshire County Council and the NHS to deliver the priorities set out in its Neighbourhood Plan as well as in relation to the ones the parish itself could lead on. Reference is made in the supporting text to the CIL 'meaningful proportion' that GGPC receives where applicable. It would be helpful to understand which priorities GGPC is looking to spend any of its 'meaningful proportion' on or other funding it has. Detail on which items are felt needed actioning first to support development would further provide helpful information for all partners. In addition, understanding the lead partner required to support implementation, for example implementation of traffic calming would need to be taken forward by Cambridgeshire County Council. As a note, any requirements will also need to be considered in line with the Local Plan 2036 and Developer Contributions SPD. Additional contribution asks will impact on viability and this will need to be carefully considered on a case by case basis.		
Local Plans Team (Huntingdonshire District Council)		GGNP:40	8. Monitoring the Planning Policies	Support	Supportive of the Parish Council's intention of providing an annual monitoring report to monitor the policies of the Neighbourhood Plan as well as changes to national and local policy and CIL spending within the parish. This will be beneficial if a review of the Neighbourhood Plan is undertaken.		

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
Mr George Craze	Mr Martin Page - Director Brown & Co Barfords	GGNP:15	Policy G1 - A Built-Up Area Boundary Strategy for Great Gransden	Object	Further to our recent email exchanges I am writing in the circumstances that we are instructed by Mr Andrew Craze and Mr Martin Craze to submit the accompanying representation of OBJECTION in respect the proposed Great Gransden built-up area boundary, proposed Great Gransden valued landscape views and the proposed other valued green spaces designation. Referring to the representations you will note the points made relate specifically to land forming part of Gransden Hall, which is in the ownership of our clients. We would be grateful to receive confirmation of receipt of the attached representations and to be kept advised on the progress of the Neighbourhood Plan. Proposed Great Gransden Built-Up Area Boundary Paragraph 7.1.6 of the proposed Neighbourhood Plan references paragraphs 4.80 to 4.85 of the adopted Huntingdonshire Local Plan to 2036, which provides guidance on the interpretation of frequently arising situations for the built-up area, and this is set out within a table at pages 53 to 55 of the Local Plan document. The identification of built-up areas forms part of the strategic policy of the Local Plan for managing new development within and around settlements, with the objective of ensuring sustainable growth and safeguarding the character of settlements. Paragraph 7.1.7 clarifies "The GGNP proposes to designate a Built-Up Area Boundary around the built-up area of the village of Great Gransden. The methodology used to define the boundary is consistent with the ten principles and guidance provided in paragraphs 4.80 to 4.85 of the Local Plan to identify the built-up area..." However, the proposed built-up area boundary omits the Gransden Hall riding school buildings and for this reason the proposed plan is inconsistent with the Local Plan definition and not in conformity with the built-up area strategic policy contained in the development plan. In March 1981 planning permission was granted by the Huntingdonshire District Council for the 'Erection of stables & barns & alterations to existing buildings for commercial riding school & car park' to the south of Gransden Hall (LPA ref. 8001862OUT). The permission was subsequently implemented, and the buildings and structures remain on the site. Given the commercial nature of the permitted riding school activity and the permanent nature of the buildings and associated land, this area is an integral part of the village built-up area as explained in the Local Plan interpretation. Further, the Local Plan table clarifies "buildings and any associated hardstanding such as surfaced car parking are part of the built-up area". Therefore, the riding school area is considered to be an integral part of the village built-up area and for consistency, and to meet the basic condition of being in general conformity with the strategic policies contained in the development plan, the proposed Neighbourhood Plan village boundary should be adjusted to include the area identified edged red below. (see attachment)	Yes	<p><u>Proposed Amendment</u></p> <p>To ensure the proposed plan will meet the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004, the Neighbourhood Plan village built-up area boundary should be amended to include the Gransden Hall riding school area, as edged red above.</p>

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
Mr George Craze	Mr Martin Page - Director Brown & Co Barfords	GGNP:17	Policy G7 - Local Green Space and Other Valued Green Spaces	Object	Local Green Spaces and Other Valued Green Spaces Designation Paragraphs 7.7.3 - 7.7.5 of the Neighbourhood Plan propose the protection of several valued green spaces, which the supporting document 'Rationale for Local Green Spaces and Other valued Green Spaces' acknowledges "we do not fully meet the criteria of Local green Spaces' identified in the National Planning Policy Framework. However, neither the proposed Neighbourhood Plan document, nor the supporting 'Rationale for Local Green Spaces and Other valued Green Spaces' provide any explanation of the methodology behind the selection of identified 'other' green spaces and the criteria against which these have been assessed in terms of their sensitivity and specific qualities, and how or why some 'other' green spaces have been selected, yet other available green spaces are not. In the absence of any clear robust analysis and assessment, the selection of the 'other' green spaces intended for protection within Policy G7 is considered arbitrary, unsound and not justified. For example, why are the fields identified by the red dots below not selected? Additionally, Policy G7 proposes these 'other' green spaces will be safeguarded for protection under Local Plan Policy LP32. Considering Policy LP32, paragraph 8.26 of the Local Plan document clarifies "The purpose of this policy is to protect against the loss of open space, outdoor recreation facilities, allotments and areas of garden land that provide amenity value". Consequently, the Local Plan already provides a policy framework for the protection of areas considered to be of public value. Considering the advice that neighbourhood plans should not repeat policies of the Local Plan and the policy measures that are already in place to protect the green spaces, there is no justification or necessity for the designation of the 'other' green spaces. Further there is the risk that identifying specific areas for protection under Policy LP32 within the Neighbourhood Plan will hamper the scope to rely on the policy for the protection of areas which have not been foreseen in the preparation of the Neighbourhood Plan.	Yes	<p><u>Proposed Amendment</u></p> <p>The identification of 'other' valued green spaces should be deleted from the Neighbourhood Plan as these are unnecessary and with the reliance on Local Plan Policy LP32 their selection is contrary to the advice that neighbourhood plans should not repeat policies of the Local Plan. If the 'other' green spaces for protection are to be retained, then they should be reviewed through a criterion-based analysis that considers their sensitivity and specific qualities, and how or why they are justified for protection when other green spaces are not.</p>

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
Mr George Craze	Mr Martin Page - Director Brown & Co Barfords	GGNP:16	Policy G4 - Development, Landscape Character and Valued Views	Object	Further to our recent email exchanges I am writing in the circumstances that we are instructed by Mr Andrew Craze and Mr Martin Craze to submit the accompanying representation of OBJECTION in respect the proposed Great Gransden built-up area boundary, proposed Great Gransden valued landscape views and the proposed other valued green spaces designation. Referring to the representations you will note the points made relate specifically to land forming part of Gransden Hall, which is in the ownership of our clients. We would be grateful to receive confirmation of receipt of the attached representations and to be kept advised on the progress of the Neighbourhood Plan. Proposed Great Gransden Valued Landscape Views Figure 8 of the proposed Neighbourhood Plan identifies several valued landscape views within and around the village, which Policy G4 aims to safeguard from development that will have an adverse impact. However, neither the proposed Neighbourhood Plan document, nor the supporting 'Character Assessment' document provide any explanation of the methodology behind the selection of the identified views and the criteria against which these have been assessed in terms of their sensitivity and specific qualities, and how or why some views have been selected, yet other available views have not. The proposed Neighbourhood Plan simply states 'The valued views both within and surrounding the village are shown on Figure 8 and described as follows:' In the absence of any clear robust analysis and assessment, the selection of the identified views intended for protection within Policy G4 is considered arbitrary, unsound and not justified. As an example, Figure 8 identifies a view from the footpath leading towards Gransden Woods and looking south, however, there is no explanation for the significance of this view under paragraph 7.4 of the document. The supporting text only refers to a view looking north stating "The view from the Hayfield looking over Gransden Brook towards Gransden Hall..." Additionally, the view looking south is identified to be from private land, rather than any public vantage point. Further, there is no explanation why view E' has been identified and other views along the footpath leading towards Gransden Woods or from Waresley Road to the west (identified above by the red arrows) have not.	Yes	<u>Proposed Amendment</u> The proposed valued landscape views for protection should be deleted from the Plan. Alternatively, the identified views, along with all other available views, should be reviewed through a criterion-based assessment that considers their sensitivity and specific qualities, and how or why they are justified for protection, when others are not.
Mr Martin Baker (Wildlife Trust BCNP)		GGNP:9	Policy G6 - Protecting and enhancing biodiversity in the parish at Gransden Woods	Support	The Wildlife Trust fully supports the Parish Plan natural environment policies and the prominence given to Gransden Woods SSSI and nature reserve, including the associated policy protections. We also support the identification of the "wildlife corridor" along the brooks through the parish and will continue to work with the parish and local community to bring forward measures to enhance the woods and wider environment of the parish.		

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:57	Overall comment on the Neighbourhood Plan	Have observations	General: We have reviewed the Steering Group responses to our points raised at the Reg 14 consultation stage. We welcome the proposed changes to the plan to reflect some of the areas of concern. However, we do not consider the changes go far enough and consider further modifications are still required to meet the Basic Conditions and other requirements in Schedule B of the Town and Country Planning Act (as amended). The submission draft Great Gransden Neighbourhood Plan ('GGNP') does not meet the basic conditions. It does not have regard to national policy contained in the National Planning Policy Framework ('NPPF') and in parts, it is not in general conformity with the Strategic policies of HDC LP2036. We do not consider it contributes to the achievement of Sustainable Development overall. Criteria (f) of Paragraph 16 of the NPPF guides that policies in neighbourhood plans should not seek to duplicate adopted development plan policies or national policy. This is occurring and the GGNP and requires modification. NPPF Paragraph 31 requires all policies to be underpinned by relevant and up to date evidence (proportionate and focused to justify policies). There are particular areas of concern where the draft plan includes various descriptions and figures that are not properly supported by the accompanying evidence base. As a result, the proposed suite of policies is not sufficiently clear or evidenced to be used in the formulation or determination of planning application proposals. The accompanying Planning Practice Guidance ('PPG') indicates that a policy should be clear and unambiguous to enable a decision maker to apply it consistently and with confidence when determining planning applications (paragraph 041: Ref ID 41-041-20140306). The GGNP requires greater clarity between policies and does not provide a clear and practical framework for decision-makers. Paragraph 041 also guides that policies should be concise, precise and supported by appropriate evidence. Whilst it states there is no 'tick box' list of evidence required, proportionate, robust evidence should support the choices made. Such evidence should then be drawn upon to explain succinctly the intention and rationale of the policies (paragraph 040: Ref ID 41-040-20160211). For context, it is worth repeating our previous comments which identified the relevant strategic policies of the adopted Huntingdonshire Local Plan to 2036 ('LP2036') which are expressly stated in Section 1.12 of the LP2036 as being the policies of Section 4 and those relating to Design Context and Affordable Housing Provision.	Yes	<u>Points of clarification required</u> The Riddy PRoW: The Riddy PRoW is referred to in several forms throughout the document; Park Riddy, Riddy Park, The Riddy. It is confusing and needs to be amended and made clear that it is the route of a designated public right of way and does not include other land. Suggested change: Use consistent references throughout
Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:59	Overall comment on the Neighbourhood Plan	Have observations	Basic Conditions Statement The GGNP is required to "have regard" to national planning policies and advice. The Basic Conditions Statement provides a table that explains the conformity of each of the Plan's policies with relevant sections of the National Planning Policy Framework. It concludes that "The Neighbourhood Plan has appropriate regard to national policies and advice contained in guidance issued by the Secretary of State". The assessment provided is relatively limited and uses a standard text. The analysis is not sufficiently tailored and does not serve to clearly demonstrate that consideration has been given to national policy.		

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:61	7. Planning Policies	Have observations	Chapter 7: Planning Policies Spatial Strategy for Great Gransden HDC has supplied an indicative figure of 64 new dwellings that the GGNP should plan for to 2036. The GGNP states that 29 dwellings have been completed in the period 2011-2021 and there are a further 64 consented plots in the village. Accordingly, no further housing allocations are proposed through the GGNP. In the table set out in 7.1.2, the 38 Custom Build plots at the Potton Timber (Kingspan) Site has not progressed beyond the Hybrid Planning Permission granted on 12th March 2021. When preparing development plans, the NPPF guides that housing requirements must include sufficient sites to meet the identified need. The 38 plots at the Kingspan site currently only have outline planning permission for a specific housing product (Custom Build) to meet a district-wide need. The site is in active commercial use and there is no indication of when the factory will relocate to enable the outline planning permission element to be progressed through Reserved Matters stage and implemented. The District Council does not rely upon the consented plots coming forward in its 5-year housing land supply calculations due to the fact that the agent confirmed purchasing land and building a new factory is a main constraint (HDC AMR April 2021). Excluding these plots, the actual deliverable supply is 55 homes. There is a risk that the current planning permissions may not provide a reliable source to meet the village needs in full to 2036 and sufficient flexibility should be provided within the GGNP to reflect this issue. At paragraph 7.1.15, the evidence base to support the GGNP has also identified an unmet need for affordable housing for 5 households (Supporting evidence - Great Gransden Housing Needs Survey 2018). The GGNP has not sought to identify a suitable site, preferring instead to propose a monitoring regime (explanatory text to Policy G2). This evidence base identified an affordable housing need for those with a local connection and it should be properly planned for to ensure the Basic Conditions are met and further, to address the concerns raised by residents about housing affordability. The tightly drawn settlement boundary limits the opportunity for unplanned, windfall sites to come forward on a scale likely to deliver additional affordable homes for the village to meet this identified need. When coupled with the restrictive landscape and protected green space policies, the opportunity to secure a rural exception site in a sustainable location is further limited (see response to Policy G2). There is also a missed opportunity to properly plan for the identified need for additional market housing for Older Persons wishing to downsize and smaller dwellings for young families. Modifications are required to the GGNP policies and supporting text and we set out suggested changes below. Paragraph 7.1.8 refers to 'exceptional circumstances' requiring to be shown for [all] development proposals outside the defined Built-Up Area Boundary. This is an incorrect test and does not include other material considerations for example. The paragraph must be reworded to remain flexible.	Yes	<u>Suggested change:</u> We recommend the deletion of 'exceptional' in this section to avoid confusion.

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:63	Policy G1 - A Built-Up Area Boundary Strategy for Great Gransden	Object	Policy G1: A Built-up Area Boundary Strategy for Great Gransden The LP2036 does not include a definitive settlement boundary for the village. If the GGNP seeks to define one, the supporting text and policy must still be in general conformity with the related policies of LP2036. The supporting text at paragraph 7.1.9 takes a restrictive approach in stating what will 'only' be supported.	Yes	<p><u>Suggested change:</u></p> <p>Suggested change: Delete 'only' in line 3 of paragraph 7.1.9 Generally, the draft policy G1 is overly restrictive and does not meet the Basic Conditions. There is a clear conflict with the strategic policies of the Huntingdonshire Local Plan to 2036 which includes for development at small settlements, on land well-related to the built up area - which includes Great Gransden - for rural exception, small and windfall sites to create flexibility in the housing supply for the district in Policy LP 2 and LP 9. The GGNP seeks to exclude greenfield development on sites adjoining the built-up area by resisting development on land outside the Built-Up Area Boundary other than in the stated circumstances. Greater flexibility is required to align with LP2036. Further, it does not have regard to the NPPF which permits development outside of built areas of villages. This does not therefore meet the Basic Conditions. Limb a of Policy G1 is also negatively worded and potentially unduly restrictive in stating where development "will be resisted".</p> <p>Suggested Change: Policy G1 should be reworded to read "Development proposals outside the defined Built-up Area Boundary should be supported where it meets the following criteria..." and those criteria should reflect the strategic policies of LP2036 and the NPPF. Alternatively, the emphasis of the policy could change to a simple function, to define the extent of the Built-Up-Area Boundary for the purposes of applying LP2036 policy.</p>

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Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:65	Policy G3 - Local Character and Design	Have observations	Policy G3: Local Character and Design The policy requires conformity with the Great Gransden Character Assessment (supporting Doc 1). In that document is a design guide chapter 7. This is similar to the Design Guide within the GGNP Chapter 6 but not identical. As the Design Guide is in section 6 of the GGNP, this reference to supporting document 1 should be deleted. Otherwise, it causes confusion. Both sections include the statement greenfield development will not be supported. This is not appropriate within a Design Guide and should be deleted (specific reference below). The Design Principle: Subsection a, limb i: This sentence is vague and difficult to apply.	Yes	<p><u>Suggested change:</u></p> <p>Suggested change: Replace proposed schemes with ‘Proposed development’ and reword to remove ambiguity of ‘those in the local proximity’. Subsection a, Limb iv: This is a partial repeat of the development principles in Policy G1.</p> <p>Suggested Change: The first sentence should be deleted to focus on design guidance matters. The reference to ‘greenfield development will not be supported’ is also misplaced. This sentence should be deleted. Subsection b, limb ii requires gardens to mirror those in immediate vicinity. This limb is overly restrictive.</p> <p>Suggested change: Delete limb ii It is unclear whether the final paragraph relates to all development proposals (i.e. subsection a) or residential proposals only (i.e. is an additional part of subsection b). It expressly mentions parking standards for residents and their visitors/every house. If so, it should be a further limb of subsection b.</p> <p>Suggested change: Further clarity is required within this section of the policy</p>
Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:67	Policy G7 - Local Green Space and Other Valued Green Spaces	Object	<p>Policy G7 - Local Green Spaces and Other Valued Green Spaces</p> <p>The GGNP sets out the Huntingdonshire LP2036 Policy LP 32(Protection of Open Space) as providing the rationale for identifying specific land parcels that this policy should apply to. Within that list, the GGNP seeks to protect the area between Park Riddy and West Street (proposed OVGS area B in the evidence base document and on Figure 11 and referred to as ‘~The hayfield and grazing land to the south of the Riddy’). In HDC Policy LP 28, the explanatory text states that the open spaces are generally defined as: Open space takes many forms including parks, village greens, play areas, sports pitches, allotments, semi-natural areas and substantial private gardens. Many provide important recreational and sporting facilities or are important for biodiversity. Others are part of heritage assets or form part of the setting of heritage assets. When applying these tests at this local village level, the land is private and there is no public access or use. They are not part of any heritage assets and do not form private gardens. Further, ecology surveys undertaken in 2018 as part of planning application activity within Area B (HDC Ref 18/02720/OUT) by Applied Ecology Ltd concluded the land was semi-improved neutral grassland, in poor condition with low biodiversity value. The identification of Area D within Policy G7 is not supported by any detailed assessment or supporting evidence base to justify its inclusion within the policy. We are concerned that the GGNP seeks to identify areas that the Parish Council consider HDC LP2036 policy LP 32 will automatically apply to, rather than leaving that policy to be considered by reference to</p>	Yes	<p><u>Suggested change:</u></p> <p>Change Policy G7 to Local Green Spaces and remove all references to Other Valued Green Spaces. Delete Figure 11 or, if OVGS designations are to be retained, modify the policy to exclude Area B and remove it from Figure 11.</p>

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
					<p>detailed assessment and criteria through the development management process. The reference “Due to the public value attached to these spaces, Local Plan Policy LP 32 (Protection of Open Space) will apply to proposals impacting upon these spaces”, should be deleted. There is no robust supporting evidence to demonstrate why the GGNP should deem Area B would be covered by Policy LP 32 or that it should be afforded specific additional protection in the GGNP. The LP 32 test is clearly one of ‘public’ value. However, Table 2 in Supporting Document 3 simply considers a general ‘landscape’ value and further, no detailed information is available to establish what the public value of this land is. For Area B it states, “the ridge and furrow agricultural practices undertaken in the past are still evident, thereby providing villagers with a connection to the past”. No evidence is supplied to corroborate this statement. Again, it is relevant that an archeological desk-based assessment undertaken in 2018 advised that whilst the southern half was within an area of potential ridge and furrow, it was not visible on the ground. Cambridge County archaeology, as statutory consultee, considered the southern half of Area B was suitable for residential development in heritage terms. It is reasonable to conclude that there is no heritage asset (above or below ground), or setting criteria, that requires specific protection through the GGNP. The only supporting justification for Area B is set out in Table 2-OVGS of Supporting Document 3 states for that “The land is seen through gaps in the hedgerows along the Riddy, thereby affording visual amenity and a sense of tranquillity to travellers along the Riddy public right of way” However, in the assessment in Supporting Document 1-Character Assessment, only attaches the sense of tranquility to Area A “due to the openness of the land on the valley slopes providing a rural and tranquil setting to the public right of way”. For Area B, this ‘openness’ is extremely limited, and not the prevailing character. The character of the Riddy is self-evident and generated from enclosure created by the strong vegetation along either side of its route. In the Character Assessment at supporting document 1, it states “The view from the Park Riddy (a public right of way) into the adjacent fields, which are rich in biodiversity and marked by ancient agricultural practices on one side and open countryside to the other”. There is no evidence accompanying the GGNP to support a claim that the fields are ‘rich in biodiversity’. No surveys have been undertaken to support this claim. As mentioned above, there has been a PEA within the public domain during the evolution of these policies which concluded the biodiversity value of half of the land was low. In seeking to protect the (glimpsed) viewpoint to the Area B, it states “Key features in this view to be respected are in the fields to the South and East of Park Riddy, the ridge and furrow fields (now a scarce feature in the Cambridgeshire countryside)”. The ridge and furrow is not visible on the ground. The assessment does not include rural tranquillity in that view. This is understandable given the backdrop of the houses and urban features. As mentioned under Policy G4, the identification of the proposed Valued View D from Park Riddy to the southeast is not justified. The real justification for identifying Area B as OVGS appears to derive from the land being identified as an area of concern for potential future development by residents, and the previous and current planning application activity on part of the site.</p>		
Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:69	Policy G9 - Public Rights of Way	Have observations	<p>Policy G9 - Public Rights of Way Network The policy includes reference to Permissive Paths. These are (rightly) not shown on Figure 12 and cannot be referenced. The policy is otherwise ambiguous and open to interpretation.</p>	Yes	<p><u>Suggested change:</u></p> <p>Remove all reference to ‘permissive paths’ throughout the GGNP.</p>

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Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:71	Policy G12 - Great Gransden Infrastructure Priorities	Have observations	Policy G12 - Great Gransden Infrastructure Priorities The list of priorities should not be contained within the planning policy section of the GGNP. As currently worded, the policy is at risk of conflict with the 2012 Community infrastructure Levy Regulations (as amended) and the NPPF. Particularly the inclusion of the word 'any' in the first paragraph.	Yes	<u>Suggested change:</u> The policy should be deleted and the list moved into the Community section.
Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:73	Overall comment on the Neighbourhood Plan	Have observations	Supporting Evidence Supporting Document 1 - Character Assessment Please refer to our comments on Policy G4. This document does not include a specific landscape assessment from which to guide policies within the GGNP. The Design Guide chapter is not a direct repeat of Chapter 6. The Design Guide should only be contained and referenced on one document. Supporting Document 3 - Rationale for Local Green Spaces and Other Valued Green Spaces See earlier comments to Policy G4 and G7 in particular. Paragraph 31 of the NPPF requires all policies (i.e. including those contained in Neighbourhood Plans) to be underpinned by relevant and up to date evidence. We do not consider the evidence base is adequate. The OVGS Rationale is a brief commentary of sites which cannot be considered to provide a sound basis for allocation of other valued green spaces. There is no detailed assessment of the value or benefit of the OVGS areas to the village.		
Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:58	3. The Plan Area	Have observations	Green Arc and Figure 5: At paragraph 3.21 of the GGNP, the supporting text also refers to a green arc which includes parts of the Mandeian Brook, Crumple Dean Brook and Park Riddy 'which are tributaries of the Gransden Brook'. This requires clarification. No maps are provided to clarify the location of these tributaries. Figure 5 only shows the Gransden Brook and the Mandeian Brook. An extract of the County Map is reproduced below that also shows these main tributaries, along with Crumple Dean to the northwest. Extract from County Map showing tributaries There is not a Park Riddy tributary and this reference should be removed along with the green shading on the fields either side of the Riddy PRoW within Figure 5. Further, the 'Green Arc' does not appear within any specific policy and the role and purpose of Figure 5 (once revised as above) should clearly be set out to assist decision-makers. Specifically, we are unclear of the origins of Figure 5. Is that produced by the Steering Group? If so, where do we look to review the justification for the areas shaded green? Where is the corresponding policy that relates to Figure 5? How is that Figure 5 expected to be used in decision-making for planning applications?	Yes	<u>Suggested change:</u> Once this information is provided, interested parties should be given an opportunity to comment further through the examination process. Otherwise the Figure 5 should be deleted and reference to the Green Arc removed.
Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:60	6. Design Guide for Great Gransden	Have observations	Chapter 6: Design Guide This section requires sense checking. Sometimes it refers to developments, sometimes to housing developments. It is not clear whether it is intended to also apply to commercial or all other development proposals. Within the design code are policy statements, such as 'greenfield development will not be supported'. This conflicts with the spatial policy G1, G2 and G3 and is not in conformity with the strategic policies of the LP2036. The language is also overtly negative using 'will not'. The specific guideline on height is negatively worded such as 'other height options will not be acceptable' at 6.3. This should be reworded to guide development proposals. At 6.4 (overall design) the constraint on house designs not being exact copies of others in a development is also overly restrictive, especially considering some outline permissions have yet to obtain reserved matters and be implemented. Repetition can create some welcome uniformity within developments when used appropriately.	Yes	<u>Suggested change:</u> The whole design guide should be removed from the main body of the plan and annexed as guidance only. If included, it requires changes throughout in order to meet the Basic Conditions.
Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck	GGNP:62	4. The Key Issues	Have observations	Key Issue 1: Sustainable development and growth of the housing stock in Great Gransden. Paragraph 4.7 of the GGNP states that that new development should be of minor scale. There is no reasonable basis provided for this restriction.	Yes	<u>Suggested change:</u> Paragraph 4.7 should be deleted.

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	Land and Planning Ltd						
Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:64	Policy G2- Affordable Housing on Rural Exception Sites	Object	Policy G2: Affordable housing on Rural Exception Sites Paragraph 7.1 - The linked CAP 1 is noted but there is no clarity on timescale within 'when appropriate' and this conflicts with Policy G2 provisions which support rural exceptions sites coming forward outside of any parish council monitoring exercise. The supporting evidence to the GGNP already identifies a current need for an additional 5 affordable homes. The Parish Council has opted not to identify a site through the GGNP in favour of Policy G2. As raised at the Reg 14 stages, this policy is unnecessary. It is not in general conformity with strategic LP2036 Policy LP 28. There is no reason to repeat the adopted policy.	Yes	<p><u>Suggested change:</u></p> <p>Suggested change: Policy G2 should be deleted. Alternatively, if Draft Policy G2 is to be retained, it requires significant modification. As evidenced by other planning permissions in the district, small villages such as Great Gransden could also accommodate local needs of other nearby smaller villages in a more sustainable way. The first and second bullet point of the policy is too restrictive and in conflict with LP2036 Policy LP 28, limb b. There is no definition of 'easy access' within the GGNP to consider development proposals against limb 3. Again, the LP 28 description under Limb 4, subsection ii is already in force (and clearer). The fourth bullet point must be caveated to conform with the the provisions of section 17 of the Housing Act 1996 and statutory instrument 623 of 1997, or other relevant legislation, again, as already acknowledged in LP2036. This limb should be extended to reflect the NPPF and the additional text added "or for the appropriate period as applicable to the form of housing" to maintain the flexibility for the Government's First Homes initiatives during the plan period to 2036. We support the test of 'significant harm' within the fifth bullet point in Policy G2 and this should not be diluted through any modified policy.</p> <p>Suggested Change: modify the policy as set out above.</p>
Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:66	Policy G4 - Development, Landscape Character and Valued Views	Have observations	Policy G4 - Development, Landscape Character and Valued Views The title of this policy includes 'Development' within it. We consider this word is misplaced. Subsection 1 requires existing features [of landscape value] to be kept intact. This is overly restrictive when dealing with the natural environment. Turning to Valued View D to the southeast, the only key features described are 'ridge and furrow field' (and the reason given is that this is a scarce feature in Cambridgeshire) plus established hedgerows around the field boundaries and the path edge. The field is not managed by ancient agricultural practices. The described features are not apparent, the field currently being maintained as grass and topped every year. Through previous planning activity on the land in 2018/19, the County Archaeologist has supported the redevelopment of part of the field. An archaeological DBA was prepared in 2018 by Britannia ltd to support a residential planning application (HDC Ref 18/02720/OUT). It advised that the	Yes	<p><u>Suggested change:</u></p> <p>Suggested change: Delete 'Development' from the policy title The first sentence of Policy G4 includes 'must' which is absolute.</p> <p>Suggested change: Replace 'must' with 'should'.</p> <p>Suggested change: Delete Policy G4 and supporting paragraphs Should the examiner consider the general policy is justified,</p>

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					<p>site had potential for ridge and furrow based on but it was not visible on the ground. A current planning application for a rural exceptions site is under consideration on part of the Area B (HDC Ref 22/01631/PIP). The County Archaeologist response does not mention the land is ridge and furrow and moreover, he did not object to the development proposal. Despite this, the GGNP describes Ridge and Furrow as a key landscape feature within Viewpoint D that requires protection. The final paragraph of Policy G4 references Valued views as described in the supporting text and shown on Figure 8. The evidence behind this criterion is not publicly available for review. It is not therefore possible to understand the value being attributed; whether that is the Steering group view as a small collective or whether it is representative of the whole community. For example, at section 4, it suggests “the most mentioned views are represented” however this supporting data is not documented anywhere. Specifically View D which is expressed in Figure 8 as being in two parts, one looking to the east towards the built edge and one looking south further along the public path. Unlike the other view points, the view to the southeast is a narrow, ‘glimpsed’ view from a short section of the path between a gap in the hedge trees. The boundary vegetation can change such that this may not always be the case. As mentioned, the extent to which this view is valued by the local residents is not included within the document. The Residents Engagement Survey at the start of the process comprised 3 basic open- ended questions (what residents liked best, least and most like to change), none of which specifically sought opinion on important views or spaces. The graphs within Appendix E9 of the Regulation 14 pre-submission consultation draft GGNP are very basic as a result. A summary of the 54 respondents to the residents survey was set out in Reg 14 draft GGNP at Appendix F. There is minimal mention of important or valued views. The only mention of Area B is related to the gap section between no. 35 and 37 West Street, by Respondent Ref 31. They suggested a change to the Development Boundary, one of the reasons being this land was an important view from within the village to the Countryside. The Steering group rejected that comment on the basis the land was far more related to the built-up area than the countryside. We have also reviewed supporting document 5 ‘Consultation Statement’ which includes a ‘heat map’ from the Gransden 2020 vision. Again, this was limited to 3 criteria - places I value; places I am concerned about and places I dislike. Rather than demonstrate any ‘public’ value in terms of the land or views, the field was mostly identified as a place of ‘concern’ (unsurprisingly, as there was a live planning application activity for housing development at the time of the engagement survey in 2018/2019). Generally, we cannot see any robust assessment for this Policy G4 as a whole. Specifically, we cannot establish the background information that has led to the proposed Valued View D. General concern expressed over potential future development is not sufficient justification or evidence to attribute a ‘Valued View’. In summary, the evidence to justify the selection of views to be protected is lacking and the policy does not therefore meet the basic conditions.</p>		<p>modifications are required to ensure it is suitable for decision-making purposes.</p> <p>Suggested change: Remove ‘and keep intact’ and remove the text in brackets ‘(including the features described in the supporting text to this policy)’. Remove Valued View D to the southeast.</p>

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Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:68	Policy G8 - Development and Open Space Requirements	Have observations	Policy G8 - Development and Open Space Requirements The policy requires all development schemes to contribute towards the provision of open space in the parish including new open space close to the village centre, prescribed as within half a mile. This draft policy is not effective. Huntingdonshire Council operates a CIL charging system. The accompanying SPD for Developer Obligations guides when CIL applies and when additional obligations may be required to be secured through s106 legal agreements. The SPD sets out Huntingdonshire Councils requirements for on-site open space provision and when additional financial contributions will be required towards off-site provision and/or enhancements. Draft Policy G8 does not contain any site size threshold or type or scale of development, nor does it have regard to the Community Infrastructure Levy and associated regulations. We consider the locally identified priorities should be described within the GGNP to guide future obligations strategies, they should not form a specific policy in the manner described.	Yes	<u>Suggested change:</u> The policy should be deleted Â
Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:70	Policy G10 - A walkable village and reducing village car use	Have observations	Policy G10 - A walkable village and reducing car use The policy includes the text ‘must’ in the first sentence. This should be replaced with ‘should be designed to encourage walking and cycling’ or similar. The use of the word ‘residents’ is misplaced, as the policy deals with places of employment and potentially staff movements to and from the village centre aswell. The second sentence also uses the word ‘must be provided as part of the development’. As the policy relates to schemes of 2 or more dwellings and an unspecified scale of employment development, it may not pass the relevant tests for planning obligations as required by paragraph 57 of the NPPF.	Yes	<u>Suggested change:</u> The policy should reworded, or deleted (as the encouragement of safe walking and cycling is already covered within the strategic policies of LP2036 and in the proposed design guide within the GGNP).
Mrs Stacey Rawlings (RH Topham and Sons)	Mrs Stacey Rawlings - Director Roebuck Land and Planning Ltd	GGNP:72	Policy G13 - Barnabas Oley Primary School and Parish pre-school provision	Have observations	Policy G13 - Barnabas Oley primary School and parish pre-school provision Suggested change: Similar to Policy G8 and G12 above, this policy needs reworking to reflect the Community Infrastructure Levy in the district and the NPPF.	Yes	<u>Suggested change:</u> Similar to Policy G8 and G12 above, this policy needs reworking to reflect the Community Infrastructure Levy in the district and the NPPF.
National Highways		GGNP:76	Overall comment on the Neighbourhood Plan	Have observations	Thank you for consulting National Highways on the Great Gransden Neighbourhood Plan. National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly. Notwithstanding the above comments, we have reviewed the document and note the details of set out within the draft document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.		
Natural England		GGNP:7	Overall comment on the Neighbourhood Plan	Support	Thank you for your consultation on the above dated 26 August 2022 Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.		

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R J & J S Millard	Lydia Pravin	GGNP:14	Overall comment on the Neighbourhood Plan	Have observations	<p>With regard to Basic Conditions for Neighbourhood Plans paragraph 1.7 sets out there are certain requirements, referred to as basic conditions which all Neighbourhood Plans are tested against at examination which we agree is a requirement. However, it is considered the plan is not in broad conformity with the strategic policies of the Huntingdonshire's Local Plan (HLP) to 2036 (adopted 2019) and is not in accordance with the National Planning Policy Framework 2021 as set out in paragraphs 1.7 and 1.8. Paragraph 36 of the NPPF 2021 sets out the tests of soundness will also be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area. The Huntingdonshire Local Plan to 2036 is more flexible and promotes a vibrant rural economy as set out in policy LP 19 which enables B class business development and farm diversification. Given the location of the site opposite the Sand Road Industrial Estate which is recognised in the Neighbourhood Plan (paragraph 3.38) and lies outside of the existing Built Up Area as shown in Figure 7 and the Sportsfield which is proposed as a Local Green Space the site is well placed. The Neighbourhood Plan places sustainability as its primary objective and part of the Vision which also seeks to evolve, however, it fails to acknowledge the need to encourage an increase in local employment opportunities by making appropriate provision for a site with the capacity to replace the existing and important Kingspan Site. The Neighbourhood Plan in paragraph 3.38 recognises the Kingspan site as a significant local employer and clearly and expressly recognises that the site is expected to be redeveloped for residential purposes. Despite this recognition the Neighbourhood Plan in Key Issue 1 proposes to restrict non-residential development to less than 1,000sq.m of floor space on a site of less than one hectare, with priority being given to a brownfield sites outside of the Conservation Area but within the existing Built Up Area which is unrealistic and the Neighbourhood Plan is therefore not in broad conformity with the strategic or non-strategic policies of the HLP to 2036 (adopted 2019) or the NPPF 2021. Policy G3 - Local Character and Design sets out "To be supported, development proposals must also be sympathetic to the existing rural character of Great Gransden, detailed in the Great Gransden Character Assessment (available as supporting Document 1 alongside this Neighbourhood Plan), and demonstrate how they accord with the Design Guide principles set out below..." which sets out a scheme must be in harmony with the character of those in local proximity, however, this is contrary to the NPPF 2021. The Neighbourhood Plan now introduces a Valued View set out in policy G4, Figure 8 with view A identified across the site. It is noted only certain views of the village are identified as Great Gransden Valued Landscape Views and within the Character Assessment which forms Supporting Document 1. However, the Neighbourhood Plan and the Character Assessment provides no explanation of the methodology as to how the Valued Landscape Views were selected. For example, why this view is considered valued and other areas in the Parish not? With regard to The Great Gransden Postmill we highlight this is located at the end of Mill Road and is a significant distance from the site, approx. 364m to the edge of the site's south-western corner. There is hedgerow along the southern boundary of the site, intervening fields and hedgerows before reaching The Great Gransden Postmill. Therefore, the view is restricted and can only be glimpsed at best from the south-western edge of the site and hedgerow could be added along Sand Road as part of a well-designed employment scheme. Therefore, it is considered there is no justification for the designation of the land as a valued landscape view as set out in policy G4 and this should be deleted from the Plan or all of the views of the village should be considered and justified through a thorough assessment. The site is well located and its allocation will enable future employment development with all matters of detail such a scale, height, site coverage, layout and strategic landscaping as well as renewable energy</p>	Yes	See representation in My comment section above.

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					<p>measures and drainage considered in the preparation and submission of a subsequent planning application. Such a scheme would pay regard to the edge of village location and carefully consider the siting of the buildings which will ensure as set out in paragraph 130 c) of the National Planning Policy Framework 2021 (NPPF) a development that is sympathetic to the landscape setting, while not preventing or discouraging appropriate innovation or change. We highlight any planning permission granted for development on this site would be expected to be conditional on the applicant completing a s106 Planning Agreement requiring the payment of substantial Financial Contributions to the costs of improvements to local Community facilities e.g. at the Clubhouse on the Caxton Road Sportsfield. In particular improvements to Transport e.g. the bus services to and from the village and Road Safety e.g. s278 Agreements in respect of the highway junctions specified in the Neighbourhood Plan and any road widening that might be triggered by the development. We enclose a copy of the letter of representation made in connection with the Great Gransden Draft Neighbourhood Plan (Regulation 14 Town and Country Planning, England, Neighbourhood Planning (General) Regulations 2012) which was emailed on 04 April 2022 to Great Gransden Neighbourhood Plan Group.</p>		

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R2 Developments	Mr Brian Flynn - Associate Carter Jonas LLP	GGNP:45	3. The Plan Area	Object	<p>Figure 5: The Gransden Brook Corridor</p> <p>OBJECT</p> <p>Figure 5 seeks to define a Gransden Brook Corridor for the purpose of encouraging wildlife protection and habitat enhancement. It is indicated in the supporting text to Figure 5 that this project would be delivered by community actions. However, Figure 5 is also referred to in Policy G6 and it is expected that development would take opportunities to restore or enhance the existing ecological network across this Corridor. There are four main concerns with the proposed Gransden Brook Corridor, which are as follows: it covers a wide area including all of the land on the southern, western and eastern edge of the village; it includes land unrelated to the Gransden Brook and its tributaries; there is no evidence provided with GGNP of the ecological value of all of the land included within the proposed Corridor area; and, it is not clear how the wildlife protection and habitat enhancement purpose of the proposed Corridor would be implemented without development or landowner agreement. There is no evidence provided with draft GGNP to explain the extent of the land included within the proposed Gransden Brook Corridor or that identifies the nature conservation and ecological interest of the land to justify the proposed designation. It is noted that Gransden Wood SSSI is partly within the draft GGNP area which is managed by the local Wildlife Trust, and the nature conservation interest at this site will be known and subject to monitoring. The brooks in the area will clearly have ecological value, as will the trees, hedgerows and grassland within the area, but no information on the nature conservation interest or ecological value of these features is available. The ecological status of other land included within the Gransden Brook Corridor e.g. the agricultural fields is unknown. There is no mention of a Gransden Brook Corridor in the Cambridgeshire Green Infrastructure Strategy (June 2011) or the adopted HLP2036. Paragraph 041 (Ref ID: 41) of the PPG clearly expects designations in neighbourhood plans to be supported by appropriate evidence. There is no evidence to justify the proposed Great Gransden Brook Corridor including the extent of the land included within this proposed designation. Therefore, the proposed Gransden Brook Corridor designation, as shown on Figure 5, is not consistent with national policy, and as such does not meet Basic Condition (a). It is requested that Figure 5 is deleted unless evidence is provided to explain and justify the land included within the Gransden Brook Corridor. Notwithstanding the above comments and requested change, the land controlled by R2 Developments at land west of West Street includes trees and hedgerows, and development at the site could retain and enhance existing ecological features and provide ecological enhancement and biodiversity net gain consistent with proposed Policy G6 of draft GGNP and adopted Policies LP3, LP30 and LP31 of the HLP2036.</p>	Yes	<p><u>Requested Change</u></p> <p>It is requested that Figure 5 is deleted unless evidence is provided to explain and justify all of the land included within the Gransden Brook Corridor.</p>

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R2 Developments	Mr Brian Flynn - Associate Carter Jonas LLP	GGNP:44	Overall comment on the Neighbourhood Plan	Object	<p>General Comments</p> <p>OBJECT</p> <p>In due course the draft submission version of the Great Gransden Neighbourhood Plan (draft GGNP) will be examined by an Independent Examiner. The examination for a neighbourhood plan considers whether specific basic conditions have been met. The basic conditions, which Draft GGNP must meet, are defined in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. There is national policy and guidance, contained in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG), on policies for neighbourhood plans. The national policy and guidance that will be referred to in these representations, and a summary of the key issues raised in representations, is set out below. R2 Developments control land west of West Street in Great Gransden, which is identified in draft GGNP as within the area of the Gransden Brook Corridor (see Figure 5), within Valued Landscape View D - View from Park Riddy (see Figure 8 and Policy G4), and within an Other Valued Green Space B - South of the Riddy (see Figure 11 and Policy G7). As set out in these representations, there is no evidence to support these designations at the site. Criteria (f) of Paragraph 16 of the NPPF states that plans should “reserve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)”. It is noted that some of the policies in draft GGNP seek to duplicate strategic policies covering the same topic in the adopted Huntingdonshire Local Plan to 2036 (HLP2036). HLP2036 already includes strategic policies on development within and well related to the built-up area of small settlements (LP9), design (LP11 and LP12), rural exception affordable housing (LP28), green infrastructure (LP3) and open space (LP32). It is not necessary for draft GGNP to duplicate these adopted strategic policies. It is also noted that in some instances the policies in draft GGNP are not in general conformity with strategic policies in HLP2036, which is likely to cause difficulties for the decision maker on planning applications because of conflicting policy requirements between two development plan documents. Paragraph 041 (Ref ID: 41) of the Planning Practice Guidance states that “It [neighbourhood plan policies] should be concise, precise and supported by appropriate evidence”. It is noted that draft GGNP does not include a glossary to explain the meaning of the proposed policy designations e.g. Valued Landscape View and Other Valued Green Space. There is no ecological evidence provided to explain or justify the decision to identify land as within the Gransden Brook Corridor. There is no evidence provided to explain or justify the decision to identify land as within areas of Valued Landscape View or as within areas of Other Valued Green Space. The documents referred to as evidence simply replicates the supporting text to these policies but does not explain why the land covered by these designations is of particular value worthy of special protection. It appears that these proposed additional policy designations are intended to prevent development and influence future decisions about the growth of the village. As explained in these representations, it is considered that draft GGNP does not meet Basic Condition (a) in that it is inconsistent with national policy, and Basic Condition (e) in that it is inconsistent with the strategic policies contained in the development plan including the adopted HLP2036.</p>	Yes	<p><u>Requested Changes/Observations</u></p> <p>In summary, the requested changes or observations in these representations are as follows: It is requested that Policies G1, G2 and G3 are deleted. It is requested that Figures 5, 8 and 11 are amended to delete the designations affecting land west of West Street in Great Gransden i.e. Gransden Brook Corridor (on Figure 5), Valued Landscape View D - View from Park Riddy (on Figure 8), and Other Valued Green Space B - South of the Riddy (on Figure 11) It is requested that Policies G4, G6 and G7 are amended to delete references to the Gransden Brook Corridor, Valued Landscape Views and Other Valued Green Space designations. It is observed that the Key Issues, Vision & Objectives, and Policies G8, G9 and G12 - relating to affordable housing, open space and community facilities - are unlikely to be delivered without support from additional residential development at Great Gransden.</p>

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
R2 Developments	Mr Brian Flynn - Associate Carter Jonas LLP	GGNP:46	4. The Key Issues	Have observations	<p>Section 4: Key Issues</p> <p>COMMENT</p> <p>Section 4 identifies key issues for draft GGNP. R2 Developments has comments on Key Issue 1 that relates to housing and affordable housing, and Key Issue 3 that relates to open space. Key Issue 1 refers to the need for further growth in the village, support for village infrastructure, housing affordability and affordable housing needs, and the preferred size of residential developments. It is noted that draft GGNP makes no allocations for residential development, and as such it is not clear how housing and affordable housing needs would be met through this document. Key Issue 1 seeks to only supports minor development of less than 10 dwellings, which would fall below the affordable housing threshold, and so affordable housing would not be delivered through this approach. It is noted that none of the recent housing developments in Great Gransden included a requirement for any of the affordable housing to be for those with a local connection, which means that the affordable housing would be available to all those households on the district-wide housing register. There will be affordable housing needs arising in the future and during the plan period for draft GGNP, but this is not acknowledged or addressed in the document. Therefore, it is very unlikely that Key Issue 1 would be tackled by any policies or actions contained in draft GGNP. It is requested that draft GGNP allocates land for residential development that includes affordable housing, or alternatively draft GGNP includes policy support for additional land to be allocated for residential development in the village through a review of HLP2036. Key Issue 3 refers to the existing areas of public open space within the village, but also highlights the lack of opportunities for informal recreation and the recreational pressure on Gransden Wood. It is noted that Policy G8 identifies an aspiration for an accessible area of open space to be provided at Great Gransden, which could provide an alternative informal recreation area and relieve pressure on Gransden Wood. The draft GGNP does not identify any land for open space and includes no actions to ensure the delivery of open space. Therefore, it is very unlikely that Key Issue 3 would be tackled by any policies or actions contained in draft GGNP, and as such no additional open space would be provided and the existing recreational pressure on Gransden Wood will continue for the foreseeable future. It is considered that additional open space could be delivered in conjunction with residential development, but draft GGNP does not allocate land for development or contain any policy support for development in the future that might provide open space. No changes are suggested to Key Issues 1 or 3, but it is unlikely that they would be achieved through policies or actions in draft GGNP. It is requested that draft GGNP allocates land for residential development that includes affordable housing and open space. Alternatively draft GGNP should include policy support for additional land to be allocated for residential development that could deliver open space in the village through a review of HLP2036.</p>		
R2 Developments	Mr Brian Flynn - Associate Carter Jonas LLP	GGNP:48	Policy G1 - A Built-Up Area Boundary Strategy for Great Gransden	Object	<p>Policy G1 - A Built-Up Area Boundary Strategy for Great Gransden</p> <p>OBJECT</p> <p>Policy G1 relates to development within and beyond the built-up area of the settlement, and the settlement boundary is defined in Figure 7. The policy seeks to support development within the built-up area subject to impacts on character, and to restrict development beyond the built-up area to a limited range of uses. The policy also refers to residential amenity, infrastructure, access and housing mix as factors to be taken into account for development. It is considered that all these matters are already adequately covered in either adopted development plan policies or national policy, and as such it is not necessary to duplicate them in draft GGNP. Paragraph 4.84 of HLP2036 defines the meaning of built-up areas. Paragraph</p>	Yes	<p><u>Requested Change</u></p> <p>It is requested that Policy G1 is deleted.</p>

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					<p>4.85 explains, with examples, of what is included and excluded from a built-up area. Paragraph 4.100 identifies a list of small settlements, including Great Gransden. Policy LP9 set out the approach to development within and well related to built-up areas, which is mainly related to sustainability of the settlement. Policy LP10 sets out the approach towards development in the countryside. Therefore, a number of adopted development plan policies contained in HLP2036 already control development within, well related to, and beyond the built-up area of settlements. Policy G1 seeks to support affordable housing exception schemes on land adjacent to the built-up area of the settlement. As highlighted in Policy G1, affordable housing exception schemes is also addressed in Policy G2. Policy LP28 of the adopted HLP2036 also deals with affordable housing exception schemes but includes more detailed policy requirements and delivery mechanisms. It is noted that Policy LP28 does allow a proportion of market housing to be provided as part of an affordable housing exception scheme, which Policy GP1 does not mention. Paragraph 78 of the NPPF also supports affordable housing exception schemes and allows for some market housing on such sites to support delivery of affordable housing. Therefore, there is an adopted development plan policy in HLP2036 that adequately deals with affordable housing exception schemes that does not need to be duplicated, and proposed Policy G1 provides less detail and is inconsistent with the adopted strategic policy and national policy. Policy G1 refers to Paragraph 80 of the NPPF, which sets out the circumstances where isolated dwellings would be permitted in the countryside. It is not necessary for Policy G1 to repeat national policy. Policy G1 references the policies in HLP2036 that specifically allow certain types of development outside the built-up areas of settlements e.g. development related to the rural economy, rural worker housing, local services and community facilities, and tourism and recreation. If adopted development plan policies in HLP2036 already set out the range of uses allowed beyond the built-up area of settlements and in the countryside, it is not necessary for Policy G1 to refer to or replicate those same strategic policies. Criteria (b) of Policy G1 refers to design related criteria for development. These are matters that are already partly covered in Policy G3 (Local Character and Design). In addition, Policies LP11 and LP12 of HLP2036 and the Huntingdonshire Design Guide SPD (2017) also provide detailed design guidance. It is not necessary for Policy G1 to include design criteria that are adequately covered in adopted development plan policies and guidance. It is clear from Criteria (f) of Paragraph 16 of the NPPF that policies in neighbourhood plans should not seek to duplicate adopted development plan policies or national policy. Therefore, Policy G1 is not consistent with national policy, and as such does not meet Basic Condition (a).</p>		
R2 Developments	Mr Brian Flynn - Associate Carter Jonas LLP	GGNP:47	5. A Vision for Great Gransden Plan Area	Have observations	<p>Vision & Objectives COMMENT</p> <p>Section 5 provides the Vision and Objectives for draft GGNP. There are objectives relating to the following: delivery of housing requirement (No.1); sustainable development support by infrastructure (No.2); protect and enhance landscape character and important views (No.4); protect and enhance biodiversity and habitats (Nos. 7 and 8); increase quantity and quality of green space (No.10); and improve community infrastructure (No.15). As set out in these representations, draft GGNP does not allocate any land for development that could support the delivery of housing and affordable housing, community infrastructure, additional open space, or ecological enhancement and biodiversity net gain. It is not clear how these objectives would be achieved in the absence of development, landowner support or funding. As set out in the representations to Figure 5 and Policies G4, G6 and G7, there is no evidence provided with draft GGNP to explain or justify the proposed nature conservation and landscape related</p>		

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					designations. It is unlikely that the nature conservation and landscape related designations would be achieved if the associated policies are deleted or amended.		
R2 Developments	Mr Brian Flynn - Associate Carter Jonas LLP	GGNP:49	Policy G2- Affordable Housing on Rural Exception Sites	Object	<p>Policy G2- Affordable Housing on Rural Exception Sites</p> <p>OBJECT</p> <p>Policy G2 set out the policy for affordable housing exception schemes on land adjacent to the built-up area of the settlement. Policy LP28 of HLP2036 also deals with affordable housing exception schemes and includes detailed policy requirements and delivery mechanisms for such housing. Policy LP28 also refers to local connection requirements, local housing needs, the availability of services and facilities in settlements, impact of development on site character, and circumstances where market housing might also be included as part of a scheme. Paragraph 78 of the NPPF also supports affordable housing exception schemes and allows for some market housing on such sites to support delivery of affordable housing. Therefore, there is an adopted development plan policy in HLP2036 that adequately deals with affordable housing exception schemes that does not need to be duplicated, and national policy also supports the delivery of affordable housing exception schemes. It is clear from Criteria (f) of Paragraph 16 of the NPPF that policies in neighbourhood plans should not seek to duplicate adopted development plan policies or national policy. Therefore, Policy G2 is not consistent with national policy, and as such does not meet Basic Condition (a). In addition, it is noted that the affordability of housing and affordable housing to meet local needs are identified as a key issue for draft GGNP. However, draft GGNP does not seek to tackle this key issue because it does not allocate any land for housing or affordable housing, it only supports minor development of less than 10 dwellings that falls below the affordable housing threshold, and it includes additional designations that would prevent development on suitable sites on the edge of the settlement.</p>	Yes	<p><u>Requested Change</u></p> <p>It is requested that Policy G2 is deleted.</p>

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
R2 Developments	Mr Brian Flynn - Associate Carter Jonas LLP	GGNP:51	Policy G4 - Development, Landscape Character and Valued Views	Object	<p>Policy G4 - Development, Landscape Character and Valued Views</p> <p>OBJECT</p> <p>Policy G4 of draft GGNP relates to landscape character and seeks to protect identified valued landscape views. Paragraph 7.4 provides the supporting text to Policy G4 and seeks to explain the rationale for the selection of valued landscape views at some locations. Figure 8 identifies those valued landscape views. Policy G4 makes is clear that development will not be supported where it would adversely impact upon the valued landscape views shown on Figure 8. The land controlled by R2 Developments at land west of West Street is located within Valued Landscape View D - Park Riddy. It is considered that this location is not a valued landscape view, and the evidence that has informed that decision is not robust. It is stated that this valued landscape view is identified for the following reason: “The view from the Park Riddy (a public right of way) into the adjacent fields, which are rich in biodiversity and marked by ancient agricultural practices on one side and open countryside to the other. Key features in this view to be respected are in the fields to the South and East of Park Riddy, the ridge and furrow fields (now a scarce feature in the Cambridgeshire countryside), the openness of the land on the valley slopes providing a rural and tranquil setting to the public right of way, together with established hedgerows marking the field boundaries and the path itself”. R2 Developments has instructed Liz Lake Associates to review the evidence that has informed the decision to identify the land as a valued landscape view. The Technical Note prepared by Liz Lake Associates is submitted with these representations. In summary, Park Riddy PROW is enclosed by a full canopy of attractive hedges and trees, and there are very limited views of the adjacent open fields from this footpath. As such, the surrounding landscape and any landscape features would not be visible to the public from the footpath. It is concluded in the Technical Note that the land west of West Street is not a valued landscape view and should not be designated. In addition, the land west of West Street is a managed grass field and horse grazed pasture and does not contain historic agricultural practices and is not managed using these methods. Paragraph 041 (Ref ID: 41) of the PPG clearly expects designations in neighbourhood plans to be supported by appropriate evidence. The evidence to justify the proposed Valued Landscape View D - Park Riddy affecting land west of West Street is not robust, as highlighted in the Technical Note prepared by Liz Lake Associates. Therefore, the proposed Valued Landscape View D - Park Riddy, as shown on Figure 8, is not consistent with national policy, and as such does not meet Basic Condition (a). It is requested that Valued Landscape View D - Park Riddy is deleted from Figure 8. Notwithstanding the above comments and requested change, the land controlled by R2 Developments at land west of West Street includes trees and hedgerows, and development at the site could retain those existing landscape features.</p>	Yes	<p><u>Requested Change</u></p> <p>It is requested that Valued Landscape View D - Park Riddy is deleted from Figure 8 because the evidence to support this proposed designation is not robust.</p>

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
R2 Developments	Mr Brian Flynn - Associate Carter Jonas LLP	GGNP:53	Policy G7 - Local Green Space and Other Valued Green Spaces	Object	<p>Policy G7 - Local Green Spaces and Other Valued Green Spaces</p> <p>OBJECT</p> <p>Policy G7 of draft GGNP seeks to allocate land as Local Green Space or Other Valued Green Space. R2 Developments control land west of West Street, which is identified within Other Valued Green Space B on Figure 11. The rationale for designating land as Other Valued Green Space is related to Policy LP32 of HLP2036, which seeks to protect areas of open space of public value. It is considered that this location is not an Other Valued Green Space, and the evidence that has informed that decision is not robust. It is stated that Other Valued Green Space B is designated for the following reasons: “Privately owned farmland to the south of the Riddy. As with the land to the north of the Riddy, the land contributes to settlement character by providing a strong rural backdrop to the edge of the village, and to the Riddy public right of way. The land is seen through gaps in the hedgerows, thereby affording visual amenity and a sense of tranquillity to travellers along the Riddy public right of way. In addition, the ridge and furrow agricultural practices undertaken in the past are still evident, thereby providing villagers with a connection to the past. A Valued View is also identified here (see Policy G4)”.</p> <p>R2 Developments has instructed Liz Lake Associates to review the evidence that has informed the decision to identify the land as an Other Valued Green Space. The Technical Note prepared by Liz Lake Associates is submitted with these representations. In summary, it is concluded in the Technical Note that the land west of West Street is not open space, there is no public access to the site, there are limited views of the site, there is a limited relationship between the site and the adjacent footpath, there is no evidence that the site is rich in biodiversity, and there is modern development on three sides of the site. It is concluded in the Technical Note that the land west of West Street does not meet the criteria for Other Valued Open Space, and as such should not be designated. In addition, the land west of West Street is a managed grass field and horse grazed pasture and does not contain historic agricultural practices and is not managed using these methods. Paragraph 041 (Ref ID: 41) of the PPG clearly expects designations in neighbourhood plans to be supported by appropriate evidence. The evidence to justify the proposed Valued Open Space B, affecting land west of West Street, is not robust, as highlighted in the Technical Note prepared by Liz Lake Associates. Therefore, the proposed Valued Open Space B, as shown on Figure 11, is not consistent with national policy, and as such does not meet Basic Condition (a). It is requested that Valued Open Space is deleted from Figure 11. Notwithstanding the above comments and requested change, the land controlled by R2 Developments at land west of West Street could include open space in conjunction with residential development at the site.</p>	Yes	<p><u>Requested Change</u></p> <p>It is requested that Valued Open Space B is deleted from Figure 11 because the evidence to support this proposed designation is not robust.</p>
R2 Developments	Mr Brian Flynn - Associate Carter Jonas LLP	GGNP:55	Policy G9 - Public Rights of Way	Have observations	<p>Policy G9 - Public Rights of Way Network</p> <p>COMMENT</p> <p>Policy G9 seeks to protect and enhance the PROW network in the village. Policy LP3 of HLP2036 already includes criteria to protect and enhance the rights of way network - see criteria (f). Therefore, it is not necessary for Policy G9 to duplicate the policy requirements for the PROW network set out in an adopted development plan, as required by criteria (f) of Paragraph 16 of the NPPF. Notwithstanding the above comment, the land controlled by R2 Developments at land west of West Street is located adjacent to Park Riddy PROW. A development at this site could deliver direct connections from the village to the PROW. However, as set out in these representations, draft GGNP does not allocate any land for residential development that could provide connections to the rights of way network and meet the aspirations of Policy G8. It is suggested that Policy G8 could be deleted because it duplicates an adopted development plan policy in HLP2036.</p>		

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
R2 Developments	Mr Brian Flynn - Associate Carter Jonas LLP	GGNP:50	Policy G3 - Local Character and Design	Object	<p>G3 - Local Character and Design</p> <p>OBJECT</p> <p>Section 6 of draft GGNP sets out the design guide for Great Gransden and includes some overarching principles and specific guidelines. Supporting Document 1: Character Areas includes a description of different parts of the village and repeats the overarching principles and specific guidelines. It is noted that Policy G3 references Design Guide (in Section 6) and Supporting Document 1 (Character Areas), and then in Criteria (a) identifies some design principles. It is considered that none of the design principles identified are specific to Great Gransden. In addition, Policies LP11 and LP12 of HLP2036 provide detailed design policies. The adopted Landscape & Townscape SPD (2022) and the adopted Huntingdonshire Design Guide SPD (2017) provide further district wide design guidance. Chapter 12 of the NPPF, Section Id. 26 of the PPG and the National Design Guide also provide detailed national design policy and guidance. Therefore, a large amount of design policy and guidance already exists that could inform development in Great Gransden. It is not necessary for Policy G3 to seek to identify some design criteria but not others. It is considered that Policy G2 could be amended to simply refer to the design guide in Section 6 of draft GGNP and to Supporting Document 1: Character Areas and require development to demonstrate how that guidance has been taken into account.</p>	Yes	<p><u>Requested Change</u></p> <p>It is requested that all text in Policy G3 is deleted except the following: 'To be supported, development proposals must also be sympathetic to the existing rural character of Great Gransden, detailed in the Great Gransden Character Assessment (available as supporting Document 1 alongside this Neighbourhood Plan), and demonstrate how they accord with the Design Guide principles set out below and follow guidance in the Design Guide (Section 6 (Design Guide for Great Gransden) of this Plan).'</p>

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
R2 Developments	Mr Brian Flynn - Associate Carter Jonas LLP	GGNP:52	Policy G6 - Protecting and enhancing biodiversity in the parish at Gransden Woods	Object	<p>Policy G6 - Protecting and enhancing biodiversity in the parish including at Gransden Woods</p> <p>OBJECT</p> <p>Policy G6 of draft GGNP seeks to protect and enhance biodiversity. Policy G6 refers to the proposed Gransden Brook Corridor identified on Figure 5. The principle of protecting and enhancing biodiversity and delivering biodiversity net gain is supported, and would be consistent with adopted Policies LP3, LP30 and LP31 of the HLP2036 and with national policy contained in Chapter 15 of the NPPF. The land controlled by R2 Developments at land west of West Street includes trees and hedgerows, and development at the site could retain and enhance those existing ecological features and provide ecological enhancement and biodiversity net gain. The principle of protecting wildlife assets at Gransden Wood by providing alternative open space elsewhere in the village is supported. However, as highlighted in the representations to Policy G8, there is no mechanism for the delivery of open space and informal recreation areas in Great Gransden that could provide a suitable alternative recreation area to relieve the existing recreational pressure on Gransden Wood, and as such this policy aim is unlikely to be delivered. The draft GGNP makes no allocations for residential development that could provide land for open space or informal recreation. The land controlled by R2 Developments at land west of West Street could provide an informal recreation area. There is no evidence provided with draft GGNP to explain the extent of the land included within the proposed Gransden Brook Corridor or that identifies the nature conservation and ecological interest of the land to justify the proposed designation. It is noted that Gransden Wood SSSI is partly within the draft GGNP area which is managed by the local Wildlife Trust, and the nature conservation interest at this site will be known and subject to monitoring. The brooks in the area will clearly have ecological value, as will the trees, hedgerows and grassland within the area, but no information on the nature conservation interest or ecological value of these features is available. The ecological status of other land included within the Gransden Brook Corridor e.g. the agricultural fields is unknown. For example, R2 Developments control land west of West Street, which is described as rich in biodiversity in the supporting text to Policy G4 (see Paragraph 7.4 and Valued Landscape View D - Park Riddy). The draft GGNP is not supported by any ecological evidence, and there have not been any ecological surveys of the private land controlled by R2 Developments. Therefore, there is no evidence provided with draft GGNP to describe the land west of West Street as rich in biodiversity, or indeed that it should be included within the proposed Gransden Brook Corridor designation. As set out in the Technical Note prepared by Liz Lake Associates (for R2 Developments and submitted with representations to Policies G4 and G7) the land west of West Street is a managed grass field and horse grazed pasture, which indicates that the land has a lower level of biodiversity. Paragraph 041 (Ref ID: 41) of the PPG clearly expects designations in neighbourhood plans to be supported by appropriate evidence. There is no evidence to justify the description of the land west of West Street as rich in biodiversity, or to include this land within the proposed Great Gransden Brook Corridor designation, and as such they are not consistent with national policy and does not meet Basic Condition (a). As set out in the representations to Figure 5, it is requested that references to Figure 5 are deleted from Policy G6 unless evidence is provided to explain and justify the land included within the Gransden Brook Corridor. It is requested that the description of land west of West Street as being rich in biodiversity is deleted from Paragraph 7.4 (see Valued Landscape View D - Park Riddy). There is no evidence to support this description.</p>	Yes	<p><u>Requested Change</u></p> <p>It is requested that references to Figure 5 are deleted from Policy G6 unless evidence is provided to explain and justify the land included within the Gransden Brook Corridor. It is requested that the description of land west of West Street as being rich in biodiversity is deleted from Paragraph 7.4 (see Valued Landscape View D - Park Riddy).</p>

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
R2 Developments	Mr Brian Flynn - Associate Carter Jonas LLP	GGNP:54	Policy G8 - Development and Open Space Requirements	Have observations	<p>Policy G8 - Development and Open Space Requirements</p> <p>COMMENT</p> <p>Policy G8 seeks to improve the quantity and quality of the open space within the village. Policy G8 identifies some priorities for improvements to open space, including a new area of open space, improved access to the countryside for informal recreation, and new walking, cycling and horse-riding routes. Paragraphs 7.8.1 and 7.8.2 highlight some of the issues associated with the lack of open space and informal recreation areas in the village. The recreational pressure on Gransden Wood and the associated impacts on the nature conservation interest at this site is also highlighted in Paragraph 7.8.2. There is a clear need for additional open space and informal recreation areas in Great Gransden, and it is entirely appropriate that draft GGNP seeks to address these needs. However, it is considered that Policy G8 lacks any mechanism for the delivery of open space and informal recreation areas, and no indication of landowner support or the availability of funding. In these circumstances it is very unlikely that the aspirations for new open space and informal recreation areas in the village will actually be delivered. It is also unlikely that the existing recreational pressure on Gransden Wood will be resolved through the provision of a suitable alternative recreation area in the foreseeable future. It is suggested that additional land for open space and informal recreation could be delivered in conjunction with residential development. However, as set out in these representations, draft GGNP makes no allocations for residential development that could provide land for open space or informal recreation. The land controlled by R2 Developments at land west of West Street could provide an informal recreation area and provide connections with Park Riddy PROW through the site from the village. This promoted development could deliver on most of the aspirations contained in Policy G8.</p>	Yes	<p><u>Requested Change</u></p> <p>It is requested that Policy G8 includes an explanation as to how the new open space and informal recreation areas would be delivered. If there is no delivery mechanism, it is requested that draft GGNP allocates land for development that could deliver additional open space and informal recreation areas or provides policy support for such development to be delivered through a review of HLP2036.</p>
R2 Developments	Mr Brian Flynn - Associate Carter Jonas LLP	GGNP:56	Policy G12 - Great Gransden Infrastructure Priorities	Have observations	<p>Policy G12 - Great Gransden Infrastructure Priorities</p> <p>COMMENT</p> <p>Policy G12 identifies a long list of infrastructure projects, including improvements to existing facilities and the delivery of new facilities. It is anticipated in Policy G12 that these infrastructure projects would be funded from developer contributions. Unfortunately, there are no development allocations identified in draft GGNP that could deliver financial contributions to fund the listed infrastructure projects. The developer contributions from completed and permitted residential developments in the village will have either already been used or allocated to other infrastructure projects. It is considered that Policy G12 lacks any mechanism for the delivery of the identified infrastructure projects and the availability of funding is uncertain, and as such there is no evidence that they would be delivered during the plan period. As set out in these representations, additional development typically supports the delivery of new infrastructure projects, but there are no allocations made in draft GGNP. As explained in the representations to Figure 5 Policy G6 there is no evidence to explain or justify the proposed Gransden Brook Corridor and the land included within this designation, and therefore references to these matters should be deleted from Policy G12. As explained in the representations to Policies G8 and G9, there is no identified mechanism to support the delivery of improvements to open space and informal recreation areas or to the PROW network, and no evidence of landowner support to provide additional land for these uses, and therefore references to these matters should be deleted from Policy G12.</p>	Yes	<p><u>Requested Change</u></p> <p>It is requested that Policy G12 includes an explanation as to how the identified infrastructure projects would be delivered. If there is no mechanism for the delivery of the identified infrastructure projects, it is suggested that draft GGNP includes policy support for additional development in the village through a review of HLP2036 that would support the delivery of these projects.</p>

Name	Agent Name	Comment ID	I am commenting on	Comment type	Comment - My comment	Changes required?	Proposed changes
Sport England		GGNP:10	Overall comment on the Neighbourhood Plan	Have observations	<p>Thank you for consulting Sport England on the above neighbourhood plan. Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/ Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place. In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and</p>		

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					<p>wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals. Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved. NPPF Section 8:</p> <p>https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign (Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.) If you need any further advice, please do not hesitate to contact Sport England using the contact details below.</p> <p>Yours sincerely Planning Administration Team</p>		
Tessa Saunders (Anglian Water Services Ltd)		GGNP:3	4. The Key Issues	Support	Para. 4.34 - 4.37 - Anglian Water supports the neighbourhood plan approach to managing flood risk and minimising surface water run-off - including through SuDS. We agree that SuDS presents an opportunity to enhance biodiversity for individual developments and as separate schemes to manage surface water flows from existing developments. We welcome the approach the parish council has taken in signposting the relevant policy framework to manage flood risk effectively including the Huntingdonshire Local Plan and the Cambridgeshire Flood and Water SPD.	No	
Tessa Saunders (Anglian Water Services Ltd)		GGNP:5	Policy G3 - Local Character and Design	Have observations	We are pleased to note the design principles set out in paragraph 6.2, which are reflected in Policy G3. We particularly support the aim for the lowest carbon footprint and highest standard of sustainability in materials and energy. This could also encourage higher standards of water efficiency in new homes and businesses. Whilst we recognise that the HDC Local Plan includes a policy requirement for the higher water efficiency standard of 110 litres per person per day, the neighbourhood plan has the opportunity to go further to encourage greater levels of water efficiency in new homes. Measures to increase water efficiency with our customers, enables supplies to be maintained.	Yes	
Tessa Saunders (Anglian Water Services Ltd)		GGNP:2	Overall comment on the Neighbourhood Plan	Have observations	Anglian Water is the statutory water and sewerage undertaker for the neighbourhood plan area and is a statutory consultee under the Neighbourhood Planning (General) Regulations 2012. Anglian Water welcomes the preparation of the Great Gransden Neighbourhood Plan and supports the aspirations of the Parish Council to shape development and enhance the environment through decisions made by the district and county councils. It is noted that the neighbourhood plan has been prepared to be consistent with the adopted development plan - Huntingdonshire Local Plan.	No	

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Tessa Saunders (Anglian Water Services Ltd)		GGNP:4	6. Design Guide for Great Gransden	Have observations	Section 6 - Design Guide for Great Gransden and Policy G3 We are pleased to note the design principles set out in paragraph 6.2, which are reflected in Policy G3. We particularly support the aim for the lowest carbon footprint and highest standard of sustainability in materials and energy. This could also encourage higher standards of water efficiency in new homes and businesses. Whilst we recognise that the HDC Local Plan includes a policy requirement for the higher water efficiency standard of 110 litres per person per day, the neighbourhood plan has the opportunity to go further to encourage greater levels of water efficiency in new homes. Measures to increase water efficiency with our customers, enables supplies to be maintained.	Yes	
Tessa Saunders (Anglian Water Services Ltd)		GGNP:6	Policy G6 - Protecting and enhancing biodiversity in the parish at Gransden Woods	Support	Policy G6: We support the approach set out in Policy G6 to delivering biodiversity net gain, which can be delivered through green infrastructure incorporating sustainable drainage systems. Such measures enhance the local environment whilst providing opportunities to minimise surface water run off.	No	
The Coal Authority		GGNP:11			<p>Thank you for your notification below regarding the Great Gransden Neighbourhood Plan Submission Consultation.</p> <p>The Coal Authority is only a statutory consultee for coalfield Local Authorities. As you are aware, Huntingdonshire District Council outside the coalfield, therefore there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.</p> <p>This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p>		