

Alconbury Parish Council has the following responses to the Examiner's Questions in Annex 2 of letter reference 01/AM/ANP

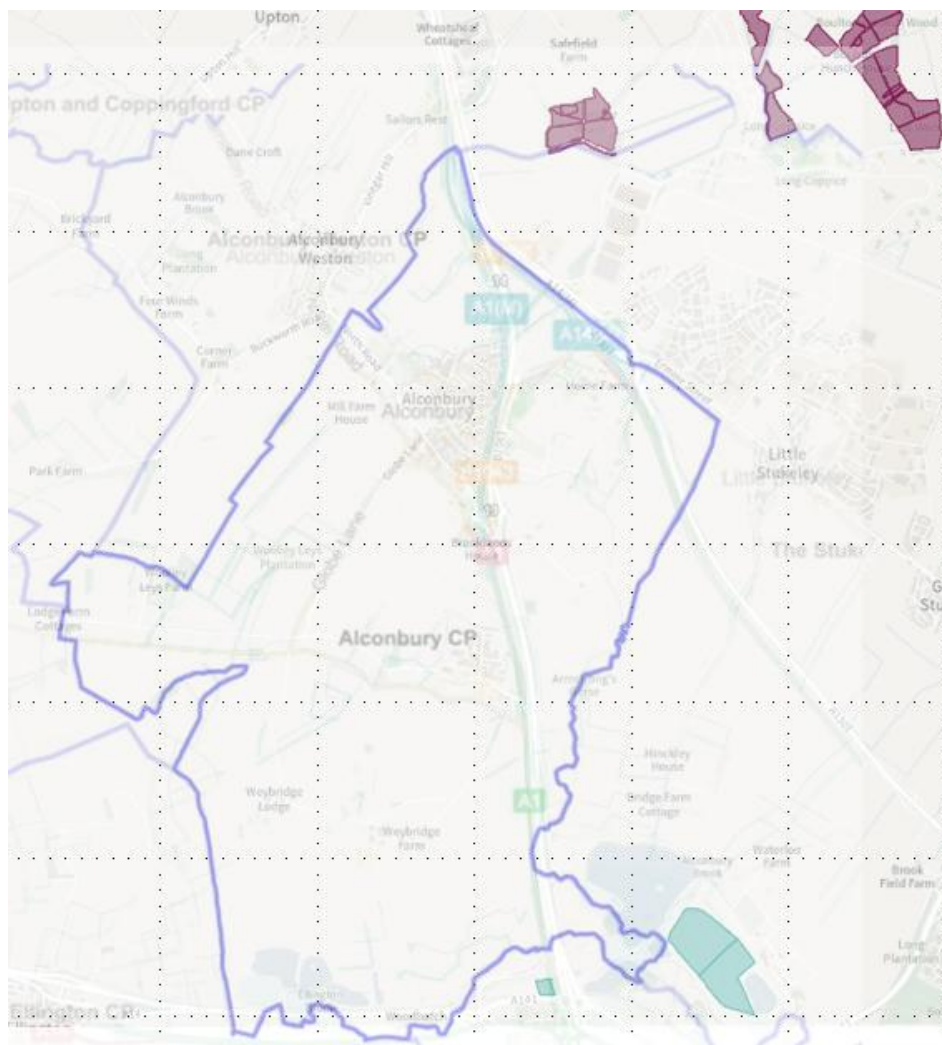
Questions for Huntingdonshire District Council (HDC)

1. Is all or any part of the Neighbourhood Area the subject of any local nature recovery strategy under Section 104 of the Environment Act 2021?

HDC Reply:

Yes. The neighbourhood area falls within the boundary of the Cambridgeshire and Peterborough Local Nature Recovery Strategy (LRNS), which is led by the Cambridgeshire and Peterborough Combined Authority as the designated Responsible Authority under Section 104 of the Environment Act 2021.

According to the published [Local Habitat Map](#), which supports the LRNS, no part of the neighbourhood area has been designated as an Area of Particular Importance for Biodiversity (APIB) or targeted for mapped nature recovery measures (see in Map 1). Map 2 shows the areas that could become of particular importance for biodiversity in the neighbourhood area.



Map 1 Area of particular importance for biodiversity (ACB) in the neighbourhood area

Map 2 Area that could become of particular importance for biodiversity

The Nature Recovery Network report identifies several priority areas, the only priority areas the report identifies that fall within the neighbourhood plan area is the Great Ouse Valley and the river corridors of Alconbury Brook and Ellington Brook.

For completeness and to provide context to Question 2 below, the relevant local nature recovery strategy for Huntingdonshire and therefore Alconbury Parish Council, is the Cambridgeshire and Peterborough Local Nature Recovery Strategy (LNRS), published on 23 December 2025.

Questions for Alconbury Parish Council (APC)

2. If relevant and appropriate, does the Parish Council consider the Plan is compatible with any local nature recovery strategy under Section 104 of the Environment Act 2021?

APC Reply:

Alconbury Neighbourhood Plan is compatible with Cambridgeshire and Peterborough Local Nature Recovery Strategy 2025.

There are no 'Areas of Particular Importance for Biodiversity' (APIB) in the Neighbourhood Plan area. However, there are 'Areas that Could become important for Biodiversity' (ACB). The categories where local actions have been identified in are:

- Woodland – numerous (Action - enhance woodland/management of woodland)
- Grassland – one site (Action - improve biodiversity)
- Rivers, streams and drains - numerous sites (Action RD1A - establish natural or semi-natural buffer zones 50 metres wide adjacent to all rivers and streams)
- Habitat mosaics – one site – not relevant.

Within the Natural Environment, Theme 6 of the Neighbourhood Plan, Objective 9, Policy AL11 and the supporting text, all align with actions identified in the LNRS for the ACB areas Woodland, Grassland, Rivers, streams and drains actions.

Appendix 3 which contains the Design Guidance, references improvements to biodiversity in the Sustainable Design and Rural Character sections, as does Appendix 4 in the Design Checklist.

The Cambridgeshire Green Infrastructure Strategy also refers to biodiversity in its six priority areas. The Neighbourhood Plan area is within the Huntingdonshire Fens and Woods priority area of the green infrastructure strategy.

3. Does the Parish Council consider that the Plan is compatible, where appropriate, with the development and use of land in the Neighbourhood Area contributing to the mitigation of, and adaptation to, climate change?

APC Reply:

There is no specific policy content referring to climate change as such. Climate change is covered in Appendix 3 under both Rural Character (in terms of resilience) and Sustainable Design (in terms of Eco design).

The Cambridgeshire Green Infrastructure Strategy, which covers the Neighbourhood Plan area, identifies the mitigation and adaption to climate change as one of the four strategy objectives.

Flooding, its impact and mitigation for flooding features frequently throughout the Neighbourhood Plan. Theme 3 is specifically about Flooding. Objective 6 states that new development will not exacerbate existing flood risk and opportunities must be taken to reduce levels of risk. Policies AL6 and AL10 both deal with flooding. Policy AL6 in terms of addressing flooding, and Policy AL1 in terms of infrastructure priorities.

4. **Policy AL 1.** I note the comment of HDC that the second bullet point should be rephrased to reflect the positive and proactive approach advised by NPPF. However, I may recommend taking this further in order to avoid the policy being used as a means of stopping any form of development on relevant nearby sites. This might be achieved by combining the second and third bullet points: I suggest the following possible modification on which **I would be grateful for comments from both Councils:** *“Development at Sensitive Settlement Edges and Important Village Gateways (See Map 6) will be supported where it would safeguard or, if possible, enhance the character of the landscape and the character of the adjoining part of Alconbury village.”*

APC Reply:

HDC’s comment about sensitive settlement edges refers to AL2, and we assume the above comment from the Examiner is a typo and should say Policy AL2. Our reply assumes this to be the case.

HDC’s proposed amendment would be more acceptable, but the aim of the above suggestion is understood. The addition of the word “distinctive” before landscape as per HDC’s comment is requested.

HDC Reply:

HDC agrees with Alconbury Parish Council that the comment HDC made regarding the sensitive settlement edge relates to Policy AL2 rather than Policy AL1. HDC accepts, in principle, the Examiner’s proposed rewording of the bullet points, combining them into a more positively framed criterion in line with the NPPF’s proactive approach, however the proposed wording put forward in our Regulation 16 response would be preferred.

5. **Policy AL 3.** Section 1 of the policy includes “Ridge and Furrow” twice. Map 7 only identifies one site of “Ridge and Furrow”. Please could this anomaly be explained and corrected?

APC Reply:

There was previously a second ridge and furrow site but that was removed from the NP, and the second mention of ridge and furrow should consequently be removed from Policy AL3.

6. **Policy AL 4.** The policy is headed “Alconbury’s Local Green Spaces” but the text of the policy includes Section 1 Local Green Spaces and Section 3 Other Green Spaces, the latter being where “... it is expected they be preserved as green spaces”. It is unclear to me what this section of the policy means. What is the policy difference between the two types of green space so far as development management is concerned? **I would be grateful for comments from both Councils.**

APC Reply:

The owner’s objection to the designation of OGS1 as Local Green Space (LGS) and OGS2 not meeting the criteria for LGS led to the policy being split to identify two different types of green space.

OGS1 Old Cow Field is part of the local character and provides the rural setting to the village. For this reason and due to the archaeological interest on the site, it is highlighted as an important green space. Its value should be considered in any planning application that could result in its partial or complete removal and the extent of the damage likely to the archaeological interest.

OGS2 Sparrow Drive/Blackbird Way Green is a local recreational open space providing a local amenity. This space should not be built on or removed without appropriate replacement in the same vicinity.

Perhaps the wording above could be included in the text which accompanies the policy to make the intention clear. The title of the policy could be amended to ‘Local Green Spaces and other Green Spaces’.

HDC Reply:

The distinction between "Local Green Spaces" (Section 1) and "Other Green Spaces" (Section 3) is an approach that several neighbourhood plans in the district have pursued and which has been adopted, including the green space policies in the [Buckden Neighbourhood Plan](#), Policy GENP 12 – Local Green Spaces in the [Grafham and Ellington Neighbourhood Plan](#), and Policy G7 – Local Green Spaces and Other Valued Green Spaces in the [Great Gransden Neighbourhood Plan](#).

This approach allows sites of local importance that do not meet the criteria for designation as Local Green Space (LGS) to be afforded a degree of policy protection, reflecting the ambition that they should be retained as open space in response to local views and consultation outcomes.

Local Green Spaces (Section 1) carry the full protection afforded by paragraph 106 of the NPPF, which is equivalent to that of the Green Belt. Other Green Spaces

(Section 3) are sites that do not meet the strict criteria for LGS designation but are nevertheless valued locally and reflect the outcomes of local consultation. These spaces are therefore expected to be preserved as green space.

7. **Policy AL 5.** In the Regulation 16 representations submitted by Savills on behalf of Endurance Estates Land Promotion Ltd, the reasonable comment is made that Policy AL 5 and, by implication, the Alconbury Design Guide, appears geared towards residential development. Therefore, I am considering modifying Section 1: first bullet point to: *“guided by the Alconbury Design Guide 2025, where appropriate”*. **I would be grateful for comments from both Councils.**

APC Reply:

The addition of the words “where appropriate” would be acceptable.

HDC Reply:

In principle, if the Design Guide relates only to residential development, HDC would agree with this amendment.

However, the Alconbury Design Guide introduction states that it applies to all new development proposals within the Neighbourhood Area. This is reinforced in Section A8, which addresses the re-purposing of agricultural buildings for non-residential uses.

On this basis, we would ask to retain the existing wording of Policy AL 5, Section 1, first bullet point, rather than qualifying it with "where appropriate", since the evidence base does not support treating the Design Guide as applicable only to residential development.

8. **Policy AL 6.** Please comment on the Regulation 16 representations of HDC.

APC Reply:

Criteria 1b. APC’s view is that there is little or no space remaining in the village centre, within the river corridor, for additional dwellings. The first words of this criteria could be amended to “Single dwellings, and alterations and extensions to existing buildings...” The flooding issues for the village are so extreme that there is justification for exceeding national requirements to minimise the impact of additional development so as not to worsen the high risk of flooding which currently exists.

Bullet 1 in section (clause) 3. There is a typo in this first bullet of clause 3, with an additional bullet dot before “in line with” splitting the first bullet in two, incorrectly. There are only two bullets in this clause of the policy. The whole bullet refers to the

SuDS guidance. Depending on the size of a proposed dwelling, it is possible that single dwellings could be subject to the guidance.

9. Policy AL 7. Please comment on the Regulation 16 representations of HDC.

APC Reply:

The Policy and the preceding text including the Community Action Point 3 and Chapter 7 expanding on the Community Action Points explain that the Parish Council will liaise and work with stakeholders to deliver aspirations. Policy AL7 says that the two aspirations are optional initiatives. Clause 5 of AL7 says that where a development proposal is directly, fairly and reasonably related to the development, off-site contributions will be secured.

Two specific initiative are mentioned in clause 4. The first, the pedestrian crossing of the Great North Road, has funding and should be completed in the current financial year. The second initiative is likely to be funded through the Local Highway Improvement (LHI) initiative by Cambridgeshire County Council. APC do not believe that a change to this policy is necessary.

10. Policy AL 8. Please comment on the Regulation 16 representations of HDC.

APC Reply:

The optional enhancement of rural routes is already preceded by the wording, “where opportunities arise”. In the same sentence “should” might be substituted with “could” or, the words “where appropriate” might be used? The specific method of funding will depend on the proposal, and which funding streams are most appropriate.

11. Policy AL 9. Please comment on the possible changes to the policy suggested by HDC.

APC Reply:

A map was draw up and was accidentally omitted from the Reg 16 Submission version of the Plan. Map attached for insertion in the Neighbourhood Plan alongside the Policy.

The required change to clause 3 and the additional clause change suggested by HDC is acceptable.

12. Policy AL 10. Please comment on the possible change to Section 2 of the policy suggested by HDC.

APC Reply:

The required amendment to the end of clause 2 is acceptable.

13. Policy AL 11. In the HDC Regulation 16 representations, a comment is made about Section 3 of the policy suggesting the Plan should specify which types of scales of development to which it would apply. My suggestion would be to substitute “*Where appropriate, proposals should take opportunities, etc, ...*” for “All proposals should take opportunities, etc, ...”. **I would be pleased to have comments of both Councils.**

APC Reply:

The Examiners suggested wording provides flexibility and is acceptable.

HDC Reply:

HDC does not object to Section 3 of the policy beginning being amended to, “*Where appropriate, proposals should take opportunities...*”. This wording supports proposals of any scale that are able to take advantage of such opportunities, without penalising or hindering those that are not, and is considered a proportionate approach.

14. Appendix 3. Please comment on the suggestions by HDC in the Regulation 16 representations about the two changes identified on page 121 of the Appendix.

APC Reply:

The Design Guidance was written by AECOM as part of the support in kind that was previously available through Locality. Whilst understanding that there are some things that could be better written, amending the Design Guidance would not be appropriate. We suggest the best way to deal with HDCs comments would be to write an Addendum to the guidance which could include the HDC suggested amendments and any typos and gaps, which might have occurred when the PDF document was converted into Word to fit the Neighbourhood Plan.

15. Appendix 4. Please comment on the suggestions by HDC in the Regulation 16 representations about the change identified on page 126 of the Appendix.

APC Reply:

The suggestion of a new bullet in Appendix 4 – Design Checklist could also be included in the above mentioned Addendum.

16. Alconbury Design Guide (ADG). The ADC is referred to in Policy AL 5 Section 1.

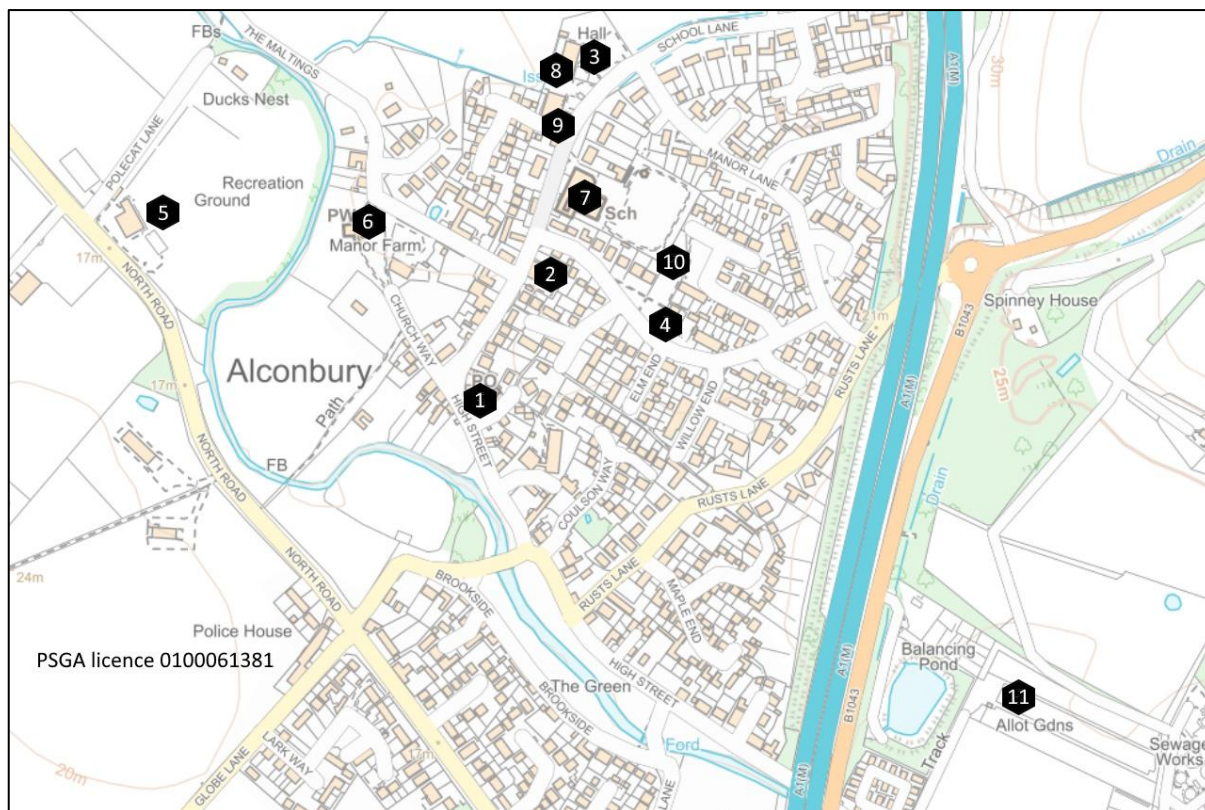
- (a) HDC make several observations about the ADG in the Regulation 16 representations, the first of which concerns the distinction between “should” and “could” on page 16. However, I am content with how the ADG treats the distinction. For example, if “should” is strengthened to “required” I consider that a false expectation is raised when, in development management, other material considerations will always be a factor which could outweigh the design policy. **I would be pleased to have comments from both Councils on my view.**
- (b) I would be pleased to have comments from APC on the other suggestions by HDC for page 46, Figure 27, Figure 28, page 50, Figure 35 and page 65 of the ADG.

APC Reply:

On the first point (a), Alconbury Parish Council do not believe that the words “required” or “must” are appropriate within the Design Guide. The Design Guide is a guide where general principles that are specific to Alconbury apply. To make a change like that suggested by HDC would change the nature of the guidance which has been subject to consultation and supported.

Regarding point (b), whilst appreciating the time HDC have spent suggesting improvements to the Design Guide, as per the comment above, the Parish Council would have concerns about introducing new restrictions on development that have not been consulted on. We would be pleased to include the helpful suggestions at a point in the future when the Alconbury Neighbourhood Plan might be reviewed.

Policy AL 9 - Local Services and Community Facilities Map and Key



- 1 Shop, Post Office and Chemist
- 2 The Manor House Hotel and Pub
- 3 Alconbury Memorial Hall
- 4 Salon 17 Hair Salon
- 5 Alconbury Sports and Social Club, play area and outdoor adult gym
- 6 Church of St Peter and St Paul
- 7 Alconbury CofE Primary School
- 8 Alconbury Pre-school
- 9 GP Surgery
- 10 Bramble End Play Area and outdoor adult gym
- 11 Alconbury Allotments

HDC Reply:

HDC agrees with the Examiner's reasoning. We recognise that strengthening "should" to "required" risks creating a false expectation, given that other material considerations, including the specific circumstances of individual sites, will always be relevant factors in decision-making.

We therefore suggest that "should" is retained, on the understanding that the Design Guide is to be read alongside, and does not override, the wider material considerations that apply to any given proposal.

