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and examinations

# **Report on Grafham and Ellington Neighbourhood Plan 2020 - 2036**

**An Examination undertaken for Huntingdonshire District Council with the support of Grafham and Ellington Parish Councils on the 25 June 2021 submission version of the Plan.**

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Date of Report: 4 October 2021

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## **Main Findings - Executive Summary**

From my examination of the Grafham and Ellington Neighbourhood Plan (the Plan) and its supporting documentation, including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – Grafham and Ellington Parish Councils;
- The Plan has been prepared for an area properly designated – the Grafham and Ellington Neighbourhood Area – Figure 1 on Page 6 of the Plan;
- The Plan specifies the period to which it is to take effect – 2020–2036; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

## **1. Introduction and Background**

### *Grafham and Ellington Neighbourhood Plan 2020-2036*

- 1.1 Grafham and Ellington are civil parishes in the southwest of Huntingdonshire District in western Cambridgeshire. The two parish councils have joined forces to produce the Grafham and Ellington Neighbourhood Plan 2020-2036.
- 1.2 The designated area extends from Grafham Water in the south up to and beyond the A14 in the north. Just south of the A14 is the village of Ellington. This is linked to the village of Grafham by a C-class road (Grafham Road/Breach Road) which runs north-south through the centre of the area. To the east-northeast is Huntingdon at a distance of about 8km from the middle of the designated area.
- 1.3 Designation in September 2019 was followed by a workshop and a start on drafting the scope of the Plan. Regular team meetings followed. Public consultations and active involvement were achieved through greater use of the parish magazines, leaflet drops, social media, emails, online access and reviews of draft copies of the Plan.

### *The Independent Examiner*

- 1.4 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Grafham and Ellington Neighbourhood Plan by Huntingdonshire District Council with the agreement of Grafham and Ellington Parish Councils.
- 1.5 I am a chartered town planner and former government Planning Inspector with over forty years' experience. I have worked in both the public and the private sectors. I am an independent examiner and do not have an interest in any of the land that may be affected by the draft Plan.

### *The Scope of the Examination*

- 1.6 As the independent examiner, I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
  - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
  - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.7 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ("the 1990 Act"). The examiner must consider:
- Whether the plan meets the Basic Conditions.
  - Whether the plan complies with provisions under Section 38A and Section 38B of the Planning and Compulsory Purchase Act 2004 (as amended) ("the 2004 Act"). These are:
    - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
    - it sets out policies in relation to the development and use of land;
    - it specifies the period during which it has effect;
    - it does not include provisions and policies for 'excluded development'; and
    - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
  - Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.

- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) (“the 2012 Regulations”).

1.8 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

### *The Basic Conditions*

1.9 The “Basic Conditions” are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with and not breach European Union (EU) obligations (under retained EU law)<sup>1</sup>; and
- meet prescribed conditions and comply with prescribed matters.

1.10 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.<sup>2</sup>

## **2. Approach to the Examination**

### *Planning Policy Context*

2.1 The Development Plan for this part of Huntingdonshire District, not including documents relating to excluded minerals and waste development, is the Huntingdonshire Local Plan to 2036 as adopted in May 2019.

2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised

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<sup>1</sup> The existing body of environmental regulation is retained under EU law.

<sup>2</sup> This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

NPPF was published in July 2021 and all references in this report are to the July 2021 NPPF and its accompanying PPG.

### *Submitted Documents*

- 2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- the draft Grafham and Ellington Neighbourhood Plan 2020-2036, (25 June 2021);
  - a map which identifies the area to which the proposed Neighbourhood Development Plan relates (Page 6 of the draft Neighbourhood Plan);
  - the Statement of Consultation, (1 July 2021);
  - the Basic Conditions Statement, (24 June 2021);
  - the Strategic Environmental Assessment and Habitat (sic) Regulations Assessment Screening Report, (June 2021);
  - all the representations that have been made in accordance with the Regulation 16 consultation;<sup>3</sup> and
  - the request for additional clarification sought in my letter of 9 September 2021 and the responses of 22 September from Grafham and Ellington Parish Councils and Huntingdonshire District Council and the email on behalf of the Parish Councils to the examiner dated 21 September 2021.<sup>4</sup>

### *Site Visit*

- 2.4 I made an unaccompanied site visit to the Neighbourhood Plan Area on 22 September 2021 to familiarise myself with it and to visit relevant sites and areas referenced in the Plan and evidential documents.

### *Written Representations with or without Public Hearing*

- 2.5 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum.

### *Modifications*

- 2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

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<sup>3</sup> View at: <https://consult.huntingdonshire.gov.uk/kse/event/36355>

<sup>4</sup> View at: <https://www.huntingdonshire.gov.uk/planning/neighbourhood-planning/>  
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### **3. Procedural Compliance and Human Rights**

#### *Qualifying Body and Neighbourhood Plan Area*

- 3.1 The Grafham and Ellington Neighbourhood Plan has been prepared and submitted for examination by Grafham and Ellington Parish Councils. The Parish Councils are a qualifying body for an area that was designated by Huntingdonshire District Council on 3 September 2019.
- 3.2 The Grafham and Ellington Neighbourhood Plan is the only neighbourhood plan for the Plan area. It does not relate to land outside the designated Neighbourhood Plan Area.

#### *Plan Period*

- 3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2020 to 2036.

#### *Neighbourhood Plan Preparation and Consultation*

- 3.4 Details of plan preparation and consultation are set out in the Parish Councils' Statement of Consultation, dated 1 July 2021. Designation was achieved on 3 September 2019 following a period of statutory consultation.
- 3.5 Consultation took place in several distinct phases. Following the decision to proceed, initial awareness was generated in the latter part of 2019. Publicity, on-going consultation and further feedback followed from that point onwards. Surveys of residents and of businesses were carried out between March and October 2020 and were followed by development of the Plan and review by residents.
- 3.6 Statutory consultation under Regulation 14 was carried out between 15 March 2021 and 30 April 2021. Appendix F of the Statement of Consultation records actions taken on comprehensive comments from the District Council and from 10 other organisations.
- 3.7 The Regulation 16 consultation ran from 12 July 2021 to 27 August 2021 and some 32 different representations were received. Again, comprehensive comments were received from the District Council. In addition, responses were received from eight other bodies and two individuals.
- 3.8 I am satisfied that, at both the Regulation 14 and the Regulation 16 stages, the consultation process met the legal requirements and there has been procedural compliance. Regard has also been paid to the advice on plan preparation in the PPG.

### *Development and Use of Land*

3.9 The Plan sets out policies in relation to the development and use of land in accordance with Section 38A of the 2004 Act.

### *Excluded Development*

3.10 The Plan does not include provisions and policies for "excluded development".

### *Human Rights*

3.11 Grafham and Ellington Parish Councils are satisfied<sup>5</sup> that the Plan does not breach Human Rights (within the meaning of the Human Rights Act 1998). From my independent assessment, I see no reason to disagree.

## **4. Compliance with the Basic Conditions**

### *EU Obligations*

4.1 The Neighbourhood Plan was screened for Strategic Environmental Assessment (SEA) by Huntingdonshire District Council which found that it was unnecessary to undertake SEA.

4.2 The Neighbourhood Plan was further screened for Habitats Regulations Assessment (HRA), which also was not triggered. It was concluded that the Plan will not have an adverse effect on the integrity of any internationally designated sites either on its own or in combination with any other plans. Therefore, an assessment is not required. Natural England agreed with this conclusion (email dated 29 March 2021, Appendix 1 of the Screening Report). From my independent assessment, I have no reason to disagree.

### *Main Issues*

4.3 Having regard for the Grafham and Ellington Neighbourhood Plan, the consultation responses and other evidence, and the site visit, I consider that there are ten main issues relating to the Basic Conditions for this examination. These relate to:

- Policy Expression;
- Built-up Areas;
- Heritage Assets;
- Small-Scale Residential Development;
- Local Economy;
- Traffic and Transport;
- Natural Environment;
- Community Facilities;

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<sup>5</sup> Response to Examiner's questions, September 2021.



- Green Spaces; and
- Flood Risk and Drainage.

- 4.4 Before I deal with the main issues, I have a few observations to make with regard to the representations. First, the Grafham and Ellington Neighbourhood Plan should be seen in the context of the wider planning system. This includes the Huntingdonshire Local Plan to 2036 as well as the NPPF and PPG. It is not necessary, and it would be inappropriate, to repeat in the Neighbourhood Plan matters that are quite adequately dealt with elsewhere.<sup>6</sup>
- 4.5 Secondly, the Neighbourhood Plan does not have to deal with each and every topic raised through the consultation. In this regard, the content of the Neighbourhood Plan and the scope of the policies is largely at the discretion of the qualifying body, albeit informed by the consultation process and the requirements set by the Basic Conditions.
- 4.6 Thirdly, my central task is to judge whether the Neighbourhood Plan satisfies the Basic Conditions. Many of the Regulation 16 representations do not demonstrate or indicate a failure to meet those conditions or other legal requirements. Similarly, many of the suggested additions and improvements are not necessary when judged against the Basic Conditions.
- 4.7 The following section of my report sets out modification that are necessary in order to meet the Basic Conditions. Some of the proposed modifications would achieve closer regard to national policies and advice. In particular, plans should contain policies that are clearly written and unambiguous.<sup>7</sup> In addition, the policies should be supported by appropriate evidence.<sup>8</sup>

#### *Issue 1: Policy Expression*

- 4.8 Many of the Plan policies use the conditional tense through the word “should”. There is an implication that something *ought* to happen but there may be circumstances where a different course of action could be appropriate.
- 4.9 I appreciate that accordance with the development plan may be affected by other material circumstances.<sup>9</sup> Nevertheless, policies should be clear and unambiguous. They should be drafted with sufficient clarity that a decision maker can apply them consistently and with confidence when determining planning applications.<sup>10</sup> In the circumstances, to pay appropriate regard to national guidance, the policies should use the word “shall”. Proposed modification **PM1** refers.

<sup>6</sup> See NPPF Paragraph 16 f).

<sup>7</sup> NPPF Paragraphs 15 and 16.

<sup>8</sup> PPG Reference: 41-041-20140306.

<sup>9</sup> Section 38(6) of the 2004 Act and Section 70(2) of the 1990 Act.

<sup>10</sup> PPG Reference ID: 41-041-20140306.

### *Issue 2: Built-Up Areas*

- 4.10 For the purposes of directing growth, Policy GENP 1 defines settlement boundaries for both Grafham and Ellington. Land outside the built-up areas is considered to be “countryside” where a proposal will only be supported in certain circumstances. One of those circumstances is “where it meets a specific need identified by the local community”. However, there is no indication in the Plan as to *how* such needs are to be identified.
- 4.11 The Parish Councils have indicated<sup>11</sup> that evidence documentation such as the resident and business questionnaires as well as the Community Action Plan should be considered as a starting point to understanding what may be supported. However, the Community Action Plan is essentially concerned with non-land use matters. As to the questionnaire surveys, they do not distinguish between unsupported suggestions and worthy proposals that would command community support. For clarity, there would have to be material evidence of a community need as in proposed modification **PM2**.

### *Issue 3: Heritage Assets*

- 4.12 The opening sentence of Policy GENP 2 states that “The significance of heritage assets and their settings shall be preserved, enhanced and celebrated...”. In this regard, there is no evidence to suggest that both preservation and enhancement are necessary. Proposals that preserve significance would also be acceptable if enhancement were not possible. To preserve or enhance would accord with the statutory test contained in primary legislation.<sup>12</sup> In the absence of other evidence, proposed modification **PM3** is appropriate.
- 4.13 On a second point, and amongst other things, a development proposal affecting a heritage asset or its setting is required to be accompanied by archaeological investigations “where relevant”. However, an applicant will not know where relevance applies. In this regard, the Parish Councils have indicated<sup>13</sup> that the supporting document “Heritage Assets of Grafham and Ellington” as well as the County Council’s Environment Record are a starting point. For clarity, these documents should be referred to in the Plan as in proposed modification **PM4**.

### *Issue 4: Small-Scale Residential Development*

- 4.14 Policy GENP 3 (Affordable Housing) includes a limitation on the scale of entry-level exception sites whereby “entry level exception homes... should be limited to a maximum of 5% of the existing parish housing stock”. This phrase gives rise to a number of concerns.

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<sup>11</sup> Response to Examiner’s questions, September 2021.

<sup>12</sup> Planning (Listed Buildings and Conservation Areas) Act 1990, Section 69(1)(a).

<sup>13</sup> Response to Examiner’s questions, September 2021.

- 4.15 First, it is the scale of the site (not the homes) that needs to be limited. Reference to “entry-level exception sites” would accord with the usage and definition in the NPPF (Paragraph 72 and Annex 2: Glossary).
- 4.16 Secondly, the reference to “a maximum of 5% of the existing parish housing stock” is lacking in clarity. Further evidence<sup>14</sup> indicates that the parishes are to be treated separately. Thus, having regard to Paragraph 6.3.1 of the Plan, the size of schemes in Grafham would be limited to 13 dwellings and those in Ellington to 12 dwellings.
- 4.17 To add clarity, and to have regard to the NPPF, two changes are appropriate. These are included in proposed modification **PM5**.
- 4.18 Under Policy GENP 4 (Minor Residential Development Proposals), certain proposals will be supported where “they will not have a detrimental effect” or where they “will not cause loss of amenity of neighbouring properties”. However, there is no evidence to suggest that, in all cases, a failure to comply should lead to lack of support. There may be cases where a minor effect may be acceptable. What matters is the *significance* of the impact. As such, the policy should be expressed in terms of avoiding *material* detrimental effects or losses of amenity.
- 4.19 The policy also requires that “All homes should be built to high sustainability standards to support the village’s (sic) zero carbon targets”. However, there is no evidence stating what are the zero carbon targets. As such, the provision should be deleted.
- 4.20 Necessary alterations to Policy GENP 4 are set out in proposed modification **PM6**.

#### *Issue 5: Local Economy*

- 4.21 In Policy GENP 5 (Supporting the Local Economy), there are three instances where proposals will be acceptable where they will not have a detrimental impact. However, as reasoned above in relation to Policy GENP 4, there may be instances where minor detrimental impacts (of no significance) could be acceptable. Reference should be made to avoiding *material* detrimental impacts.
- 4.22 The same policy indicates that “Minor scale development proposals” at the Brook Farm Local Employment Area will be supported in the stated circumstances. As such, additional floorspace would have to be less than 1,000 sq m or the site less than 1 ha.<sup>15</sup>
- 4.23 I saw on my site visit that, given the safeguards in the policy, there would be no need to put a limit of 1,000 sq m on the scale of development. Reference to “minor scale” should be deleted.

<sup>14</sup> Response to Examiner’s questions, September 2021.

<sup>15</sup> See response to Examiner’s questions, September 2021.

- 4.24 In the light of the evidence, and to provide clarity, the policy should be amended. Proposed modification **PM7** refers.
- 4.25 Policy GENP 6 (Tourism) also makes reference to ensuring that there are “no detrimental effects” in relation to access and street parking. Again, non-material effects may be acceptable and the wording should be changed as in proposed modification **PM8**.

#### *Issue 6: Traffic and Transport*

- 4.26 Under the heading of traffic and transport, Policy GENP 9 concerns multi-use paths. Enhancement proposals will be supported where stated criteria can be met. However, for the purposes of clarity, the policy should be modified to indicate that meeting any one of the criteria would lead to support under the policy. Not all criteria need to be met.
- 4.27 The policy concludes by saying “Enhancing “active travel” is beneficial to not just the environment but to health and wellbeing”. For succinctness (NPPF Paragraph 15) and clarity, this reference should be deleted. No requirements flow from this statement. In addition, the meaning of “active travel” is not clear from a reading of the Plan.
- 4.28 Necessary amendments to Policy GENP 9 are set out in proposed modification **PM9**.

#### *Issue 7: Natural Environment*

- 4.29 Policy GENP 10 requires developers to apply Natural England’s Impact Risk tool to identify potential risks to “statutorily designated sites”. However, this tool is designed for use with Sites of Special Scientific Interest. This usage should be clear from the policy wording.
- 4.30 The policy also calls for developments to deliver a wide range of environmental enhancements. Reference is made to the Nature Recovery Network, to Natural Cambridgeshire’s “doubling nature” target, to the aspirations of the NPPF and to DEFRA’s 25-Year Environment Plan. Whilst the intentions of the policy are laudable, there is a lack of clarity as to the particular enhancements the delivery of which is required. As an alternative, it would be appropriate for developments to have regard to the provisions of these documents. Attention would need to be paid to any material provisions.
- 4.31 Proposed modification **PM10** records necessary amendments to Policy GENP 10.

#### *Issue 8: Community Facilities*

- 4.32 Under Policy GENP 11 (Support and provision of community facilities), the provision of new or enhanced community facilities that “address the identified needs of residents”, will be supported in the circumstances

identified in the policy. However, it is not clear how such needs are to be identified.

- 4.33 The Parish Councils' approach<sup>16</sup> is similar to that advanced above in relation to Policy GENP 1. In turn, a similar response is called for as in proposed modification **PM11**.

#### *Issue 9: Green Spaces*

- 4.34 Under the draft Plan, provisions are made with regard to "Local Green Spaces" and "Other Green Spaces". However, there is some confusion over the distinction between the two. For example, Paragraph 6.10.6 of the Plan does not mention Other Green Spaces; and, in relation to Ellington, the headings in Appendix C do not distinguish between Open Green Spaces and the Village Green.
- 4.35 With regard to the policy provisions (Policy GENP 12 – Local Green Spaces), these need to be considered in the context of the NPPF. In this respect, Paragraph 103 of the Framework states "Policies for managing development within a Local Green Space should be consistent with those for Green Belts".
- 4.36 The policy includes exceptions that are similar to those set out in Paragraph 149 of the NPPF. However, there are some differences. In addition, not all the exceptions listed in national policy are included. There is no evidence to support the differences. In the circumstances, and to ensure accordance with national policy, Policy GENP 12 should cross-refer to the NPPF.
- 4.37 Having regard to the assessment of the sites in Appendix C of the Plan, I am satisfied that the sites proposed as LGS generally meet the criteria for designation as set out in the NPPF and should be capable of enduring beyond the Plan period. Necessary amendments to the policy and text are contained in proposed modification **PM12**.

#### *Issue 10: Flood Risk and Drainage*

- 4.38 Amongst other things, Policy GENP 13 (Flood Risk and Drainage) makes provision for the submission of site-specific flood risk assessments. The text states that these "may also be required on a site-by-site basis based on locally available knowledge". In this regard, reference is made to knowledge that may be available from the Lead Local Flood Authority, Anglian Water, Cambridgeshire County Council, Highways and the Environment Agency.
- 4.39 The provisions offer no clarity on the occasions when local knowledge may be relevant. Be that as it may, I appreciate that not all circumstances will be covered by local and national policy and advice. Applicants need to be

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<sup>16</sup> Response to Examiner's questions, September 2021.

aware of the possible need for assessments in other instances and of the sources of advice. They can, of course, glean such advice from the identified authorities at the pre-application stage. However, I would normally expect the need to be identified by the drainage authorities through the local planning authority. Such matters are addressed in the proposed modifications to the policy.

4.40 Evidence from Huntingdonshire District Council and Anglian Water<sup>17</sup> indicates the need for other modifications:

- to highlight the need for sustainable drainage systems;
- to provide further advice in respect of soakaways; and
- to state that proposals shall not increase flood risk of any form.

4.41 To add necessary clarity, and to address the evidence, amendments are set out in proposed modification **PM13**.

#### *Other Matters*

4.42 There are two policies that have not been the subject of scrutiny in the above report. These are GENP 7 (Zero-Carbon Initiatives) and GENP 8 (Electric Car Infrastructure). To a greater or lesser extent, these topics are covered in NPPF Section 14 (Meeting the challenge of climate change, flooding and coastal change). I find that there has been regard for national policy and that the Basic Conditions have been met.

#### *Conclusions on the Main Issues*

4.43 With the proposed modifications in place, the Basic Conditions would be met. Other non-material amendments, including suggestions and corrections set out in the representations and correspondence<sup>18</sup> and any updated factual references to the revised NPPF (2021) can be incorporated into the final version of the Plan.

## **5. Conclusions**

### *Summary*

5.1 The Grafham and Ellington Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan and the evidence documents submitted with it.

5.2 I have made recommendations to modify a number of policies, and text, to ensure the Plan meets the Basic Conditions and other legal

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<sup>17</sup> Regulation 16 representations.

<sup>18</sup> Email on behalf of the Parish Councils to the Examiner, dated 21 September 2021.

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requirements. I recommend that the Plan, once modified, proceeds to referendum.

*The Referendum and its Area*

5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Grafham and Ellington Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

*Overview*

5.4 It is evident that a considerable amount of time and effort has been devoted to the development and production of the Plan and I congratulate those who have been involved. The Plan should prove to be a useful tool for future planning and change in the parishes of Grafham and Ellington over the coming years.

*Andrew S Freeman*

Examiner

## Appendix: Modifications

<b>Proposed modification number (PM)</b>	<b>Page no./ other reference</b>	<b>Modification</b>
PM1	Various	In all policies, substitute usages of the word "should" with "shall".
PM2	Page 24	In the third paragraph of Policy GENP 1, replace "it meets a specific need identified by the local community or" with "there is material evidence of a local community need, a need that would be met by the proposal, or where the proposal complies"....
PM3	Page 28	In Policy GENP 2, replace "preserved, enhanced and celebrated" with "celebrated and preserved or enhanced".
PM4	Pages 27 and 28	In the text preceding Policy GENP 2, state that reference to Cambridgeshire County Council's Historic Environment Record and "Historic Assets of Grafham and Ellington" (Ref 22) will be of assistance in identifying archaeological sites of likely significance.
PM5	Page 32	In the second sentence of Policy GENP 3, delete the wording including and after "entry level" and replace with "housing on an entry-level housing site shall be limited to a maximum of 5% of the housing stock in the parish within which it is located".
PM6	Page 32	In the first paragraph of Policy GENP 4, insert "material" before "detrimental effect". Delete the second sentence of the paragraph.  In the second paragraph, insert "material" before "loss of amenity". Insert "through" before "loss of privacy".
PM7	Page 36	In the first sentence of Policy GENP 5, insert "material" before "detrimental impact".  In the second paragraph, replace "Minor scale development proposals" with



		<p>"Development proposals". Insert "material" before "detrimental impacts".</p> <p>In the third paragraph, insert "material" before "detrimental impact".</p>
PM8	Page 37	In Policy GENP 6, insert "material" before "detrimental impact".
PM9	Page 44	<p>In Policy GENP 9, at the end of the first three bullet points, delete the full stop and insert "; or".</p> <p>Delete the final sentence of the policy.</p>
PM10	Page 48	<p>In the third paragraph of Policy GENP 10, replace "statutorily designated sites such as Grafham Water SSSI" with "SSSIs such as Grafham Water".</p> <p>Replace the final paragraph of the policy with the following: "Developments shall seek to deliver environmental enhancements having appropriate regard to the Nature Recovery Network, Natural Cambridgeshire's "doubling nature" target, relevant aspirations in the NPPF and DEFRA's 25-Year Environment Plan."</p> <p>Provide links in Appendix B.</p>
PM11	Page 55	Replace the second sentence of Policy GENP 11 with the following: "Where there is material evidence of the needs of residents, needs that would be met by the proposal, the provision of new or enhanced community facilities of an appropriate scale, within or on land immediately adjoining the built-up area, will be supported."
PM12	Pages 56, 59 and 86	<p>At the end of Paragraph 6.10.6, add "or Other Green Spaces".</p> <p>Replace the second sentence of the opening paragraph of Policy GENP 12, and criteria a), b) and c), with the following: "Proposals shall be consistent with Green Belt policy as set out in the NPPF."</p>

		In Appendix C, replace the heading "Ellington's Green Spaces" with "Ellington – Other Green Spaces and Village Green".
PM13	Page 68	<p>In the second paragraph of Policy GENP 13, insert "using a sustainable drainage system" after "surface water drainage solution".</p> <p>At the end of the second paragraph, add the following: "Where this is the case, other infiltration methods such as swales, ponds and wetlands shall be explored or, where demonstrably unsuitable, such alternatives as may be acceptable to the local planning authority with the advice of the Lead Local Flood Authority."</p> <p>In the first sentence of the third paragraph, replace "the fluvial flood risk" with "flood risk from any form".</p> <p>Replace the second sentence of the third paragraph with the following: "A site-specific flood risk assessment in line with the requirements of local and national policy advice shall accompany a proposal on a site with an identified risk of flooding or where otherwise justified by the local planning authority." Delete the remainder of the paragraph.</p> <p>In the text preceding Policy GENP 13, insert the following: "A site-specific flood risk assessment will be required in accordance with Policy GENP 13. This includes on sites where the requirement is based on local knowledge and notified by the local planning authority on the advice of the LLFA, Anglian Water, CC Highways, the Environment Agency or, in Ellington, the Alconbury and Ellington Internal Drainage Board (bodies from which pre-application advice should also be available)."</p>