

INDEPENDENT EXAMINATION OF THE RAMSEY COMMUNITIES NEIGHBOURHOOD PLAN

Response of Ramsey Town Council

We set out below for ease the questions set out in the letter dated 7 July 2026 from Andrew Freeman the Examiner together with our response.

Questions for Huntingdonshire District Council

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?

The Cambridgeshire and Peterborough Local Nature Recovery Strategy was published by the Cambridgeshire and Peterborough Combined Authority on Tuesday 23 December 2025.

2. Please update me on the determination or otherwise of planning application reference 25/01382/OUT.

N/A

3. Has Natural England been consulted on the April 2026 HRA Screening Report and has a reply been received?

In addition to the Regulation 16 consultation undertaken by HDC, at the Regulation 14 stage, the Town Council published drafts of all documents alongside the Neighbourhood Plan itself. This included a draft HRA Screening Report and a draft SEA Screening Report. At the Regulation 14 stage, Natural England did send a response that stated: *“Natural England does not have any specific comments on this draft neighbourhood plan.”*

Questions for Ramsey Town Council

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

The new legal requirement is worded ‘as the qualifying body considers appropriate, and having regard to the subject matter of the plan’. Consequently, it places the emphasis of judgement on the Town Council to exercise as it considers appropriate. It also has to be considered in the context of the subjects which the Neighbourhood Plan has chosen to address.

In this context the Neighbourhood Plan seeks to address locally distinctive issues and does not look to unnecessarily duplicate matters that are already addressed by other parts of the Development Plan or by National Policy.

The Neighbourhood Plan refers to the Cambridgeshire and Peterborough Local Nature Recovery Strategy in paragraph 12.2 and in footnote 16 includes a web link to the document. It provides a brief summary of the Local Nature Recovery Strategy (LNRS) in paragraph 24.12 and again in footnote 42 includes a web link to the document. At the Regulation 14 consultation stage Cambridgeshire County Council Biodiversity Team did not identify any inconsistency with the LNRS. They suggested that the ‘Parish (sic) Council may wish to consider producing a LNRS for the Parish.’

The Steering Group on behalf of the Town Council considered that suggestion, as we set out on page 31 of the Consultation Statement: *“No action has been taken in response to the query as to*

whether the Town Council might want to consider producing a nature recovery plan for the Parish. This is considered to be outwith the scope of a Neighbourhood Plan and requires skills and resources beyond that available.”

The LNRS contains no specific initiatives or proposals specific to Ramsey Parish, the LNRS is broad brush in its overall approach. The habitat types in the LNRS that have potential for improvement are Woodlands, Wetlands, Grasslands, Habitat Mosaics, Rivers, Chalk Streams and Drainage Ditches, Urban Landscapes, Farmed Landscapes in addition to Priority Species.

The Neighbourhood Plan refers to all statutory and non-statutory designated nature conservation sites identified in and around the Neighbourhood Area. Appendix 1 also includes details of the Nature Impact Zones that apply to development and the statutory designated nature conservation sites. This has been included in response to concerns that development proposals are not considering their relationship to these sites.

The first bullet point under Objective B in the Neighbourhood Plan states: *“Protect, enhance and conserve the open spaces; landscape; views; and biodiversity across the town and villages.”*

The Great Fen project which is a wetland priority is referred to in the Neighbourhood Plan. The Neighbourhood Plan contains community aspirations on ‘Great Fen & Biodiversity’ on page 54 as well as sections on the natural environment and trees & woodlands in sections 24 and 25. Paragraph 26.5 also highlights the opportunities for increasing biodiversity at opportunity sites and in the protected settlement breaks. Specifically identifying that there is a potential for increasing biodiversity through the use of SuDS features such as attenuation basins, ponds and swales in these circumstances.

Rivers and drainage ditches are a particular feature of Ramsey Parish and the Neighbourhood Plan has identified two areas of Local Green Space, namely the Mooring at Ramsey Forty Foot and the Ramsey Town Moorings for factors including their wildlife richness. The other LGS, namely Green Opposite Thomas A Becket Church (Church Green), Newtown Green and Area East of Rural Museum are also identified as LGS for factors including wildlife richness.

Paragraph 24.1 identifies the role that green infrastructure plays in biodiversity. Paragraph 20.13 sets out how the protected settlement break forms an important green corridor which would assist in retaining the identity of the two existing settlements and also provides opportunities for new green infrastructure and/or biodiversity enhancement to support the delivery of the strategic allocations.

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

The new legal requirement is worded ‘as the qualifying body considers appropriate and having regard to the subject matter of the plan’. Consequently, it places the emphasis of judgement on the Town Council to exercise as it considers appropriate. It also has to be considered in the context of the subjects which the Neighbourhood Plan has chosen to address.

In this context the Neighbourhood Plan seeks to address locally distinctive issues and does not look to unnecessarily duplicate matters that are already addressed by other parts of the Development Plan or by National Policy.

Paragraph 162 of the NPPF states: *“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures⁶¹. Policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts, such as providing*

space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

Of these broad topics flood risk and biodiversity are relevant. The issue of biodiversity has been largely addressed in the response to Q4. In Ramsey a fundamental aspect of the impact of climate change relates to flood risk. The third bullet point under Objective A in the Neighbourhood Plan states: *“Ensure that the design and location of new development is resilient to the effects of climate change and flooding.”* Paragraph 26.3 addresses the matter of climate change mitigation/adaptation and flooding further.

Paragraphs 30.8 and 30.9 also refer to the benefits that promoting active travel can have on the mitigation of climate change. Through Policies 8, 9 and 10 the Neighbourhood Plan can support these ambitions and promote sustainable transport modes such as public transport, walking and cycling. It seeks to move away from the use of private car to help tackle climate change, pollution and congestion.

It is considered that other parts of the Development Plan and National Policy set out sufficient detail on the issue of mitigation of, and adaptation to, climate change.

Climate change is more strongly covered in the draft emerging NPPF. The basic conditions statements also consider conformity with this emerging national policy. It identifies consistency between Policies 3 and 5 of the Neighbourhood Plan and DP1 and DP3 of the emerging draft NPPF.

6. Policy 1: Please comment on the Regulation 16 representations of Huntingdonshire District Council.

HDC note that proposed or built rural exceptions sites are excluded from the built-up area boundary but consider this approaches conflicts with the built-up area guidance as commitments for residential development should also be included. The Town Council notes with disappointment that HDC did not raise this in their comments on the Plan at the Regulation 14 consultation stage. Had they done so then we could have explained in the Consultation Statement as to what our response would have been.

The point is entirely academic as none of the settlements in the Neighbourhood Area have any ‘proposed or built rural exceptions sites’ as explained on page 36 of the Settlement Boundary Methodology document. As explained on page 36 *“These sites where allowed are intended to be allowed as ‘exceptions’, therefore they should remain excluded from settlement boundaries to reflect this status.”*

The methodology used, as explained in the Settlement Boundary Methodology document, which in paragraph 23 states: *“The above criteria match those in the Bury Neighbourhood Plan⁴ which was made in May 2021 following independent examination⁵ and referendum. The criteria have therefore been judged to be in general conformity with the Huntingdonshire Local Plan to 2036. As the settlement boundary for the town of Ramsey will in places be contiguous with the settlement boundary for Bury it is important to follow consistent criteria.”*

In addition, the methodology used matches exactly that used in The Stukeleys Neighbourhood Plan which was also made following independent examination and referendum. As such the criteria including the exclusion of ‘proposed or built rural exceptions sites’ has been found twice to be appropriate by Independent Examiners.

The suggestion that a proposed rural exceptions site should be included in a settlement boundary would have the unintended consequence of then not being able to resist standard market housing as developing the site would no longer be an exception. The delivery of rural exception sites is difficult enough without seeking to undermine the concept through unintended consequences.

It is not disputed that once a rural exception scheme is built it will be part of the community; however, it was permitted as an exception to normal planning policies, and the methodology purely reflects that position and such an approach helps public understanding and monitoring. The opportunity would exist in any future Neighbourhood Plan Review to assess whether completed rural exceptions sites have become so embedded in the settlement-built form that they should then be included in a reviewed settlement boundary.

In relation to the suggestion that the proposed Local Green Space Area East of Rural Museum and Ramsey Forty Foot Moorings are outside of the built-up area. HDC did raise this issue at the Regulation 14 stage. It is noted that HDC continue to use the word 'may' rather than 'should', so it remains a suggestion.

As we explain on page 31 of the Consultation Statement: *"No change has been made in relation to the suggestion that the Local Green Spaces for the Area East of Rural Museum and Ramsey Forty Foot Moorings might be better included within the relevant settlement boundaries. Whilst these areas meet the criteria for Local Green Space, they are not considered to meet the criteria for inclusion within the settlement boundary used."*

HDC are trying to align two policy concepts that have no direct correlation. Local Green Spaces do not need to be within a settlement boundary. The NPPF in paragraph 107 a) requires LGS to be in reasonably close proximity to the community it serves. Therefore, an LGS can be outside of a settlement as long as it is reasonably close, which both of these sites are. LGS designation also doesn't support built development in principle.

The Local Plan excludes from their definition of built-up area:

Open spaces and sports and recreational facilities, allotments, caravan sites, churchyards and cemeteries which extend into the countryside and are not well contained by strong boundary features, or primarily relate to the countryside in their use, form or character.

Agricultural land, woodland, meadow, areas of water and natural habitats that penetrate the built form or sections of large residential curtilages where the character of the land primarily relates to the countryside.

Under the Local Plan criteria, the Town Council considers that both areas would be excluded from the built-up area. In the Neighbourhood Plan, applying the criteria in the Settlement Boundary Methodology document, both of the LGS are considered as meeting the exclusion criteria as 'Recreational or amenity space at the edge of the settlement that relates more closely to the open countryside.' Accordingly, both LGS areas have been correctly excluded from the defined settlement boundary.

7. Policy 1: What is meant by the "structure of the surrounding area"?

The Huntingdonshire Townscape SPD for Ramsey identifies wording that says 'Reflect the existing built forms and local relationship with the street in any new development'. Policy 1 of the NP refers to taking into account the existing built form, layout and structure of the surrounding area.

This is intended to cover the wide array of factors that contribute to the distinctiveness of how a place looks, works and functions. In terms of structure we mean factors such as the configuration, the arrangement of the built elements in a particular form, figure, or combination.

The National Design Guide suggests that structure can be a separate consideration to built form or layout. For example, M2 of National Design Guide looks for a clear structure and hierarchy of streets. It goes on to identify in relation to Layout that:

*“A layout shows how routes and blocks of development are arranged and relate to one another to create streets, open spaces and buildings. It defines:
the structure or settlement pattern;
the grain, or the pattern of development blocks and plots; and
the broad distribution of different uses, and their densities or building heights.”*

The National Design Guide also refers to the structure of blocks and routes that this creates; as well as open space, its location and structure need careful consideration.

It is noted that HDC have no concerns relating to the wording. The neighbouring made Bury Village Neighbourhood Plan also referred to structure in the wording: *“Within the settlement boundary proposals will be supported on sites not allocated for development where development would not adversely affect the structure and form of the existing settlement and the undeveloped nature of the surrounding rural areas; and would respect its landscape setting.”*

8. Policy 1: “views and vistas”: Are these the views and vistas referenced under Policy 6?

Yes, in part; although Policy 1 is not intended to prevent consideration of views and vistas that may become apparent during the design process for new development. The National Design Guide in C1 identifies ‘views inwards and outwards’ a part of understanding the context of the site. In I1 the National Design Guide goes on to identify ‘views, vistas and landmarks’ an aspect of responding to existing local character and identity. New development can create new views and sightlines.

9. Policy 1: Will not the last sentence of the policy apply to *all* land outside settlement boundaries whether or not the development is *well related* to the boundary?

Yes

10. Policy 2: Please comment on the Regulation 16 representations of Huntingdonshire District Council.

The Town Council considers that HDC have continuously failed to understand the importance of retaining the distinct and separate identities of Ramsey as a town and Bury as a village. These are separate communities and function under a separate Town Council and Parish Council respectively. They are abutting but separate designated Neighbourhood Areas.

HDC only appear to be referring to the southern side of 25/01382/OUT which suggests that they seem to be misunderstanding that Longland Crescent to the east is in Bury village. The proposed Protected Settlement Break is intended to prevent the coalescence between the current southern edge of Ramsey (formed by Taverners Drive, Hopbine Court, Malthouse Lane, Kenny Drive and Stoneman Way) and Bury (formed by Longland Crescent and the planned extension to Upwood Airfield that will spatially and visually appear to be part of Bury notwithstanding the actual parish boundary).

In that respect, at the very least even if HDCs first suggestion was followed then the protected settlement break would need to be an L shape covering the existing open space along the western side of Longland Crescent (approx. 12 to 13m in depth) and the proposed open space along the eastern side of 25/01382/OUT which is shown to be around 30m in depth on the illustrative layout; thereby giving an overall depth of 42 to 43m along this boundary.

The HDC first suggestion fails to acknowledge that application 25/01382/OUT remains undetermined, it is a speculative housing proposal for a site which has not been chosen to be allocated in the emerging Local Plan Update to 2046. The illustrative layout has not been prepared

on the basis of creating any buffer between it and the northern runway of Upwood Airfield. The 12m green space corridor along the southern edge of the site is notably the narrowest of all the green space illustrated. The illustrative layout suggests taking vehicular access through this area onto the Upwood Airfield site.

It is not considered that a 24m wide strip for a protected settlement break is sufficient to create a clear physical and visual separation between two separate settlements. In terms of scale context, the suggested 24m wide strip would be only around half the width of the northern runway on Upwood Airfield which is around 48m in width. By further comparison this would only be twice the depth of the existing open space along the western edge of Longland Crescent, or 1.5 times the depth of the open space along the western edge of Stoneman Way. It would be less than a quarter of the depth of the protected settlement break in the Bury Village Neighbourhood Plan secured to the east of the B1040 (Bury Road).

The HDC first suggestion would also remove developable land from the emerging allocation known as Bury 3. The suggested 12m wide protected settlement break strip would include part of the runway area of Bury 3 and as such it would have to be subject to digging up.

The second HDC suggestion of removing the protected settlement break as sufficient landscaping can be secured through 25/01382/OUT (if approved) and through the draft policy in the emerging Local Plan to 2046 for Bury 3 is naïve and misplaced. It would also be inconsistent with the made Bury Village Neighbourhood Plan where it was agreed that securing a protected settlement break was important.

The report of the Independent Examiner for the Bury Village Neighbourhood Plan addressed this issue, his conclusions are material:

- “4.47 One of the stated Objectives of the BVNP is to maintain the distinct village identity and to ensure ‘that further coalescence with Ramsey does not take place’ (page 15). Having visited the area and seen the fragility of the gap between the two settlements, I am satisfied that the objective of the Parish Council to retain the separate identity of the two communities (as far as is possible) is justified. To that end, policy NE2 seeks to protect the remaining settlement break between Bury and Ramsey.*
- 4.48 It was suggested that the wording of the policy is ambiguous, but it is clear to me that the presumption is against development unless the physical and visual separation between the two settlements is secured. In the circumstances, that is a reasonable approach to take. I am mindful that the HLP places Bury and Ramsey together as a Single Spatial Planning Area (SSPA), but there is no reason to conclude that within the SSPA the opportunity to retain the current distinctiveness of the two settlements should in any way be diluted. “*

History demonstrates that HDC have never sought to prevent coalescence. The emerging Local Plan Update to 2046 contains no strategic policy framework to prevent coalescence and if the Neighbourhood Plan does not secure this key aspect then the chance of the development management process securing the equivalent of a protected settlement break is highly unlikely.

At present the Neighbourhood Plan has been prepared on the basis of tacit support for the future development of Upwood Airfield including Bury 3. If the proposed settlement break could not be secured as the Neighbourhood Plan proposes, then quite reasonably, it would be highly likely that the Town Council would have sought to identify the protected settlement break instead across the triangle area of Bury 3 within the Ramsey boundary.

The Town Council has noted the support of the promoters of Upwood Airfield of the Neighbourhood Plan as submitted. The HDC suggestion would impact on their future interests, albeit the proposed Bury 3 allocation would be for a mixed-use development comprising of commercial development and open space comprising 170 homes and about 11.5 ha of land for green infrastructure. The HDC suggestion would be dictating about 5 ha of that 11.5 ha to being in the 12m strip over a length of about 410m.

The site 25/01382/OUT was known as 'Ramsey 2' in the SHLAA process for the emerging Local Plan Update to 2046. The conclusion of the SHLAA was:

"In combination the outcomes of the LAA and SA indicate that the site:

Is considered not to be potentially appropriate for development as development of the site would continue the urbanising impact of development on this part of the countryside and risk the further sense of coalescence between these settlements and therefor adversely impacting landscape and townscape character."

The SHLAA conclusion clearly reflected the impact of coalescence arising from developing this site. For these reasons the site was not put forward by HDC for allocation in the emerging Local Plan Update to 2046. It is disappointing that the developer chose to put forward an outline application for the site despite its unacceptability identified in the SHLAA for the impact on coalescence.

A protected settlement break needs to secure spatial and visual separation. The gap must be wide enough to prevent the coalescence of the town of Ramsey with the village of Bury. The HDC suggested depth of 24m is not considered to be sufficient to allow each settlement to maintain its own distinct spatial and visual identity.

The flat landscape context of the area has a bearing on the need for the depth of the gap. The flat terrain means that a wider gap if anything is needed to prevent urban sprawl and coalescence. The area does not contain existing physical features such as woodlands, rivers or similar that may assist in providing a natural boundary. In this case the proposed settlement break is a single flat agricultural field. In broad terms flatter terrain would generally necessitate a wider gap.

11. Policy 4: Second paragraph: To gain support, is it sufficient to just have a Statement of Community Involvement that details how the outcome of the pre-application engagement has been taken into account?

Yes

Given that Ramsey Town and Bury Village form a single Spatial Planning Area, together with the fact that certain planned sites, notably Bury 3 goes across the parish boundary; the Town Council wanted to pursue a common approach to community engagement with the already made Bury Village Neighbourhood Plan. As such the wording of this policy mirrors the wording of Policy G3 in the Bury Village Neighbourhood Plan; which coincidentally the Independent Examiner amended for clarity.

12. Policy 5: Please comment on the Regulation 16 representations of Huntingdonshire District Council.

The Neighbourhood Plan is clear Local Green Space E - Ramsey Forty Foot Moorings is not intended to prevent enhancements to mooring infrastructure or open space, but instead seeks to compliment it and enhance the reasons for the LGS designation. LGS is intended to be protected in a manner consistent with Green Belts, national policy for Green Belts is not wholly explicit on how infrastructure, except for transport infrastructure should be addressed. Therefore, for the avoidance of any doubt Policy 5 has explicitly set out support for proposals to improve mooring and public access. The Moorings meet the criteria for LGS and are demonstrably special to the local community.

With respect to HDC they cannot assume that the proposed allocated in the Local Plan Update will be found to be sound, the Local Plan Update has to go through its own examination process.

The Town Council would have no concern with the wording of Policy 5 also explicitly supporting flood mitigation infrastructure, the final paragraph could be amended to read:

“The sites listed above and shown on the respective map will be protected in a manner consistent with the protection of land within Green Belts. Proposals to improve mooring infrastructure, install flood mitigation infrastructure and to improve public access including suitable community infrastructure will be supported.”

The Middle Level Commissioners (the IDB) have no concerns with the proposed LGS.

- 13.** Policy 7: Cannot “required community infrastructure” and “green community infrastructure” only be sought where the tests for planning obligations, or similar, are met? Will not the Neighbourhood Community Infrastructure Levy (NCIL) be used to provide required local infrastructure?

Given that Ramsey Town and Bury Village form a single Spatial Planning Area, together with the fact that certain planned sites, notably Bury 3 goes across the parish boundary; the Town Council wanted to pursue a common approach towards community infrastructure with the already made Bury Village Neighbourhood Plan. As such the wording of this policy mirrors the wording of Policy ISF4 in the Bury Village Neighbourhood Plan; albeit our Neighbourhood Plan reflects the fact that across the Ramsey Communities there are a number of village halls/community centres.

The policy wording includes the words ‘where appropriate’ which reflects the need for infrastructure contributions to meet the tests for planning obligations.

The neighbourhood element of CIL must be spent by the Town Council in accordance with the relevant legislation. Local areas can spend Neighbourhood CIL (NCIL) on a much wider array of projects than standard CIL. It is not restricted to traditional infrastructure (like roads or major transport) and can include non-infrastructure items so long as they address the demands that development places on the area.

The Town Council does spend the NCIL monies it receives in accordance with the legal requirements including on local infrastructure. However, the NCIL monies is not sufficient to cover all the local infrastructure that development requires.

Ramsey as the town serves a wide hinterland and for example has significant demand for car parking which the Town Council and partners are seeking to address. Much of the increased demand for car parking in the town is a result of development in neighbouring settlements, the NCIL regime means that the NCIL monies are paid to the host Town/Parish Council. However, in reality demands on local infrastructure arise in Ramsey as the town; even though for example that development may be on Upwood airfield meaning that Bury Parish Council get the NCIL contribution.

- 14.** Policy 7: If improvements to the local surface water drainage system or the water or sewerage network are necessary to allow development to proceed, shouldn't this be expressed as a requirement?

The Town Council would have no objection to the final paragraph of the policy being amended as Anglian Water suggested to read: *“Development proposals will be supported where they can demonstrate that there is capacity in the local surface water drainage system, the water supply network, and sewerage network, or capacity can be made available in time to support the development. Early engagement with Anglian Water is recommended.”*

- 15.** Policy 8: Third paragraph – “a network of walking and cycling linkages”: Has an actual network towards which developments might contribute been identified/published?

Yes, an actual network towards which developments might contribute been identified and published.

The County Council previously produced area specific transport strategies for all of the market towns in Cambridgeshire. It was intended to replace the market town strategies with district strategies. The Ramsey Market Town Transport Strategy (2010) remained in place, notwithstanding its name it actually covers Ramsey, Bury, Upwood and the Raveleys, Wistow and Warboys. It included the plan in the Appendix 1 that did set out a network of routes. That plan is included in the made Bury Neighbourhood Plan.

At present, many elements of transport is in the process of moving responsibility from the County Council to the Cambridgeshire and Peterborough Combined Authority. This gives a state of flux where former documents have been removed from the County Council website and new documents are being produced. These include the Vision for Ramsey Document referred to paragraph 30.7. The Vision for Ramsey Document does include the plan in Appendix 2 that shows a network of routes, although the focus is less on routes within the town itself.

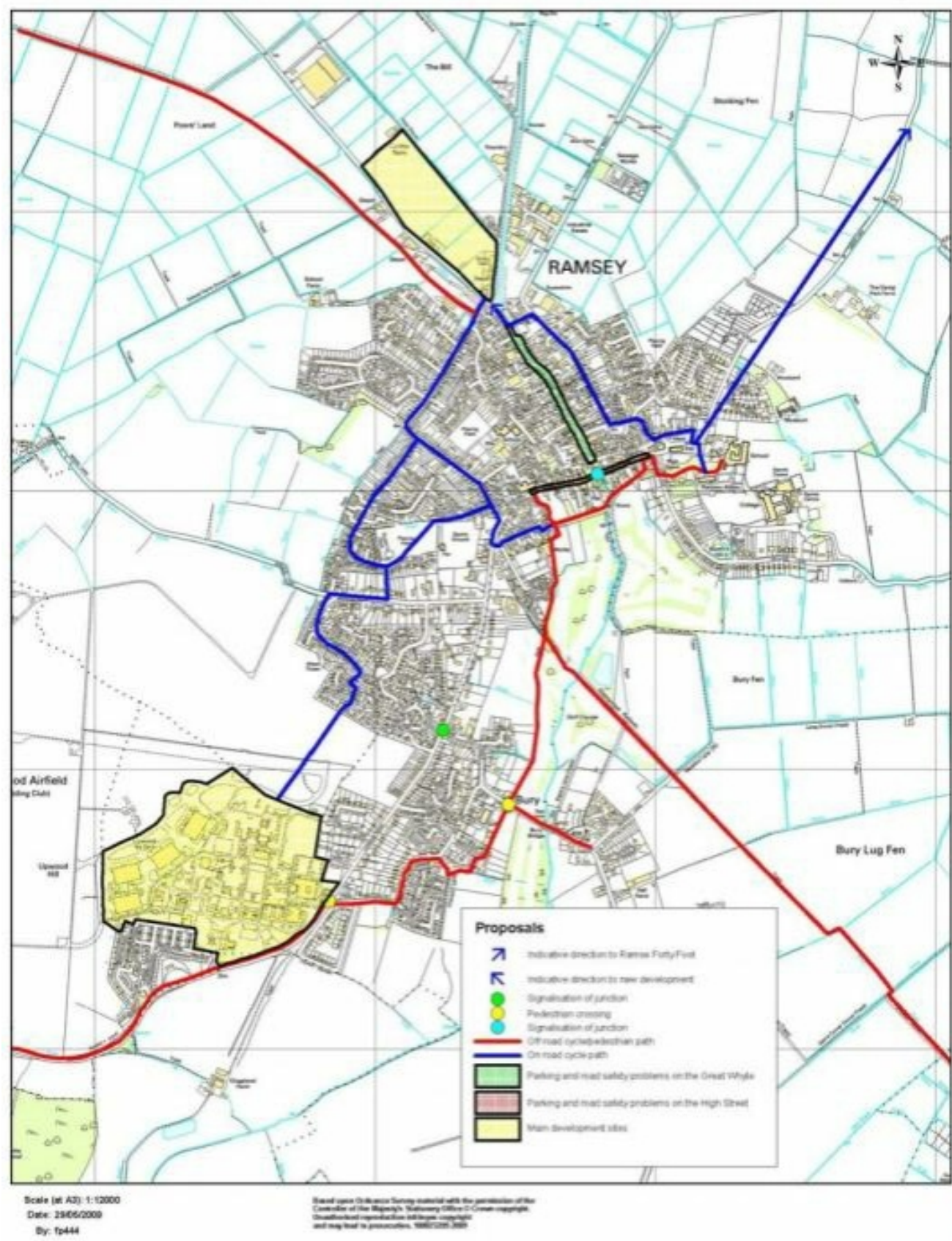
Given that the Vision for Ramsey document represents the latest thinking we could insert the plan in Appendix 2 into the Neighbourhood Plan after the table extract that sits between paragraphs 30.8 and 30.9.

16. Policy 8: Support for various improvements to public transport: Is it the intention to offer support where these improvements are included voluntarily as part of a planning application (rather than being “required” through a planning obligation)?

As already highlighted, Ramsey Town and Bury Village form a single Spatial Planning Area and public and community transport operate across both areas, as well as the Ramsey villages. As such the wording of this paragraph of the policy mirrors the wording of Policy ISF1 in the Bury Village Neighbourhood Plan.

The policy is intended to cater for both circumstances. Sometimes improvements to public transport provision such as waiting facilities, raised kerbs, signage and real time information systems can be justified based on usage or demand arising from a development scheme; thereby meaning that the tests for planning obligations can be met. At other times the level of likely usage or demand arising from a development scheme means that it cannot strictly be required having regard to the tests for planning obligations or conditions can be met. Nevertheless, such improvements can be volunteered and should be weighed in the planning balance.

Appendix 1 - Extract from Ramsey Market Town Transport Strategy



Appendix 2 - Extract from Vision for Ramsey Document

