

Comment

Consultee	Francesca Lasman The Stukeleys Neighbourhood Plan Submission Consultation
Event Name	
Comment by	Francesca Lasman
Comment ID	STNP:4
Response Date	05/10/22 07:47
Status	Processed
Submission Type	Web
Version	0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Overall comment on the Neighbourhood Plan

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Overall, the concept of the local plan is helpful, and the separation of the villages from Huntingdon is to be supported. However, the plan is too restrictive, focuses exclusively on development in Alconbury Weald alone, and is insufficiently imaginative to encourage the development of a thriving community in the villages. This needs both good connections and sustainable transport options to other local towns and villages, and some injection of "new blood" from limited but sufficient and sympathetic new development within the villages themselves. I will enter specific comments relating to the relevant sections of the plan as separate comments.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

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Future Notification

Comment

Consultee Sport England

Event Name The Stukeleys Neighbourhood Plan Submission Consultation

Comment by Sport England

Comment ID STNP:9

Response Date 30/09/22 10:35

Status Processed

Submission Type Letter

Version 0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Overall comment on the Neighbourhood Plan

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

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 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:

<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>

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.

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If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Ms Deb Roberts (The Coal Authority)
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	.
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Ms Deb Roberts (The Coal Authority)
Comment ID	STNP:10
Response Date	04/10/22 08:28
Status	Processed
Submission Type	Email
Version	0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Overall comment on the Neighbourhood Plan

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Thank you for your notification below regarding the Stukeleys Neighbourhood Plan Submission Consultation.

The Coal Authority is only a statutory consultee for coalfield Local Authorities. As you are aware, Huntingdonshire District Council lies outside the coalfield, therefore there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.

This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.

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Future Notification

Comment

Agent Lydia Pravin

Consultee Messrs M & N Conroy

Company / Organisation Messrs M & N Conroy

Event Name The Stukeleys Neighbourhood Plan Submission Consultation

Comment by Messrs M & N Conroy

Comment ID STNP:11

Response Date 10/10/22 13:21

Status Processed

Submission Type Web

Version 0.1

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Overall comment on the Neighbourhood Plan

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

In the Introduction we agree with paragraph 1.6 that “Neighbourhood planning is a tool to promote sustainable growth and will not be able to prevent development in an area. Neighbourhood plans can only include proposals for an equal (or greater) amount of growth than is set out in the local authority’s development plan. They must also accord with national planning policy.”

Paragraph 18.1 sets out “The adopted strategic policies for The Stukeleys are contained in the Huntingdonshire Local Plan to 2036. This forms the strategic planning framework; one of the

requirements of a Neighbourhood Plan is that they should be in line with the 'strategic policies' of the adopted development plan for the local area. Paragraph 29 of the NPPF states: "Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies."

Paragraph 18.8 of the Neighbourhood Plan sets out "The two villages of Little Stukeley and Great Stukeley as small settlements are locations where windfall development can be expected over the plan period. To assist with this the Neighbourhood Plan defines the 'built-up area' for Little Stukeley and Great Stukeley through use of a settlement boundary."

Paragraph 19.1 sets out "The Stukeleys has planned strategic growth, however, there could be pressure for planning applications to come forward for residential development on greenfield sites which are not allocated. Such speculative development has the potential to undermine the strategic policies of the Huntingdonshire Local Plan to 2036. It also has the potential to affect the distinctive character and separate identity of Little Stukeley and Great Stukeley as separate and distinct villages."

The Huntingdonshire Local Plan (HLP) to 2036 in paragraph 4.82 sets out with regard to the Built-up area "A criteria based definition is favoured as, among other benefits, it avoids the perception that any form of development on any land within a drawn boundary would be acceptable and the pressure for every piece of land within a drawn boundary to be developed. This is undesirable as it could damage the loose knit character of many settlements in Huntingdonshire by creating harder, more regular edges to settlements." Paragraph 4.85 of the HLP 2036 provides guidance or interpretation on the Built-up area and therefore using a settlement boundary as proposed in Policy 1 – Definition of 'Built-up Area' (Settlement Boundary) is clearly completely contrary to the aims and purpose of the Built-up area definition. The Huntingdonshire Local Plan 2036 allows for changes over time to be considered through the lifetime of the Plan rather than following an arbitrary line and adding a line could create a hard edge to the settlement and actually erode the character of Great Stukeley.

Paragraph 13 of the NPPF 2021 sets out Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies. Paragraph 29 of the NPPF 2021 sets out Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies. It also sets out in footnote 18 that Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area. The Neighbourhood Plan is completely contrary to the strategic policies contained in the Huntingdonshire Local Plan 2036.

Paragraph 35 of the NPPF 2021 sets out the examination of plans:

Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the areas objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Paragraph 36 of the NPPF 2021 sets out the tests of soundness will 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.

Paragraph 19.4 sets out the settlement boundary will "In addition, the boundary will protect the landscape

setting of the villages.” The NPPF 2021 paragraph 130 sets out planning policies and decisions should ensure that developments c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging innovation or change. The definition of the settlement boundary is too restrictive and is also contrary to policy LP 11 Design Context of the HLP 2036 which sets out “A proposal should also have had regard to relevant advice or guidance that promotes high quality design, details the quality or character of the area or describes how the area should develop in the future.” Policy LP 12 of the HLP 2036 sets out a requirement for development to contribute positively to the areas character and identity.

The Neighbourhood Plan has to be in general conformity with the Huntingdonshire Local Plan 2036, however, the introduction of policy 1 – definition of ‘Built-up Area (Settlement Boundary) is clearly contrary to the Built Up Area definition in the HLP 2036 and therefore is unsound as set out in paragraphs 35 and 36 of the NPPF 2021 and we object to the introduction of a settlement boundary as set out in policy 1 – definition of ‘Built-up Area (Settlement Boundary).

The Neighbourhood Plan sets out in section 30 Protected Settlement Breaks and within Paragraph 30.1 sets out “As such a protected settlement break between the Green End part of Great Stukeley and the planned urban edge of Huntingdon is therefore included in the Neighbourhood Plan. This is important to protect the rural hamlet style character of the Green End part of Great Stukeley and to protect the distinct identities of The Stukeleys as separate settlements.”

Policy 8 sets out “The areas shown on Maps 9a and 9b are identified as protected settlement breaks to prevent the coalescence of the planned development at Huntingdon, RAF Alconbury and Alconbury Weald with the existing settlements of Great Stukeley and Little Stukeley. Protected settlement breaks are also proposed to maintain the distinctive identity of Great Stukeley and Little Stukeley as separate settlements.

Proposals for built development within the protected settlement break will not be supported unless the purpose of preventing coalescence and retaining spatial, physical and visual separation between the settlements is secured. Proposals to use the protected settlement breaks for green infrastructure, biodiversity net gain or tree planting will be supported where this doesn’t conflict with the purposes of being a protected settlement break.”

There is still the ability to retain the hamlet style character of Green End without the designation of the land between Green End part of Great Stukeley as a settlement break. Paragraph 174 of the NPPF 2021 sets out Planning policies and decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside. The Huntingdonshire Local Plan 2036 already has policies such as LP 10 regarding the protection of the open countryside which seeks to recognise the intrinsic character and beauty of the countryside with conforms with the NPPF 2021 alongside policies LP 11, LP 12 surrounding design. Considering the advice that neighbourhood plans should not repeat policies of the Local Plan and the measures already in place to protect the open countryside, there is considered to be no justification for the designation of policy 8 – Protected Settlement Breaks.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

See comments made in My comment section

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If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Edward James
Company / Organisation	Historic England
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Historic England
Comment ID	STNP:12
Response Date	10/10/22 14:59
Status	Processed
Submission Type	Email
Version	0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Overall comment on the Neighbourhood Plan

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

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-your-neighbourhood/>>

We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk <<mailto:eastplanningpolicy@historicengland.org.uk>> if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on

or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Do you think changes are needed to address the issue you have identified? No

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Future Notification

Comment

Consultee	Ms Alice Lawman
Company / Organisation	National Highways
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	National Highways
Comment ID	STNP:13
Response Date	14/10/22 14:47
Status	Processed
Submission Type	Email
Version	0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Overall comment on the Neighbourhood Plan

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Thank you for consulting National Highways on the abovementioned Neighbourhood Plan.

National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).

It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.

Notwithstanding the above comments, we have reviewed the document and note 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.

Do you think changes are needed to address the No issue you have identified?

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Future Notification

Comment

Consultee	Natural England
Company / Organisation	Natural England
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Natural England
Comment ID	STNP:14
Response Date	31/10/22 15:20
Status	Processed
Submission Type	Email
Version	0.5

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Overall comment on the Neighbourhood Plan

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Thank you for your consultation on the above dated 28 September 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 further comments on this draft submission consultation for The Stukeleys 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.

Do you think changes are needed to address the issue you have identified? No

Supporting documents

If you would like you can support your comment with documents. If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to the website where it is available or give a full reference (including author(s), full title and date of publication) in your comment. By submitting a supporting document you give permission for the council to use it for the Neighbourhood Plan for The Stukeleys and to reproduce the document for such purposes.

Please redact any personal information such as signatures.

Please note that you can upload more than one document but you will only see the last one that you have uploaded until your representation is processed.

Please note that any comments that are wholly contained within uploaded documents, with 'See attached' or similar in the comment field will not be accepted.

[Natural England Annex.pdf](#)

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Future Notification

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty (AONB)**, the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁵ website and also from the [LandIS website](http://www.landis.org.uk/)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) ¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

Comment

Consultee Local Plans Team
Company / Organisation Huntingdonshire District Council

Event Name The Stukeleys Neighbourhood Plan Submission Consultation
Comment by Huntingdonshire District Council (Local Plans Team)
Comment ID STNP:25
Response Date 08/11/22 10:43
Status Processed
Submission Type Web
Version 0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Overall comment on the Neighbourhood Plan

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Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The Neighbourhood Plan may want to consider a policy or 'in principle support' on Rural Exceptions Housing that allows for development requiring occupation of affordable housing by people with a village connection. The Council is happy to discuss this approach if the Neighbourhood Plan Group would like to proceed with such a policy. Examples of Neighbourhood Plans that have employed this requirement include Bury Village (Policy G4).

Proposals for affordable housing on rural exception sites well related to the built-up area would be supported in principle if prioritised for people with a Stukeleys connection and is evidenced through a local housing needs survey.

Do you think changes are needed to address the issue you have identified? No

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee Local Plans Team
Company / Organisation Huntingdonshire District Council

Event Name The Stukeleys Neighbourhood Plan Submission Consultation
Comment by Huntingdonshire District Council (Local Plans Team)
Comment ID STNP:26
Response Date 08/11/22 10:44
Status Processed
Submission Type Web
Version 0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Overall comment on the Neighbourhood Plan

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The Neighbourhood Plan is missing reference or application of the Government's requirement for First Homes. National Planning Practice Guidance states that "For areas that do not meet the criteria for transitional arrangements, new development plans, including local plans and neighbourhood plans, should take account of the new First Homes requirements from 28 June 2021."

The Neighbourhood Plan has not met all requirements as set out in basic condition a. "having regard to national policies and advice contained in guidance issued by the Secretary of State..."

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Inclusion of policy, or assessment of need for First Homes.

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If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Agent Lesley Golding

Consultee *

Company / Organisation Lesley Golding

British Horse Society International UK Ltd

Event Name The Stukeleys Neighbourhood Plan Submission Consultation

Comment by British Horse Society International UK Ltd (Lesley Golding)

Comment ID STNP:59

Response Date 14/11/22 10:35

Status Processed

Submission Type Email

Version 0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Overall comment on the Neighbourhood Plan

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

BHS response to The Stukeley's Neighbourhood Plan (NP)

The Stukeley's Neighbourhood Plan (NP) does not at any point mention provision for equestrians, which is unacceptable. Considering that the presence of the racecourse and many equestrians in the area this is both disappointing and surprising. Horse riders are vulnerable road users in the same way as walkers and cyclists, in fact under the new Highway code horse riders are considered in the road

hierarchy to be equal to cyclists. The Local Travel Plan includes horse riders as part of Active Travel (or Sustainable travel). The needs of all Non Motorised Users (NMUs) including equestrians must be taken into consideration, not just cyclists and pedestrians. Any paths/routes should be improved/developed for all NMUs. 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.

The NP does not mention the inclusion of improving links from the neighbourhood into the local landscape and improving public rights of way (PROW). It would be nice to maintain and enhance the 'green fingers' which connect the neighbourhood to the local landscape and other villages.

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If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Agent Lesley Golding
Consultee Lesley Golding
Company / Organisation British Horse Society International UK Ltd *

Event Name The Stukeleys Neighbourhood Plan Submission Consultation
Comment by British Horse Society International UK Ltd (Lesley Golding)
Comment ID STNP:65
Response Date 14/11/22 11:03
Status Processed
Submission Type Email
Version 0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Overall comment on the Neighbourhood Plan

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/ paragraph/figure that your comments relates to is mentioned.

My comment

Additional Comments and information from the British Horse Society

I welcome the opportunity to comment on the Stukeleys 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.

Central government support for including horses

The government's Cycling and Walking Investment Strategy Safety Review says: "1.2 But safety has particular importance for vulnerable road users, such as walkers, cyclists and horse riders. All road users have an equal right to use the road, and safety and the perception of safety are key factors in determining how far people use these modes of transport. The safer they feel, the more they will use these active modes of travel. The more people who use Active Travel, the fitter and healthier they will be, and the more their communities will benefit from lower congestion and better air quality, among a host of other benefits"(Jesse Norman, Minister for Transport)

Jesse Norman in House of Commons debate on Road Safety, 5 November 2018:

"We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable users, including horse-riders"

And final point by Jesse Norman in debate: "Horse riders are vulnerable road users—there is no doubt about that, and there never has been—and they have been included in the work we are doing."

Newly Constructed Paths

Any physical creation of new paths to achieve Active Travel objectives within the county is to be welcomed (provided that equestrians are included, as a minimum, on those outside of large town centres), as this will enhance the ability of the public to increase its access to safe off road routes for leisure and commuting. District Authorities should take a strategic approach to Active Travel proposals within their administrative boundary - giving consideration to potential links outside their boundary that could contribute to a more integrated network and achieve maximum benefit for all users.

Use of Existing Public Rights of Way

I recognise that some of the routes within this consultation could be in urban areas. However, many horses are kept on the urban fringe, so it is important that equestrians are not excluded from routes that exit the urban areas into the surrounding environs.

Active Travel routes should not, in any way, compromise the use of the public rights of way by making them less amenable to existing lawful users of the right of way. In particular:

- Where existing routes are considered as part of the plan, it is important that all user groups are consulted so that the impact on other lawful users can be assessed and, if necessary, alternative measures discussed.
- For each specific proposal which uses a public right of way or minor road, the width, the proposed surface and the impact of increased estimated numbers of cyclists must be considered in order to design a route suitable for all legal users in each specific location.
- Any newly constructed paths should be integrated/physically linked with the existing public rights of way network where possible and needed, clearly waymarked and recorded on either the definitive map or another publicly accessible map as appropriate.
- Where proposed new, or improved routes have crossing points or junctions with the main highway network, appropriate signal-controlled (or even grade-separated) crossings should be provided suitable for all user groups.
- Consideration should be given to the use of 'Quiet Lanes' where the speed of traffic is reduced.
- Where motorised traffic is to be prohibited on either a right of way or minor road to facilitate cycling and walking, it should be remembered that this is likely to also benefit equestrians. Signage and structures must not impede equestrians.

Other Considerations to Note

Commuting cycling is likely to take place at times other than when recreational use takes place. Thus, a path used for commuting may well be used for recreational travel especially if it provides a circular route by connecting to other paths

Several categories of public rights of way (bridleways, restricted byways and byways) and minor public roads are already shared by cyclists and other user groups. Thus, as a general principle, we believe that, for maximum public benefit and fairness, the reciprocal approach should be implemented, i.e. that new cycle paths should be shared with other user groups unless there is a specific, unresolvable reason not to do so. Use of Traffic Regulation Orders to prohibit use of a public right of way by a specific user group for the benefit of cycling needs to be fully justified and take into account the rights of other lawful users. It should be noted that the Defra Statutory Guidance to local authorities on Rights of Way Improvement Plans, 2002, states in para. 2.2.21:

'There is potential for conflict on ways carrying higher rights between different classes and types of users. Wherever possible proposals for improving rights of way should not unduly benefit one class of user at the expense of another. Improvements that are intended to benefit cyclists, harness-horse drivers, horse riders or walkers should not unduly restrict lawful MPV use of public vehicular rights of way'.

Equestrian use must be considered when Active Travel routes are proposed in new developments, so that new links can be created to the countryside beyond. Where new bridges/underpasses are proposed these should be suitable for equestrian use.

Effect of excluding Equestrians from Active Travel Routes

If equestrians are not included as a user on active travel routes, the consequence is that equestrians are left on the carriage with lorries and cars passing them on the outside and cyclists passing them on the inside, which is another accident waiting to happen. It is therefore important that this aspect is considered in the risk assessment for such routes.

The Health Benefits of Horse Riding in the UK - Data comes from research undertaken by the University of Brighton and Plumpton College on behalf of The British Horse Society)

- 68% of questionnaire respondents participated in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimate that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity.
- Women have been identified in government studies as a social group with relatively low levels of participation in physical activity. Some 93% of questionnaire respondents were women and 49% percent of female respondents were aged 45 or above. These are comparable figures to a major Sport England survey which found that 90 percent of those participating in equestrianism are women and 37 percent of the female participants in equestrianism are aged 45 or above. The gender and age profile of equestrianism is not matched by any other sport in the UK .
- Amongst the horse riders who took part in the survey, 39% had taken no other form of physical activity in the last weeks. This highlights the importance of riding to these people, who might otherwise be sedentary.
- Horse riders with a long-standing illness or disability who took part in the survey are able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability.

For further information, please see:

https://www.bhs.org.uk/~/_/media/documents/marketing/health-benefits-of-riding-in-the-uk-full-report.ashx?la=en

Benefits of catering for horses

The British Equestrian Trade Association National Equestrian Survey 2019
(<http://www.beta-uk.org/pages/news-amp-events/news/national-equestrian-survey-2019-provides-optimistic-view-of-industr> indicated:

- £4,174 is spent per horse which represents a significant contribution to the economy

- The value of the equestrian sector is £4.7 billion per annum
- General Statistics
- 847,000 horses in Britain
 - 1.8 million regular riders of 3 million total
 - Lack of access to horses and riding facilities is a barrier for 22% of lapsed riders returning

REASONS TO INCLUDE EQUESTRIANS in the Stukeleys Neighbourhood Plan

- In 2017 the equestrian industry excluding the racing industry, contributed £4.3bn to the economy and is the second largest rural employer.
- The equestrian industry relies on a network of safe, off road access to the countryside.
- It was established at a Cambridgeshire County Council Planning meeting that, with good design, it costs no more to provide access for equestrians.
- Horses safely and happily share paths less than 3m wide all over the country.
- No report ever of any injury to a third party on any RoW by a horse.
- The Cambs RoWIP (Rights of Way Improvement Plan) states that the bridleway network is inadequate, fragmented and in need of improvement. Every shared pedestrian / cycle path further fragments that network.
- The majority of cyclists are male (78% : Sustrans) whereas the majority of horse riders are female (BHS).
- Horse riding has mental and physical health benefits. Older women particularly participate in this activity, where the not otherwise exercise.
- Horse riders are a vulnerable road user, in the same way as walkers and cyclists.

Equestrian accident statistics

In the UK the period November 2010 to March 2019 road incidents involving horses:

43 humans died
315 horses died

3757 incidents were reported to the British Horse Society (BHS) although it is believed that this represents only 10% of the actual incidents.

The East of England is one of the regions with the highest accident rate.

Cambridgeshire County Council has a Local Transport Policy (LTP), which sets out their transport objectives, policies and strategy for the county. A sister document of the LTP is the Rights of Way Improvement Plan (ROWIP). The County Council updated its ROWIP in 2016 in line with the Countryside and Rights of Way Act 2000. You may wish to consult this document when drafting policies dealing with Non-Motorised Users (NMU) and the Public Rights of Way network.

<https://cambridgeshire.gov.uk/residents/travel-road-and-parking/transport-plans-and-policies/local-transport-plan>

Particular interest should be given to Policies SOA1 'Making the Countryside More Accessible', SOA2 'A Safer Activity', SOA4 'Knowing what's out there', SOA5 'Filling in the Gaps', and SOA8 'A Better Countryside Environment' – all of which include the need for access for equestrians.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it () and identifying any text to be deleted by striking it through (~~ABC~~).

What changes would address the issue(s) that you have identified?

Safe routes for equestrians are desperately needed as demonstrated by the accident statistics in respect of horses on the roads.

Whilst the Society supports the national initiative to encourage more cycling and walking as part of Active Travel Plans imperative that the Council recognises that Active Travel also includes equestrians.

Any physical creation of new paths to achieve Active Travel objectives within the county is to be welcomed (provided that equestrians are included, as a minimum, on those outside of large town centres), as this will enhance the ability of the public to increase its access to safe off road routes for leisure and commuting.

I recognise that some of the routes within this consultation could be in urban areas. However, many horses are kept on the urban fringe, so it is important that equestrians are not excluded from routes that exit the urban areas into the surrounding environs.

Active Travel routes should not, in any way, compromise the use of the public rights of way by making them less amenable to existing lawful users of the right of way. In particular:

Where existing routes are considered as part of the plan, it is important that all user groups are consulted so that the impact on other lawful users can be assessed and, if necessary, alternative measures discussed.

For each specific proposal which uses a public right of way or minor road, the width, the proposed surface and the impact of increased estimated numbers of cyclists must be considered in order to design a route suitable for all legal users in each specific location.

Any newly constructed paths should be integrated/physically linked with the existing public rights of way network where possible and needed, clearly waymarked and recorded on either the definitive map or another publicly accessible as appropriate.

Where proposed new, or improved routes have crossing points or junctions with the main highway network, appropriate signal-controlled (or even grade-separated) crossings should be provided suitable for all user groups.

Consideration should be given to the use of 'Quiet Lanes'[1] where the speed of traffic is reduced.

Where motorised traffic is to be prohibited on either a right of way or minor road to facilitate cycling and walking, it must be remembered that this is likely to also benefit equestrians. Signage and structures must not impede equestrians

[1] https://www.cpre.org.uk/wp-content/uploads/2019/11/quiet_lanes_1.pdf

Equestrian use must be considered when Active Travel routes are proposed in new developments, so that new links can be created to the countryside beyond. Where new bridges/underpasses are proposed these should be suitable for equestrian use.

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If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Matt Verlander
Company / Organisation	Avison Young (National Grid)
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Avison Young (National Grid) (Matt Verlander) STNP:66 10/11/22 12:19
Comment ID	Processed
Response Date	Email
Status	0.5
Submission Type Version	

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Overall comment on the Neighbourhood Plan

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The Stukeleys Neighbourhood Plan – Regulation 15 Consultation
September-November 2022

Representations on behalf of National Grid

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution

networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

• www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:

plantprotection@cadentgas.com

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If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee Local Plans Team
Company / Organisation Huntingdonshire District Council

Event Name The Stukeleys Neighbourhood Plan Submission Consultation
Comment by Huntingdonshire District Council (Local Plans Team)
Comment ID STNP:27
Response Date 08/11/22 10:58
Status Processed
Submission Type Web
Version 0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 1 - 10. Introduction and Background Information

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Since the consultation on draft Stukeleys Neighbourhood Plan, further Neighbourhood Areas have been designated such as Grafton and Alconbury Weston, therefore the map showing Neighbourhood Area Designations should be updated.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

The map showing Neighbourhood Area Designations should be updated to show the new designated Neighbourhood Areas.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Francesca Lasman
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Francesca Lasman
Comment ID	STNP:1
Response Date	04/10/22 20:28
Status	Processed
Submission Type	Web
Version	0.4

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 16. Vision and Objectives

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Overall, the concept of the local plan is helpful, and the separation of the villages from Huntingdon is to be supported. However, the plan is too restrictive, focuses exclusively on development in Alconbury Weald alone, and is insufficiently imaginative to encourage the development of a thriving community in the villages. This needs both good connections and sustainable transport options to other local towns and villages, and some injection of "new blood" from limited but sufficient and sympathetic new development within the villages themselves. I will enter specific comments relating to the relevant sections of the plan as separate comments.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

16.1 The following vision has been developed for the Neighbourhood Plan:

To provide a planning framework and policies that will result in sustainable growth occurring at Alconbury Weald and to the northern edge of Huntingdon -~~whilst protecting the distinctive character~~ and allow the ongoing development of a community which preserves the identity of Great Stukeley and Little Stukeley as villages

16.2 Protect and enhance the built environment of The Stukeleys

•Ensure that new development respects or enhances the distinctive character and appearance of the area in which it is sited or contribute new buildings of architectural interest which respect the environment through carbon neutrality and enhanced energy efficiency.

add: take into consideration planned sustainable transport initiatives, such as the new railway station planned for Alconbury Weald, to ensure connectivity for both Great and Little Stukeley, and promote opportunity sites accessible to such links

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If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee

Paul Ryan

Event Name

The Stukeleys Neighbourhood Plan Submission Consultation

Comment by

Paul Ryan

Comment ID

STNP:15

Response Date

01/11/22 06:52

Status

Processed

Submission Type

Email

Version

0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on

16. Vision and Objectives

Please say whether you

Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

By assigning growth only to Alconbury Weald, by exclusion the policy does not allow for development in Great & Little Stukeley. Without development, the locality will progressively fail to meet the needs and desires of the community, preventing it can thriving and adapting to changing circumstances. The vision is a statement of "preserving in aspic". Without adaptation, the villages will not meet the needs of future generations. Note also that the Parish Council's housing needs survey, though out of date, identified unfulfilled need for additional affordable housing and accommodation that is more suitable for later life. Assigning ay new development to Alconbuy Weald is not a good solution for people with close connections with the historic villages e.g. elderly may have to leave the village in which they have lived because of lack of suitable accommodation.

Suggest "...and policies that will result in sustainable growth occurring in the locality whilst protecting the distinctive character.."

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggest "...and policies that will result in sustainable growth occurring in the locality whilst protecting the distinctive character.."

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee Local Plans Team
Company / Organisation Huntingdonshire District Council

Event Name The Stukeleys Neighbourhood Plan Submission Consultation
Comment by Huntingdonshire District Council (Local Plans Team)
Comment ID STNP:28
Response Date 08/11/22 11:02
Status Processed
Submission Type Web
Version 0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 17. Sustainable Growth - Profile

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Footnote 12 is a word for word extract of the strategic policy allocation for SEL 1.1 'Former Alconbury Airfield and Grange Farm' of Huntingdonshire's Local Plan to 2036.

The footnote unnecessarily duplicates part of the strategic policy in Huntingdonshire's Local Plan to 2036. This will cause confusion as indicates that the text for strategic policy SEL 1.1 finishes at the end of the footnote; this is not the case. There is significantly more policy and supporting text which must be considered when submitting or assessing planning applications. It is therefore considered that footnote 12 is misleading and could result in the full strategic policy of SEL 1.1 not being applied as intended.

The same applies to footnote 13, which refers to strategic policy SEL 1.2 RAF Alconbury.

As such the Neighbourhood Plan has not met basic condition a (having regard to national policies and

advice contained in guidance) as it does not comply with:

- Paragraph 16 f of the National Planning policy framework which notes that ‘Plans should... serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area’; and
 - Paragraph: 041 Reference ID: 41-041-20140306 of National Planning Practice Guidance ‘Neighbourhood Planning’ which states that policies “...should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications”
- The Neighbourhood Plan has not met basic condition e (in general conformity with the strategic policies contained in the development plan) as it:
- does not support and uphold the general principle that the strategic policy is concerned with (Paragraph: 074 Reference ID: 41-074-20140306)
 - creates conflict the neighbourhood plan policy, development proposal and Local Plan strategic policy (Paragraph: 074 Reference ID: 41-074-20140306)

Suggested Change

As such the Council strongly advocates that the footnote instead just refers to the allocation as follows in the footnote:

Delete footnote 12 and replace with:

“See strategic policy SEL 1.1 Former Alconbury Airfield and Grange Farm as set out in Huntingdonshire’s Local Plan to 2036.”

Delete footnote 13 and replace with:

“See strategic policy SEL 1.2 RAF Alconbury as set out in Huntingdonshire’s Local Plan to 2036”

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Change

The Council strongly advocates that the footnote instead just refers to the allocation as follows in the footnote:

Delete footnote 12 and replace with:

“See strategic policy SEL 1.1 Former Alconbury Airfield and Grange Farm as set out in Huntingdonshire’s Local Plan to 2036.”

Delete footnote 13 and replace with:

“See strategic policy SEL 1.2 RAF Alconbury as set out in Huntingdonshire’s Local Plan to 2036”

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Local Plans Team
Company / Organisation	Huntingdonshire District Council
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation Huntingdonshire District Council (Local Plans Team)
Comment by	
Comment ID	STNP:29
Response Date	08/11/22 11:06
Status	Processed
Submission Type	Web
Version	0.4

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 17. Sustainable Growth - Profile

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The opening sentence of paragraph 17.3 requires amending as it incorrectly infers that promoters of Alconbury Weald are suggesting just three 3 key phases of development. In reality the 3 phases identified in paragraph reflects solely the phases of development that have been submitted to date. The paragraph therefore promotes less development than set out in the strategic policy SEL 1.1 in Huntingdonshire's Local Plan to 2036.

In addition bullet 1 should also note that the provision of a secondary school has been approved. As such the Neighbourhood Plan has not met basic condition a (having regard to national policies and advice contained in guidance) as it does not comply with:

- Paragraph 13 of the National Planning Policy which states that "neighbourhood plans should "should not promote less development than set out in the strategic policies for the area or undermine those strategic policies."

The Neighbourhood Plan has not met basic condition e (in general conformity with the strategic policies

contained in the development plan) as it:

- creates conflict the neighbourhood plan policy, development proposal and Local Plan strategic policy (Paragraph: 074 Reference ID: 41-074-20140306)

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Change

The Council strongly advocates that the wording is amended as follows:

First Sentence

~~“The promoters of Alconbury Weald (SEL 1.1) are suggesting three key phases for the strategic allocation as follows: Three phases of the overall Alconbury Weald allocation have currently been approved or are pending determination, as follows;”~~

Bullet 2

Key Phase 2 – this involves a new 150-acre Country Park focusing on enhancing the woodland and Ancient Monument of Prestley Wood. Alongside key phase 2 but not technically part of that key phase is a separate outline planning application on the Grange Farm area of the development. This includes permission for 1,500 homes, a community centre and sports facilities, and a Permission for the provision of a primary school has been approved. on the Grange Farm area of the development.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Agent	Tom Kimber
Company / Organisation	David Lock Associates
Consultee	Urban & Civic
Company / Organisation	Urban&Civic
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Urban&Civic (Urban & Civic)
Comment ID Response	STNP:57
Date	10/11/22 14:11
Status	Processed
Submission Type	Web
Version	0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 17. Sustainable Growth - Profile

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

RE: THE STUKELEYS NEIGHBOURHOOD PLAN 2022-2036 (SUBMISSION VERSION)
This response is produced by David Lock Associates on behalf of Urban&Civic Ltd (U&C), the landowners and master developer of Alconbury Weald. U&C have a long-term commitment to effective place making across Alconbury Weald and welcome the opportunity to provide comments in relation to the submission version of the Neighbourhood Plan.

U&C wish to make the following comments in relation to the planning policies contained within the draft Neighbourhood Plan.

Paragraph 17.3 – the third bullet could be updated to Key Phase 3 rather than Phase 3.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Paragraph 17.3 – the third bullet could be updated to Key Phase 3 rather than Phase 3.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee Local Plans Team
Company / Organisation Huntingdonshire District Council

Event Name The Stukeleys Neighbourhood Plan Submission Consultation
Comment by Huntingdonshire District Council (Local Plans Team)
Comment ID STNP:30
Response Date 08/11/22 11:10
Status Processed
Submission Type Web
Version 0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 18. Sustainable Growth - Strategic Planning Framework

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The additional text at the end of paragraph 18.3 notes that the strategic sites SEL 1.1, 1.2 and HU 1 will deliver market and affordable housing. However the allocations are mixed-use allocations and include far more than just housing such as associated services and facilities, schools, retail, community facilities and in some cases employment space.

It is strongly recommended that the strategic allocations are referred to as mixed-use allocations removing the reference to housing types to accurately reflect the intentions of the strategic policy allocations. This will ensure that the paragraph is not promoting more or less development than that in the strategic policies especially as the overall mix of housing has not been approved and therefore cannot be accurately defined at this moment in time.

The Neighbourhood Plan has not met basic condition e (in general conformity with the strategic policies contained in the development plan) as it:

- does not support and uphold the general principle that the strategic policy is concerned with (Paragraph: 074 Reference ID: 41-074-20140306)
- creates conflict the neighbourhood plan policy, development proposal and Local Plan strategic policy (Paragraph: 074 Reference ID: 41-074-20140306)

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Change

The Council strongly advocates that the wording is amended as follows:

“The Huntingdonshire Local Plan to 2036 proposes that the ‘Huntingdon Spatial Planning Area’ has the two strategic expansion locations of Alconbury Weald (SEL 1.1) and RAF Alconbury (SEL 1.2) together with the eastern half of the housing mixed-use allocation at Ermine Street, Huntingdon (HU 1) in The Stukeleys. ~~These will deliver market and affordable housing.~~”

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Local Plans Team
Company / Organisation	Huntingdonshire District Council
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation Huntingdonshire District Council (Local Plans Team)
Comment by	
Comment ID	STNP:31
Response Date	08/11/22 11:12
Status	Processed
Submission Type	Web
Version	0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 18. Sustainable Growth - Strategic Planning Framework

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Paragraph 18.5 notes that “The Local Plan does not propose any allocated sites in the villages of Great Stukeley or Little Stukeley.” This statement is true of Huntingdonshire’s Local Plan to 2036. However there is no guarantee that future updates to Huntingdonshire’s Local Plan will not employ an alternative strategy for development (a review of which is envisaged to commence early 2023).

In addition the Neighbourhood Plan is itself promoting two designations as ‘opportunity sites for enhancement’.

It is considered that the Neighbourhood Plan has not met basic condition a (having regard to national policies and advice contained in guidance) as:

- It could preclude users of the Neighbourhood Plan from referring to any future revisions of Huntingdonshire’s Local Plan and future development plan proposals and strategic policies

- creates a degree of conflict between the supporting text and the intentions of draft neighbourhood plan Policy 2 (Paragraph: 074 Reference ID: 41-074-20140306)

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested change

Delete as follows.

~~18.5 The Local Plan does not propose any allocated sites in the villages of Great Stukeley or Little Stukeley.~~

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Agent	Tom Kimber
Company / Organisation	David Lock Associates
Consultee	Urban & Civic (992844)
Company / Organisation	Urban&Civic
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Urban&Civic (Urban & Civic)
Comment ID	STNP:58
Response Date	10/11/22 14:15
Status	Processed
Submission Type	Email
Version	0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 18. Sustainable Growth - Strategic Planning Framework

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

RE: THE STUKELEYS NEIGHBOURHOOD PLAN 2022-2036 (SUBMISSION VERSION)
This response is produced by David Lock Associates on behalf of Urban&Civic Ltd (U&C), the landowners and master developer of Alconbury Weald. U&C have a long-term commitment to effective place making across Alconbury Weald and welcome the opportunity to provide comments in relation

to the submission version of the Neighbourhood Plan.

U&C wish to make the following comments in relation to the planning policies contained within the draft Neighbourhood Plan.

The footnote on page 19 could be updated – if this is felt worthwhile – recognising that reserved matters applications 21/01548/REM, 21/02322/REM, 21/02675/REM have now all been approved by Huntingdonshire District Council. Additionally, the Key Phase 3 ‘definition’ setting out the scope of Key Phase 3 has been approved by HDC, in June 2022.

Paragraph 18.3 refers to the “two strategic expansion locations of Alconbury Weald (SEL 1.1) and RAF Alconbury (SEL1.2)”. However, it should be noted that Alconbury Weald and RAF Alconbury are two separate site allocations within the same strategic expansion location as set out in the adopted Huntingdonshire Local Plan to 2036.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

The footnote on page 19 could be updated – if this is felt worthwhile – recognising that reserved matters applications 21/01548/REM, 21/02322/REM, 21/02675/REM have now all been approved by Huntingdonshire District Council. Additionally, the Key Phase 3 ‘definition’ setting out the scope of Key Phase 3 has been approved by HDC, in June 2022.

Paragraph 18.3 refers to the “two strategic expansion locations of Alconbury Weald (SEL 1.1) and RAF Alconbury (SEL1.2)”. However, it should be noted that Alconbury Weald and RAF Alconbury are two separate site allocations within the same strategic expansion location as set out in the adopted Huntingdonshire Local Plan to 2036.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

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Future Notification

Comment

Agent	Lesley Golding
Consultee	Lesley Golding
Company / Organisation	British Horse Society International UK Ltd *

Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	British Horse Society International UK Ltd (Lesley Golding)
Comment ID	STNP:60
Response Date	14/11/22 10:43
Status	Processed
Submission Type	Email
Version	0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on	18. Sustainable Growth - Strategic Planning Framework
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Please say whether you	Object
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Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

18.10 Alconbury Weald contains numerous footpath and cycle routes which will develop further as the overall strategic site is delivered. Ermine Street forms part of the National Cycle Network 12, this is a route of 110 miles that runs in sections from Enfield Lock in north London to Spalding via Stevenage, St Neots and Peterborough. In The Stukeleys, the National Cycle Network 1222 links the parish to the higher order services and facilities in Huntingdon.

The needs of all Non Motorised Users (NMUs) including equestrians must be taken into consideration, not just cyclists and pedestrians. Any paths/routes should be improved/developed for all NMUs. Horse riders are considered to be part of Active Travel (Sustainable transport) according to the Local Transport Plan, and as such should be included.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

The needs of all Non Motorised Users (NMUs) including equestrians must be taken into consideration, not just cyclists and pedestrians. Any paths/routes should be improved/developed for all NMUs. Horse riders are considered to be part of Active Travel (Sustainable transport) according to the Local Transport Plan, and as such should be included.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Local Plans Team
Company / Organisation	Huntingdonshire District Council
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation Huntingdonshire District Council (Local Plans Team)
Comment by	
Comment ID	STNP:32
Response Date	08/11/22 11:15
Status	Processed
Submission Type	Web
Version	0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 19. Definition of Built up Area

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The last sentence of paragraph 19.3 conflates the objectives and policies of Huntingdonshire's Local Plan to 2036 with a locally specific aspiration of the Neighbourhood Plan i.e. "Proposals which involve high quality architecture and include the latest environmentally friendly technology would be supported." It is considered that this aspiration would be better suited within a locally specific neighbourhood plan policy, if adequately justified in terms of viability and delivery.

However, if this approach were to be taken forward the Council would strongly object to this being applied to any Local Plan strategic allocations to ensure continued delivery of these sites.

It is considered that the Neighbourhood Plan has not met basic condition e (in general conformity with the strategic policies contained in the development plan) as it:

- creates conflict between the draft neighbourhood plan policy or development proposal and the strategic policies of Huntingdonshire's Local Plan to 2036. Specifically LP 9 Small Settlements (Paragraph: 074 Reference ID: 41-074-20140306)

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Change

19.3 The Huntingdonshire Local Plan to 2036 does not identify a settlement boundary for these villages; instead, it moves to use of a definition of 'built-up area'. Policy LP 9 – Small Settlements, supports development where it is appropriately located within a built-up area of a small settlement. This is what is known as windfall development as it relates to housing coming forward on sites not specifically allocated for housing. ~~Proposals which involve high quality architecture and include the latest environmentally friendly technology would be supported.~~

-

Inclusion of a new policy that supports proposals which involve high quality architecture and include the latest environmentally friendly technology.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

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Future Notification

Comment

Consultee	Local Plans Team
Company / Organisation	Huntingdonshire District Council
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation Huntingdonshire District Council (Local Plans Team)
Comment by	
Comment ID	STNP:33
Response Date	08/11/22 11:19
Status	Processed
Submission Type	Web
Version	0.5

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 19. Definition of Built up Area

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Paragraph 19.6 is unclear and causes an element of confusion in explaining the difference between neighbourhood plan settlement boundaries and Local Plan strategic allocations and mixed-use allocations.

It is considered that the supporting text will not aid decision-makers and applicants in the application of the policy.

As such the Neighbourhood Plan has not met basic condition a (having regard to national policies and advice contained in guidance) as it does not comply with:

- Paragraph 16 f of the National Planning policy framework which notes that 'Plans should... serve a clear purpose...'
- Paragraph: 041 Reference ID: 41-041-20140306 of National Planning Practice Guidance 'Neighbourhood Planning' which states that policies "...should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications"

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Change

For the avoidance of doubt and to provide additional clarity it is proposed that paragraph 19.6 is amended as follows:

~~“No settlement boundary is being defined in The Stukeleys Neighbourhood Plan for the strategic expansion locations SEL 1.1 (Former Alconbury Airfield and Grange Farm now commonly referred to as Alconbury Weald), and SEL 1.2 (RAF Alconbury) or HU 1 (Ermine Street, Huntingdon) as the Huntingdonshire Local Plan already defines a clear boundary for these Local Plan allocations two combined strategic expansion locations. The Local Plan also defines a clear boundary for the allocated site HU 1 (Ermine Street, Huntingdon). This allows for the effective delivery of strategic expansion locations and mixed-used allocation taking into account. Although the Local Plan defines an area for each of these three strategic allocations, the ability to accommodate the dynamic nature of proposals, particularly in the strategic expansion locations is an important feature. This is why these areas are explicitly referred to in Policy 1 as being excluded from the area designated as countryside.”~~

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee

Paul Ryan

Event Name

The Stukeleys Neighbourhood Plan Submission Consultation

Comment by

Paul Ryan

Comment ID

STNP:16

Response Date

01/11/22 06:52

Status

Processed

Submission Type

Email

Version

0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on

Policy 1 - Definition of 'Built-up Area (Settlement Boundary)

Please say whether you

Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The proposed boundary has been drawn tightly around the some of the existing built environment; significant built areas have been excluded. Within the boundary, and net of other exclusions such as protected settlement breaks, there is very little opportunity for additional community facilities, retail, or housing. Consequently, there must have been a presumption that the present built development is fully sufficient and appropriate for the future community. However, the housing needs survey conducted by the Parish Council identified need for additional affordable and older-person housing, The survey as years ago and should be updated to inform this neighbourhood plan proposal. Without this, the plan is vulnerable to being found invalid due to lack of evidence to support the presumed lack of need for additional development.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

The housing needs survey conducted by the Parish Council identified need for additional affordable and older-person housing, The survey as years ago and should be updated to inform this neighbourhood plan proposal.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Local Plans Team
Company / Organisation	Huntingdonshire District Council
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Huntingdonshire District Council (Local Plans Team)
Comment ID	STNP:34
Response Date	08/11/22 11:37
Status	Processed
Submission Type	Web
Version	0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on	Policy 1 - Definition of 'Built-up Area (Settlement Boundary)
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Please say whether you	Object
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Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The policy as written does not provide sufficient guidance and clarity to ensure that a decision-maker can apply the policy consistently. In addition the final paragraph is considered to create confusion, repeating and identifying policies and processes that are already comprehensively dealt with through the strategic allocations of Huntingdonshire's Local Plan to 2036 and strategic policies.

As written paragraph 2 of the policy does not meet basic condition a (having regard to national policies and advice contained in guidance) as it does not comply with:

- Paragraph 16 d of the National Planning Policy Framework which notes that: "Plans should...contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;"
- Paragraph: 041 Reference ID: 41-041-20140306 of National Planning Practice Guidance 'Neighbourhood Planning' which states that policies "...should be drafted with sufficient clarity that a

decision maker can apply it consistently and with confidence when determining planning applications”
The criteria to be assessed by a development management officer is currently unstructured and difficult to ‘untangle’.

In addition paragraph 2 of the policy does not meet basic condition e (in general conformity with the strategic policies contained in the development plan) as it:

- creates conflict between the draft neighbourhood plan policy or development proposal and the strategic policies of Huntingdonshire’s Local Plan to 2036 (Paragraph: 074 Reference ID: 41-074-20140306). Specifically, LP 9 Small Settlements which states that “A proposal for development on land well-related to the built-up area may be supported where it accords with the specific opportunities allowed for through other policies of this plan.”

The final paragraph of the policy does not meet basic conditions a and e as:

- It adds element of confusion, repeating and identifying policies and processes that are already comprehensively dealt with through the strategic allocations of Huntingdonshire’s Local Plan to 2036 and strategic policies such as LP 2 Strategy for Development, LP 7 Spatial Planning Areas, LP 10 The Countryside. This creates conflict between the draft neighbourhood plan policy or development proposal and the strategic policies of Huntingdonshire’s Local Plan to 2036 (Paragraph: 074 Reference ID: 41-074-20140306).
- Is not sufficiently clear for planning applicants and decision makers to ensure that policies are applied consistently and with confidence when determining planning applications (NPPF 16d)

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Change

Paragraph 2: Change to provide greater clarity in terms of what characteristics are being protected, and how the assessment should be made.

Within the settlement boundary and on land well-related to the settlement boundary of Great Stukeley and Little Stukeley proposals will be supported where development would not adversely affect;

- The established character and appearance of the existing settlement;
- would not harm The undeveloped nature of the surrounding rural areas; and
- would respect The landscape setting of the respective village

~~Factors to be considered will include how the proposal reflects~~ Applications will be expected to demonstrate how they have protected local character and have had regard to:

- ~~the~~ existing built form, layout and structure of the surrounding area;
- ~~the~~ contribution of spaces between buildings; and
- ~~the~~ design and visual appearance of buildings in the surrounding area

Paragraph 3

~~The land outside of the settlement boundary [excluding the defined areas allocated as SEL 1.1 (Former Alconbury Airfield and Grange Farm now commonly referred to as Alconbury Weald); SEL 1.2 (RAF Alconbury); and HU1 (Ermine Street, Huntingdon) in the Huntingdonshire Local Plan] is considered as countryside outside of the ‘built-up area’. Proposals outside the settlement boundary and the allocations in the Huntingdonshire Local Plan (SEL 1.1, SEL 1.2 & HU1) will only be supported for development where it meets the requirements of other policies in the Development Plan or National Planning Policy; such as that which requires a countryside location, agriculture, horticulture or forestry; rural exceptions housing; or are related to community, leisure or recreation. In particular community, leisure or recreation proposals designed to meet the needs of local residents will be supported.~~

Land outside or not well related to the settlement boundary should be determined in accordance with the relevant Local Plan and Neighbourhood Plan policies.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee

S Dockerill

Event Name

The Stukeleys Neighbourhood Plan Submission Consultation

Comment by

S Dockerill

Comment ID

STNP:49

Response Date

09/11/22 16:43

Status

Processed

Submission Type

Email

Version

0.6

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on

Policy 1 - Definition of 'Built-up Area (Settlement Boundary)

Please say whether you

Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

We object to the principle of defining a rigid settlement boundary for Little Stukeley as indicated on Map 3b of the submitted Plan. The adoption of the Huntingdonshire Local Plan signified a shift away from defined settlement boundaries to a more flexible criteria-led approach, which we supported. The reintroduction of settlement boundary lines as proposed in Policy 1, similar to the 1995 Local Plan, detracts from that flexible approach without justification. In our opinion Policy 1 is in clear conflict with the approach of the adopted Local Plan and settlement boundary definition should be deleted. If, however, the settlement boundary for Little Stukeley is to continue, then the small group of properties and the adjoining parcel of land to the south of Ermine Street should be included within the boundary, as a separate group similar to that shown to the east of Great Stukeley on Map 3a. This small group and associated land contribute to the built form of Little Stukeley and they relate much more to the built-up area of the settlement than they do to the open countryside to the east and south. Paragraph 20.4 of the submission Plan confirms that there is a desire to provide some self-build housing within the two villages and inclusion of the land referred to above within the defined area would provide the opportunity to fulfil that desire at Little Stukeley.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Removal of rigid settlement boundary and use the more flexible approach set out in the Local Plan.

If, however, the settlement boundary for Little Stukeley is to continue, then the small group of properties and the adjoining parcel of land to the south of Ermine Street should be included within the boundary, as a separate group similar to that shown to the east of Great Stukeley on Map 3a.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Francesca Lasman
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Francesca Lasman
Comment ID	STNP:2
Response Date	04/10/22 20:46
Status	Processed
Submission Type	Web
Version	0.1

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 20. Opportunity Sites for Enhancement

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The opportunity sites identified on the northern boundary of Gt Stukeley are appropriate sites for windfall development, but the sites do not allow for sufficient development to ensure a thriving village community . The site at the Three horsehoes, if it is to retain a pub and car parking , will probably only accommodate 3 or 4 houses, and the same for the farm site. I believe that more allowance should be made to expand the villages, whilst still retaining their character, and the drawn settlement boundary does not allow for this.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Modified text is not appropriate but the settlement boundary could either be removed, or re drawn to include some sites such as between houses along Owl End to the North, Low Road to the West, and Green End to the East at the end of the current boundary. Limited and sympathetic development at these sites could enhance the character of the villages and appropriate biodiversity enhancements and tree planting could improve the environment.

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Future Notification

Comment

Consultee

Paul Ryan

Event Name

The Stukeleys Neighbourhood Plan Submission Consultation

Comment by

Paul Ryan

Comment ID

STNP:17

Response Date

01/11/22 06:52

Status

Processed

Submission Type

Email

Version

0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on

20. Opportunity Sites for Enhancement

Please say whether you

Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Paragraph 20.2

The existing building has little merit and its location in the site, if preserved, would be excessively restrictive on appropriate development. Indeed it is a good aim to include some hospitality facility in a development - pub, restaurant, guest house, holiday accommodation. History shows that a conventional village pub struggles for viability; a wider interpretation of hospitality should be included. A more flexible attitude to development would lead to a better, and more sustainable result.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

A wider interpretation of hospitality should be included. A more flexible attitude to development would lead to a better, and more sustainable result.

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Future Notification

Comment

Consultee

Paul Ryan

Event Name

The Stukeleys Neighbourhood Plan Submission Consultation

Comment by

Paul Ryan

Comment ID

STNP:18

Response Date

01/11/22 06:52

Status

Processed

Submission Type

Email

Version

0.5

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on

Policy 2 - Opportunity Sites for Enhancement

Please say whether you

Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Site 1 - Note the comment above [on paragraph 20.2]. Sustainability of the business, and maximising the benefit to the community should allow for more significant change to the "existing pub", including change of scale, structure and location within the site. Further, a wider definition of retail commercial should be allowed e.g. restaurant, hotel, guest house, other accommodation for tourism e.g. cabins
Site 2 - Why more car parking? We are supposed to be promoting sustainable travel e.g. "walk to the pub". Is there a problem with parking space now? Increasing parking only maintains car dominance - increasing traffic through the village, damaging the environment and supporting poor health through lack of exercise.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Site 1 - Sustainability of the business, and maximising the benefit to the community should allow for more significant change to the "existing pub", including change of scale, structure and location within the site. Further, a wider definition of retail commercial should be allowed e.g. restaurant, hotel, guest house, other accommodation for tourism e.g. cabins

See also comments under paragraph 20.2

Site 2 - Why more car parking?

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Future Notification

Comment

Consultee	Local Plans Team
Company / Organisation	Huntingdonshire District Council
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Huntingdonshire District Council (Local Plans Team)
Comment ID	STNP:35
Response Date	08/11/22 12:00
Status	Processed
Submission Type	Web
Version	0.4

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 2 - Opportunity Sites for Enhancement

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Although the intentions of this policy are honourable, and the Council supports the Parish Council in providing opportunity sites for development. It is feared that the deliverability of this site may be compromised by the number of uses proposed on it. The Council would like to ensure that the implementation of this policy best serves the needs of the local community.

To ensure that this policy works to the benefit of the community and to allow for the retention of a community facility on-site the Council would like to offer its services to discuss the best approach. The policy provides a broad range of potential development scenarios, including but not limited to redevelopment of the entire site for mixed use. This implies that the site may be developed in any format and for any use and undermines the intention of the policy to provide development of a locally beneficial and specific nature.

There is no mention of the size of the sites or evidence to justify if all the recommended uses can be accommodated on the site (for example through viability or feasibility evidence). The policy would have

to ensure development could be achieved including any specific mitigation measures and should ensure that new development can be integrated effectively with existing businesses and community facilities (Paragraph 187 of the NPPF). It is also not clear whether the replacement community facility is required on site or could/must be provided elsewhere in the village.

Reference to Custom and Self Build housing is welcomed by the Council however this requirement could be strengthened by requiring custom-and self-build housing with a local connection, including an indicative capacity and evidenced through a local housing needs survey.

As such the Neighbourhood Plan has not met basic condition a (having regard to national policies and advice contained in guidance) as it does not comply with:

- Paragraph: 074 Reference ID: 41-074-20140306 of the NPPG which looks at “the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach”

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested change

More specific reference and thought given to proposed uses on site to ensure that the opportunity sites address local need.

Adequate assessment to ensure the proposed uses can be effectively delivered on site in tandem with required infrastructure with reference to Local Plan policy LP 4 Contributing to Infrastructure Delivery.

Greater clarity on the custom and self-build for example, requiring custom-and self-build housing with a local connection, including an indicative capacity and evidenced through a local housing needs survey.

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Future Notification

Comment

Agent

Mr James Sturgess

Consultee

Wellington Pub Company

Event Name

The Stukeleys Neighbourhood Plan Submission Consultation

Comment by

Wellington Pub Company

Comment ID

STNP:67

Response Date

23/11/22 11:20

Status

Processed

Submission Type

Email

Version

0.4

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on

Policy 2 - Opportunity Sites for Enhancement

Please say whether you

Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Caldecotte Group, acting as planning agents for Wellington Pub Company; owners of the Three Horseshoes, Ermine Street, Great Stukeley, can confirm that the inclusion of Policy 2 - Opportunity Sites for Enhancement within the Neighbourhood Plan is supported. As is noted within the submission version, the property is currently underutilised and so the owners welcome the opportunity to re-develop the Three Horseshoes in order to make better and more efficient use of the site. That said, we note that the area marked A on Map 4 does not cover the whole of the Three Horseshoes site and would prefer for the whole area as shown on the attached plan to be included.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

We note that the area marked A on Map 4 does not cover the whole of the Three Horseshoes site and would prefer for the whole area as shown on the attached plan to be included.

Supporting documents

If you would like you can support your comment with documents. If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to the website where it is available or give a full reference (including author(s), full title and date of publication) in your comment. By submitting a supporting document you give permission for the council to use it for the Neighbourhood Plan for The Stukeleys and to reproduce the document for such purposes.

Please redact any personal information such as signatures.

Please note that you can upload more than one document but you will only see the last one that you have uploaded until your representation is processed.

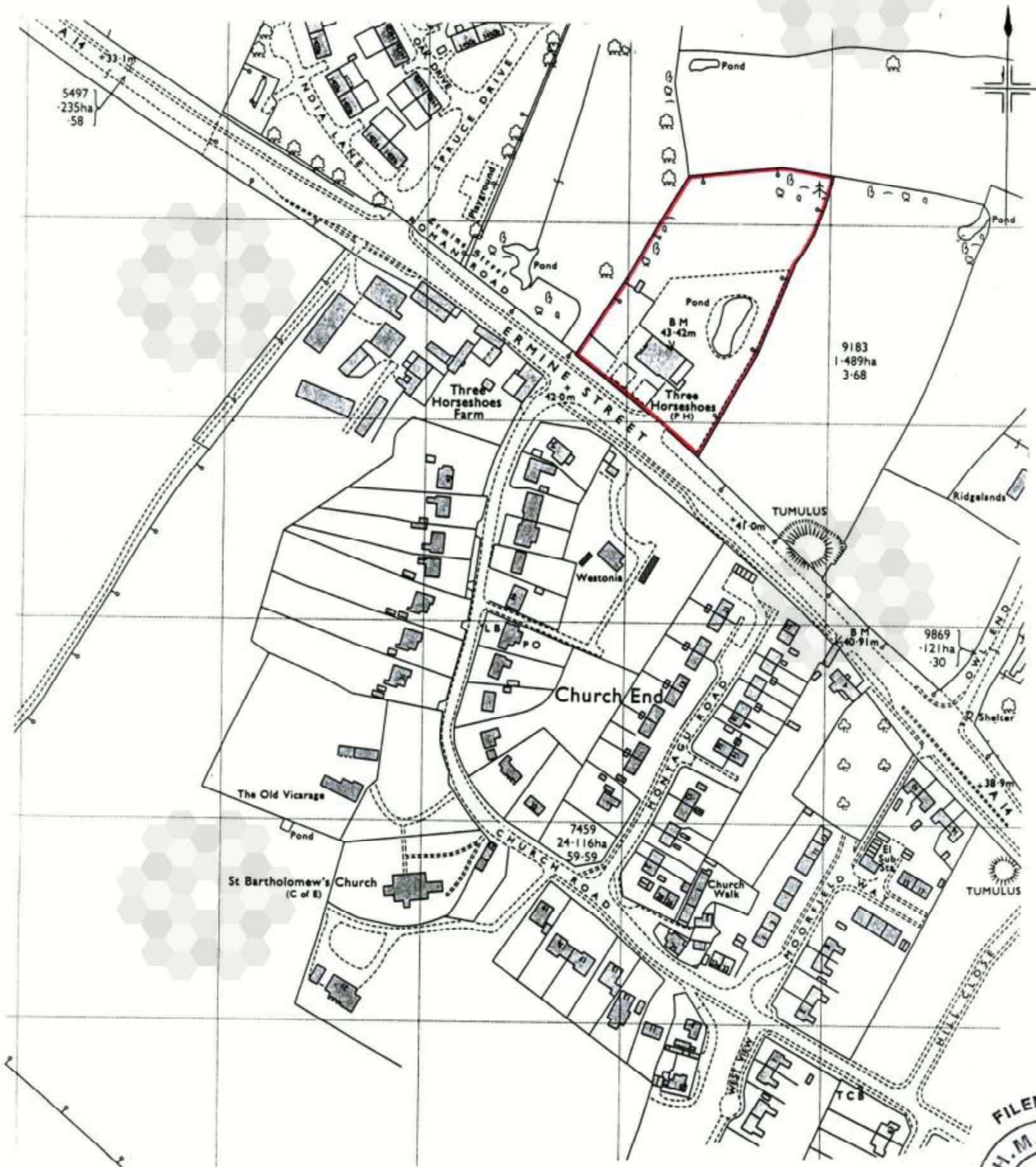
Please note that any comments that are wholly contained within uploaded documents, with 'See attached' or similar in the comment field will not be accepted. [Wellington Pub Company - Three Horseshoes Title.pdf](#)

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

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Future Notification

H.M. LAND REGISTRY		TITLE NUMBER	
		CB148225	
ORDNANCE SURVEY PLAN REFERENCE	TL2174		Scale 1/2500
COUNTY CAMBRIDGESHIRE	DISTRICT HUNTINGDONSHIRE		© Crown copyright



Comment

Consultee	Tessa Saunders
Company / Organisation	Anglian Water Services Ltd
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Anglian Water Services Ltd (Tessa Saunders)
Comment ID Response	STNP:5
Date	03/10/22 10:12
Status	Processed
Submission Type	Email
Version	0.5

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 3 - Strategic Development Delivery

Please say whether you Support

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Water Resources

The Stukeleys parish is within the Ruthamford South Water Resource Zone (WRZ) – each WRZ is used to develop forecasts of supply and demand. The Ruthamford South WRZ is predicted to be in a severe supply-demand deficit for water supply due the challenges of climate change and population growth. This means we will need more resilience to supply customers throughout the Anglian Water region in the coming decades. Our plans to invest in the water supply network are set out in the Water Resource Management Plan 2019 (WRMP19) and the forthcoming WRMP24. Deficits driven by climate change and sustainability reductions in the Ruthamford WRZs will be addressed by transfer into Ruthamford North. Using existing infrastructure, this water is distributed to Ruthamford South. Neighbourhood Plans can have a role in introducing demand management measures that increase water efficiency with customers and enables supplies to be maintained, such as encouraging more ambitious water efficiency measures in new homes, and rainwater harvesting.

The following comments are made in relation to ensuring the making of the neighbourhood plan contributes to sustainable development and has appropriate regard to assets owned and managed by Anglian Water.

We consider that the necessary strategic policy requirements in relation to the provision of sustainable drainage and facilitating wastewater connections are addressed through the Huntingdonshire Local Plan strategic expansion policies:

- SEL 1.1 Alconbury Airfield and Grange Farm
- SEL 1.2 RAF Alconbury
- HUN 1 Ermine Street, Huntingdon

Together these policies allocate significant growth on the edge of Huntingdon, and within The Stukeleys neighbourhood plan area.

- Anglian Water supports the neighbourhood plan objectives for the promotion of sustainable development including green infrastructure and high sustainability standards of construction.
- Policy 3 - Strategic Development Delivery - we support this policy which encourages the delivery of sustainable strategic growth, including opportunities for green corridors and biodiversity net gain across the neighbourhood plan area. We suggest that green infrastructure should be developed in combination with sustainable drainage systems to ensure that these are designed in from the start and minimise the risk of surface water flooding, as well as providing opportunities for rainwater harvesting and recycling as part of the options to increase water efficiency of the new communities across Alconbury Weald and RAF Alconbury.

CONCLUSION

Anglian Water is supportive of the direction taken in the The Stukeleys Neighbourhood Plan - subject to the suggested clarifications outlined in our response above. We consider the neighbourhood plan will help to deliver sustainable development within the parish, in conjunction with the strategic policies in the adopted Huntingdonshire Local Plan.

Do you think changes are needed to address the issue you have identified? No

Supporting documents

If you would like you can support your comment with documents. If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to the website where it is available or give a full reference (including author(s), full title and date of publication) in your comment. By submitting a supporting document you give permission for the council to use it for the Neighbourhood Plan for The Stukeleys and to reproduce the document for such purposes.

Please redact any personal information such as signatures.

Please note that you can upload more than one document but you will only see the last one that you have uploaded until your representation is processed.

Please note that any comments that are wholly contained within uploaded documents, with 'See attached' or similar in the comment field will not be accepted. [Anglian Water Response2.pdf](#)

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Anglian Water Consultation Response

The Stukeleys Neighbourhood Plan – Submission Consultation (Regulation 16)

Anglian Water welcomes the opportunity to respond to the consultation on The Stukeleys Submission Neighbourhood Plan.

Anglian Water

Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a full quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding. Additionally, our region has the highest rate of housing in England. The initial 2021 census report identifies that population growth in the region was 8.3% in the past decade against a national average of 6.6%. Population growth in Huntingdonshire district was broadly comparable to the national average at 6.7% between 2011 and 2021.

Anglian Water has amended its Articles of Association to include the requirement that in undertaking these duties we will act in the public interest. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop. We recognise the carbon impacts of managing customer's water needs and so Anglian Water has made the commitment to be a net zero business by 2030.

Anglian Water and the Neighbourhood Plan

Anglian Water is the statutory water and sewerage undertaker for The Stukeleys neighbourhood plan area and is a statutory consultee under the Neighbourhood Planning (General) Regulations 2012. Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for the residents, and in doing so protect the environment and water resources. As a purpose-led company, we are committed to seeking positive environmental and social outcomes for our region.

Water Resources

The Stukeleys parish is within the Ruthamford South Water Resource Zone (WRZ) – each WRZ is used to develop forecasts of supply and demand. The Ruthamford South WRZ is predicted to be in a severe supply-demand deficit for water supply due to the challenges of climate change and population growth. This means we will need more resilience to supply customers throughout the Anglian Water region in the coming decades. Our plans to invest in the water supply network are set out in the [Water Resource Management Plan 2019](#) (WRMP19) and the forthcoming WRMP24. Deficits driven by climate change and sustainability reductions in the Ruthamford WRZs will be addressed by transfer into Ruthamford North. Using existing infrastructure, this water is distributed to Ruthamford South. Neighbourhood Plans can have a role in introducing demand management measures that increase water efficiency with customers and enable supplies to be maintained, such as encouraging more ambitious water efficiency measures in new homes, and rainwater harvesting.

COMMENTS ON THE STUKELEYS NEIGHBOURHOOD PLAN

The following comments are made in relation to ensuring the making of the neighbourhood plan contributes to sustainable development and has appropriate regard to assets owned and managed by Anglian Water.

We consider that the necessary strategic policy requirements in relation to the provision of sustainable drainage and facilitating wastewater connections are addressed through the Huntingdonshire Local Plan strategic expansion policies:

- SEL 1.1 Alconbury Airfield and Grange Farm
- SEL 1.2 RAF Alconbury
- HUN 1 Ermine Street, Huntingdon

Together these policies allocate significant growth on the edge of Huntingdon, and within The Stukeleys neighbourhood plan area.

- Anglian Water supports the neighbourhood plan objectives for the promotion of sustainable development including green infrastructure and high sustainability standards of construction.
- **Policy 3 - Strategic Development Delivery** - we support this policy which encourages the delivery of sustainable strategic growth, including opportunities for green corridors and biodiversity net gain across the neighbourhood plan area. We suggest that green infrastructure should be developed in combination with sustainable drainage systems to ensure that these are designed in from the start and minimise the risk of surface water flooding, as well as providing opportunities for rainwater harvesting and recycling as part of the options to increase water efficiency of the new communities across Alconbury Weald and RAF Alconbury.
- **Policy 5 Community Assets and Map 5c** - we note that the main community facilities area for Alconbury Weald includes an area to the south-east (Ermine Street Church Academy Primary School and associated grounds in Alconbury Weald). This area contains Anglian Water assets, including the Alconbury Weald Swynford Road Sewer Pumping Station. We consider that this asset is incorrectly included as part of the wider designation area as this is not a community asset, but part of our infrastructure network. Therefore, we request that Policy 5 should therefore not apply to any work/operations that may be required to enhance our network assets and the Sewer Pumping Station is removed from the community facilities area identified on map 5c.
- **Para 28.3** - Anglian Water welcomes the neighbourhood plan reference to SuDS as an efficient and natural approach to managing surface water run-off, particularly noting the Alconbury Weald policy requirement to include SuDS (Local Plan Policy SEL 1.1).
- **Para 28.5** - We note that the neighbourhood plan references the Alconbury water recycling centre. Our [draft Drainage and Wastewater Management Plan](#) (DWMP 2025-2050) provides details regarding the Alconbury WRC - with a medium-term strategy to 2035 to provide a mixed strategy for the network, with main solution of SuDS and long-term strategy of 25% surface water removal across the water recycling network by 2050. The DWMP identifies that sustainable drainage systems are essential to the long-term operation of our water recycling network within this catchment.



- Accommodating wastewater flows from the strategic expansion sites is addressed through the respective Huntingdonshire Local Plan policies (SEL 1.1, SEL 1.2 and HUN 1). These growth areas are expected to connect to Huntingdon (Godmanchester) WRC unless alternative options become available. Early engagement with our pre-development team will ensure that the phasing of development across these sites can be accommodated by our wastewater network.
- **Policy 7 Green Infrastructure Network in Alconbury Weald** - we support the policy approach that would enhance the existing green infrastructure (GI) as multi-functional green space. The GI around Alconbury Weald already incorporates sustainable drainage features including swales and a balancing pond, and we consider that the policy could be amended to provide this clarification, so that the term drainage is replaced by 'sustainable drainage systems (SuDS)'.

...or for sustainable drainage systems (SuDS) will be supported subject...

CONCLUSION

Anglian Water is supportive of the direction taken in the The Stukeleys Neighbourhood Plan - subject to the suggested clarifications outlined in our response above. We consider the neighbourhood plan will help to deliver sustainable development within the parish, in conjunction with the strategic policies in the adopted Huntingdonshire Local Plan.

Comment

Consultee

Paul Ryan

Event Name

The Stukeleys Neighbourhood Plan Submission Consultation

Comment by

Paul Ryan

Comment ID

STNP:19

Response Date

01/11/22 06:52

Status

Processed

Submission Type

Email

Version

0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on

Policy 3 - Strategic Development Delivery

Please say whether you

Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Paragraph 1 - add "... and to the surrounding area including, particularly, Huntingdon, Alconbury, Abbots Ripton and Brampton"

Paragraph 2 - add "And to connect these green corridors into and through the historic villages to extend the "green network" to enhance resilience and richness of the villages environment."

Alconbury Weald (SEL 1.1), bullet 2 - add "In particular to Huntingdon, Alconbury, Abbots Ripton and Brampton"

RAF Alconbury (SEL 1.2), bullet 2 - add "In particular to Huntingdon, Alconbury, Abbots Ripton and Brampton"

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Paragraph 1 - add "... and to the surrounding area including, particularly, Huntingdon, Alconbury, Abbots Ripton and Brampton"

Paragraph 2 - add "And to connect these green corridors into and through the historic villages to extend the "green network" to enhance resilience and richness of the villages environment."

Alconbury Weald (SEL 1.1), bullet 2 - add "In particular to Huntingdon, Alconbury, Abbots Ripton and Brampton"

RAF Alconbury (SEL 1.2), bullet 2 - add "In particular to Huntingdon, Alconbury, Abbots Ripton and Brampton"

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Future Notification

Comment

Consultee	Local Plans Team
Company / Organisation	Huntingdonshire District Council
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Huntingdonshire District Council (Local Plans Team)
Comment ID	STNP:36
Response Date	08/11/22 12:03
Status	Processed
Submission Type	Web
Version	0.4

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 3 - Strategic Development Delivery

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Huntingdonshire District Council objects to the policy in its current form and would like to invite the Neighbourhood Planning Group to meet with the Council to address the intricacies of the policy which would enable the policy to provide locally specific solutions that will provide a balance between the strategic delivery of the sites and a local community focussed policy.

The policy as written currently does not meet basic condition a (having regard to national policies and advice contained in guidance) or e (in general conformity with the strategic policies contained in the development plan) as it does not comply with:

- NPPF paragraph 16 which states that “Plans Should: d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals” As such the policy should be amended to address these issues.
- Paragraph 9 of the NPPF which states that Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.

- National Planning Practice Guidance which notes that when considering whether a policy is in general conformity the following should be considered: does the “draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy” (Paragraph: 074 Reference ID: 41-074-20140306)
- National Planning Practice Guidance which notes that “It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications” (Paragraph: 041 Reference ID: 41-041-20140306 of National Planning Practice Guidance ‘Neighbourhood Planning’)

General Comments

The policy is extremely long and may make it difficult for developers or Development Management Officers to identify the specific site they are determining an application on. It is recommended that the policy is divided into separate policies for each site to ensure ease of use. This will help with the clarity and application of the policy. Currently the policy does not meet paragraph: 041 Reference ID: 41-041-20140306 of National Planning Practice Guidance (NPPG) which states that “It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications”.

Policy aspects referring to Alconbury Weald (SEL 1.1), should be deleted or significantly revised to ensure deliver can continue on this strategic site.

References to Infrastructure

It is important that any additional policy criteria in the Neighbourhood Plan minimises the impact upon development viability. The policies in Huntingdonshire’s Local Plan to 2036 were set based on viability testing prior to the Stukeleys Neighbourhood Plan. The ‘headroom’ available from the Council’s generic viability testing accommodates future changes in assumption values (for example increases in build costs) but has not factored in additional requirements. As such, the addition of further policy criteria over and above the strategic and non-strategic policy requirements set out in the Local Plan may not have been viability tested. It is therefore unknown whether the requirements set out within this policy would impact on the viability of the site without further evidence. This ‘unknown’ could extend developer contribution negotiations increasing the time taken to determine planning applications and deliver the Councils housing target. The likely outcome of negotiations could be a reduction in the level of affordable housing achieved. In reference specifically to Strategic Allocation SEL 1.1 there is already a very complex viability review mechanism within the existing S106 that is unlikely to change.

It is therefore important that the policy requirements (especially with regard to infrastructure) are adequately evidenced and that the bulleted requirements are worded to provide a balance between the costs of mitigating constraints on-site and delivering attractive, useable, long-lasting buildings and spaces without hampering delivery. This will enable the policy to conform to strategic policies LP 1, LP3, LP4, LP24 and SEL 1.2, 1.2 and HU1 and paragraph 13 of the NPPF which notes that Neighbourhood Plans should support the delivery of strategic policies.

Existing evidence documents that could be used to justify infrastructure requirements on the Strategic Allocations identified in the Neighbourhood Plan’s Policy 3 can be found in the Council’s Infrastructure Delivery Plan (IDP). This document was used to justify the viability of the Local Plan and its policies. Major infrastructure projects such as those identified the Neighbourhood Plan policy would in some instances require consultation with Cambridgeshire County Council (if they are identified as the delivery partner) to discuss priority infrastructure projects, deliverability, costings and whether this would be an on-site or financial contribution.

Infrastructure requirements identified in the Policy would also need to be in conformity with the National Planning Policy Framework and the Community Infrastructure Levy Regulations 2010 (as amended). Paragraph 56 of the National Planning Policy Framework (NPPF) which states that planning obligations must meet the ‘three tests’ of: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

As such it is difficult to determine if the infrastructure references within the policy meet basic condition e.

Alconbury Weald (SEL 1.1)

Due to the stage of development that Alconbury Weald has reached, many of the requirements in this policy including bullet points 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 are all covered by existing approvals, S106 agreements and conditions and will therefore have no additional impact on development of the site. For example green infrastructure requirements are already covered in an existing S106 agreement which has been carefully balanced with previously agreed viability requirement.

Bullet 7 references on-site community facilities. It should be noted that any new facility over and above

that already agreed should be carefully considered to ascertain who will be undertaking the long-term maintenance and management of the facility. It should also be noted that that if the provision is a combined provision this needs to align with all aspects. Please also see comments above regarding infrastructure provision

Bullet 8 regarding of site infrastructure provision is difficult to interpret as currently written. Ideally all infrastructure is to be provided on-site. As set out in current government policy and legislation all infrastructure provided is required to meet the 'three tests' and therefore the requirement does not add anything locally. It therefore does not meet Paragraph: 074 Reference ID: 41-074-20140306 of the NPPG.

Bullet 9 – please see comments above regarding infrastructure provision.

Bullet point 11 refers to 'sterilisation which is a requirement which is not only undefined but provides little guidance or criteria to enable a development management officer to reasonably assess the requirement, or for a developer to understand what is expected of them.

Bullet 12 - Reference to high-quality design built to a high sustainability standard provides little weight to the policy and instead replicates existing legislation and Local Plan policy requirements. There is no reference to any form of design code or guide, which would be recommended to provide locally specific guidance to developers as to how the policy should be applied. This is contrary to Paragraph: 074 Reference ID: 41-074-20140306 of National Planning Practice Guidance.

Bullet 13 also provides little weight to the policy again replicating existing legislation and Local Plan policy requirements already outlined in criteria d of strategic policy SEL 1.1 and supporting text in paragraph 9.12

In summary policy text in relation to 'Alconbury Weald (SEL 1.1) will not provide any additional impact to the existing strategic policy for the following reasons:

- The majority of the requirements have already been addressed through existing approvals, S106 agreements and conditions and will therefore have no additional impact on development of the site.
- Many of the requirements replicate that which is already set out in the Local Plan strategic policy.
- Some of the matters for consideration are now outside the scope of the Council and are being finalised by other authorities e.g. Cambridgeshire County Council for example bullet one and sustainable transport.

It is therefore proposed that this is either removed from the Neighbourhood Plan or the Neighbourhood Planning Group to meet with the Council to address the intricacies of the policy which would enable it to provide locally specific solutions that will provide a balance between the strategic delivery (without jeopardising viability) and a local community focussed policy

RAF Alconbury (SEL 1.2)

Paragraph 2 asks that "Proposals for RAF Alconbury should illustrate through an overall masterplan for the whole allocation SEL 1.2 how the proposals would deliver the following aspects:" Some of these requirements would be able to be fully addressed through a masterplan drawing for example the requirements as identified in the bullet points (1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12) would fall within a S106 agreement or applied as a planning condition. These aspects may be addressed in a more beneficial way for example by requiring the provision of additional evidence or a planning statement which demonstrate that the requirements can be met and how.

Bullet 10 (living conditions) – It is unclear how the proposed criteria regarding the 'reuse of existing large buildings' can be reconciled with paragraph one which asks that "Redevelopment proposals for RAF Alconbury should seek to enhance the character and appearance of the Little Stukeley Conservation Area through removal of large-scale utilitarian buildings in the area to the immediate north-east of Little Stukeley." The requirement therefore cannot enable a development management officer to reasonably assess the requirement, or for a developer to understand what is expected of them and fails to meet the guidance set out in Paragraph: 041 (Reference ID: 41-041-20140306) of the NPPG.

Bullet 11 - Reference to a 'high-quality new sustainable community' provides little weight to the policy and instead replicates existing legislation and Local Plan policy requirements. There is no reference to any form of design code or guide, which would be recommended to provide locally specific guidance to developers as to how the policy should be applied. The policy is therefore contrary to National Planning Practice Guidance notes that when considering whether a policy is in general conformity the following should be considered: does the "draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy" (Paragraph: 074 Reference ID: 41-074-20140306).

Bullet 12 also provides little weight to the policy again replicating existing legislation and Local Plan policy requirements already outlined in criteria b of strategic policy SEL 1.2 and supporting text in

paragraph 9.26.

It is strongly advised that the policy is accompanied by a plan that identifies potential infrastructure connections, edges/buildings that raise concerns etc. as a way to highlight what the policy is looking to tackle. This will enable development management officers and applicants to clearly identify which policy aspects need to be directly addressed.

Ermine Street, Huntingdon (HU 1)

The Council has no comment.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Changes

Removal of policy relating to SEL 1.1 Alconbury Weald.

SEL 1.2 RAF Alconbury:

- . Assurance that the addition of further policy criteria over and above the strategic and non-strategic policy requirements set out in the Local Plan are viable and achievable without restricting delivery on-site and meet the requirements set out in NPPF paragraph 57 and the Community Infrastructure Levy Regulations 2010 (as amended)
- . Revision of criteria to identify which can be achieved through the masterplanning process and which would require the provision of additional evidence or a planning statement which demonstrates that the requirements can be met and how.
- . Amendment to bullet 10 to ensure there is no conflict with regard to the reuse of existing large buildings.
- . Deletion of bullets 11 and 12
- . Inclusion of a plan that identifies potential infrastructure connections, edges/buildings that raise concerns etc. as a way to highlight what the policy is looking to tackle. This will enable development management officers and applicants to clearly identify which policy aspects need to be directly addressed.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Agent	Tom Kimber
Company / Organisation	David Lock Associates
Consultee	Urban & Civic
Company / Organisation	Urban & Civic
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Urban&Civic (Urban & Civic)
Comment ID	STNP:54
Response Date	10/11/22 13:59
Status	Processed
Submission Type	Email
Version	0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 3 - Strategic Development Delivery

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

RE: THE STUKELEYS NEIGHBOURHOOD PLAN 2022-2036 (SUBMISSION VERSION)
This response is produced by David Lock Associates on behalf of Urban&Civic Ltd (U&C), the landowners and master developer of Alconbury Weald. U&C have a long-term commitment to effective place making across Alconbury Weald and welcome the opportunity to provide comments in relation to the submission version of the Neighbourhood Plan.

U&C wish to make the following comments in relation to the planning policies contained within the draft Neighbourhood Plan.

Policy 3 – Strategic Development Delivery

The policy wording highlighting that the Stukeleys Parish Council will seek to develop an integrated overall network of communities within the Parish, in collaboration with Huntingdonshire District Council, Cambridgeshire County Council and developers is supported. Urban&Civic are committed to close joint working and engagement with Stukeleys Parish Council in the delivery of sustainable development at Alconbury Weald.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

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Future Notification

Comment

Agent	Lesley Golding
Consultee	Lesley Golding
Company / Organisation	* British Horse Society International UK Ltd

Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	British Horse Society International UK Ltd (Lesley Golding)
Comment ID	STNP:61
Response Date	14/11/22 10:45
Status	Processed
Submission Type	Email
Version	0.5

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on	Policy 3 - Strategic Development Delivery
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Please say whether you	Object
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Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The Stukeleys Parish Council will in collaboration with Huntingdonshire District Council, Cambridgeshire County Council and developers seek to develop an integrated overall network of communities across the Parish. This will include securing improvements to the sustainable transport linkages for walking and cycling between Alconbury Weald and the two villages of Great Stukeley and Little Stukeley to allow residents of the villages to better access the new services and facilities in Alconbury Weald.

Alconbury Weald (SEL 1.1)

Accessibility and Linkages • How proposals will maximise accessibility, including by sustainable transport modes, to green infrastructure and community facilities for the proposed additional community and the existing communities at Alconbury Weald and the villages of Little Stukeley and Great Stukeley; How a network of footpath and cycle routes can be integrated around the site and how links into Great and Little Stukeley and wider afield, can be achieved to promote the use of non-vehicle modes of transport for short journeys;

Green Infrastructure • How the proposed country park will be delivered and how it will relate to the Owl End and Green End parts of Great Stukeley; how new green infrastructure, open space, ecological corridors and structural landscaping can both contribute to amenity and result in biodiversity net gain; The needs of all Non Motorised Users (NMUs) including equestrians must be taken into consideration, not just cyclists and pedestrians. Any paths/routes should be improved/developed for all NMUs. Horse riders are considered to be part of Active Travel (Sustainable transport) according to the Local Transport Plan, and as such should be included.

RAF Alconbury (SEL 1.2)

Accessibility and Linkages • How proposals will maximise accessibility, including by sustainable transport modes, to green infrastructure and community facilities for the proposed additional community and The Stukeleys Neighbourhood Plan (Submission) 29 the existing communities at Alconbury Weald and the villages of Little Stukeley and Great Stukeley;

• How a network of footpath and cycle routes can be integrated around the site and how links into Alconbury Weald and Great and Little Stukeley and wider afield, can be achieved to promote the use of non-vehicle modes of transport for short journeys;

Green Infrastructure • How new green infrastructure, open space, ecological corridors and structural landscaping can both contribute to amenity and result in biodiversity net gain;

The needs of all Non Motorised Users (NMUs) including equestrians must be taken into consideration, not just cyclists and pedestrians. Any paths/routes should be improved/developed for all NMUs. Horse riders are considered to be part of Active Travel (Sustainable transport) according to the Local Transport Plan, and as such should be included.

The needs of all Non Motorised Users (NMUs) including equestrians must be taken into consideration, not just cyclists and pedestrians. Any paths/routes should be improved/developed for all NMUs. Horse riders are considered to be part of Active Travel (Sustainable transport) according to the Local Transport Plan, and as such should be included.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

The needs of all Non Motorised Users (NMUs) including equestrians must be taken into consideration, not just cyclists and pedestrians. Any paths/routes should be improved/developed for all NMUs. Horse riders are considered to be part of Active Travel (Sustainable transport) according to the Local Transport Plan, and as such should be included.

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If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Local Plans Team
Company / Organisation	Huntingdonshire District Council
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Huntingdonshire District Council (Local Plans Team)
Comment ID	STNP:37
Response Date	08/11/22 12:24
Status	Processed
Submission Type	Web
Version	0.4

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 4 - Community Engagement

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

A positive policy to engage the community in shaping their village. This accords the National Planning Policy Framework's aim of encouraging effective early engagement with the community (paragraph 40).

It would be beneficial to include the phrase 'subject to compliance with other relevant policies' (or similar) in the Policy to ensure that it is clear that the provision of a Statement of Community Involvement does not guarantee that the development will be granted permission. This will ensure that the policy meets basic condition a (having regard to national policies and advice contained in guidance) and paragraph 16 d of the NPPF which notes that Plans should "contain policies that are clearly written and unambiguous"

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Change

Paragraph 2

Proposals for development which are accompanied by a statement of community involvement that details how the outcome of the pre-application community engagement has been taken into account in the scheme submitted will be particularly supported: subject to accordance with the relevant Local Plan and Neighbourhood Plan policies.

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If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee Local Plans Team
Company / Organisation Huntingdonshire District Council

Event Name The Stukeleys Neighbourhood Plan Submission Consultation
Comment by Huntingdonshire District Council (Local Plans Team)
Comment ID STNP:38
Response Date 08/11/22 12:31
Status Processed
Submission Type Web
Version 0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 22. Community Assets

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

There are two paragraphs numbered as 22.6. This section requires renumbering.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

There are two paragraphs numbered as 22.6. This section requires renumbering.

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If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Tessa Saunders
Company / Organisation	Anglian Water Services Ltd
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Anglian Water Services Ltd (Tessa Saunders)
Comment ID	STNP:6
Response Date	03/10/22 10:12
Status	Processed
Submission Type	Email
Version	0.4

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 5 - Community Assets

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

- Policy 5 Community Assets and Map 5c - we note that the main community facilities area for Alconbury Weald includes an area to the south-east (Ermine Street Church Academy Primary School and associated grounds in Alconbury Weald). This area contains Anglian Water assets, including the Alconbury Weald Swynford Road Sewer Pumping Station. We consider that this asset is incorrectly included as part of the wider designation area as this is not a community asset, but part of our infrastructure network. Therefore, we request that Policy 5 should therefore not apply to any work/operations that may be required to enhance our network assets and the Sewer Pumping Station is removed from the community facilities area identified on map 5c.

CONCLUSION

Anglian Water is supportive of the direction taken in the The Stukeleys Neighbourhood Plan - subject to the suggested clarifications outlined in our response above. We consider the neighbourhood plan

will help to deliver sustainable development within the parish, in conjunction with the strategic policies in the adopted Huntingdonshire Local Plan.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

We request that Policy 5 should therefore not apply to any work/operations that may be required to enhance our network assets and the Sewer Pumping Station is removed from the community facilities area identified on map 5c.

Supporting documents

If you would like you can support your comment with documents. If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to the website where it is available or give a full reference (including author(s), full title and date of publication) in your comment. By submitting a supporting document you give permission for the council to use it for the Neighbourhood Plan for The Stukeleys and to reproduce the document for such purposes.

Please redact any personal information such as signatures.

Please note that you can upload more than one document but you will only see the last one that you have uploaded until your representation is processed.

Please note that any comments that are wholly contained within uploaded documents, with 'See attached' or similar in the comment field will not be accepted. [Anglian Water Response2.pdf](#)

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

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Future Notification



Anglian Water Consultation Response

The Stukeleys Neighbourhood Plan – Submission Consultation (Regulation 16)

Anglian Water welcomes the opportunity to respond to the consultation on The Stukeleys Submission Neighbourhood Plan.

Anglian Water

Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a full quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding. Additionally, our region has the highest rate of housing in England. The initial 2021 census report identifies that population growth in the region was 8.3% in the past decade against a national average of 6.6%. Population growth in Huntingdonshire district was broadly comparable to the national average at 6.7% between 2011 and 2021.

Anglian Water has amended its Articles of Association to include the requirement that in undertaking these duties we will act in the public interest. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop. We recognise the carbon impacts of managing customer's water needs and so Anglian Water has made the commitment to be a net zero business by 2030.

Anglian Water and the Neighbourhood Plan

Anglian Water is the statutory water and sewerage undertaker for The Stukeleys neighbourhood plan area and is a statutory consultee under the Neighbourhood Planning (General) Regulations 2012. Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for the residents, and in doing so protect the environment and water resources. As a purpose-led company, we are committed to seeking positive environmental and social outcomes for our region.

Water Resources

The Stukeleys parish is within the Ruthamford South Water Resource Zone (WRZ) – each WRZ is used to develop forecasts of supply and demand. The Ruthamford South WRZ is predicted to be in a severe supply-demand deficit for water supply due to the challenges of climate change and population growth. This means we will need more resilience to supply customers throughout the Anglian Water region in the coming decades. Our plans to invest in the water supply network are set out in the [Water Resource Management Plan 2019](#) (WRMP19) and the forthcoming WRMP24. Deficits driven by climate change and sustainability reductions in the Ruthamford WRZs will be addressed by transfer into Ruthamford North. Using existing infrastructure, this water is distributed to Ruthamford South. Neighbourhood Plans can have a role in introducing demand management measures that increase water efficiency with customers and enable supplies to be maintained, such as encouraging more ambitious water efficiency measures in new homes, and rainwater harvesting.

COMMENTS ON THE STUKELEYS NEIGHBOURHOOD PLAN

The following comments are made in relation to ensuring the making of the neighbourhood plan contributes to sustainable development and has appropriate regard to assets owned and managed by Anglian Water.

We consider that the necessary strategic policy requirements in relation to the provision of sustainable drainage and facilitating wastewater connections are addressed through the Huntingdonshire Local Plan strategic expansion policies:

- SEL 1.1 Alconbury Airfield and Grange Farm
- SEL 1.2 RAF Alconbury
- HUN 1 Ermine Street, Huntingdon

Together these policies allocate significant growth on the edge of Huntingdon, and within The Stukeleys neighbourhood plan area.

- Anglian Water supports the neighbourhood plan objectives for the promotion of sustainable development including green infrastructure and high sustainability standards of construction.
- **Policy 3 - Strategic Development Delivery** - we support this policy which encourages the delivery of sustainable strategic growth, including opportunities for green corridors and biodiversity net gain across the neighbourhood plan area. We suggest that green infrastructure should be developed in combination with sustainable drainage systems to ensure that these are designed in from the start and minimise the risk of surface water flooding, as well as providing opportunities for rainwater harvesting and recycling as part of the options to increase water efficiency of the new communities across Alconbury Weald and RAF Alconbury.
- **Policy 5 Community Assets and Map 5c** - we note that the main community facilities area for Alconbury Weald includes an area to the south-east (Ermine Street Church Academy Primary School and associated grounds in Alconbury Weald). This area contains Anglian Water assets, including the Alconbury Weald Swynford Road Sewer Pumping Station. We consider that this asset is incorrectly included as part of the wider designation area as this is not a community asset, but part of our infrastructure network. Therefore, we request that Policy 5 should therefore not apply to any work/operations that may be required to enhance our network assets and the Sewer Pumping Station is removed from the community facilities area identified on map 5c.
- **Para 28.3** - Anglian Water welcomes the neighbourhood plan reference to SuDS as an efficient and natural approach to managing surface water run-off, particularly noting the Alconbury Weald policy requirement to include SuDS (Local Plan Policy SEL 1.1).
- **Para 28.5** - We note that the neighbourhood plan references the Alconbury water recycling centre. Our [draft Drainage and Wastewater Management Plan](#) (DWMP 2025-2050) provides details regarding the Alconbury WRC - with a medium-term strategy to 2035 to provide a mixed strategy for the network, with main solution of SuDS and long-term strategy of 25% surface water removal across the water recycling network by 2050. The DWMP identifies that sustainable drainage systems are essential to the long-term operation of our water recycling network within this catchment.



- Accommodating wastewater flows from the strategic expansion sites is addressed through the respective Huntingdonshire Local Plan policies (SEL 1.1, SEL 1.2 and HUN 1). These growth areas are expected to connect to Huntingdon (Godmanchester) WRC unless alternative options become available. Early engagement with our pre-development team will ensure that the phasing of development across these sites can be accommodated by our wastewater network.
- **Policy 7 Green Infrastructure Network in Alconbury Weald** - we support the policy approach that would enhance the existing green infrastructure (GI) as multi-functional green space. The GI around Alconbury Weald already incorporates sustainable drainage features including swales and a balancing pond, and we consider that the policy could be amended to provide this clarification, so that the term drainage is replaced by 'sustainable drainage systems (SuDS)'.

...or for sustainable drainage systems (SuDS) will be supported subject...

CONCLUSION

Anglian Water is supportive of the direction taken in the The Stukeleys Neighbourhood Plan - subject to the suggested clarifications outlined in our response above. We consider the neighbourhood plan will help to deliver sustainable development within the parish, in conjunction with the strategic policies in the adopted Huntingdonshire Local Plan.

Comment

Consultee

Paul Ryan

Event Name

The Stukeleys Neighbourhood Plan Submission Consultation

Comment by

Paul Ryan

Comment ID

STNP:20

Response Date

01/11/22 06:52

Status

Processed

Submission Type

Email

Version

0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on

Policy 5 - Community Assets

Please say whether you

Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Paragraph 1 - add "And facilities for hospitality, tourism and making the most of historical and ecological interest"

Paragraph 2 - add "and provision for hospitality, tourism and making the most of historical and ecological interest"

Paragraph 4 - Noting that "loss" does not preclude change of use to an alternative community asset e.g the recreation field does not need to be preserved in its exact form as a field, but could be adapted for other outdoor recreation - as has been proposed and agreed.

Huntingdon Racecourse, bullet 1 - I don't think the Neighbourhood Plan can require the rugby club to continue to use the racecourse as its location in perpetuity.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Paragraph 1 - add "And facilities for hospitality, tourism and making the most of historical and ecological interest"

Paragraph 2 - add "and provision for hospitality, tourism and making the most of historical and ecological interest"

Paragraph 4 - Noting that "loss" does not preclude change of use to an alternative community asset e.g the recreation field does not need to be preserved in its exact form as a field, but could be adapted for other outdoor recreation - as has been proposed and agreed.

Huntingdon Racecourse, bullet 1 - I don't think the Neighbourhood Plan can require the rugby club to continue to use the racecourse as its location in perpetuity.

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Future Notification

Comment

Consultee	Local Plans Team
Company / Organisation	Huntingdonshire District Council
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Huntingdonshire District Council (Local Plans Team)
Comment ID	STNP:39
Response Date	08/11/22 12:32
Status	Processed
Submission Type	Web
Version	0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 5 - Community Assets

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The Council support this policy but have suggested a few amendments which could enable greater clarity in the interpretation of the policy for decision-making purposes and allow greater flexibility as new facilities are provided at strategic allocations.

The policy may want to make it clear that these are community facilities and not Assets of Community Value to avoid confusion. Alternatively, some general clarity on what is meant to be considered a 'community asset' could be incorporated into the policy (as in Local Plan policy LP22) to ensure the 'assets' identified do not constitute a closed list. This would also enable the policy to be more flexible as more facilities are delivered at Alconbury Weald. This will enable the policy to meet basic condition a (having regard to national policies and advice contained in guidance) and allow it to comply with:

- Paragraph 16 f of the National Planning policy framework which notes that 'Plans should... serve a

clear purpose, avoiding unnecessary duplication of policies that apply to a particular area'; and
• Paragraph: 041 Reference ID: 41-041-20140306 of National Planning Practice Guidance 'Neighbourhood Planning' which states that policies "...should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications"

Map 5b identifies numerous community facilities attributed to RAF Alconbury. The map implies that the loss of each facility "will be resisted unless it can be shown that they are poorly used". At the moment these facilities are not for 'wider community use' and have been specifically tailored to meet the needs of the base. It is difficult also to understand what uses these 'community assets' serve without further information.

If Strategic Allocation 1.2 RAF Alconbury were to be redeveloped it is unlikely that the wholesale retention of these facilities would a) be viable, or b) adequately meet the specific needs of the new community vis a vis sizes and services provided.

As it stands this suggested approach to RAF Alconbury is contrary to the Strategic Allocation 1.2 criterion 3 which requires social and community facilities to meet needs arising from the development and the finer site-specific requirements set out in paragraph 9.31. For example incorporating facilities in "accessible locations; multi-purpose use should be promoted to aid the viability and efficient use of such facilities." It is strongly advised that the map should be revised to remove community facilities at RAF Alconbury to ensure that it meets basic condition e "e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)." and ensure delivery of RAF Alconbury can be achieved.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Change

Revise text to make it clear that these are community facilities and not Assets of Community Value to avoid confusion. Alternatively, some general clarity on what is meant to be considered a 'community asset' could be incorporated into the policy.

Removal of 'community assets' associated with strategic allocation 1.2 RAF Alconbury from map 5b.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Wakako Hirose
Company / Organisation	Rapleys LLP
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Rapleys LLP (Wakako Hirose)
Comment ID	STNP:53
Response Date	10/11/22 15:50
Status	Processed
Submission Type	Email
Version	0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 5 - Community Assets

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Re: The Stukeleys Neighbourhood Plan 2022-2036 (Submission Plan) – Representations on behalf of Jockey Club Racecourses Limited

We act on behalf of Jockey Club Racecourses (JCR) and have been instructed to submit representations to the consultation on the Stukeleys Neighbourhood Plan (Submission Plan).

JCR is the owner and operator of Huntingdon Racecourse. We note that the Neighbourhood Plan does not contain any policies specific to the development of facilities at the Racecourse, on the basis that it is covered by Policy HU9 of the adopted Huntingdonshire Local Plan. We have no objection to this approach.

The area identified as a community asset/main community facility as the “Rugby Club at Huntingdon Racecourse” under Policy 5 is in JCR’s ownership. By virtue of the use and function of the area as an outdoor recreational/sporting facility, it is protected as “open space” by policy LP32 of the Local Plan, rather than Policy LP22 of the Local Plan which seeks to support and protect local services and community facilities.

As defined in the Local Plan and the supporting paragraphs for Policy 5, the role of open space is different from facilities protected by Policy LP22. Indeed, paragraph 22.3 identifies the Rugby Club site as one of important areas of open space, which can take many forms and provide important recreational and sporting facilities. Furthermore, Policy LP32 does not restrict the use of open space to a specific type of outdoor sports or recreational use. While it is currently in use by a rugby club, the site has a potential to provide other outdoor recreational and sporting facilities if the need for an alternative provision arises.

The Neighbourhood Plan could be interpreted to protect the site for use by a rugby club only rather than open space for outdoor sports and recreational uses. Policy 5 therefore risks placing an onerous barrier preventing the open space being used for alternative outdoor sports and recreational facilities (which would bring forward equivalent planning benefits to the rugby club) as in such circumstances it might lead officers to request marketing evidence to demonstrate that the rugby club is no longer viable and that it can be adapted to retain a viable community facility or service. Rather, the Neighbourhood Plan should be clear that it encourages and supports the use of the site for outdoor sports and recreation (and the planning benefits this would bring) more generally.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

We therefore object to Policy 5 and the site reference and request that the following changes are made:

- . The site should be defined as “outdoor sport and recreational facility” rather than a community asset.
- . The reference to the site (including map reference) should be amended to “outdoor sport and recreational area at Huntingdon Racecourse.”
- . The 4th paragraph of Policy 5 should be amended as follows:

“Proposals that would result in the loss of the following community assets, **with the exception of outdoor sport and recreational facilities**, will be resisted unless it can be shown³⁰ that they are poorly used, not viable or adequate replacement provision is made elsewhere in The Stukeleys which is an equivalent service or community facility located where it is equally or more accessible to the existing and planned new community it is intended to serve:

Proposals that would result in the loss of outdoor sport and recreational area will be resisted unless they replace the existing use with an alternative outdoor sport or recreational use, or the loss is justified by an assessment that demonstrates that the space is clearly surplus to the requirements of the current local population and the population of planned development that would be served by the space.”

- . The last paragraph of paragraph 23.2 should be amended as follows:

“The **current** Rugby Club site within the overall racecourse site is protected as **an outdoor sport and recreational facility** ~~community asset~~ under Policy 5 of this Neighbourhood Plan.”

We consider that the above changes are necessary to provide clarity in the interpretation of the policy in line with paragraph 16 of the National Planning Policy Framework (2021) and Paragraph 041 Reference ID 41-041-20140306 of National Planning Practice Guidance ‘Neighbourhood Planning’ and to ensure it is in general conformity with the Local Plan relative to Policy LP32.

We request that our representations are fully taken into account in the Neighbourhood Plan process.
We wish to be notified of the Neighbourhood Plan process.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Agent	Tom Kimber
Company / Organisation	David Lock Associates
Consultee	Urban & Civic
Company / Organisation	Urban&Civic
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Urban&Civic (Urban & Civic)
Comment ID	STNP:55
Response Date	10/11/22 14:01
Status	Processed
Submission Type	Email
Version	0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 5 - Community Assets

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

RE: THE STUKELEYS NEIGHBOURHOOD PLAN 2022-2036 (SUBMISSION VERSION)
This response is produced by David Lock Associates on behalf of Urban&Civic Ltd (U&C), the landowners and master developer of Alconbury Weald. U&C have a long-term commitment to effective place making across Alconbury Weald and welcome the opportunity to provide comments in relation to the submission version of the Neighbourhood Plan.

U&C wish to make the following comments in relation to the planning policies contained within the draft Neighbourhood Plan.

Policy 5 – Community Assets

The designation of The Café/Bistro, Swynford Stores and the Gym in The Club at Alconbury Weald as 'Community Assets' is not supported by Urban&Civic. These are commercial operations that may not continue in perpetuity or may be run by a different operator at some point in the future. Therefore, protecting their uses as a 'community asset' may restrict the future use of these spaces that is purposefully designed to be flexible to meet the needs of residents and visitors to Alconbury Weald. In particular, Swynford Stores was provided on a temporary basis, in a temporary building, to offer residents a convenience store before more permanent retail provision comes forward at Alconbury Weald. Urban& Civic also object to the designation of the temporary library within the Club Building as a community asset. This provision is also on a temporary basis ahead of more permanent and improved provision on the site. The permanent provision is a Section 106 obligation.

However, it is also acknowledged, and supported, that Policy 5 does allow for the 'loss' of community assets if they are poorly used, not viable, or adequate replacement is made elsewhere within The Stukeleys. Urban&Civic are committed to providing appropriate and viable community facilities at Alconbury Weald, as agreed within the Outline Planning Permission S106 Legal Agreement, and this may result in the need to re-provide facilities in a flexible way to ensure their ongoing provision. Urban&Civic are open to the idea to locate some of the community assets intended for Alconbury Weald within the wider Stukeley Parish. For example the permanent library or formal sports facilities.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Removal of the designation of The Café/Bistro, Swynford Stores and the Gym in The Club at Alconbury Weald as 'Community Assets'.

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If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Agent Lesley Golding
Consultee Lesley Golding (
*
British Horse Society International UK Ltd

Company / Organisation

Event Name The Stukeleys Neighbourhood Plan Submission Consultation
Comment by British Horse Society International UK Ltd (Lesley Golding)
Comment ID STNP:62
Response Date 14/11/22 10:46
Status Processed
Submission Type Email
Version 0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 5 - Community Assets

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Policy 5 – Community Assets

23. Huntingdon Racecourse 23.1 Policy HU 9 (Huntingdon Racecourse) in the Local Plan allocates 72ha of land at Huntingdon Racecourse for mixed use development to comprise: continued use of the site for the 30 See paragraph 22.6 and footnote 28 The Stukeleys Neighbourhood Plan (Submission) 33 racecourse, equine support facilities and Huntingdon Rugby Football Club; and complementary

conference and events facilities, outdoor recreational and leisure facilities.

23.2 Most but not all of the area within site HU 9 lies within the parish of The Stukeleys, the southern end including the access road, the stables and the Holiday Inn hotel is in the neighbouring parish of Brampton. The red dashed line shows the plan area boundary. Due to the Local Plan policy approach the Neighbourhood Plan does not set out any further policies for the development of facilities at the Racecourse. The Rugby Club site within the overall racecourse site is protected as a community asset under Policy 5 of this Neighbourhood Plan.

25.3 As detailed in Policy 3 The Stukeleys Parish Council will in collaboration with Huntingdonshire District Council, Cambridgeshire County Council and developers seek to develop an integrated overall network of communities across the Parish. This will include securing improvements to the sustainable transport linkages for walking and cycling between Alconbury Weald and the two villages of Great Stukeley and Little Stukeley to allow residents of the villages to better access the new services and facilities in Alconbury Weald. Improved linkages to Huntingdon including site HU 1 at Ermine Street could also improve active travel from the existing settlements to the higher order services and facilities in Huntingdon. Footway and cycleway provision can heavily influence the appearance of the public realm; proposals should avoid over-engineered design but should instead contribute to a high quality public realm.

The needs of all Non Motorised Users (NMUs) including equestrians must be taken into consideration, not just cyclists and pedestrians. Any paths/routes should be improved/developed for all NMUs. Horse riders are considered to be part of Active Travel (Sustainable transport) according to the Local Transport Plan, and as such should be included.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

The needs of all Non Motorised Users (NMUs) including equestrians must be taken into consideration, not just cyclists and pedestrians. Any paths/routes should be improved/developed for all NMUs. Horse riders are considered to be part of Active Travel (Sustainable transport) according to the Local Transport Plan, and as such should be included.

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If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee Local Plans Team
Company / Organisation Huntingdonshire District Council

Event Name The Stukeleys Neighbourhood Plan Submission Consultation
Comment by Huntingdonshire District Council (Local Plans Team)
Comment ID STNP:40
Response Date 08/11/22 12:41
Status Processed
Submission Type Web
Version 0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 23. Huntingdon Racecourse and Main Community Facilities

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Paragraph 23.2

As stated in the response to Policy 5, the text may want to make it clear that the Rugby Club site is a community facility and not an Asset of Community Value to avoid confusion.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Paragraph 23.2

As stated in the response to Policy 5, the text may want to make it clear that the Rugby Club site is a community facility and not an Asset of Community Value to avoid confusion.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee Local Plans Team
Company / Organisation Huntingdonshire District Council

Event Name The Stukeleys Neighbourhood Plan Submission Consultation
Comment by Huntingdonshire District Council (Local Plans Team)
Comment ID STNP:41
Response Date 08/11/22 12:45
Status Processed
Submission Type Web
Version 0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 26. Natural and Built Environment - Natural Environment

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Paragraph 26.9

This paragraph will need revising following changes to policy 3, which are strongly advocated to ensure the delivery of strategic allocations.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

This paragraph will need revising following changes to policy 3, which are strongly advocated to ensure the delivery of strategic allocations.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Francesca Lasman
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Francesca Lasman
Comment ID	STNP:3
Response Date	04/10/22 21:13
Status	Processed
Submission Type	Web
Version	0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 27. Natural and Built Environment - Trees and Woodlands

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The plan notes that the area has poor tree cover and the 5th lowest amount of tree cover in Huntingdonshire. It suggests that tree planting in Alconbury Weald country park could improve this, but misses an opportunity to propose more specific and environmentally beneficial proposals to expand and connect established small pockets of woodland. Prestley Wood, for example, could be connected with small patches of woodland on Grange Farm and along Owl End, and connect with Stukeley Country park. this would also improve potential amenity land . It should be noted that the original plan for Alconbury Weald proposed a very much larger country park, which has now been reduced to a "country runway" by the addition of 1500 houses not in the initial plan.Expanding the woodland area as proposed would go some way to restoring the promised parkland area for the benefit of new and existing residents. Ideally, the public footpath across Stukeley Park should connect to the Alconbury Weald country park via a woodland area.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

27.2 Additional tree and woodland planting within Alconbury Weald, for example as part of the country park would help to improve ecological networks within the Parish. The strategic development sites and the protected settlement breaks provide an opportunity to increase tree and hedgerow canopy cover across The Stukeleys and perform a dual purpose of enhancing the environment and contributing to biodiversity net gain. Incentives should be considered to encourage additional tree planting to connect existing small patches of woodland around Grange Farm, Prestley wood and behind Owl End, connecting with Stukeley Country park. This would provide meaningful wildlife corridors and add value to the proposed Alconbury Weald country park.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Tessa Saunders
Company / Organisation	Anglian Water Services Ltd
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Anglian Water Services Ltd (Tessa Saunders)
Comment ID	STNP:7
Response Date	03/10/22 10:12
Status	Processed
Submission Type	Email
Version	0.4

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 28. Natural and Built Environment - Flood Risk and Drainage

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Para 28.3 - Anglian Water welcomes the neighbourhood plan reference to SuDS as an efficient and natural approach to managing surface water run-off, particularly noting the Alconbury Weald policy requirement to include SuDS (Local Plan Policy SEL 1.1).

Para 28.5 - We note that the neighbourhood plan references the Alconbury water recycling centre. Our draft Drainage and Wastewater Management Plan (DWMP 2025-2050) provides details regarding the Alconbury WRC - with a medium-term strategy to 2035 to provide a mixed strategy for the network, with main solution of SuDS and long-term strategy of 25% surface water removal across the water recycling network by 2050. The DWMP identifies that sustainable drainage systems are essential to the long-term operation of our water recycling network within this catchment.

Accommodating wastewater flows from the strategic expansion sites is addressed through the respective Huntingdonshire Local Plan policies (SEL 1.1, SEL 1.2 and HUN 1). These growth areas are expected

to connect to Huntingdon (Godmanchester) WRC unless alternative options become available. Early engagement with our pre-development team will ensure that the phasing of development across these sites can be accommodated by our wastewater network.

CONCLUSION

Anglian Water is supportive of the direction taken in the The Stukeleys Neighbourhood Plan - subject to the suggested clarifications outlined in our response above. We consider the neighbourhood plan will help to deliver sustainable development within the parish, in conjunction with the strategic policies in the adopted Huntingdonshire Local Plan.

Supporting documents

If you would like you can support your comment with documents. If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to the website where it is available or give a full reference (including author(s), full title and date of publication) in your comment. By submitting a supporting document you give permission for the council to use it for the Neighbourhood Plan for The Stukeleys and to reproduce the document for such purposes.

Please redact any personal information such as signatures.

Please note that you can upload more than one document but you will only see the last one that you have uploaded until your representation is processed.

Please note that any comments that are wholly contained within uploaded documents, with 'See attached' or similar in the comment field will not be accepted. [Anglian Water Response2.pdf](#)

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Anglian Water Consultation Response

The Stukeleys Neighbourhood Plan – Submission Consultation (Regulation 16)

Anglian Water welcomes the opportunity to respond to the consultation on The Stukeleys Submission Neighbourhood Plan.

Anglian Water

Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a full quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding. Additionally, our region has the highest rate of housing in England. The initial 2021 census report identifies that population growth in the region was 8.3% in the past decade against a national average of 6.6%. Population growth in Huntingdonshire district was broadly comparable to the national average at 6.7% between 2011 and 2021.

Anglian Water has amended its Articles of Association to include the requirement that in undertaking these duties we will act in the public interest. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop. We recognise the carbon impacts of managing customer's water needs and so Anglian Water has made the commitment to be a net zero business by 2030.

Anglian Water and the Neighbourhood Plan

Anglian Water is the statutory water and sewerage undertaker for The Stukeleys neighbourhood plan area and is a statutory consultee under the Neighbourhood Planning (General) Regulations 2012. Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for the residents, and in doing so protect the environment and water resources. As a purpose-led company, we are committed to seeking positive environmental and social outcomes for our region.

Water Resources

The Stukeleys parish is within the Ruthamford South Water Resource Zone (WRZ) – each WRZ is used to develop forecasts of supply and demand. The Ruthamford South WRZ is predicted to be in a severe supply-demand deficit for water supply due to the challenges of climate change and population growth. This means we will need more resilience to supply customers throughout the Anglian Water region in the coming decades. Our plans to invest in the water supply network are set out in the [Water Resource Management Plan 2019](#) (WRMP19) and the forthcoming WRMP24. Deficits driven by climate change and sustainability reductions in the Ruthamford WRZs will be addressed by transfer into Ruthamford North. Using existing infrastructure, this water is distributed to Ruthamford South. Neighbourhood Plans can have a role in introducing demand management measures that increase water efficiency with customers and enable supplies to be maintained, such as encouraging more ambitious water efficiency measures in new homes, and rainwater harvesting.

COMMENTS ON THE STUKELEYS NEIGHBOURHOOD PLAN

The following comments are made in relation to ensuring the making of the neighbourhood plan contributes to sustainable development and has appropriate regard to assets owned and managed by Anglian Water.

We consider that the necessary strategic policy requirements in relation to the provision of sustainable drainage and facilitating wastewater connections are addressed through the Huntingdonshire Local Plan strategic expansion policies:

- SEL 1.1 Alconbury Airfield and Grange Farm
- SEL 1.2 RAF Alconbury
- HUN 1 Ermine Street, Huntingdon

Together these policies allocate significant growth on the edge of Huntingdon, and within The Stukeleys neighbourhood plan area.

- Anglian Water supports the neighbourhood plan objectives for the promotion of sustainable development including green infrastructure and high sustainability standards of construction.
- **Policy 3 - Strategic Development Delivery** - we support this policy which encourages the delivery of sustainable strategic growth, including opportunities for green corridors and biodiversity net gain across the neighbourhood plan area. We suggest that green infrastructure should be developed in combination with sustainable drainage systems to ensure that these are designed in from the start and minimise the risk of surface water flooding, as well as providing opportunities for rainwater harvesting and recycling as part of the options to increase water efficiency of the new communities across Alconbury Weald and RAF Alconbury.
- **Policy 5 Community Assets and Map 5c** - we note that the main community facilities area for Alconbury Weald includes an area to the south-east (Ermine Street Church Academy Primary School and associated grounds in Alconbury Weald). This area contains Anglian Water assets, including the Alconbury Weald Swynford Road Sewer Pumping Station. We consider that this asset is incorrectly included as part of the wider designation area as this is not a community asset, but part of our infrastructure network. Therefore, we request that Policy 5 should therefore not apply to any work/operations that may be required to enhance our network assets and the Sewer Pumping Station is removed from the community facilities area identified on map 5c.
- **Para 28.3** - Anglian Water welcomes the neighbourhood plan reference to SuDS as an efficient and natural approach to managing surface water run-off, particularly noting the Alconbury Weald policy requirement to include SuDS (Local Plan Policy SEL 1.1).
- **Para 28.5** - We note that the neighbourhood plan references the Alconbury water recycling centre. Our [draft Drainage and Wastewater Management Plan](#) (DWMP 2025-2050) provides details regarding the Alconbury WRC - with a medium-term strategy to 2035 to provide a mixed strategy for the network, with main solution of SuDS and long-term strategy of 25% surface water removal across the water recycling network by 2050. The DWMP identifies that sustainable drainage systems are essential to the long-term operation of our water recycling network within this catchment.



- Accommodating wastewater flows from the strategic expansion sites is addressed through the respective Huntingdonshire Local Plan policies (SEL 1.1, SEL 1.2 and HUN 1). These growth areas are expected to connect to Huntingdon (Godmanchester) WRC unless alternative options become available. Early engagement with our pre-development team will ensure that the phasing of development across these sites can be accommodated by our wastewater network.
- **Policy 7 Green Infrastructure Network in Alconbury Weald** - we support the policy approach that would enhance the existing green infrastructure (GI) as multi-functional green space. The GI around Alconbury Weald already incorporates sustainable drainage features including swales and a balancing pond, and we consider that the policy could be amended to provide this clarification, so that the term drainage is replaced by 'sustainable drainage systems (SuDS)'.

...or for sustainable drainage systems (SuDS) will be supported subject...

CONCLUSION

Anglian Water is supportive of the direction taken in the The Stukeleys Neighbourhood Plan - subject to the suggested clarifications outlined in our response above. We consider the neighbourhood plan will help to deliver sustainable development within the parish, in conjunction with the strategic policies in the adopted Huntingdonshire Local Plan.

Comment

Consultee	Joely Norris
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Joely Norris
Comment ID	STNP:51
Response Date	10/11/22 14:57
Status	Processed
Submission Type	Web
Version	0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 28. Natural and Built Environment - Flood Risk and Drainage

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Dear Planning Policy Team,

Thank you for consulting us on The Stukeleys Neighbourhood Plan 2022-2036 (dated September 2022).

It is extremely positive to the LLFA's previous comments incorporated into Section 28 of the updated Neighbourhood Plan; with information provided in relation to surface water flood risk and sustainable drainage systems (SuDS) and the following policies and documents referenced within the plan:

- Cambridgeshire Flood and Water Supplementary Planning Document
- Policies LP 5 and LP 15 of the Huntingdonshire Local Plan
- National Planning Policy Framework (NPPF)

Upon reviewing the plan, I have the following comments for your consideration:

1. Whilst it is noted that information in relation to surface water flood risk and sustainable drainage systems (SuDS) has been provided, specific reference should be made in reference to new developments and how surface water flood risk will be managed going forward.
2. Policies LP 5 and LP 15 of the Huntingdonshire Local Plan and the NPPF have been referenced and provided as a source, however, we would encourage that the Neighbourhood Plan is amended to specifically include policies LP 5, LP 15 and the Chapter 14 of the NPPF for all new developments.
3. In addition, reference should be made to the Non-Statutory Technical Standards for SuDS and the

Flood Risk and Coastal Change Planning Practice Guidance (PPG) which was updated in August 2022.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

1. Whilst it is noted that information in relation to surface water flood risk and sustainable drainage systems (SuDS) has been provided, specific reference should be made in reference to new developments and how surface water flood risk will be managed going forward.
2. Policies LP 5 and LP 15 of the Huntingdonshire Local Plan and the NPPF have been referenced and provided as a source, however, we would encourage that the Neighbourhood Plan is amended to specifically include policies LP 5, LP 15 and the Chapter 14 of the NPPF for all new developments.
3. In addition, reference should be made to the Non-Statutory Technical Standards for SuDS and the Flood Risk and Coastal Change Planning Practice Guidance (PPG) which was updated in August 2022.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

I would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan

Comment

Consultee

Paul Ryan

Event Name

The Stukeleys Neighbourhood Plan Submission Consultation

Comment by

Paul Ryan

Comment ID

STNP:21

Response Date

01/11/22 06:52

Status

Processed

Submission Type

Email

Version

0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on

29. Local Green Space and Green Infrastructure

Please say whether you

Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The only ecological policies that are proposed relate to designation of green space. Though this is important, a more significant omission is an overall "green environment" policy that can act as reference for the entire parish. In particular it should state objectives to:

- increase the numbers of trees
- improve connectivity between isolated areas with richer wildlife habitat e.g. areas of woodland, hedgerows etc.
- improve amount and quality of wildlife habitats for insects, bats and reptiles
- discourage measures that act against these objectives

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

The only ecological policies that are proposed relate to designation of green space. Though this is important, a more significant omission is an overall "green environment" policy that can act as reference for the entire parish. In particular it should state objectives to:

- increase the numbers of trees
- improve connectivity between isolated areas with richer wildlife habitat e.g. areas of woodland, hedgerows etc.
- improve amount and quality of wildlife habitats for insects, bats and reptiles
- discourage measures that act against these objectives

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Future Notification

Comment

Consultee	Local Plans Team
Company / Organisation	Huntingdonshire District Council
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Huntingdonshire District Council (Local Plans Team)
Comment ID Response	STNP:42
Date	08/11/22 12:46
Status	Processed
Submission Type	Web
Version	0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 29. Local Green Space and Green Infrastructure

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Paragraph 29.3

For clarity it may be advisable to add that the sites referred to in this paragraph have not been designated as Local Green Space. As it stands the paragraph - due to its position within the section 'Local Green Spaces and Green Infrastructure' - implies that the named sites are either Local Green Space or Green Infrastructure; which they are not. This could lead Development Management Officers and applicants to apply Neighbourhood Plan Policy 6 – Local Green Space to the named sites as opposed to LP 32 Protection of Open Space and LP 34 Heritage Assets and their Settings found in Huntingdonshire's Local Plan to 2036.

As such it is considered that this policy does not currently meet basic condition a (having regard to national policies and advice contained in guidance) with reference to:

- paragraph 16 f of the National Planning policy framework which notes that 'Plans should... serve a

clear purpose'

- Paragraph: 041 Reference ID: 41-041-20140306 of National Planning Practice Guidance 'Neighbourhood Planning' which states that policies "...should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications"

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Change

Removal of paragraph 29.3

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Future Notification

Comment

Consultee

Paul Ryan

Event Name

The Stukeleys Neighbourhood Plan Submission Consultation

Comment by

Paul Ryan

Comment ID

STNP:22

Response Date

01/11/22 06:52

Status

Processed

Submission Type

Email

Version

0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on

Policy 6 - Local Green Space

Please say whether you

Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Map 8a – Local Green Spaces – Great Stukeley

The area to the North of Stukeley Park should be included in the LGS. It would provide a green corridor to connect the park at Grange Farm and the woodland at the NE. See also 1887 map below Map 8a.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Map 8a – Local Green Spaces – Great Stukeley

The area to the North of Stukeley Park should be included in the LGS. It would provide a green corridor to connect the park at Grange Farm and the woodland at the NE. See also 1887 map below Map 8a

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

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Future Notification

Comment

Consultee Local Plans Team
Company / Organisation Huntingdonshire District Council

Event Name The Stukeleys Neighbourhood Plan Submission Consultation
Comment by Huntingdonshire District Council (Local Plans Team)
Comment ID STNP:43
Response Date 08/11/22 12:48
Status Processed
Submission Type Web
Version 0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 6 - Local Green Space

Please say whether you Support

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The Council supports this policy.

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Future Notification

Comment

Agent	Tom Kimber
Company / Organisation	David Lock Associates
Consultee	Urban & Civic
Company / Organisation	Urban&Civic
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Urban&Civic (Urban & Civic)
Comment ID	STNP:56
Response Date	10/11/22 14:04
Status	Processed
Submission Type	Email
Version	0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 6 - Local Green Space

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

RE: THE STUKELEYS NEIGHBOURHOOD PLAN 2022-2036 (SUBMISSION VERSION)
This response is produced by David Lock Associates on behalf of Urban&Civic Ltd (U&C), the landowners and master developer of Alconbury Weald. U&C have a long-term commitment to effective place making across Alconbury Weald and welcome the opportunity to provide comments in relation to the submission version of the Neighbourhood Plan.

U&C wish to make the following comments in relation to the planning policies contained within the draft Neighbourhood Plan.

Policy 6 Local Green Space and Policy 7 Green Infrastructure Network in Alconbury Weald

It is noted that Policy 6 Local Green Space has been amended to remove the majority of proposed designated 'Local Green Spaces' within Alconbury Weald (with the exception of the designation of Land at the Boulevard adjacent to the Watch Office). It is equally acknowledged that the Neighbourhood Plan now contains a new Policy 7 to protect the existing green infrastructure network at Alconbury Weald, unless adequate replacement provision is made elsewhere. U&C are committed to the provision of high-quality green spaces within Alconbury Weald, and equally support the flexibility included within the policy.

It is additionally noted that Policy 6 now includes Stukeley Park as a site to be designated as a Local Green Space. This was not included within the previous version of the Neighbourhood Plan. As set out in the Neighbourhood Plan, designation as Local Green Space will mean that the land will be protected in a manner consistent with the protection of land within a Green Belt. It is worth highlighting that this still enables the provision of buildings for agricultural or forestry use, or for the provision of appropriate facilities for outdoor sport, outdoor recreation, cemeteries and allotments as long as the facilities preserve openness.

The description of Stukeley Park is not considered to reflect the existing nature of the space, which is in private ownership and used as farmland to graze animals. The land is fenced all around, has a pen for herding sheep and parts of it have recently been sold off by the owners to extend gardens for some of the c.30 residential properties that back onto the land. The key elements referred to in the Neighbourhood plan, such as historic significance, relate to the land still retained by Stukeley Hall rather than the land referred to as Stukeley Park. The planting and landscaping referred to is located outside of the proposed Local Green Space designation, within the grounds of Stukeley Hall itself. 'Stukeley Fields' may be a better description of the proposed Local Green Space rather than Stukeley Park.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

The description of Stukeley Park is not considered to reflect the existing nature of the space, which is in private ownership and used as farmland to graze animals. The land is fenced all around, has a pen for herding sheep and parts of it have recently been sold off by the owners to extend gardens for some of the c.30 residential properties that back onto the land. The key elements referred to in the Neighbourhood plan, such as historic significance, relate to the land still retained by Stukeley Hall rather than the land referred to as Stukeley Park. The planting and landscaping referred to is located outside of the proposed Local Green Space designation, within the grounds of Stukeley Hall itself. 'Stukeley Fields' may be a better description of the proposed Local Green Space rather than Stukeley Park.

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Future Notification

Comment

Agent	Lesley Golding
Consultee	Lesley Golding
Company / Organisation	British Horse Society International UK Ltd *

Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	British Horse Society International UK Ltd (Lesley Golding)
Comment ID	STNP:63
Response Date	14/11/22 10:50
Status	Processed
Submission Type	Email
Version	0.4

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on	Policy 6 - Local Green Space
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Please say whether you	Object
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Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Stukeley Park This is a traditional parkland landscape which forms an important green open heart between the Owl End and Green End parts of Great Stukeley. It is the Victorian parkland associated with Stukeley Hall; the existing hall is thought to have been built for James Torkington whose family held the estate for 300 years. During the last century it was occupied by various families and finally by Howard Coote, who bought it in 1904. The Hall is now converted into apartments. The Stukeleys

Neighbourhood Plan (Submission) 46 Dating back to 1887, Ordnance Survey maps show the parkland to the south of the Hall with peripheral planting and shrubberies around the Hall, by 1924 the parkland had been extended with further landscaping and tree planting. Today the park borders the Hall sitting between Owl End and Green End. The parkland has natural beauty and historical significance and the parkland trees offers important ecological habitat. The parkland is crossed by a public footpath which links Owl End to Green End, this gives the opportunity for recreational value and tranquillity for local residents. Could this footpath be upgraded to a bridleway for use by both cyclists and equestrians, which would help to join up the disjointed bridleway network and provide safe off-road routes. There are stable years at Owl End and a bridleway that only goes to Owl End, so upgrading the footpath to a bridleway could provide a circular route.

Land at West View The land at West View is an open area dominated by trees at its northern end that offer the potential for ecological habitat with grassland at the southern end that is available for recreational use. It is the main open space within the southern side of Great Stukeley village. It provides the opportunity for informal recreation and has the visual appearance of a modern style village green. In this respect it makes an important contribution to the character and appearance of the local area. It is crossed by a public footpath that runs through the centre of the village, it is part of a natural circular walk on public footpaths around the southern side of the village. Could these aforementioned footpaths be upgraded to bridleways for use by both cyclists and equestrians, which would help to join up the disjointed bridleway network and provide safe off-road routes.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Stukeley Park - The parkland is crossed by a public footpath which links Owl End to Green End, this gives the opportunity for recreational value and tranquillity for local residents. Could this footpath be upgraded to a bridleway for use by both cyclists and equestrians, which would help to join up the disjointed bridleway network and provide safe off-road routes. There are stable years at Owl End and a bridleway that only goes to Owl End, so upgrading the footpath to a bridleway could provide a circular route.

Land at West View - Is crossed by a public footpath that runs through the centre of the village, it is part of a natural circular walk on public footpaths around the southern side of the village. Could these aforementioned footpaths be upgraded to bridleways for use by both cyclists and equestrians, which would help to join up the disjointed bridleway network and provide safe off-road routes.

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Future Notification

Comment

Consultee Tessa Saunders
Company / Organisation Anglian Water Services Ltd

Event Name

Comment by The Stukeleys Neighbourhood Plan Submission Consultation
Anglian Water Services Ltd (Tessa Saunders)

Comment ID STNP:8

Response Date 03/10/22 10:12

Status Processed

Submission Type Email

Version 0.4

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 7 - Green Infrastructure Network in Alconbury Weald

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Policy 7 Green Infrastructure Network in Alconbury Weald - we support the policy approach that would enhance the existing green infrastructure (GI) as multi-functional green space. The GI around Alconbury Weald already incorporates sustainable drainage features including swales and a balancing pond, and we consider that the policy could be amended to provide this clarification, so that the term drainage is replaced by 'sustainable drainage systems (SuDS)'.
...or for sustainable drainage systems (SuDS) will be supported subject...

CONCLUSION

Anglian Water is supportive of the direction taken in the The Stukeleys Neighbourhood Plan - subject to the suggested clarifications outlined in our response above. We consider the neighbourhood plan

will help to deliver sustainable development within the parish, in conjunction with the strategic policies in the adopted Huntingdonshire Local Plan.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

we consider that the policy could be amended to provide this clarification, so that the term drainage is replaced by 'sustainable drainage systems (SuDS)'.
...or for sustainable drainage systems (SuDS) will be supported subject...

Supporting documents

If you would like you can support your comment with documents. If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to the website where it is available or give a full reference (including author(s), full title and date of publication) in your comment. By submitting a supporting document you give permission for the council to use it for the Neighbourhood Plan for The Stukeleys and to reproduce the document for such purposes.

Please redact any personal information such as signatures.

Please note that you can upload more than one document but you will only see the last one that you have uploaded until your representation is processed.

Please note that any comments that are wholly contained within uploaded documents, with 'See attached' or similar in the comment field will not be accepted. [Anglian Water Response2.pdf](#)

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Future Notification



Anglian Water Consultation Response

The Stukeleys Neighbourhood Plan – Submission Consultation (Regulation 16)

Anglian Water welcomes the opportunity to respond to the consultation on The Stukeleys Submission Neighbourhood Plan.

Anglian Water

Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a full quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding. Additionally, our region has the highest rate of housing in England. The initial 2021 census report identifies that population growth in the region was 8.3% in the past decade against a national average of 6.6%. Population growth in Huntingdonshire district was broadly comparable to the national average at 6.7% between 2011 and 2021.

Anglian Water has amended its Articles of Association to include the requirement that in undertaking these duties we will act in the public interest. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop. We recognise the carbon impacts of managing customer's water needs and so Anglian Water has made the commitment to be a net zero business by 2030.

Anglian Water and the Neighbourhood Plan

Anglian Water is the statutory water and sewerage undertaker for The Stukeleys neighbourhood plan area and is a statutory consultee under the Neighbourhood Planning (General) Regulations 2012. Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for the residents, and in doing so protect the environment and water resources. As a purpose-led company, we are committed to seeking positive environmental and social outcomes for our region.

Water Resources

The Stukeleys parish is within the Ruthamford South Water Resource Zone (WRZ) – each WRZ is used to develop forecasts of supply and demand. The Ruthamford South WRZ is predicted to be in a severe supply-demand deficit for water supply due to the challenges of climate change and population growth. This means we will need more resilience to supply customers throughout the Anglian Water region in the coming decades. Our plans to invest in the water supply network are set out in the [Water Resource Management Plan 2019](#) (WRMP19) and the forthcoming WRMP24. Deficits driven by climate change and sustainability reductions in the Ruthamford WRZs will be addressed by transfer into Ruthamford North. Using existing infrastructure, this water is distributed to Ruthamford South. Neighbourhood Plans can have a role in introducing demand management measures that increase water efficiency with customers and enable supplies to be maintained, such as encouraging more ambitious water efficiency measures in new homes, and rainwater harvesting.

COMMENTS ON THE STUKELEYS NEIGHBOURHOOD PLAN

The following comments are made in relation to ensuring the making of the neighbourhood plan contributes to sustainable development and has appropriate regard to assets owned and managed by Anglian Water.

We consider that the necessary strategic policy requirements in relation to the provision of sustainable drainage and facilitating wastewater connections are addressed through the Huntingdonshire Local Plan strategic expansion policies:

- SEL 1.1 Alconbury Airfield and Grange Farm
- SEL 1.2 RAF Alconbury
- HUN 1 Ermine Street, Huntingdon

Together these policies allocate significant growth on the edge of Huntingdon, and within The Stukeleys neighbourhood plan area.

- Anglian Water supports the neighbourhood plan objectives for the promotion of sustainable development including green infrastructure and high sustainability standards of construction.
- **Policy 3 - Strategic Development Delivery** - we support this policy which encourages the delivery of sustainable strategic growth, including opportunities for green corridors and biodiversity net gain across the neighbourhood plan area. We suggest that green infrastructure should be developed in combination with sustainable drainage systems to ensure that these are designed in from the start and minimise the risk of surface water flooding, as well as providing opportunities for rainwater harvesting and recycling as part of the options to increase water efficiency of the new communities across Alconbury Weald and RAF Alconbury.
- **Policy 5 Community Assets and Map 5c** - we note that the main community facilities area for Alconbury Weald includes an area to the south-east (Ermine Street Church Academy Primary School and associated grounds in Alconbury Weald). This area contains Anglian Water assets, including the Alconbury Weald Swynford Road Sewer Pumping Station. We consider that this asset is incorrectly included as part of the wider designation area as this is not a community asset, but part of our infrastructure network. Therefore, we request that Policy 5 should therefore not apply to any work/operations that may be required to enhance our network assets and the Sewer Pumping Station is removed from the community facilities area identified on map 5c.
- **Para 28.3** - Anglian Water welcomes the neighbourhood plan reference to SuDS as an efficient and natural approach to managing surface water run-off, particularly noting the Alconbury Weald policy requirement to include SuDS (Local Plan Policy SEL 1.1).
- **Para 28.5** - We note that the neighbourhood plan references the Alconbury water recycling centre. Our [draft Drainage and Wastewater Management Plan](#) (DWMP 2025-2050) provides details regarding the Alconbury WRC - with a medium-term strategy to 2035 to provide a mixed strategy for the network, with main solution of SuDS and long-term strategy of 25% surface water removal across the water recycling network by 2050. The DWMP identifies that sustainable drainage systems are essential to the long-term operation of our water recycling network within this catchment.



- Accommodating wastewater flows from the strategic expansion sites is addressed through the respective Huntingdonshire Local Plan policies (SEL 1.1, SEL 1.2 and HUN 1). These growth areas are expected to connect to Huntingdon (Godmanchester) WRC unless alternative options become available. Early engagement with our pre-development team will ensure that the phasing of development across these sites can be accommodated by our wastewater network.
- **Policy 7 Green Infrastructure Network in Alconbury Weald** - we support the policy approach that would enhance the existing green infrastructure (GI) as multi-functional green space. The GI around Alconbury Weald already incorporates sustainable drainage features including swales and a balancing pond, and we consider that the policy could be amended to provide this clarification, so that the term drainage is replaced by 'sustainable drainage systems (SuDS)'.

...or for sustainable drainage systems (SuDS) will be supported subject...

CONCLUSION

Anglian Water is supportive of the direction taken in the The Stukeleys Neighbourhood Plan - subject to the suggested clarifications outlined in our response above. We consider the neighbourhood plan will help to deliver sustainable development within the parish, in conjunction with the strategic policies in the adopted Huntingdonshire Local Plan.

Comment

Consultee

Paul Ryan

Event Name

The Stukeleys Neighbourhood Plan Submission Consultation

Comment by

Paul Ryan

Comment ID

STNP:23

Response Date

01/11/22 06:52

Status

Processed

Submission Type

Email

Version

0.5

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on

Policy 7 - Green Infrastructure Network in Alconbury Weald

Please say whether you

Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Paragraph 2 - Future green infrastructure that is consented & planned, should be included in the policy

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Paragraph 2 - Future green infrastructure that is consented & planned, should be included in the policy

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If you would prefer not to receive notifications about future planning consultations and just be kept informed of The Stukeleys Neighbourhood Plan please tick the box below.

Future Notification

Comment

Consultee	Local Plans Team
Company / Organisation	Huntingdonshire District Council
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Huntingdonshire District Council (Local Plans Team)
Comment ID	STNP:44
Response Date	08/11/22 12:49
Status	Processed
Submission Type	Web
Version	0.4

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 7 - Green Infrastructure Network in Alconbury Weald

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Suggested changes have been provided below to ensure that delivery of strategic allocation SEL 1.1 Alconbury Weald can be achieved. This will ensure that the policy meets basic condition e (in general conformity with the strategic policies contained in the development plan) as it currently:

- does not support and uphold the general principle that the strategic policy is concerned with (Paragraph: 074 Reference ID: 41-074-20140306)
- creates conflict the neighbourhood plan policy, development proposal and Local Plan strategic policy (Paragraph: 074 Reference ID: 41-074-20140306)

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Change

It is recommended that the word 'existing' is removed in the first sentence of paragraph 2 of the policy. This will ensure that any future green infrastructure provided is also protected.

Paragraph 2 of the policy requires additional text to ensure that wider delivery of Alconbury Weald can be achieved and thus the priorities for strategic allocation SEL 1.1. The following wording has been proposed:

Proposals that would result in the loss of any part of the existing Green Infrastructure Network in Alconbury Weald will be resisted where it would undermine the connectivity of the Green Infrastructure Network or reduce the accessibility of Green Infrastructure to the community unless it can be shown that:

- a) It is in compliance with policy SEL 1.1, of Huntingdonshire's Local Plan to 2036, permitted schemes and masterplan; and
- b) adequate replacement provision can made elsewhere in Alconbury Weald which performs an equivalent role; and
- c) is located where it is equally or more accessible to the existing and planned new community it is intended to serve.

This consultation is being run through Huntingdonshire District Council's Planning Consultation Portal website. Registering on the Consultation Portal will keep you informed about all future planning policy consultation events for Huntingdonshire.

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Future Notification

Comment

Agent	Lesley Golding
Consultee	Lesley Golding
Company / Organisation	British Horse Society International UK Ltd *

Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	British Horse Society International UK Ltd (Lesley Golding)
Comment ID	STNP:64
Response Date	14/11/22 10:55
Status	Processed
Submission Type	Email
Version	0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on	Policy 7 - Green Infrastructure Network in Alconbury Weald
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Please say whether you	Object
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Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Policy 7 – Green Infrastructure Network in Alconbury Weald
Development proposals that result in the improvement/enhancement of the existing Green Infrastructure Network in Alconbury Weald or that result in the provision of additions or extensions to the Green Infrastructure Network as multi-functional green space in Alconbury Weald as the community develops,

including through the provision of additional play facilities; recreational footpaths; biodiversity enhancement; or for drainage will be supported subject to their compliance with other development plan policies.

Proposals that would result in the loss of any part of the existing Green Infrastructure Network in Alconbury Weald will be resisted where it would undermine the connectivity of the Green Infrastructure Network or reduce the accessibility of Green Infrastructure to the community unless it can be shown that adequate replacement provision is made elsewhere in Alconbury Weald which performs an equivalent role and is located where it is equally or more accessible to the existing and planned new community it is intended to serve.

31.8 The neighbourhood proportion of the CIL will be focused on assisting the delivery of community infrastructure projects located in The Stukeleys Parish. In terms of priorities for spending the neighbourhood portion of CIL these will include consideration of: • the creation of Pocket Parks; • provision of play equipment; • provision of a Multi-Use Games Area (MUGA); • highway enhancements such as road safety improvements; and • pavement or footway enhancements; and improvements to the sustainable transport linkages between Alconbury Weald and the two villages of Great Stukeley and Little Stukeley to allow residents of the villages to better access the new services and facilities in Alconbury Weald.

Sustainable transport modes: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.

The needs of all Non Motorised Users (NMUs) including equestrians must be taken into consideration, not just cyclists and pedestrians. Any paths/routes should be improved/developed for all NMUs. Horse riders are considered to be part of Active Travel (Sustainable transport) according to the Local Transport Plan, and as such should be included.

Rights of Way (ROW) IMPROVEMENTS

The BHS would like to suggest enhancement of the current ROW network as follows:

Upgrading of footpaths to bridleways to mitigate the disjointed bridleway network would enable equestrians and cyclists to use more of the ROW network in this area. Bridleways should not be hard-topped and converted into cycle tracks. It is important to many users to have a soft-surface on the bridleways, and this should be protected at all costs as the bridleways are valuable historical assets. Suggested upgrades:

- Upgrade footpath 10 to a bridleway to link up to the existing bridleway and make a circular route.
- Upgrade footpath 11 to a bridleway. Horse riders have in the past used this route.
- Upgrade footpaths 7/9 to bridleways. Horse riders already use these routes as otherwise they are cut off from The Stukeleys. These footpaths have been used historically for 60 years, first by Macer Gifford and Terry Pinner training and now by the liveries at Home Farm Alconbury. The horse riders go over the bridge as there are mounting blocks on either side to remount.
- When Hinchingsbrooke Park was built, with a small circular bridleway, there was not enough money to link up via a tunnel to bridleway 26, which would have opened up the park, but at the moment access is cut off by the old spur road ie the A1307.
- In order to get from the bridleway at Green End to Bridleway 26 it is necessary to cross a busy dangerous road, Ermine Street. A crossing suitable for all users, including horse riders, should be installed for the benefit and safety of all.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

The needs of all Non Motorised Users (NMUs) including equestrians must be taken into consideration, not just cyclists and pedestrians. Any paths/routes should be improved/developed for all NMUs. Horse riders are considered to be part of Active Travel (Sustainable transport) according to the Local Transport Plan, and as such should be included.

Suggested upgrades:

- . Upgrade footpath 10 to a bridleway to link up to the existing bridleway and make a circular route.
- . Upgrade footpath 11 to a bridleway. Horse riders have in the past used this route.
- . Upgrade footpaths 7/9 to bridleways. Horse riders already use these routes as otherwise they are cut off from The Stukeleys. These footpaths have been used historically for 60 years, first by Macer Gifford and Terry Pinner training and now by the liveries at Home Farm Alconbury. The horse riders go over the bridge as there are mounting blocks on either side to remount.
- . When Hinchingsbrooke Park was built, with a small circular bridleway, there was not enough money to link up via a tunnel to bridleway 26, which would have opened up the park, but at the moment access is cut off by the old spur road ie the A1307.
- . In order to get from the bridleway at Green End to Bridleway 26 it is necessary to cross a busy dangerous road, Ermine Street. A crossing suitable for all users, including horse riders, should be installed for the benefit and safety of all.

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Future Notification

Comment

Consultee Local Plans Team
Company / Organisation Huntingdonshire District Council

Event Name The Stukeleys Neighbourhood Plan Submission Consultation
Comment by Huntingdonshire District Council (Local Plans Team)
Comment ID STNP:45
Response Date 08/11/22 12:54
Status Processed
Submission Type Web
Version 0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 30. Protected Settlement Breaks

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The paragraph is inaccurate, Policy 3 does not require that the Country Park is required to prevent coalescence.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Change
Delete paragraph 30.6

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Future Notification

Comment

Consultee	Local Plans Team
Company / Organisation	Huntingdonshire District Council
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Huntingdonshire District Council (Local Plans Team)
Comment ID	STNP:46
Response Date	08/11/22 12:55
Status	Processed
Submission Type	Web
Version	0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 8 - Protected Settlement Breaks

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

It is recommended that clear reasoning or evidence is provided to explain the need and drivers for settlement breaks. For example, is the intent here to create green corridors/wedges into the settlement? Why were these locations chosen and how?

Local Plan policy LP 28 Rural Exceptions Housing although not a strategic policy notes that "A proposal for housing will be supported on a site well-related to a built-up area, as an exception to the requirements of relevant policies". This policy assists in the delivery of proportionate small scale development opportunities to provide affordable housing for people with a local connection. If such a development were to be proposed on a settlement break it would be beneficial to provide specific criteria to enable development management officers to assess whether "coalescence and retaining spatial, physical and visual separation between the settlements is secured." As it stands it is considered that the policy fails to meet the guidance set out in Paragraph: 041 (Reference ID: 41-041-20140306) of the NPPG where:

“It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications.” and thus basic condition a.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Change

Provision of specific criteria within the policy to enable development management officers to assess whether “coalescence and retaining spatial, physical and visual separation between the settlements is secured”.

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Future Notification

Comment

Consultee

S Dockerill

Event Name

The Stukeleys Neighbourhood Plan Submission Consultation

Comment by

S Dockerill (Hutchinsons Planning)

Comment ID

STNP:50

Response Date

09/11/22 16:54

Status

Processed

Submission Type

Email

Version

0.4

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on

Policy 8 - Protected Settlement Breaks

Please say whether you

Support

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

We support in principle the Protected Settlement Breaks as set out in Policy 8, which avoid the coalescence of settlements and seek to preserve the separate identity of the two villages. Indeed, the identified settlement break on the south side of Ermine Street at Little Stukeley as shown on Map 9b supports our contention that this land relates to the open countryside, and should remain so, whereas the land to the west referred to above has a much stronger relationship with the small housing group further to the north-west and, quite correctly, has been excluded from the defined Settlement Break.

Do you think changes are needed to address the issue you have identified? No

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Future Notification

Comment

Consultee	Mrs Stacey Rawlings
Company / Organisation	Roebuck Land and PLanning Ltd
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Roebuck Land and PLanning Ltd (Mrs Stacey Rawlings)
Comment ID Response	STNP:52
Date	10/11/22 15:23
Status	Processed
Submission Type	Email
Version	0.3

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on Policy 8 - Protected Settlement Breaks

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

RESPONSE ON BEHALF OF H RABY & SONS

General:

On behalf of our client, we welcome this opportunity to comment on the Stukeleys Neighbourhood Plan 2022-2036 (SNP) Submission Plan dated September 2022. We are largely supportive of the Neighbourhood Plan; however, we have some specific comments in relation to Policy 8 'Protected Settlement Breaks'. For this reason, our comments only focus on this element of the SNP.

NPPF Paragraph 31 requires all policies to be underpinned by relevant and up to date evidence (proportionate and focused to justify policies). There is a particular areas of concern where the draft plan includes descriptions and a policy that is not properly supported by the accompanying evidence base. As a result, the Policy 8 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).

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).

Protected Settlement Breaks – Policy 8

The Settlement Boundary Methodology (Supporting Document 7) states at paragraph 26:

“The protected settlement breaks form important green corridors which retain the identity of the existing settlement. They also provide opportunities for new green infrastructure and/or biodiversity enhancement to support the delivery of the strategic allocations.”

This is repeated at supporting paragraph 30.2 of the SNP.

The majority of the protected settlement breaks are within private ownership, and often not within the same ownership of the adjoining allocations. As such, although this policy can restrict development in certain locations, it will have no influence on the enhancement of biodiversity or green infrastructure for the HU1 strategic expansion location in the Huntingdonshire Local Plan to 2036. There is no evidence to show how they will support the delivery of the strategic allocations. LP2036 Policy HU1 is currently the subject of two outline planning applications that combine to cover the entire allocation. Neither require or include any land beyond the respective red line areas to deliver any part of the development, green infrastructure or biodiversity net gain.

The justification also states that the Stukeleys are made up from two established villages, Little Stukeley and Great Stukeley. Great Stukeley derives its character from the 'three ends', Green End, Owl End and Church End, albeit there is no existing gap between Owl End and Church End. Policy 8 – Protected Settlement Breaks specifically states that the identified protected settlement breaks are required to prevent the coalescence of the planned development at Huntingdon, RAF Alconbury and Alconbury Weald with the existing settlements of Great and Little Stukeley. However, all of the proposed 'breaks' are outside the allocations as well as outside the SNP settlement boundaries. This policy is therefore wholly unnecessary and provides no more protection than the land already has in policy terms.

The settlement boundary proposed by 'Policy 1 'Definition of Built-up Area' (Settlement Boundary)' is more than sufficient to provide a suitable planning policy framework for the determination of planning applications. The area of land between HU1 and the southeastern area of Great Stukeley, particularly at Green End, has been assessed during the adoption of the Local Plan and was not considered appropriate for special protection as a protected gap.

Part of this policy is justified on the basis that it promotes green infrastructure in line with Policy LP3 of the Local Plan. Policy 8 of the SNP does not however promote the enhancement of public space, because the land is privately owned, rather it only seeks to restrict development in these areas. It does not provide an additional level of detail or a distinct local approach to that set out in the strategic policy. It is also considered that there is a lack of justification for this policy with the specific areas identified not assessed in terms of their contribution towards the distinctiveness or setting of the villages. Rather they appear to have been identified as areas for development which the parish council therefore seek to resist. It is therefore concluded that this policy is unduly restrictive and not positively prepared. It also runs the risk of preventing appropriate agricultural related development or other proposals that are appropriate on land well-related to the built-up area of small settlements as supported by LP9, LP10, LP19, LP28 of the LP2036 and the NPPF. It does not meet the Basic Conditions in this respect.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Change Required:

It is proposed that this policy should be removed in its entirety for the reasons provided above. Should the examiner consider the general policy is justified, modifications are required to ensure it is suitable for decision-making purposes. If retained, the wording of the second paragraph should also be amended to be more positive rather than wholly restrictive. The text 'will not be supported unless' should be changed to "will be supported where it does not conflict with the purpose of"

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Future Notification

Comment

Consultee

Paul Ryan

Event Name

The Stukeleys Neighbourhood Plan Submission Consultation

Comment by

Paul Ryan

Comment ID

STNP:24

Response Date

01/11/22 06:52

Status

Processed

Submission Type

Email

Version

0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on

31. Implementation and Delivery

Please say whether you

Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Paragraph 31.8, bullet 5 - add "and to other travel and recreation destinations: Huntingdon, Alconbury, Brampton, Abbots Ripton"

Paragraph 31.9 - after 'and community facilities and transport add ".. and including health and recreation"

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Paragraph 31.8, bullet 5 - add "and to other travel and recreation destinations: Huntingdon, Alconbury, Brampton, Abbots Ripton"

Paragraph 31.9 - after 'and community facilities and transport add ".. and including health and recreation"

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Future Notification

Comment

Consultee	Local Plans Team
Company / Organisation	Huntingdonshire District Council
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Huntingdonshire District Council (Local Plans Team)
Comment ID	STNP:47
Response Date	08/11/22 12:57
Status	Processed
Submission Type	Web
Version	0.4

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 31. Implementation and Delivery

Please say whether you Object

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

Minor changes proposed to ensure the text is clear and reflects current legislation, policy and guidance and thus basic condition a.

Paragraph 31.3 references benefit to existing residents. It should be noted that new development does not create new infrastructure for existing residents – however what is provided by new development may also by default be of benefit to others

Paragraph 31.7 It should be noted that CIL may not be obtained from any housing development. It will depend on a variety of factors for example, if it is a new dwelling, the size of development, or if an exemption is approved etc. With reference to “The element of CIL which is the district portion will be spent by Huntingdonshire District Council on district-wide infrastructure in line with the priorities that HDC has set.” Reference to the Council’s Infrastructure Funding Statement with corresponding web link would assist in providing greater clarity to the paragraph.

Paragraph 31.8 identifies infrastructure priorities for the Parish. Has the Parish Council considered

further infrastructure requirements that could be of benefit to the local community such as health and education. There is no current evidence provided to justify how these priorities have been identified, how they have been decided, what specific projects have been agreed, indicative costs, other potential funding sources, or lead delivery partner or delivery partners that would be required to implement the project.

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Changes

Paragraph 31.3

"New development creates a need to provide new infrastructure, facilities and services to successfully incorporate new development into the surrounding area to benefit ~~existing~~, new and future residents..."

Paragraph 31.7

~~"Contributions through CIL will be obtained from any housing development taking place in the Parish. Some new development taking place in the Parish will be liable for CIL contributions."~~

Paragraph 31.8

Consideration of further infrastructure requirements such as health and education.

Provision of evidence provided to justify how these priorities have been identified, how they have been decided, what specific projects have been agreed, indicative costs, other potential funding sources, or lead delivery partner or delivery partners that would be required to implement the project.

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Future Notification

Comment

Consultee	Local Plans Team
Company / Organisation	Huntingdonshire District Council
Event Name	The Stukeleys Neighbourhood Plan Submission Consultation
Comment by	Huntingdonshire District Council (Local Plans Team)
Comment ID	STNP:48
Response Date	08/11/22 13:13
Status	Processed
Submission Type	Web
Version	0.2

Please tell us which part of the Neighbourhood Plan you are commenting on.

I am commenting on 33. Glossary

Please say whether you Have observations

Please give details of your comment and the reasons for it here. Please use following questions to identify any changes you would like to see made to the plan. Please be as concise as possible and ensure that the section/paragraph/figure that your comments relates to is mentioned.

My comment

The Glossary has not met basic condition a (having regard to national policies and advice contained in guidance) as it does not comply with Paragraph: 041 Reference ID: 41-041-20140306 of National Planning Practice Guidance 'Neighbourhood Planning' which states that policies "...should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications".

Do you think changes are needed to address the issue you have identified? Yes

Please tell us what changes would address the issue(s) that you have identified.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it (**U**) and identifying any text to be deleted by striking it through (**ABC**).

What changes would address the issue(s) that you have identified?

Suggested Change

It is recommended that a separate asterisk/ symbol is provided to identify:

- 1 those items in the glossary which do not fully replicate what is in the NPPF; and
- 2 definitions that are not defined in the NPPF glossary *

Further it is recommended that paragraph 33.1 is made clearer to ensure that those reading the plan look at the appropriate definitions in the correct documents to avoid a mis-interpretation definitions and that full compliance with those documents is achieved.

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Future Notification