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Report on the Great Staughton Neighbourhood Plan 2021 – 2036

An Examination undertaken for Huntingdonshire District Council with the support of Great Staughton Parish Council on the September 2024 draft submission version of the Plan.

Independent Examiner: Andrew S Freeman BSc (Hons) DipTP DipEM FRTPI

Date of Report: 3 April 2025

Contents

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Main Findings - Executive Summary	3
1. Introduction and Background	3
Great Staughton Neighbourhood Plan 2021 - 2036.....	3
The Independent Examiner	3
The Scope of the Examination	4
The Basic Conditions.....	5
2. Approach to the Examination	5
Planning Policy Context	5
Submitted Documents.....	5
Site Visit	6
Written Representations with or without Public Hearing	6
Modifications	7
3. Procedural Compliance and Human Rights	7
Qualifying Body and Neighbourhood Plan Area	7
Plan Period	7
Neighbourhood Plan Preparation and Consultation	7
Development and Use of Land.....	8
Excluded Development.....	8
Human Rights	8
4. Compliance with the Basic Conditions.....	8
EU Obligations	8
Main Issues	9
Issue 1 – Spatial Strategy and Housing.....	10
Issue 2 – Village Character	12
Issue 3 – Historic Environment	13
Issue 4 – Natural Environment	13
Issue 5 – Climate Change	14
Issue 6 – Transport and Accessibility	15
Issue 7 – Economy and Village Facilities.....	15
Other Policies	15
Other Matters	15
5. Conclusions	16
Summary	16
The Referendum and its Area	16
Appendix: Modifications	18

Main Findings - Executive Summary

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

I have also concluded that:

- the Plan has been prepared and submitted for examination by a qualifying body – Great Staughton Parish Council;
- the Plan has been prepared for an area properly designated – the Great Staughton Neighbourhood Plan Area – as shown on Map 1;
- the Plan specifies the period to which it is to take effect – 2021 - 2036; and
- the policies relate to the development and use of land for a designated neighbourhood area.

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

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

1. Introduction and Background

Great Staughton Neighbourhood Plan 2021 - 2036

- 1.1 Great Staughton is a civil parish and village within the Huntingdonshire District of Cambridgeshire and is located towards the southwestern boundary of the county and to the southwest of Grafham Water. The village of Great Staughton is central to the Parish. Kimbolton is about 5 km to the northwest whilst St Neots is some 7 km to the southeast. Huntingdon itself is approximately 13 km away to the northeast.
- 1.2 The Parish was designated as a neighbourhood area by Huntingdonshire District Council in January 2021. Since then, plan preparation has proceeded under the auspices of the Parish Council with the support of a number of topic-based working groups. The resultant Plan has an overarching vision, nine broad objectives and 19 detailed policies under seven topic headings.

The Independent Examiner

- 1.3 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Great Staughton Neighbourhood Plan by Huntingdonshire District Council, with the agreement of Great Staughton Parish Council.

- 1.4 I am a chartered town planner and former government Planning Inspector with over forty years' experience. I have worked in both the public and the private sectors. I am an independent examiner and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

- 1.5 As the independent examiner I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.6 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ("the 1990 Act"). The examiner must consider:
- Whether the plan meets the Basic Conditions;
 - Whether the plan complies with provisions under Sections 38A and 38B of the Planning and Compulsory Purchase Act 2004 (as amended) ("the 2004 Act"). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for "excluded development";
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area;
 - whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum; and
 - Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) ("the 2012 Regulations").
- 1.7 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

- 1.8 The “Basic Conditions” are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan for the area;
 - be compatible with and not breach European Union (EU) obligations (under retained EU law)¹; and
 - meet prescribed conditions and comply with prescribed matters.
- 1.9 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the Neighbourhood Development Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.²

2. Approach to the Examination

Planning Policy Context

- 2.1 The Development Plan for this part of Huntingdonshire District Council, not including documents relating to excluded minerals and waste development, is Huntingdonshire’s Local Plan to 2036.
- 2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. Unless otherwise stated, all references in this report are to the December 2023 NPPF and its accompanying PPG.³

Submitted Documents

¹ The existing body of environmental regulation is retained in UK law.

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

³ A revised NPPF was published on 12 December 2024 which includes transitional arrangements for neighbourhood plans. Paragraph 239 of the December 2024 NPPF advises that it will only apply to neighbourhood plans submitted after 12 March 2025.

2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:

- the draft Neighbourhood Plan 2021 – 2036, September 2024;
- a map which identifies the area to which the proposed Neighbourhood Development Plan relates;
- the Consultation Statement, 29 August 2024;
- the Basic Conditions Statement, 29 August 2024;
- all the representations that have been made in accordance with the Regulation 16 consultation;
- the Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report, September 2023, prepared by Huntingdonshire District Council;
- the Strategic Environmental Assessment (SEA) for Great Staughton Neighbourhood Plan, November 2024, prepared by AECOM; and
- the request for additional clarification sought in my letter dated 20 February 2025 and the joint response from Huntingdonshire District Council and Great Staughton Parish Council received on 6 March 2025.⁴

2.4 A number of further supporting evidential documents were provided as follows:

- the Planning Policy Context Analysis, 7 October 2021;
- the Demographic & Socio-Economic Review, 10 November 2021;
- the Non Designated Heritage Assets report, 26 April 2023;
- the Draft Landscape and Townscape Assessment. 28 April 2023;
- the Site Options and Assessment - Final Report, May 2023;
- the Flood Risk Assessment For the Proposed Allocation For Residential Development of Land South of 29 The Green, February 2024; and
- the Sequential Test Report, 29 August 2024.⁵

Site Visit

2.5 I made an unaccompanied site visit to the Neighbourhood Plan Area on 17 March 2025 to familiarise myself with it and visit relevant sites and areas referenced in the Plan and evidential documents.

Written Representations with or without Public Hearing

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

⁴ View all the documents referenced in paragraph 2.3 above at:

<https://consult.huntingdonshire.gov.uk/kse/event/38254> and
<https://www.huntingdonshire.gov.uk/planning/neighbourhood-planning/>

⁵ View at: <https://consult.huntingdonshire.gov.uk/kse/event/38254>

Modifications

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

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Great Staughton Neighbourhood Plan has been prepared and submitted for examination by Great Staughton Parish Council, which is a qualifying body for an area that was designated by Huntingdonshire District Council on 21 January 2021.
- 3.2 It is the only Neighbourhood Plan for the Great Staughton Neighbourhood Plan Area and does not relate to land outside the designated Neighbourhood Plan Area.

Plan Period

- 3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2021 to 2036.

Neighbourhood Plan Preparation and Consultation

- 3.4 Details of plan preparation and consultation are set out in the Parish Council's Consultation Statement. Following designation of the Parish as a neighbourhood area on 21 January 2021, plan preparation was progressed by the Parish Council in a number of distinct stages. Stage one involved the recruitment of interested individuals and stakeholders. Key themes were identified at stage two and policy ideas were developed at stage 3. Sections 2 to 4 of the Consultation Statement detail the engagement activities undertaken at each of those stages.
- 3.5 Formal consultation on the draft Plan under Regulation 14 took place between 20 September 2023 and 2 November 2023. Details of the persons and bodies consulted together with an explanation of how they were consulted are set out in the Consultation Statement (Section 5). Comments received and the response of the Parish Council are summarised in Appendix 8 of the Consultation Statement.
- 3.6 In response to the formal consultation under Regulation 16 (11 December 2024 to 5 February 2025), some 51 representations⁶ (including five accepted late representations) were received from 22 different parties. In

⁶ <https://consult.huntingdonshire.gov.uk/kse/event/38254/peoplesubmissions/>

addition to those of Huntingdonshire District Council, they included comments from statutory consultees, other public bodies and members of the public.

- 3.7 I am satisfied that, at both the Regulation 14 and the Regulation 16 stages, the consultation process met the legal requirements and there has been procedural compliance. Regard has been paid to the advice on plan preparation and engagement in the PPG.

Development and Use of Land

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

Excluded Development

- 3.9 The Plan does not include provisions and policies for “excluded development”.⁷

Human Rights

- 3.10 An assessment of Human Rights has been carried out by consultants acting on behalf of Great Staughton Parish Council. This indicates that there is no breach of Human Rights (within the meaning of the Human Rights Act 1998). From my independent assessment, I see no reason to disagree.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 Through the Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report prepared by Huntingdonshire District Council, the Plan was screened for both SEA and Habitats Regulations Assessment (HRA). With regard to HRA, this was not triggered. Natural England considered that significant effects on Habitats sites, either alone or in combination, would be unlikely.⁸ From my independent assessment of the matter, I have no reason to disagree.
- 4.2 In terms of the SEA, the screening report concluded that SEA would be required. Historic England was concerned about the potential impact of the allocation at Brook Farmyard on designated heritage assets; the Environment Agency highlighted the surface water risk on the proposed allocation at land south of 29 The Green; and Natural England considered that views of local wildlife organisations should be sought in determining if a SEA was required.

⁷ The meaning of ‘excluded development’ is set out in s.61K of the 1990 Act.

⁸ See email dated 24 August 2023 in Appendix 1 of the Screening Report

4.3 As a result, SEA was carried out by consultants AECOM. In the event, it was concluded that the Neighbourhood Plan would not be likely to lead to negative effects under any of the topics that were the focus of the SEA. Having read the Assessment, I support this conclusion.

Main Issues

4.4 Having regard for the Great Staughton Neighbourhood Plan, the consultation responses and other evidence, and the site visit, I consider that there are seven main issues relating to the Basic Conditions for this examination. These concern:

- Spatial Strategy and Housing;
- Village Character;
- Historic Environment;
- Natural Environment;
- Climate Change;
- Transport and Accessibility; and
- Economy and Village Facilities.

4.5 Before I deal with the main issues, I have a few observations to make with regard to the representations. First, the Great Staughton Neighbourhood Plan should be seen in the context of the wider planning system. This includes Huntingdonshire's Local Plan to 2036 as well as the NPPF and PPG. It is not necessary to repeat in the Neighbourhood Plan matters that are quite adequately dealt with elsewhere.⁹ Having said that, there may be scope to give emphasis to matters particularly relevant in the context of Great Staughton.

4.6 Secondly, the Neighbourhood Plan does not have to deal with each and every matter raised through the consultation (including omission sites). In this regard, the content of the Neighbourhood Plan and the scope of the policies is largely at the discretion of the qualifying body, albeit informed by the consultation process and the requirements set by the Basic Conditions.

4.7 Thirdly, my central task is to judge whether the Neighbourhood Plan satisfies the Basic Conditions. Many of the representations do not demonstrate or indicate a failure to meet those conditions or other legal requirements. Similarly, many of the suggested additions and improvements are not necessary when judged against the Basic Conditions.

4.8 The following section of my report sets out modifications that are necessary in order to meet the Basic Conditions. Some of the proposed modifications are factual corrections.¹⁰ Others are necessary in order to

⁹ See NPPF, Paragraph 16 f).

¹⁰ Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.

have closer regard to national policies and advice. In particular, plans should be succinct and contain policies that are clearly written and unambiguous.¹¹ A decision maker should be able to apply them consistently and with confidence when determining planning applications. In addition, the policies should be supported by appropriate evidence.¹²

Issue 1 – Spatial Strategy and Housing

- 4.9 Policy GSNP 1 (Spatial Strategy) identifies how at least 60 dwellings are going to be delivered over the Plan period. This would be achieved, in part, through housing development at Brook Farm, which is housing that may be needed to enable the delivery of a healthcare facility on the same site. In this regard, the policy gives emphasis to the development of the healthcare facility. To reflect the purpose of the policy, the focus should be on the residential development, leaving the healthcare allocation to be dealt with under Policy GSNP 3.
- 4.10 In addition to the identified ways of meeting growth, I am aware that Local Plan Policy LP9, Small Settlements, can support development proposals on land well-related to the built-up area. For completeness, such opportunities should be recognised in Policy GSNP 1. Absence of such reference could suggest, mistakenly, an intention to deviate from the provisions of the Local Plan.
- 4.11 Comments from the Environment Agency (Comment ID: GSNP 18) have drawn attention to capacity issues at the Kimbolton Waste Water Treatment Works. It may be necessary to phase development in line with infrastructure improvements. A related addition to the policy will be necessary. Appropriate amendments to cover these matters are set out in proposed modification **PM1**.
- 4.12 Amongst other things, Policy GSNP 2 identifies development that would be supported within the built-up area boundary. This includes infill development for up to two dwellings. In this regard, I have seen no evidence to demonstrate why there should be a limit of two dwellings. Indeed, such a restriction may result in the ineffective use of land. Bearing in mind also safeguards within the policy, I consider that reference to “small scale” development would be more appropriate.
- 4.13 On a second matter, there is no mention within the policy of the ‘enabling’ housing development at Brook Farm. For clarity and completeness, reference should be added. Necessary changes are included in proposed modification **PM2**.
- 4.14 Policy GSNP 3 deals with the healthcare proposal at Brook Farm. For clarity, and since the allocation also covers enabling residential development as well as the healthcare facility, this should be referred to in

¹¹ NPPF, Paragraphs 15 and 16 d).

¹² PPG Reference ID: 41-041-20140306.

the title and in the description of the allocation (corrected to refer to Brook Farm, not Brook Farmyard¹³).

4.15 Other amendments to Policy GSNP 3 are necessary in the interests of clarity and succinctness. In this regard:

- The policy cannot directly *require* the provision of land, building, GP surgery, dispensary and the like. However, development that includes these facilities can be expected to enjoy the support of the policy.
- Provision “to the satisfaction of the local planning authority or local highway authority” is inexact terminology because the requirements are uncertain.
- If proposals for vehicular access or for the remediation of contaminated land were unacceptable, the related planning application would be refused. There is no need to refer to the local highways authority or local planning authority.
- Although consultation would undoubtedly take place in connection with several of the criteria, it is the local planning authority (not the local highway authority or other body) that makes the final decision on planning applications.
- The policy calls for “a satisfactory distance between new dwellings and the sewage pumping station in consultation with Anglian Water”. Paragraph 5.38 of the supporting text refers to a minimum separation distance of 15 metres. This requirement should be set out in the policy.

4.16 Paragraph 5.44 of the supporting text refers to the possibility of extending development into the field to the rear (0.2 hectares). However, I am told¹⁴ that the extent of the site area is likely to change further and that the extended development would benefit from the provisions of Local Plan Policy LP 22 Local Services and Community Facilities. In the circumstances, specific reference to the area of any extended site is best avoided. Necessary amendments are set out in proposed modification **PM3**.

4.17 A housing allocation at The Green is the subject of Policy GSNP 4. A number of amendments are required:

- In criterion i, and to be succinct, there is no need to refer to Policy GSNP 6. This will apply in any event.
- “Provide” should be inserted at the beginning of criterion ii (omitted in error).

¹³ See the response to my questions received on 6 March 2025

¹⁴ See the response to my questions received on 6 March 2025

- In criterion iii, the requirements should be carried out in consultation with the Environment Agency, the Local Lead Flood Authority and the District Council.
- In criterion iv, delete reference to the local highways authority.
- Clarity should be added to criterion vi by making provision for suitable access for the maintenance of the foul drainage infrastructure.
- In respect of the B645 Pedestrian Crossing, requirements should be subject to the tests set out in NPPF, Paragraph 57.

Proposed modification **PM4** identifies the necessary amendments.

- 4.18 Turning to Policy GSNP 6, this concerns the allocation of affordable housing. However, whilst it is possible to restrict *occupation* to those with a strong local connection, *allocation* is the responsibility of the local housing authority or registered provider. It is not a matter of development management. Re-wording of the policy will be necessary (proposed modification **PM5**).
- 4.19 As to the legitimacy of the provision, the District Council has referred to a scheme at Jewell Close where affordable housing is already the subject of a local connection provision. The District Council does not feel that it is necessary for any local connection criteria to be applied to any other remaining social rented properties in the Parish.
- 4.20 For my part, I note that the numbers are likely to be quite small. If housing were to be included in a scheme at Brook Farm, then the viability of any affordable element might be questionable given that the scheme would already be subsidising the healthcare facilities. In addition, and notwithstanding the reference to affordable housing in Paragraph 5.42, there may well be fewer than 10 housing units (thus falling outside the provisions of Local Plan Policy LP 24, Affordable Housing Provision).
- 4.21 The other identified housing scheme in Great Staughton, at The Green, is for approximately 20 dwellings. If 40% were affordable units, and half of those were subject to a local connection requirement, the number involved would be four units. Bearing in mind also evidence summarised in Paragraphs 5.69 and 5.70 of the Plan, it does not appear to me that such provision would be 'unnecessary', irrespective of availability at Jewell Close.

Issue 2 – Village Character

- 4.22 Landscape and townscape characteristics are addressed under Policy GSNP 7 where there is reference to the Great Staughton Landscape and Townscape Assessment. For clarity, a link to this document should be provided, as in proposed modification **PM6**.

Issue 3 – Historic Environment

- 4.23 Amongst other things, Policy GSNP 10 deals with Non-Designated Heritage Assets. It is the intention that such assets should be formally designated under the policy.¹⁵ However, there is confusion over the naming of the assets in Paragraph 7.11 and in their mapping on Map 7 and Map 8. Accurate details would be provided under proposed modification **PM7**.

Issue 4 – Natural Environment

- 4.24 Policy GSNP 11 deals with biodiversity and wildlife sites. As well as the use of consistent terminology (sites of ecological importance rather than sites of biodiversity importance), amendments are needed to ensure consistency between the sites identified in the policy and those shown on the related maps.
- 4.25 The policy text relating to Map 9B refers to the whole of the river valley of the Kym. For accuracy, the text should refer to “the path of the River Kym”. Also, to reflect the most recent policy position¹⁶, the Grafham-Brampton-River Kym Habitat Network should be illustrated and referenced in the policy.
- 4.26 Roadside verges are also referred to in relation to Map 9B. However, a map of important or valued roadside verges has not yet been prepared.¹⁷ Without such mapping, there is no clarity over the areas to which the policy is intended to apply. Deletion of the reference is necessary.
- 4.27 Four water bodies are referenced in relation to Map 9C. However, they are not numbered on the map itself and (for those with no local knowledge) it is not possible to tell which is which. Related numbers should be added to Map 9C.
- 4.28 Turning to Map 9D, the policy includes reference to two copses, one individual tree and two groups of trees. For accuracy in development management, the specific location and extent of the features needs to be known. Revised mapping is required.
- 4.29 In terms of Biodiversity Net Gain (BNG), the policy requires that BNG for all qualifying development shall be a minimum of 20%, subject to viability. In this regard, the PPG states (Reference ID: 74-006-20240214):
- “Plan makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any*

¹⁵ See the response to my questions received on 6 March 2025

¹⁶ See the response to my questions received on 6 March 2025

¹⁷ See the response to my questions received on 6 March 2025

impact on viability for development. Consideration will also need to be given to how the policy will be implemented.”

- 4.30 As to local need for the higher percentage, I can see that the Neighbourhood Plan policy would help (in a small way) meet the challenges set out in initiatives such as the County Council’s “Doubling Nature 2018” and also help mitigate climate change and support increased diversity. However, I would not regard such assistance as “essential” or as definite evidence of a local need for a higher percentage.
- 4.31 In terms of local opportunities, I have seen examples such as Soham Commons in the Soham and Barway Neighbourhood Plan Topic Paper on wildlife habitats and biodiversity, but no such referenced examples in Great Staughton.
- 4.32 Finally, on impact on viability of development, examples have been given for Swale Borough and for the Kent Nature Partnership. However, there are no local examples based on costs in Great Staughton.
- 4.33 The policy provisions on BNG also require submission of an implementation and management strategy covering a period of 10 years. Irrespective of the time period that should be used, this requirement duplicates statutory requirements and should be deleted.
- 4.34 I have concluded that BNG at a minimum rate of 20% has not been justified. Other matters referred to above can be amended as under proposed modification **PM8**.

Issue 5 – Climate Change

- 4.35 Policy GSNP 12 concerns Sustainable Construction and Energy Efficiency. Steps identified include ensuring buildings use a low carbon heat source. Although a laudable objective, powers in this regard are limited. The provision would be better added to the first part of the policy which sets out desirable actions on the policy topic. Proposed modification **PM9** refers.
- 4.36 Policy GSNP 13 – Community Led Renewable Energy Projects gives support to “a proposal [in the singular] for a Community Led Renewable Energy Project”. However, the policy is intended to be supportive of more than one project if more than one came forward.¹⁸ Amended wording is needed (proposed modification **PM10**).
- 4.37 The concluding paragraph of Policy GSNP 15 – Surface Water Flood Risk refers to standards set out in various named documents “and other relevant codes of practice”. This requirement would lead to uncertainty in that an applicant would not know what codes of practice are to be applied. The requirement should be changed as in proposed modification **PM11**.

¹⁸ See the response to my questions received on 6 March 2025

Issue 6 – Transport and Accessibility

- 4.38 Policy GSNP 17 – Road Safety and Parking includes provisions in circumstances where “proposals are likely to impact adversely on road safety”. In this regard, I can envisage situations where there is an adverse impact but that impact would not be sufficient to require action. To accord more closely with the provisions of the NPPF (Paragraphs 114 d). and 115), the provision should refer to unacceptable adverse impacts. Proposed modification **PM12** sets out an appropriate change.

Issue 7 – Economy and Village Facilities

- 4.39 Policy GSNP 19 is a policy protective of local services and facilities (as listed in the policy). However, the facilities are not mapped in any way. For someone unfamiliar with the area, it would be difficult to locate the facilities. In addition, there is no information on the extent of the curtilages of the facilities and hence the area to which the policy would apply.
- 4.40 I have been provided¹⁹ with a map that would show the necessary information, a map that would be inserted under proposed modification **PM13**.

Other Policies

- 4.41 Policy GSNP 8 – Local Green Space seeks to designate the Recreation Ground as local green space. In conducting my site inspection, I visited the Recreation Ground and concur with the overall assessment in paragraph 6.30 of the Plan. I am therefore satisfied that the Recreation Ground meets the criteria in the NPPF, Paragraph 106; is capable of enduring beyond the end of the Plan period (Paragraph 105); and should be so designated.
- 4.42 The remaining policies that have not been the subject of commentary in the above report concern Policy GSNP 5 - Housing Mix; Policy GSNP 9 - Great Staughton Conservation Areas; Policy GSNP 14 - Water Efficiency; Policy GSNP 16 - Walkable and Cycle Neighbourhoods; and Policy GSNP 18 - New Pedestrian and Cycle Routes.
- 4.43 To a greater or lesser extent, these topics are covered in NPPF Sections 5 (Delivering a sufficient supply of homes; 9 (Promoting sustainable transport); 14 (Meeting the challenge of climate change, flooding and coastal change); and 15 (Conserving and enhancing the historic environment). I find that there has been regard for national policy and that the Basic Conditions have been met.

Other Matters

¹⁹ See the response to my questions received on 6 March 2025

4.44 All policy areas have been considered in the foregoing discussion. With the modifications that I have recommended, the Plan would meet the Basic Conditions. Other minor non material changes (that do not affect the Basic Conditions)²⁰, including those suggested by Huntingdonshire District Council as well as consequential amendments, corrections (for example, the Plan contains two page ones) and up-dates, could be made prior to the referendum at the Councils' discretion.

5. Conclusions

Summary

- 5.1 The Great Staughton Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

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

²⁰ PPG Reference ID:41-106-20190509.

Overview

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

Andrew S Freeman

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no/ other reference	Modification
PM1	Page 15	<p>In Policy GSNP1, replace point iii with the following:</p> <p>“On land at Brook Farm, The Highway, such residential development as is demonstrably necessary to enable the delivery of a GP surgery / NHS healthcare facility in accordance with Policy GSNP 3; and”.</p> <p>At the end of the policy add, “v. “windfall” sites on land well related to the Built Up Area Boundary identified on Map 3 that come forward during the Plan period and are in accordance with local and national policy.”</p> <p>After new criterion v, add the following paragraph:</p> <p>“Development proposals will only be supported if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to meet all the necessary requirements arising from a proposed development. Where appropriate, development may need to be phased spatially and chronologically to enable the provision of infrastructure in a timely manner with conditions or planning obligations to be used in securing any phasing arrangements.”</p>
PM2	Page 17	<p>In the second paragraph of Policy GSNP 2, replace “up to 2 dwellings” with “small scale development”. Make a similar change to Paragraph 5.12.</p> <p>After “Brook Farm”, insert “(and essential enabling housing)”.</p>

PM3	Page 21	<p>In Policy GSNP 3, replace all the text up to and including “The following criteria also apply” with the following:</p> <p>“POLICY GSNP 3 – Healthcare Facility and Enabling Housing at Brook Farm</p> <p>A site at Brook Farm, as defined on Map 4, is allocated for provision of a healthcare facility and enabling housing development.</p> <p>A comprehensive development of the whole of the allocated site for a healthcare facility (GP Surgery, dispensary and NHS healthcare facility) and enabling housing will be supported where, as appropriate, the proposal is designed and landscaped so as to enhance the character and appearance of the area, the Conservation Area and the setting of the nearby Listed Buildings.”</p> <p>At the end of criterion vi. delete “and to the satisfaction of the local highways authority”.</p> <p>At the end of criterion ix, delete “to the satisfaction of the Environment Agency, Local Lead Flood Authority and the District Council”. At the beginning of the criterion, insert: “In consultation with the Environment Agency, the Local Lead Flood Authority and the District Council, provide...”.</p> <p>Amend the end of criterion x. so that it reads “can be remediated satisfactorily”.</p> <p>Replace criterion xi. With the following: “Safeguard the living conditions of residents by ensuring that any residential curtilage is a minimum of 15m from the sewage pumping station.”</p> <p>Replace the penultimate paragraph of the policy with the following:</p>
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		<p>“Residential development will be supported where an independent Viability Assessment demonstrates that such development is essential to enable the delivery of the healthcare facility.”</p> <p>In Paragraph 5.44 of the supporting text, delete “(0.2 hectares)”.</p>
PM4	Page 25	<p>In Policy GSNP 4, criterion i, delete all the text after “affordable housing needs”.</p> <p>At the beginning of Criterion ii, insert “Provide”.</p> <p>At the end of criterion iii, delete “to the satisfaction of the Environment Agency, Local Lead Flood Authority and the District Council”. At the beginning of the criterion, insert: “In consultation with the Environment Agency, the Local Lead Flood Authority and the District Council, provide...”.</p> <p>At the end of Criterion iv, delete “and to the satisfaction of the local highways authority”.</p> <p>In Criterion vi, replace “safeguard a” with “make provision for”.</p> <p>At the beginning of the paragraph relating to the B645 Pedestrian Crossing, insert “Subject to the tests set out in Paragraph 57 of the NPPF (December 2023),”.</p>
PM5	Page 29	<p>For the first three paragraphs of Policy GSNP 6, substitute the following:</p> <p>“In respect of all new affordable housing provision within the Parish, a minimum of 50% of the affordable homes for rent and 50% of Low Cost Home Ownership shall be occupied by households with a strong local connection.”</p>

PM6	Page 35	In Policy GSNP 7, provide a link to the Great Staughton Landscape and Townscape Assessment.
PM7	Pages 38 to 40	In Policy GSNP10, add a new penultimate paragraph: "The assets listed below and shown on Maps 7 and 8 are designated as non-designated heritage assets:" [List the assets as set out in the response to my questions as received on 6 March 2025 and substitute Maps 7 and 8 as provided.]
PM8	Pages 43 to 44	In Policy GSNP 11, amend the list of sites shown under "Map 9A shows" by separately listing Perry and Agden Woods. Amend Map 9A to show numbering that corresponds with that in the policy. In the policy reference to Map 9B, substitute "path of the River Kym" for "whole river valley of the". In the policy and the mapping, add reference to the Grafham-Brampton-River Kym Habitat Network. To Map 9C, add numbering that coincides with the numbering in the policy. In relation to Map 9D, provide added detail such that the location and geographical extent of the listed features can be identified. Delete the paragraph commencing "In addition to the mandatory Biodiversity Net Gain requirements", and the following sub-paragraphs (a) and (b) and replace with: "When a biodiversity net gain proposal is being formulated, the following are encouraged:". Delete the paragraph commencing "As appropriate to their scale".

PM9	Page 48	In Policy GSNP 12, delete criterion iv. At the end of the opening paragraph of the policy, add "including the use of low carbon heat sources".
PM10	Page 52	At the commencement of Policy GSNP 13, change "A proposal for a Community Led Energy Project" to "Proposals for Community Led Energy Projects".
PM11	Page 54	In the final paragraph of Policy GSNP 15, delete "and other relevant codes of practice". After "technical guidance", insert "including advice".
PM12	Page 57	In the second paragraph of Policy GSNP 17, change "impact adversely" to "unacceptably impact adversely".
PM13	Page 61	In relation to Policy GSNP 19, insert a map of the listed facilities [as included in the response to my questions received on 6 March 2025]. ²¹

²¹ View at: <https://www.huntingdonshire.gov.uk/media/haddwbvm/great-staughton-neighbourhood-plan-examination-responses.pdf>