

# Appendix 2 - The Examiners Report



## **Report on Huntingdon Neighbourhood Plan 2018 - 2026**

**An Examination undertaken for Huntingdon District Council with the support of Huntingdon Town Council on the October 2018 submission version of the Plan.**

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Date of Report: 09 May 2019

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## **Main Findings** - Executive Summary

From my examination of the Huntingdon 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 – Huntingdon Town Council;
- the Plan has been prepared for an area properly designated – the Huntingdon Neighbourhood Area as shown on the map on Page 11 of the Plan;
- the Plan specifies the period to which it is to take effect – 2018 - 2026; 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**

### *Huntingdon Neighbourhood Plan 2018 - 2026*

- 1.1 Huntingdon is one of five principal towns in the district of Huntingdonshire within the county of Cambridgeshire. It is situated about 30km to the northwest of Cambridge and a similar distance to the south of Peterborough. The town lies north of the river Great Ouse and is bisected by the A14 principal road, as well as the main line railway between Peterborough and King's Cross / St Pancras.
- 1.2 The surrounding area is largely rural in nature. However, much of Huntingdon itself is developed with the main built-up area extending between the Great Ouse to the south and the A141 which loops around the town to the north. The town's High Street has been by-passed and part pedestrianised. The general area within the B1514 ring road, including High Street, is the principal shopping location although there are a number of out-of-town retail sites. The primary shopping area is wholly within the Huntingdon Conservation Area and contains a large number of listed buildings.

- 1.3 As indicated below, initial work towards preparation of the Neighbourhood Plan began in 2015. Designation in April 2015 was followed by many meetings, drop-in sessions, exhibitions and surveys. The submitted Plan represents more than three years detailed work by those involved. The Plan contains a Vision covering the period 2018 to 2026; also, four broad objectives, five policy areas and 18 detailed policies.

#### *The Independent Examiner*

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

#### *The Scope of the Examination*

- 1.6 As the independent examiner, I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
  - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
  - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.7 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ("the 1990 Act"). The examiner must consider:
- whether the Plan meets the Basic Conditions;
  - whether the Plan complies with provisions under 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”).

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

*The Basic Conditions*

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

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

1.10 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.<sup>1</sup>

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<sup>1</sup> This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

## 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, includes the Huntingdonshire Core Strategy adopted September 2009. This is where strategic policies are to be found. The Development Plan also includes the Huntingdon West Area Action Plan (adopted February 2011) and saved policies from the Local Plan 1995 and the Local Plan Alteration 2002.
- 2.2 Strategic policies can also be identified in the emerging Huntingdonshire Local Plan to 2036. It is anticipated that this Plan will be adopted on 15 May 2019.
- 2.3 The Planning Practice Guidance (PPG) offers guidance on how National Planning Policy Framework's (NPPF) policies should be implemented.<sup>2</sup> PPG Reference ID: 41-009-20160211 makes clear that whilst a neighbourhood plan is not tested against the policies in an emerging local plan, the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the Basic Conditions against which a neighbourhood plan is tested. PPG also states, "Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area". On this basis, I refer to the emerging Local Plan in this report.
- 2.4 I also consider whether the policies are sufficiently clear and unambiguous, having regard to advice in the PPG. A policy should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.<sup>3</sup>

### *Submitted Documents*

- 2.5 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- the draft Huntingdon Neighbourhood Plan 2018 - 2026, October 2018;

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<sup>2</sup> Planning policy for England is set out principally in the NPPF and the PPG offers guidance on how this policy should be implemented. A revised NPPF was published on 19 February 2019. All references in this report are to the February 2019 NPPF and its accompanying PPG.

<sup>3</sup> PPG Reference ID: 41-041-20140306.

- a map which identifies the area to which the proposed neighbourhood development plan relates (Page 11 of the draft Neighbourhood Plan);
- the Consultation Statement, October 2018;
- the Basic Conditions Statement, October 2018;
- all the representations that have been made in accordance with the Regulation 16 consultation; and
- the Strategic Environmental Assessment and Habitats Regulations Assessment Screening, October 2018, as prepared by the Town Council.

#### *Site Visit*

2.6 I made an unaccompanied site visit to the Neighbourhood Plan Area on 19 April 2019 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*

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

#### *Modifications*

2.8 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 Huntingdon Neighbourhood Plan has been prepared and submitted for examination by Huntingdon Town Council which is a qualifying body for an area that was designated by Huntingdonshire District Council on 23 April 2015.

3.2 The Huntingdon Neighbourhood Plan is the only neighbourhood plan for the Plan area. It does not relate to land outside the designated Neighbourhood Plan Area.

### *Plan Period*

- 3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2018 to 2026. This is in line with the adopted Huntingdonshire Core Strategy. In the Regulation 16 representations, it has been suggested that the Plan period should align with that of the emerging Local Plan to 2036. I note that the PPG advises that, "Neighbourhood planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years in ways that meet identified local need and make sense for local people".<sup>4</sup> However, in my view this does not amount to it being prescriptive on this point and as stated in Paragraph 149 of the Plan, it is unlikely that the Neighbourhood Plan would remain current and entirely relevant, if the Plan period were extended. Given also the commitment to consider a partial review, and the changing planning context in this part of Cambridgeshire, I consider the Plan period to be entirely appropriate.

### *Neighbourhood Plan Preparation and Consultation*

- 3.4 Details of plan preparation and consultation are set out in the Town Council's Consultation Statement October 2018. Application for designation as a neighbourhood area was made in March 2015. Following statutory publicity, the Neighbourhood Plan Area was approved by Huntingdon District Council on 23 April 2015.
- 3.5 The details of community engagement are also summarised in Paragraph 31 of the Plan. Since designation, various elements of continuous consultation have been undertaken. Initial consultation on "early issues" took place in mid-2015, with consultation on "issues" in early 2016. Further consultation then took place through a series of community roadshows in early 2017.
- 3.6 At the Regulation 14 stage, representations were submitted by 14 different consultation bodies, organisations or individuals. Several changes to the Plan were made with the aim of addressing the representations, all as documented in the Consultation Statement.
- 3.7 At the Regulation 16 stage, 36 discrete representations were made by 17 different parties.
- 3.8 I am satisfied that, at both the Regulation 14 and 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.

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<sup>4</sup> PPG Reference ID: 41-003-20140306.



### *Development and Use of Land*

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

### *Excluded Development*

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

### *Human Rights*

- 3.11 Huntingdon Town Council is satisfied that the Plan does not breach Human Rights (within the meaning of the Human Rights Act 1998). Huntingdonshire District Council has not alleged that the Plan breaches Human Rights and from my independent assessment, I see no reason to disagree.

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

### *EU Obligations*

- 4.1 The Neighbourhood Plan was screened for Strategic Environmental Assessment (SEA) by Huntingdon Town Council which found that it was unnecessary to undertake SEA. Having read the Strategic Environmental Assessment Screening Opinion, I support this conclusion.
- 4.2 The Plan was further screened for Habitats Regulations Assessment (HRA), which also was not triggered. This effectively concludes that the Plan would not have an adverse effect under the terms of the 2017 Regulations. Natural England agreed with this conclusion in its Regulation 14 representations. From my independent assessment of this matter, I have no reason to disagree.

### *Correction of Errors*

- 4.3 Before proceeding to my detailed assessment of the remaining Basic Conditions, there are a number of necessary editing points that need to be addressed and minor inaccuracies and the like that needs to be corrected. These can be tackled by the Town Council in preparing the final version of the Huntingdon Neighbourhood Plan. Of this nature is the reference to Regulation 14 (instead of Regulation 16) at the start of the document and

in the header. However, there are certain errors that require particular comment.<sup>5</sup>

- 4.4 The first matter is reference to the NPPF. At the time the draft of the Neighbourhood Plan was being finalised, the edition of the NPPF issued in July 2018 was the operative version. However, since that time, this has been replaced by a version published in February 2019. The changes in the latest version are minor and do not affect the content of the Plan or the Basic Conditions Statement. Nevertheless, the correct reference should be used as in proposed modification **PM1**. On a related point, "Section 7" in Paragraph 114 should refer to "Section 12" of the NPPF (proposed modification **PM6**).
- 4.5 The second matter is reference to the role of the Development Plan. In the Forward, and in Paragraphs 1 and 6, there is an indication that planning applications must comply with/be in accordance with the Development Plan. However, it would be important to add the qualification "unless material considerations indicate otherwise". Without this qualification, false expectations could arise. Main modifications **PM2 to PM4** refers.
- 4.6 A third matter is the statement "Listed Building Consent is required for all works to a Listed Building" (Para 122). The legislation actually indicates that consent is required for all works *of demolition, alteration or extension* to a Listed Building *that affect its character as a building of special architectural or historic interest* (Planning (Listed Buildings and Conservation Areas) Act 1990)). Again, the relevant qualification should be added as in proposed modification **PM5**.
- 4.7 A final point regarding accuracy is the definition of heritage assets. The NPPF definition is set out in the Plan's Glossary. However, Paragraph 118 uses a "shorthand" version. The correct definition should be referenced as in proposed modification **PM7**.

### *Main Issues*

- 4.8 Having considered whether the Plan complies with various procedural and legal requirements, it is now necessary to deal with whether it complies with the Basic Conditions, particularly the regard it pays to national policy and guidance, the contribution it makes to the achievement of sustainable development and whether it is in general conformity with strategic development plan policies. I test the Plan against the Basic Conditions by considering specific issues of compliance of all the Plan's policies.

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<sup>5</sup> Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.

4.9 Having regard for the Huntingdon Neighbourhood Plan, the consultation responses and other evidence, and the site visit, I consider that there are six main issues relating to the Basic Conditions for this examination.

These relate to:

- Allocations;
- Huntingdon Town Centre;
- Tourism, Leisure, Sport and Community Facilities;
- Natural, Built & Historic Environment;
- Travel and Transport; and
- Employment and Investment

#### *Issue 1: Allocations*

4.10 The Huntingdon Neighbourhood Plan does not seek to allocate sites for development. As stated in Paragraph 12 of the Plan, sites are already allocated in the emerging Huntingdonshire Local Plan to 2036. In my opinion, it is entirely appropriate for the Town Council to choose not to allocate land for development in its Neighbourhood Plan, including sites that may have been granted planning permission.

4.11 Notwithstanding the stated approach, Paragraph 12 of the Plan indicates that the Town Council would support additional development on land to the north of the A141. Land within the designated area is shown on a plan within the document. I appreciate that this support is not in the form of a policy. Nevertheless, I consider that these references are inappropriate.

4.12 First, the identified land is not allocated in the emerging Huntingdonshire Local Plan to 2036, so although not fatal in itself, it does not align with the emerging Local Plan. Secondly, whilst it would be open to the Town Council to make allocations, I would expect this to follow an appraisal of options and an assessment against clearly identified criteria.<sup>6</sup> In addition, SEA may be necessary. All in all, I find that the approach taken is not supported by proportionate, robust evidence.<sup>7</sup> The final sentence of Paragraph 12 and the following plan should be deleted (proposed modification **PM8**).

#### *Issue 2: Huntingdon Town Centre*

##### Retail Development

4.13 Amongst other things, Policy TC1 (Retail Development) supports the subdivision of existing shop units or the creation of larger shop units involving two or more existing units. However, as noted above, the primary

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<sup>6</sup> See PPG ID 41-042-20170728.

<sup>7</sup> See PPG ID 41-040-20160211.

shopping area contains a large number of listed buildings. The policy should respond to this planning context by ensuring that the reconfiguration of shop units does not adversely affect listed buildings or the Huntingdon Conservation Area.<sup>8</sup> A modified form of wording is set out in proposed modification **PM9**.

#### Public Realm

4.14 The evidence in Paragraphs 61 and 64 of the Plan indicates that St Germain Street and St Benedict's Court are areas where the public realm needs improvement. This need was confirmed at my site visit. As presently worded, Policy TC2 will require a demonstration of how development proposals will contribute to the public realm. To address this, it would seem appropriate to align it with the approach in Policy LP11 (Design Context) of the emerging Local Plan to 2036, so that a positive contribution needs to be sought. This would be recognised under proposed modification **PM10**.

#### St Benedict's Court

4.15 Policy TC3 offers support for temporary uses at St Benedict' Court as well as regeneration proposals. However, this does not adequately recognise longer term opportunities including redevelopment of the area. The additions in proposed modifications **PM11** would ensure the policy contributes to the achievement of sustainable development, drawing on the evidence of emerging possibilities (Regulation 16 representations of Huntingdonshire District Council) as well as giving focus to the particular mixed-use scheme that would be strongly encouraged.

#### Town Centre Car Parking

4.16 Policy TC4 of the Neighbourhood Plan gives support to the development of additional car parking provision; also, improvements to the quality of parking. Be that as it may, local authorities should also be seeking measures to promote accessibility for pedestrians and cyclists (NPPF, Paragraph 106). To ensure better accordance with national policy, encouragement should be given to non-car modes as in proposed modification **PM12**.

#### Local Neighbourhood Shopping

4.17 Policy TC5 is directed at protecting existing local neighbourhood shops. Where a loss is in prospect, applicants will be expected to demonstrate that the site has been marketed for "a reasonable period of time".

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<sup>8</sup> See NPPF paragraph 195.

However, this phrase is not defined. To avoid uncertainty, a time period should be inserted as in proposed modification **PM18**.

- 4.18 Accordingly, with the recommended modifications, I consider that the policies relating to Huntingdon Town Centre would generally conform with strategic statutory policies, would contribute to the achievement of sustainable development and have due regard to national policy and guidance. Therefore, the Basic Conditions are met.

### *Issue 3: Tourism, Leisure, Sport and Community Facilities*

#### Tourism Development

- 4.19 Policy TL1 of the Neighbourhood Plan states that proposals for visitor accommodation will not be supported outside the built up area of the town. However, there is likely to be confusion over what is meant by "visitor accommodation". Reference to Paragraph 83 of the Plan indicates that a need for additional holiday accommodation is anticipated. As such, in the interests of clarify, it would be better to use the term "overnight accommodation" as in proposed modification **PM19**.

#### Provision of Sports Facilities

- 4.20 The National Planning Policy Framework (Paragraph 96) states that, with regard to open space, sport and recreation, planning policies should be based on robust and up-to-date assessments of need. To have regard to national policy, a related criterion should be added to Neighbourhood Plan Policy TL3 (Provision of Sports Facilities) – see proposed modification **PM13**.
- 4.21 Accordingly, with the recommended modifications, I consider that the policies relating to Tourism, Leisure, Sport and Community Facilities would generally conform with strategic statutory policies, would contribute to the achievement of sustainable development and have due regard to national policy and guidance. Therefore, the Basic Conditions are met.

### *Issue 4: Natural, Built & Historic Environment*

#### Local Green Space

- 4.22 Policy NE1 deals with the designation of Local Green Spaces. However, modifications in order to meet the Basic Conditions are needed in respect of a number of matters:
- There is inadequate qualification of development that would be supported (NPPF Paragraph 145 b);

- The policy should seek to provide net gains for biodiversity (NPPF, Paragraph 170 d);
- For Land at Oxmoor Lane, the boundary of the suggested site should be modified to allow for the potential expansion of the Oak Tree Health Centre; and
- Larger scale plans of each site should be provided so as to facilitate development management.

4.23 Appropriate amendments are set out in proposed modifications **PM20 to 23**. Otherwise, I am content that the remaining sites should be designated as Local Green Spaces.

#### Open Space and Green Infrastructure

4.24 The third and fourth paragraphs of Policy NE2 are directed at protecting open spaces within Huntingdon. However, I confirmed on my site visit that there are large areas of low-quality open space in the area. Development of some areas and improvement of others could make a greater contribution to sustainable development than simple protection. A more flexible approach regarding the loss of open space is set out in proposed modification **PM14**. Land at Stukeley Meadows (omitted in error) should also be referenced in Paragraph 108, as in proposed modification **PM15**.

#### Setting of Huntingdon

4.25 Policy NE3 of the Plan (Setting of Huntingdon) gives rise to a number of problems:

- The first paragraph of the policy could be seen as unduly restrictive, as written, and potentially impede sustainable development;
- In addition, the first paragraph does not provide sufficient clarity for a decision maker to determine a planning application;
- Paragraphs four and five of the policy would benefit from being strengthened to reflect the ecological value of the subject sites and provide net gains to biodiversity; and
- There is a potential for internal conflict between this policy and Policy TL3 (Provision of Sports Facilities) of the emerging Local Plan to 2036.

4.26 These problems can be avoided and the Basic Conditions met through a number of amendments to the text. Proposed modification **PM16** refers.

## Heritage Assets

- 4.27 Policy BE3 (Heritage Assets) contains the sentence, "Development should maintain history and wildlife trails, help to restore forestation and hedgerows to ensure the green heritage is enhanced." However, there is no explanatory text describing what is expected. A decision maker would struggle to apply such provisions consistently and with confidence. In the circumstances, the sentence should be deleted as in proposed modification **PM17**.
- 4.28 Accordingly, with the recommended modifications, I consider that the policies relating to Natural, Built & Historic Environment would generally conform with strategic statutory policies, would contribute to the achievement of sustainable development and have due regard to national policy and guidance. Therefore, the Basic Conditions are met.

### *Issue 5: Travel and Transport*

- 4.29 Policy TT1 concerns sustainable transport. There is reference to maximising the potential for cycling and walking. However, there is no provision for adding links to existing rights of way networks (including equestrian access) as referred to in Paragraph 98 of the NPPF. An appropriate addition is suggested in proposed modification **PM24**. On a similar theme, and in respect of the Community Infrastructure Levy, the reference to cycleways and footpaths should be widened, as in proposed modification **PM25**. With these modifications, the Plan's policies for Transport will meet the Basic Conditions.

### *Issue 6: Employment and Investment*

- 4.30 There remains one policy area that has not been the subject of scrutiny in the foregoing report. That concerns employment and investment. Proposals for economic development would be supported under Policy E1, (Opportunities for Employment); and schemes that would involve business investment would be supported under Policy E2 (Business Investment). This is in line with Section 6 of the NPPF which is concerned with building a strong, competitive economy. The policies are compliant with the Basic Conditions.

## **5. Conclusions**

### *Summary*

- 5.1 The Huntingdon 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

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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 Huntingdon Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

#### *Overview*

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

*Andrew S Freeman*

Examiner



## Appendix: Modifications

<b>Proposed modification number (PM)</b>	<b>Page no./ other reference</b>	<b>Modification</b>
PM1	Page 5	Replace the final sentence of Paragraph 5 with the following text: "The NPPF published in February 2019 replaces versions issued in March 2012 and July 2018."
PM2	Page 4	In the Foreword, at the end of the fourth paragraph, add the words "unless material considerations indicate otherwise".
PM3	Page 5	At the end of Paragraph 1, add the words "unless material considerations indicate otherwise".
PM4	Page 6	At the end of the penultimate sentence in Paragraph 6, add the words "unless material considerations indicate otherwise".
PM5	Page 37	For the first sentence of Paragraph 122, substitute the following: "Listed Building Consent is required for all works of demolition, alteration and extension to a Listed Building that affect its character as a building of special architectural or historic interest."
PM6	Page 34	At the beginning of Paragraph 114, substitute "Section 12" for "Section 7".
PM7	Page 35	In Paragraph 118, after the words "Heritage assets", insert "(as defined in the Glossary)".
PM8	Page 7	Delete the second sentence of Paragraph 12 and the following plan (Land north of the A414 (within the Designated Neighbourhood Plan Area)).
PM9	Page 20	At the end of Policy TC1, add the words "...provided that development, without clear and convincing justification, avoids harm to, or loss of, the significance of the Huntingdon Conservation Area and any nearby listed buildings."
PM10	Page 21	At the end of both the second and third paragraphs of Policy TC2, substitute the

		words "make a positive contribution" for "contribute".
PM11	Page 22	At the end of the first paragraph of Policy TC3, add the following sentence: "A mixed-use redevelopment with a wide range of town centre uses (including retail, hotel, food and drink, cultural and leisure, office and residential) would be welcomed."
PM12	Page 22	Change the title of Policy TC4 to "Town Centre Parking and Access". At the end of the first paragraph, add the following sentence: "Development proposals will be supported where they maximise the potential for cycling and walking linkages to and within the town centre."
PM13	Page 27	Add the following bullet point at the end of Policy TL3: "The proposed scale and mix of uses is justified through robust evidence of local need which takes into account existing public and private sector provision within the Huntingdon Spatial Planning Area."
PM14	Page 33	Substitute the following for the third and fourth paragraphs of Policy NE2:  "A proposal involving the loss of open space that provides an amenity or recreation function will only be supported where: <ul style="list-style-type: none"> <li>• Alternative open space of equal or higher quality is provided in close proximity; or</li> <li>• The alternative use would address locally identified issues and the loss of open space would be compensated for by qualitative improvements to open space in close proximity."</li> </ul>
PM15	Page 31	In Paragraph 108, add the following bullet point: "Land at Stukeley Meadows Local Nature Reserve".
PM16	Pages 33 and 34	Substitute the following for the first paragraph of Policy NE3:  "Development within or on the edge of

		<p>Huntingdon will only be permitted where it responds positively to the area’s character and identity.”</p> <p>Substitute the following for the final three paragraphs of Policy NE3:</p> <p>“Development affecting Alconbury Brook, the River Great Ouse or Portholme Meadow will be supported where it makes a positive contribution to the character, appearance, setting, recreational purpose and biodiversity value of the river corridor.</p> <p>“Development affecting Hinchingsbrooke Country Park will be supported where it makes a positive contribution to the character, appearance, setting, recreational purpose and biodiversity value of the park.</p> <p>“Development affecting the Great Stukeley Railway Cutting SSSI will be supported where it makes a positive contribution to the character, appearance and biodiversity value of the SSSI.”</p>
PM17	Page 37	Delete the final sentence of paragraph four of Policy BE3.
PM18	Page 23	At the end of the first paragraph of Policy TC5, delete “a reasonable period of time” and insert “a continuous period of at least 12 months”.
PM19	Page 25	In the final sentence of Policy TL1, substitute “overnight accommodation” for “visitor accommodation”.
PM20	Page 30	Delete the second bullet point in the second paragraph of Policy NE1 and replace with the following: “Provide appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport or outdoor recreation in the circumstances set out in Paragraph 145 b) of the NPPF February 2019”.
PM21	Page 30	In the second paragraph of Policy NE1, third bullet point, add the following after “of the site”: “(and provide net gains where

		practical)”. 
PM22	Page 30	Re-draw the boundary of Land at Oxmoor Lane in accordance with the plan “Proposed amendment to the Northern boundary of Oxmoor Lane”, Huntingdonshire District Council, 25/03/2019.
PM23	Page 30	Provide a larger scale plan of each of the proposed Local Green Space sites.
PM24	Page 39	In the second paragraph of Policy TT1, delete “linkages” and all the following wording and insert: “appropriate links including to bus routes to the town centre, to employment areas, to services and facilities elsewhere in Huntingdon as well as to the rights of way network.”.
PM25	Page 40	In Paragraph 138, change the third bullet point to read “Improvements to cycleways, footpaths and the rights of way network”.